



Aviva's Speak Up Charter

Report concerns via one of the following channels:

Direct to the Speak Up team: speakup@aviva.com

Via EthicsPoint: avivaspeakup.ethicspoint.com or scan the QR code:



Version: June 2023

Page 1 of 11



Contents	<i>Page</i>
1. Speak Up today for a better tomorrow	3
2. What to Speak Up about	3
3. How do I Speak Up?.....	4
4. We’ll protect you when you Speak Up	5
5. What happens after someone Speaks Up?	6
6. Frequently Asked Questions.....	6
Appendix 1 –Whistleblowing laws applicable to the markets in which we operate.....	10

Please note for India the Speak Up Charter is referred to as ‘Whistleblower Policy.’



1. Speak Up today for a better tomorrow: Speak Up. Listen Up. Live our Values.

Everyone connected to Aviva must do the right thing to protect our customers, assets, reputation and each other. By everyone we mean employees, contractors, outsource providers and others who acquire information of potential wrongdoings arising from their current or past work activities with Aviva.

This is supported by adopting and supporting a 'speak up' and 'listen up' culture across our business. It is vital that we live by our values so that we help to protect Aviva, our customers and each other. Often it is only through individuals being brave enough to speak up that information comes to light that allows us to address the issue(s) before any damage is done, or to contain it and improve the way we do business.

This Charter applies to an individual who acquired information of potential wrongdoings arising from their current or past work activities with Aviva.

Speak Up is Aviva's confidential and secure whistleblowing service to enable you to raise concerns. It includes both internal and external channels for reporting concerns. NAVEX Global is an independent company that provides a dedicated and secure external Speak Up facility (called EthicsPoint) across the Aviva Group to report concerns anonymously should you wish.

Speak Up is managed by the Speak Up team who sit within Group Investigations and ultimately report to the Aviva Whistleblowers' Champion. Patrick Flynn, Chair of the Group Audit Committee and Senior Independent Director, is our Whistleblowers' Champion and is responsible for the independence, autonomy and effectiveness of Aviva's policies and procedures on whistleblowing.

A Speak Up concern is a concern about, for example, a risk, malpractice or wrongdoing including one that affects others. It could be something that negatively impacts our customers, the public, employees or Aviva. If you suspect something illegal or unethical then you should Speak Up.

It's not always easy to speak up. Here at Aviva though, doing the right thing must be core to how we work, how we act, and how we deliver our strategy. We all need to live by the purpose and values we've chosen to help protect Aviva, our customers and each other.

We take any wrongdoing in the workplace very seriously and encourage everyone to have the confidence to speak up, and to help us to foster a safe, transparent and open culture. This Charter provides guidance on what should be reported, when and how you should speak up, the protection provided to anyone who speaks up and raises a concern, and how concerns are dealt with.

2. What to Speak Up about

If you have a legitimate concern about improper behaviour in the workplace (by Aviva employees or third parties) which, for example, you feel is, was or may be a breach of our [Business Ethics Code](#) or appears/is unlawful, illegal, criminal, or unethical, you can use the Speak Up facility to report it.

In your location jurisdiction, there may be a specific definition of what constitutes a protected disclosure/relevant concern. You should contact [the Speak Up Team](#) if you have any questions regarding whether your concern is one which is reportable under this Charter.

For example¹, report suspected:

- Acts of bribery and/or corruption.
- Actual or potential conflicts of interest.
- Inappropriate or disproportionate offering, solicitation or accepting of gifts, entertainment and hospitality when doing business with suppliers, business introducers or other third parties.

¹ The list is not intended to be exhaustive and we encourage our shareholders, board members, non-executive directors, employees, contractors, contingency workers, outsource providers, suppliers and other third parties who could acquire information of potential wrongdoing during current or past work activities (such as volunteers, agency workers, those provided with work experience or training, job applicants and individuals involved in contractual negotiations with Aviva) to report any behaviour that violates the spirit of the Business Ethics Code and Aviva's high ethical standards even if not explicitly listed in this Charter.



