

2017

Aviva's Modern Slavery Statement 2017

Aviva remains committed to respecting human rights in all its operations and external business dealings. Our commitment to human rights is reflected in our Human Rights Policy.

Aviva recognises modern slavery, servitude, forced or compulsory labour; and human trafficking ("Modern Slavery") as grave violations of many human rights and freedoms. Our [Aviva Values](#) compel us to take our responsibilities in this area seriously, in particular our values of Care More and Create Legacy.

As required by the Modern Slavery Act 2015 (the "Act"), this statement describes the steps Aviva plc has taken during the financial year ended 31 December 2017 to prevent modern slavery from taking place in our supply chains or within our own business.

I. About our business

Aviva Group

Aviva provides life insurance, general insurance, health insurance and asset management to 33 million customers worldwide.

We have a strong international presence in selected insurance markets across North America, Europe and Asia. We're focused on markets and businesses where we can achieve scale, profitability and competitive advantage.

Aviva in the UK

We are one of the largest insurers with 15.5 million customers. Our UK-based businesses contribute 53% of our market operating profit (as at 30 June 2017). We offer a wide range of savings and investments, protection and insurance products to individuals, business and corporate customers. Our market share for general insurance is 10%, healthcare 13% and life insurance 15%.

Our customers can interact with us in a number of ways: online, by phone, through brokers, financial advisers, strategic partners and price comparison websites.

We have over 15,000 employees in the UK working across different locations including: London, Norwich, Bristol, Manchester, York, Perth, Sheffield, Birmingham, and Glasgow.

More information about our business can be found here <http://www.aviva.com/about-us/>

II. Scope of our assessments in 2017

During 2017, we continued to focus our efforts on the Aviva entities registered in the UK and a sample of their suppliers that have a direct business relationship with Aviva, regardless of where these suppliers may be based. A list of the Aviva entities identified in scope of the Act can be found within Annex 1 of this statement. In 2018, we will expand this scope to include non-UK Aviva entities.

III. Our progress

During 2017 we have:

Continued to improve our existing policies

- We have now updated our Human Rights policy to include explicit reference to modern slavery.

Conducted due diligence on all of our managed suppliers.

- We have engaged our UK managed supply base via our mandatory annual engagement on corporate responsibility.

- Building on our experience from 2016, we reviewed and improved the modern slavery supplier survey for 2017. The information obtained allows us to perform a better evaluation of risk in our supply chain, learn from and spread best practice and helps inform our priorities for engagement in 2018.
- We made changes to the procurement process to ensure that new suppliers (where UK Procurement are engaged in tender activity) are required to agree to abide by our Business Code of Behaviour and our Business Ethics Code. Both the Business Code of Behaviour and Business Ethics Code make explicit reference to modern slavery.
- Modern slavery is discussed in a forum which brings together stakeholders from each UK business unit and Supplier managers responsible for managing our highest risk category suppliers. This forum convenes regularly throughout the year.

Conducted a review of the standard clauses in supplier contracts

- We have reviewed our supplier contract template clauses on modern slavery to ensure they remain fit for purpose.

Delivered further training and engaged a wider audience

- We continued providing training on modern slavery to employees. We released an interview with our Group General Counsel, Aviva Investors Chief Responsible Investment Officer and the Group Facilities Director on human rights and modern slavery issues as part of employee and supplier communications and training. This recording describes Aviva's commitment and actions on modern slavery, reporting mechanisms and how people can get more involved.
- We have created a page on our UK intranet dedicated to human rights and modern slavery to keep employees informed.
- Our UK employee representative group have also been engaged on modern slavery.

Reviewed data and begun developing potential indicators

- We conducted a review of current data sources available to track our performance in tackling modern slavery issues. We are aiming at testing a set of indicators in 2018. Potential indicators may include:
 - Number of suppliers engaged on preventing modern slavery risks.
 - Percentage of managed suppliers audited on their approach to managing modern slavery risks.
 - Number of concerns regarding modern slavery reported through RightCall.

