

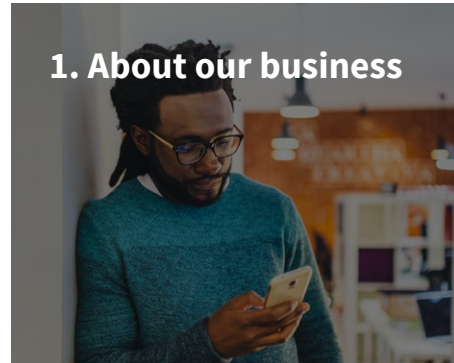


# Aviva's Modern Slavery Act Transparency Statement 2018

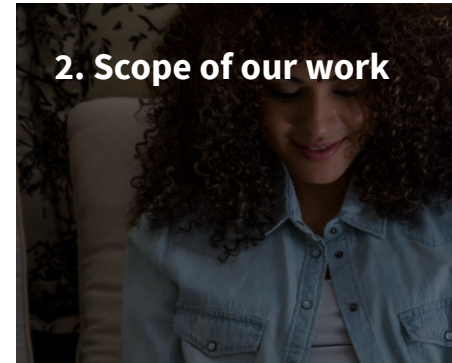
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As required by the Modern Slavery Act 2015 (the "Act"), this statement describes the steps Aviva plc has taken during the financial year ended 31 December 2018 to prevent modern slavery from taking place in our supply chains or within our own business.

An important part of our approach is our respect for human rights. We care about human rights, this is both: the right thing to do for the business and enlightened self-interest. Modern slavery, servitude, forced or compulsory labour and human trafficking are grave violations of fundamental human rights and freedoms. We live up to our commitments and core values of Care More and Create Legacy by taking actions to manage our risks relating to modern slavery, as well as by supporting wider societal efforts to stamp out modern slavery.



## 1. About our business



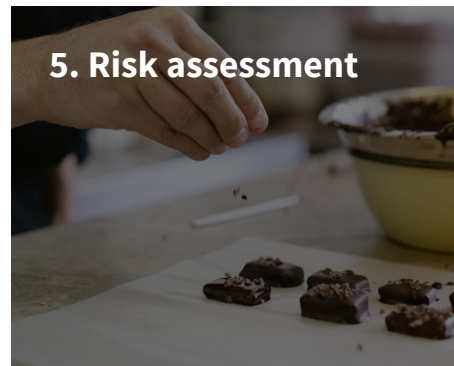
## 2. Scope of our work



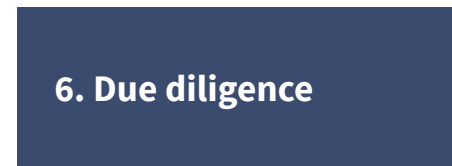
## 3. Policies and controls



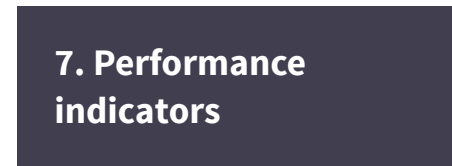
## 4. Governance framework



## 5. Risk assessment



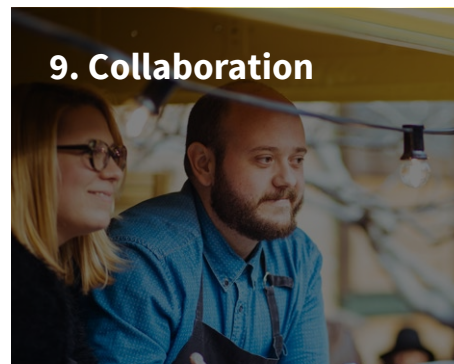
## 6. Due diligence



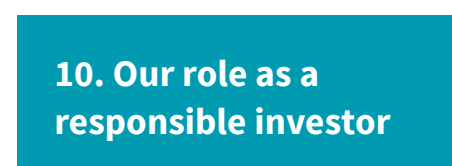
## 7. Performance indicators



## 8. Training and Communications



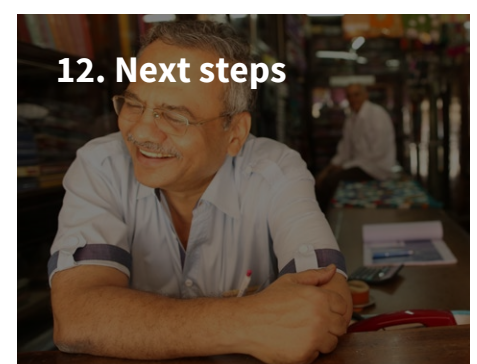
## 9. Collaboration



## 10. Our role as a responsible investor



## 11. Reporting mechanisms



## 12. Next steps

[About our business](#)