- Fraud.
- Accounting misstatement.
- Inaccurate, misleading, or fraudulent reporting of key risks.
- Data privacy breaches (such as theft or deliberate/accidental loss).
- Money laundering.
- Price fixing, market abuse, or insider trading.
- Facilitation of tax evasion.
- Failure to comply with a legal or regulatory obligation (including commission of a criminal offence).
- Danger to the health and safety of individuals.
- Actual or potential abuses of human rights (including modern slavery, forced labour, child labour and any form of discrimination in our business or supply chain).
- Serious environmental concerns.
- Behaviour that harms or is likely to harm our reputation or financial well-being or the provision of good customer outcomes (e.g. inappropriate treatment of customers).

You can also use Speak Up to report abuses or breaches of our systems, standards, policies or circumvention of controls, or the cover-up of **any of the above**, whether or not the matter is confidential.

We take all such concerns seriously and you can be confident that you'll be heard, protected and supported. All senior managers and leaders are responsible for embedding a speak up culture across the Group.

The above is not an exhaustive list, so if you have any doubts, raise the concern or contact the Speak Up team in confidence for advice.

If your concern relates to a People Function (PF)/Human Resources (HR) type issue such as a complaint about something that affects you personally (e.g., alleged bullying and/or harassment) or your individual employment contract, Aviva has procedures and processes in place to address these – details of which, including how to report, can be found on your local PF/HR intranet pages and/or from your local PF/HR contact.

Remember: You must not investigate your concerns yourself or try to prove if the concern is well-founded. As soon as you have a genuinely held concern, report it.

3. How do I Speak Up?

There are many ways to speak up, so choose the one you feel most comfortable with:

Your leader/leadership team

Discuss your concerns with your line manager or leadership team – we know it is not always easy to raise your concerns. or

People Function

If it's not appropriate to discuss the issue with your leader or leadership team, you can discuss it with a member of the People Function team.

If you are uncomfortable with raising your concern via the above channels (for example, where the concern is about your leader) or if you have already raised this internally and you feel that no appropriate action has been taken, you can report it to the Speak Up team directly or raise a report using the EthicsPoint reporting system hosted by NAVEX Global.

Report it to the Speak Up Team

The Speak Up team is responsible for the operation of Aviva's Speak Up service that provides multiple channels for reporting concerns. All concerns received are passed through an assessment and triage process and assessed against whistleblowing legislation to determine if they qualify for formal investigation. The Speak Up team do not investigate concerns and will allocate matters to the appropriate team internally based on the subject matter. Any information you provide will be shared on a strictly need to know basis for the purpose of investigation only.



Below are the contact details for the Speak Up team:

- Speak Up Team mailbox: speakup@aviva.com
- Directly to the team via a telephone call. Contact details can be found [here](#).

Ireland

For Ireland, concerns can be raised directly to your local Speak Up Advocate by telephone, email, or at a physical meeting if requested. Any such physical meeting will be held within a reasonable period of your request. For contact details for your local Speak Up Advocate please visit [here](#)


India

For India, concerns can also be raised in confidence directly to the Chairman of the Board, Committee Board or to the Statutory Auditor.

Report it confidentially via the EthicsPoint reporting system

There may be occasions when reporting a concern internally is not appropriate or doesn't feel like the right approach. NAVEX Global is an independent company that provides a dedicated and secure Speak Up facility called EthicsPoint to our employees, contractors, suppliers, business partners, and anybody with a working relationship with Aviva.

EthicsPoint allows us to report our concerns confidentially and anonymously should we wish. EthicsPoint provides a free 24- hour service, which operates seven days a week offering the facility to raise a report via a confidential hotline in your local language or by submitting a report online. It also allows reports to be submitted via mobile devices by scanning a QR code. All concerns raised via EthicsPoint are shared with the Speak Up team who will action as appropriate.