Collaborated with others

- In 2017, we continued working with the UN Global Compact. We are part of the UK working group on modern slavery which brings together peers from across different industry sectors to share learnings and information to support our work in tackling modern slavery.
- We are also a founding member of Business Against Slavery working group convened by the Home Office. This working group focuses on sharing learnings and working on tangible initiatives to combat modern slavery.

IV. Reporting mechanisms

Employees, business partners, and suppliers with any concerns regarding modern slavery can report them through any of the following channels:

- Independent reporting service: RightCall
 Email: rightcall@expolink.co.uk
 Website: <http://www.expolink.co.uk/rightcall>
 Telephone: UK 0800 915 4043
- Through our Corporate Responsibility teams and inbox at: CR.team@aviva.com

V. Next steps

We are committed to continue improving our approach to respecting human rights and preventing modern slavery. In this context, in 2018 we will:

- Test indicators to track performance.
- Consider pre-screening tools to assess suppliers before on-boarding.
- Prioritise engagement on high risk suppliers based on the results of our 2017 survey.
- Further explore the scope of our work in markets outside of the UK.

VI. Process followed to issue this statement

The boards of the Aviva entities identified within scope, as listed in Annex 1, as well as the Aviva plc Board, have approved this statement.



Mark Wilson
Group Chief Executive Officer

Annex to the DRAFT Modern Slavery Statement

List of Aviva entities in scope of the Act.

Aviva Insurance Limited
Aviva Annuity UK Limited
Aviva plc
Aviva Central Services UK Limited
Aviva Employment Services Limited
Aviva Equity Release UK Limited
Aviva Europe SE
Aviva Group Holdings Limited
Aviva Health UK Limited
Aviva Investors Employment Services Limited
Aviva Investors Global Services Limited
Aviva Investors Pensions Limited
Aviva International Insurance Limited
Aviva International Holdings Limited
Aviva Investors UK Fund Services Limited
Aviva Life Holdings UK Limited
Aviva Life & Pensions UK Limited
Aviva Life Services UK Limited
Aviva UK Digital Ltd
Friends Life FPG Limited
Friends Life Holdings plc
Aviva Management Services UK Limited
Friends Life FPL Limited
Friends Life and Pensions Limited
Aviva Administration Limited
Friends Life Limited
General Accident plc
Gresham Insurance Company Limited
Sesame Services Limited
Solus (London) Limited

2016

Aviva's Modern Slavery Statement and Human Trafficking Statement

Aviva is committed to respecting human rights in all its operations and external business dealings. Our commitment to human rights is reflected in our [Human Rights Policy](#).

Aviva recognises modern slavery, servitude and forced or compulsory labour, and human trafficking ("Modern Slavery") as grave violations of many human rights and freedoms. Our [Aviva Values](#) compel us to take our responsibilities in this area seriously, in particular our Values of Care More and Create Legacy.

As required by the Modern Slavery Act 2015 (the "Act"), this statement describes the steps Aviva plc has taken during the financial year ended 31 December 2016 to ensure that Modern Slavery is not taking place in our supply chains or within our own business.

VII. About our business

Aviva provides life insurance, general insurance, health insurance and asset management to 33 million customers, across 16 markets worldwide. More information about our business can be found here <http://www.aviva.com/about-us/>

VIII. Scope of our assessments in 2016

During 2016, we focused our efforts on the Aviva entities registered in the UK and a sample of their suppliers that have a direct business relationship with Aviva, regardless of where these may be based. A list of the Aviva entities identified in scope of the Act can be found within Annex 1 of this statement. Our intention is to widen this scope to include non-UK Aviva entities in future years.

IX. Our progress

Aviva has a [Human Rights Policy](#) and other policy documents that contribute to managing the risks of Modern Slavery. During the year we conducted a review of the existing policies to ensure that there is explicit reference to these risks, where possible.

During 2016 we have:

- Assessed the risks of Modern Slavery within our own business.

Within the assessment of our own business we considered the nature of our business which is mostly office based work and the implementation and effectiveness of the policies we have in place to support human rights, as well as the controls and procedures embedded in our hiring practices, pre-employment checks and people management.