# 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 are focused on markets and businesses where we can achieve scale, profitability and competitive advantage.

More information about our business can be found here [www.aviva.com/about-us](http://www.aviva.com/about-us)

Market	Key insurance lines or services provided	Contribution to 2018 Group operating profit (£m)	% of employees (Group total)	% of managed suppliers (Group total)
United Kingdom	Life, GI and Health	2,324	53	34
Canada	GI	46	14	9
France	Life, GI and Health	436	9	5
Italy	Life, GI	156	2	9
Poland	Life, GI	170	6	2
Asia	GI, Health and Life	284	6	30
Ireland	Life, GI	44	5	1
Aviva Investors	Asset management	150	4	9



# Scope of our work

We acknowledge that the risk of modern slavery exists across all of our operations in the UK and all other markets where Aviva operates. Therefore, our commitment is to include all wholly owned Aviva entities in the work undertaken to manage our modern slavery risks.

In 2017, we worked only with our UK businesses. In 2018, we extended the remit of our work to also include: Canada, France, Ireland, Italy, Poland, and Singapore in relevant activities. By the end of 2020, we will have covered all relevant wholly owned Aviva businesses.

The markets included in our 2018 work were selected because: they are wholly owned business, represent our largest markets, and can implement our requirements using common systems and processes.

In addition to working with our international, wholly-owned, businesses, we are also working across our Joint Ventures (JVs) to include them in the scope of our work on modern slavery. We will use our influence with our partners with the aim of aligning JVs - where we have operational control - to Aviva's approach to modern slavery by the end of 2020.

We continue to focus on suppliers that directly provide Aviva with goods or services. More specifically, those suppliers that are actively managed by the business, which include many suppliers that represent our highest commercial risk and/or the most significant expenditure. Aviva markets included in scope of this statement have established criteria to identify which suppliers should be actively managed. The criteria include considerations such as: potential regulatory impact, spend and whether the supplier will be delivering a service on behalf of Aviva (outsourcing arrangement).

We understand the risk of modern slavery for our business is also present within our non-managed suppliers. In some cases, the risks in our non-managed supply may even be higher. We are committed to working with these suppliers too and aim to include a sample of them within our scope of work from 2019 onwards.

A list of the Aviva entities included in this statement can be found within [Annex 1](#) of this statement.

**Policies and controls**

**Human rights policy**

We set out our commitment to respect human rights, including the prevention of modern slavery in our operations and supply chains, in our human rights policy, which covers the entire Aviva group. This policy was developed in consultation with internal stakeholders and an external expert on international law and human rights and published in 2015. Aviva's commitment to respect human rights is guided by the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation's Core Labour Standards and its Tripartite Declaration of Principles, the UN Global Compact principles on Human Rights and Labour Standards, the Women's Empowerment Principles and the UN Guiding Principles on Business and Human Rights, which detail the "Protect, Respect and Remedy" framework. Our human rights policy identifies our main stakeholders, as well as the most salient human rights issues for our business including:

- customers and their right to be treated fairly which includes protection of their privacy;
- employees and their rights to be treated equally and their freedom of association;
- suppliers and paying the living wage: we ensure that suppliers pay at least the Living Wage to employees that are subcontracted to Aviva in the UK;
- responsible investment, how we interact with companies we invest in to highlight human rights issues, including modern slavery issues; and
- grievance mechanisms so that we have a way to address any potential human rights violations.