Website:	avivaspeakup.ethicspoint.com Hotline numbers can be found on the site and reports can be submitted online. Please note that the EthicsPoint hotline numbers are local free phone numbers.
QR Code	

4. We'll protect you when you Speak Up

We will not tolerate retaliation against anyone who speaks up and raises a genuinely held concern in connection with perceived wrongdoing. Retaliation may potentially lead to a finding of gross misconduct under our disciplinary procedures, as may any attempt to try and identify somebody raising a genuinely held concern. Retaliation can take many forms including, but not limited, to taking any of the following actions in response to someone raising a concern and which causes or may cause unjustified detriment to the person. The following is a non-exhaustive list of examples of retaliation:

- Demotion
- Reduction in pay and/or bonus
- Suspension
- Disciplinary action
- Negative performance review



- Lack of promotion
- Exclusion from work projects and/or social events
- Failure to renew or early termination of a temporary contract

Speak Up will complete a retaliation risk assessment for all reports received and take appropriate measures to protect our people. If you believe you've been unfavourably treated as a consequence of raising a concern, please contact the Speak Up team or the Group General Counsel, who'll independently review your circumstances. The Speak Up team and Group General Counsel will keep what you tell them confidential throughout and beyond any investigation process, subject to our legal obligations.

You should be aware that there may be times when the Speak Up team is unable to resolve a concern regarding retaliation without revealing your identity, for example, where revealing your identity is required by law. However, the Speak Up team will, subject to its legal obligations, request your agreement prior to any such disclosure.

Please remember that if you report a concern anonymously, it will be investigated as far as possible, but could be more difficult for us to investigate, protect your position, or to provide you with feedback on the outcome. However, we would rather you raised your concern anonymously than not at all.

5. What happens after someone Speaks Up?

Below is an outline of what the Speak Up team does when someone raises a concern:

- When a concern is received, the Speak Up team will contact the person raising the concern (directly where contact details are provided and it is appropriate to do so or as may be required by local laws, or via the follow up section on the EthicsPoint system that allows for anonymity), to acknowledge receipt in writing, ensure that it has all available information and advise of next steps. This written acknowledgement will be issued not more than 7 days after receipt of the concern;
- All concerns received are passed through an assessment and triage process to determine next steps including investigation as appropriate. The Speak Up team are not responsible for investigating your concerns and will allocate to the appropriate team internally based on the subject matter;
- If, having carried out an initial assessment, the Speak Up team decides that there is no prima facie evidence that a wrongdoing may have occurred, you will be advised that the procedure under this Charter is being closed. The concern may, where appropriate, be referred to another procedure such as a local formal resolution procedure. You will be notified in writing as soon as practicable of any decision to close the procedure under this Charter and the reasons for that decision;
- The Speak Up team will make a decision, in consultation with relevant stakeholders as appropriate (e.g. the People Function, Legal, Corporate Security etc.), as to which area will progress the matter: Group Investigations, People Function, or another team as appropriate;
- Where the Speak Up team determines that it is a matter for Group Investigations, an investigator will investigate the concern(s). If you have provided contact details, you will be provided with information on the action envisaged or taken as follow-up and the reasons for such follow-up ("feedback") in compliance with our local legal and confidentiality obligations. Your local laws may also entitle you to make a written request for further periodic feedback; and
- The Speak Up team will keep full and accurate records of all disclosures and actions taken. At the end of an investigation or review of the concern(s), where contact details are known, the Speak Up team will contact you to advise you that the matter has been closed and request feedback on the Speak Up process.

6. Frequently Asked Questions

a) *Who is responsible for the Group Speak Up service?*

Patrick Flynn, Chair of the Group Audit Committee and Senior Independent Director, is our Whistleblowers' Champion and is responsible for the independence, autonomy and effectiveness of Aviva's policies and procedures on whistleblowing.



The Whistleblowers' Champion delegates day-to-day responsibility to the Speak Up team who are responsible for the operation of Aviva's Speak Up service and provide multiple channels to report concerns. The Speak Up team is part of Group Investigations.

Market responsibility:

It is the responsibility of the local Board and business CEOs (or equivalent) of the locally supervised entities to assess and determine whether the UK whistleblowing regulation set out in the FCA Handbook (SYSC 18.3) and Provision 6 of the UK Code of Governance satisfy local regulatory requirements. In circumstances where local regulation/legislation sets a higher requirement than the requirement set by Group, businesses must comply with those additional obligations and inform the Whistleblowers' Champion. In circumstances where the legal requirements set by Group create a conflict with local regulation/ legislation, or businesses cannot otherwise comply, businesses must follow the modification/exception/non-compliance process.