- Conducted due diligence on a sample of our suppliers.

We gathered information from our supplier databases to create an overview of our supplier population. We then proceeded to select a sample of our suppliers based on risk criteria that included the type of services provided to Aviva, amongst others. The sample included a large percentage of our managed supply¹. In total we selected over 300 suppliers which were then engaged through a survey which included questions relevant to assessing the risks of Modern Slavery. The results of this survey will inform our engagement with suppliers in 2017.

Within our direct supplier base, we also have a number of suppliers working at Aviva premises, for example, providing services related to the running of our premises such as cleaners, caterers and security. As a member of the Living Wage Foundation, we ask all suppliers working on Aviva premises to ensure that these employees are paid at least the [National or London Living Wage](#).

¹ Managed Supply is defined as the population of supply that by its nature is sufficiently important to the business that it requires active management of supply risk. All Aviva entities are required to identify their managed supply populations.

- Reviewed our policies, business standards, and codes of conduct including our: Business Ethics Code, Human Rights Policy, Supplier Code of Behaviour, People Business Standard, and Supplier Contract templates.

We have updated our Business Ethics Code to include explicit reference to human rights and Modern Slavery as examples of issues that can be reported through our independent malpractice reporting service (RightCall).

Our Supplier Code of Behaviour now includes prevention of Modern Slavery as an explicit requirement of the commitment to human rights which we ask our suppliers to adhere to.

We have created new contract clauses to set out our expectations regarding Modern Slavery; these are included in the standard template supplier agreements for any new contracts from November 2016 onwards.

- Provided training

Procurement Managers and Supplier Relationship Managers have received basic training, which covered the offences as defined in the Act and how to identify warning signs of Modern Slavery. Our aim is to continue raising awareness of the issues as they are complex and very difficult to identify. For this training we used a toolkit developed in collaboration with a financial services peer and supported by an external consultancy. The toolkit is available to employees on our intranet.

X. Reporting mechanisms

Employees, business partners, and suppliers with concerns regarding Modern Slavery can report them through any of the following channels:

- a) Independent reporting service: RightCall
Email: rightcall@expolink.co.uk
Website: <http://www.expolink.co.uk/rightcall>
Telephone: UK 0800 915 4043

- b) Through our Corporate Responsibility inbox at: CR.team@aviva.com

XI. Next steps

We are committed to continue improving our approach to respecting human rights and preventing Modern Slavery. As part of this approach, in 2017 we will:

- Develop our existing supplier due diligence document to consider Modern Slavery risk.
- Review and, where necessary, improve processes created in 2016 to manage the risk of Modern Slavery.
- Continue with the delivery of training for our procurement and supplier management employees, and other employees as appropriate.
- Begin identifying appropriate KPIs for future measurement and reporting.

XII. Process followed to issue this statement

The boards of the Aviva entities identified within scope as listed in Annex 1, as well as the Aviva plc Board, have approved this Statement.



Mark Wilson
Group Chief Executive Officer

Annex 1

Aviva entities within scope for 2016 statement:

Aviva Annuity UK Limited
Aviva Equity Release UK Limited
Aviva Health UK Limited
Aviva International Insurance Limited
Aviva Insurance Limited
Aviva Investors Employment Services Limited
Aviva Investors Global Services Limited
Aviva Investors Pensions Limited
Aviva Investors UK Fund Services Limited
Aviva Life & Pensions UK Limited
Aviva Life Holdings UK Limited
Aviva Life Services UK Limited
Gresham Insurance Company Limited
Solus (London) Limited
Aviva Employment Services Limited
Aviva Europe SE
Aviva Group Holdings Limited
Aviva International Holdings Limited
Aviva plc
Friends Life and Pensions Limited
Friends Life Holdings plc
Friends Life Limited
Friends Life Management Services Limited
Friends Life Services Limited
General Accident plc
Aviva Investors Holdings Limited
Aviva Investors UK Funds Limited
Sesame Limited
Sesame Services Limited