Where a market wishes to implement a modification and exception, application must be submitted to and approved by the Whistleblowers' Champion and reviewed annually.

The market CEO (or equivalent) is responsible for supporting the Speak Up team in:

- Implementing the Speak Up service; and
- Raising awareness of the Speak Up service through promotion, communications and training.

The accountability of the Group General Counsel, Market General Counsel or local legal Head of, for investigating and reporting on cases of suspected or alleged instances of internal and non-customer malpractice or financial crime in their market, is set out in the Group Investigations Charter and Group Legal, Group Investigations and Public Policy Standard.

For India, the Head Legal Officer is required to periodically brief the Board on concerns received via the Speak Up service.

b) Who owns the Speak Up Charter?

The Speak Up Charter is owned by the Director of Group Investigations.

c) What legislation protects you when you "Speak Up"?

We will not tolerate retaliation against anyone who raises a concern.

If you believe you have been unfavourably impacted, please contact the Speak Up team or the Group General Counsel who will independently review your circumstances.

Please contact your local Legal and/or Financial Crime team to obtain information and advice regarding the legal and regulatory framework applicable to you as this varies by country. For example, in the UK, when someone Speaks Up, they may be protected by the [Public Interest Disclosure Act 1998](#) (PIDA).

Set out at **Appendix 1** is a summary table of Whistleblowing laws applicable to the markets in which we operate.

d) What's the difference between reporting a concern confidentially or anonymously?

All reports are confidential, but not all reports are raised anonymously.

A concern is raised confidentially where the individual reporting the concern gives their name on the understanding that it is shared only on a strictly need-to-know basis and in accordance with any applicable local laws. We make every effort to protect your identity, however, you should be aware that there may be times when the Speak Up team is unable to resolve/investigate a concern without revealing your identity, for example, where doing so is required by law. Where this is the case, the Speak Up team will make every effort to obtain your agreement prior to any such disclosure, subject to our legal obligations.

An anonymous report is where the individual raising the concern does not provide their name or any other identifying information. An anonymous concern can make it much more difficult for us to investigate the matter, protect your position, or to provide you with feedback on the outcome. However, we would rather you raised your concern anonymously than not at all.

e) Can I raise my concerns to someone completely independent of Aviva?



We provide several different ways to Speak Up with all concerns taken seriously. You can report a concern through EthicsPoint, and your identity will not be shared by NAVEX Global should you specifically ask to remain anonymous. Be assured, you will be heard, protected, and supported.

If you feel that reporting your concern through NAVEX Global's reporting tool EthicsPoint is still not an appropriate way to raise your concern, the financial regulator in your local region may offer the facility to report concerns directly to them.

For example, in the UK, information for reporting concerns directly to either the Financial Conduct Authority (FCA) or the Prudential Regulation Authority (PRA) can be found on their websites:

- [Financial Conduct Authority](#)
- [Prudential Regulation Authority](#)

The PRA and FCA are prescribed persons under section 43F of the Employment Rights Act 1996 and by making a Protected Disclosure to them, will afford you the same protection as if you made the report to Aviva or EthicsPoint.

In **Ireland**, an individual may, in certain circumstances, make a report to a prescribed person such as the Central Bank or to the [Protected Disclosures Commissioner](#). The current list of prescribed persons in Ireland can be found [here](#) and includes the following:

- The Central Bank in respect of all matters relating to contraventions of financial services legislation;
- a member of the Competition and Consumer Protection Commission in respect of all matters falling within the remit of the Commission relating to the enforcement of consumer protection law, competition law and the review of mergers or acquisitions notified to the Commission;
- the Director of Corporate Enforcement in respect of all matters relating to the functions of the Director of Corporate Enforcement under section 949 of the Companies Act 2014.

In India, the appointed actuary and the statutory/internal auditors have a duty to report to the Insurance Regulatory and Development Authority of India if they are aware of a concern that is or is likely to have a materially adverse financial impact on Aviva India.

Refer to **Appendix 1** for the financial regulator in your local region, and/or ask your local Legal and/or Financial Crime team for details of the financial regulator in your local market.

f) Can I ask for support from my Union representative when raising a concern?

We realise that raising a concern can be a difficult decision. Therefore, if you wish to do so you can seek support from your Union representative.

g) Who can I contact to discuss and clarify a concern to be reported?

Any member of the Speak Up or Group Investigations team can be contacted to discuss concerns and obtain guidance.

In addition, see below regarding external independent advice/further information.

h) Can I obtain external independent advice/further information?

There are external bodies that may be able to provide independent advice related to your concern. This will vary by market and details of the external bodies, to the extent they exist, can generally be found by performing a search across your local search engines.

In the UK some examples include (but are not limited to):

- Local Union representative;
- Protect Whistleblower Charity;
- Financial Reporting Council (FRC);
- Professional Bodies such as Chartered Institute of Internal Auditors;
- Chartered Institute of Management Accountants (CIMA);
- Chartered Insurance Institute (CII);



- Citizens Advice Bureau; and/or
- Law Centre Network.

We have a relationship with [Protect](#), a UK charity set up to support people considering raising concerns. We can utilise the [online form](#) on its website for independent guidance to help understand whether we should raise a concern and speak up. On its website, Protect publishes a [list of non-governmental organisations \(NGO\)](#) around the world that are directly involved in whistleblowing, and details of the NGOs that provide support and guidance.

In Ireland, you may consult the Protected Disclosures Commissioner's website for further relevant information. Further relevant information is available on the Minister for Public Expenditure and Reform's website.

i) What happens if I am not happy with the way my concern has been investigated?

If you are not satisfied with the outcome of the investigation, you can contact the Group General Counsel who will review the investigation, findings and outcome, and where appropriate commission an additional review. If you are still unhappy with the outcome, you may also raise a concern with your local financial regulator where the regulator is a prescribed person in respect of the particular concern.

j) What if concerns raised prove to be false?

Where the reported concern is not substantiated, the important thing is that you have acted on your reasonable belief. If you have so acted in reporting your concern, it doesn't matter if you are mistaken. These assurances, however, do not extend to someone who knowingly and maliciously raises a concern they know to be untrue. Any employee knowingly and maliciously raising a concern they know to be untrue may face disciplinary action, up to and including dismissal.

k) As a leader, what should I do if someone raises a concern with me?

When someone raises a concern with you (whether formally or otherwise) it's important that you thank them for raising their concern, respect confidentiality, provide reassurance to the individual, encourage them to speak up, and reassure them that their concern will be taken seriously.

You should listen carefully to their concerns and avoid pre-judging the matter. If the matter concerns a potential breach of our Code of Business Ethics or appears illegal, unethical or a potential abuse of our systems, processes or policies, you should guide the employee to the Speak Up reporting options available to them as set out in this Charter. If the employee does not feel able to report the concern themselves, you should report the concern.

Reporting requirements in respect of reportable concerns are set out in the Financial Crime Business Standard and the Group Legal, Group Investigations and Public Policy Standard:

- The Financial Crime Standard (FCR-C-32) states: *"In order for Group Investigations to ensure incidents are investigated in an effective and timely manner, businesses must report using any available channel (e.g. direct to Group Investigations or using Speak Up (by email, telephone or app)), actual or potential breaches of the Business Ethics Code, suspicions or alleged instances of internal and non-customer malpractice and/or financial crime."*
- The Group Legal, Group Investigations and Public Policy Standard states: *"Group Investigations and Speak Up (Group Investigations) provides the Group and its businesses with an independent investigation function. Group Investigations must be informed within 2 business days of all suspicions of or alleged instances of employee unethical activity, malpractice, or financial crime that may result in financial or reputational impact on the group or affect multiple businesses for investigation."*



Appendix 1 –Whistleblowing laws applicable to the markets in which we operate

This Appendix sets out a high-level overview of the Whistleblower legislation and/or legislation that contains Whistleblowing provisions in certain markets in which Aviva operates as at the date of drafting this Charter.

Please note that this list is not an exhaustive list and other whistleblowing protections and mandatory reporting/internal control provisions may exist in local/provincial laws that are not included in this Appendix. Should you require a full list of Whistleblowing laws and provisions applicable to the market in which you operate, the relevant regulator details, and/or an understanding of how the laws may apply to you, please consult with your local Legal, Financial Crime Team and/or Compliance team as appropriate.

Country	Whistleblowing legislation	Enforcement agency and/or local regulator
Australia	Corporations Act 2001	Australian Securities and Investments Commission (ASIC)
Canada	1. Section 425.1 of the Criminal Code 2. Financial Services Regulatory Authority of Ontario (FSRA) whistleblowing protections	1. Office of the Superintendent of Financial Institutions (OSFI) 2. FSRA
China	1. People's Republic of China (PRC) Constitutional Law (Article 41) 2. Criminal Law (Article 254) 3. PRC Labour laws (Article 101) 4. China Banking and Insurance Regulatory Commission (CBIRC) Measures for Handling Whistleblowing	1. The Ministry of Public Security of PRC/People's Court 2. Ibid 3. Ministry of Human Resources & Social Security of PRC 4. CBIRC
Germany	1. EU Directive (EU) 2019/1937 2. Whistleblower Protection Act (Hinweisgeberschutzgesetz)	1. BAFIN
Ireland	1. The Protected Disclosures Act Amendment Act 2022 ("PDA") 2. Central Bank (Supervision and Enforcement) Act, 2013	1. Disclosures can, in certain instances, be made directly to the Office of the Protected Disclosures Commissioner ('the Commissioner'). There is a range of different 'prescribed persons' for the purposes of making disclosures to, of which the Central Bank of Ireland ("CBI") is one.
India	1. The Corporate Governance Guidelines for insurers in India - IRDA/F&A/GDL/CG/100/05/2016 2. The Companies Act, 2013	1. Insurance Regulatory and Development Authority of India (IRDAI)
Italy	Whistleblowing Law - Law (no. 179/2017)	Institute for the Supervision of Insurance (IVASS)
Luxembourg	1. EU Directive (EU) 2019/1937 2. Luxembourg law 7945 (the « Bill of Law ») 3. CSSF Circular CSSF 20/758 &	1. CSSF 2. le Conseil de la concurrence, l'Administration de l'Enregistrement et des Domaines, 3. l'Inspection du travail et des mines, 4. la Commission nationale pour la protection des données
Netherlands	The Dutch Whistleblowers Act	The Dutch Whistleblowers Authority/ Huis voor klokkenluiders
Poland	The Whistleblowers Bill (Draft)	Financial Supervision Authority



Country	Whistleblowing legislation	Enforcement agency and/or local regulator
Singapore	<ol style="list-style-type: none"> 1. Prevention of Corruption Act (Section 36) 2. MAS Internal control guidance (2013) / MAS Guidelines on Individual Accountability and Conduct 	<ol style="list-style-type: none"> 1. Corrupt Practices Investigation Bureau (CPIB), Commercial Affairs Department (CAD) and Singapore Police Force (SPF) 2. Monetary Authority of Singapore (MAS)
United Kingdom	<ol style="list-style-type: none"> 1. Public Interest Disclosure Act 1998 (PIDA) 2. SYSC18 of the FCA's Handbook 3. Provision 6 of the UK Code of Governance 	<ol style="list-style-type: none"> 1. Prudential Regulation Authority (PRA) 2. Financial Conduct Authority (FCA) 3. Financial Reporting Council (FRC)
United States of America	<ol style="list-style-type: none"> 1. Sarbanes-Oxley ('SOX') Act 2002 (principally section 806) 2. Dodd-Frank Wall Street Reform and Consumer Protection Act (sections 748 and 922) 3. The Commodity Futures Trading Commission's (CFTC) Whistleblower Program 	<ol style="list-style-type: none"> 1. U.S Securities and Exchange Commission (SEC) 2. CFTC's Whistleblower Office