**Business Ethics Code**

We are committed to high standards of ethical behaviour. Our Business Ethics Code outlines our ethical standards and ensures we operate responsibly and transparently. We require all our people, at every level, to read and sign-up to our Code every year (99% of our employees did so in 2018). We expressly include a reference to human rights abuses and slavery and forced labour in our business or supply chain as one of the concerns employees should raise through reporting channels available. The Code is also communicated to our UK suppliers when responding to a tender.

Case study

**Living Wage**



We believe in treating our employees with dignity and respect, it is what all employers must do but also it helps realise the potential of our people, with clear benefits for us. Research from the Living Wage Foundation found that worker absenteeism fell by 25% after employers started paying at least the real living wage.

See Lynne's and other employee's story at: [\*\*Why do we pay the Living Wage?\*\*](#)



## Policies and controls

### Business Code of Behaviour:

Performance and adherence to high business standards is an important and integral part of Aviva's value chain; therefore, we ask our suppliers to agree to abide by our "Code of Behaviour". This Code sets the expectations of the procurement relationship and details our corporate responsibility commitments. In the UK, suppliers are asked to agree to the Code when responding to a request for a proposal as part of a tender process. Managed suppliers are asked annually to agree to our Code of Behaviour as part of our CR engagement in Canada, France, Ireland, Italy, Poland, Singapore, and the UK.

The Code specifically refers to:

*Human Rights: We should respect all internationally proclaimed human rights and should be guided in the conduct of our business by the provisions of the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) core labour standards, including all specific provisions on prevention of modern slavery and forced labour.*

*Child Safeguarding: We should ensure that, where applicable, guidelines and procedures are in place to respect children's rights.*

### Corporate responsibility task:

Aviva businesses in Canada, France, Ireland, Italy, Poland, Singapore and the UK engage their managed suppliers via an online survey which includes questions regarding: business ethics, the UN Sustainable Development Goals, diversity and inclusion, human rights (high level questions on procedures and policies) and modern slavery (specific questions about employees pay, controls to monitor employment grievances, etc).

This is an annual exercise. We use this survey to raise awareness among our suppliers on sustainability issues and human rights obligations, identify potential opportunities for collaboration, and it will inform our engagement with suppliers for example by prioritising engagement with suppliers who have not issued a modern slavery statement. Supplier relationship managers review the responses received and request further clarification from suppliers where appropriate or escalate any concerns to the Group Corporate Responsibility team. This survey also allows us to raise concerns with our suppliers and take preventative or remedial action where appropriate. In 2018, the survey did not identify modern slavery concerns.

For more detail on our policies please see

<https://www.aviva.com/social-purpose/policies/>

## Policies and controls

### In the UK:

#### Standard clauses on human rights and modern slavery included in our contracts with suppliers:

We have standard clauses included in our UK supplier contract templates. The clauses cover obligations on human rights and specifically on the prevention of modern slavery. The clauses include:

- Compliance with the provisions of the International Labour Organisations core standards and the provisions of the United Nations Universal Declaration of Human Rights in respect to both its employees and its suppliers;
- Paying eligible employees not less than the Living Wage in respect of work provided to Aviva at our premises in the UK;
- Commitment to replying to the relevant anti-slavery and human trafficking questions within Aviva's Supplier Due Diligence questionnaires
- Commitment to implement due diligence procedures for its own suppliers, subcontractors and other participants in its supply chain in relation to services provided to Aviva to ensure that there is no slavery or human trafficking in their supply chain
- Provide training on modern slavery for relevant employees (e.g. those that are responsible for the recruitment of staff and/or the procurement of good and services)
- Requirement to notify Aviva as soon as it becomes aware of a case or potential case of modern slavery in its supply chain
- No Zero Hours Contracts; unless the employee or worker has provided his or her positive, expressed consent to enter into such a contract; and the supplier (or its sub-contractor) can, on request, provide to Aviva written evidence of such employee or worker's consent.

Additional specific examples of controls that contribute to manage the risk of modern slavery in the business include:

#### Pre-employment checks

The key policies are recruitment's pre-employment screening and prevention of illegal working policies: these ensure that anyone recruited to work for Aviva in the UK has the right to work in the UK. Our pre-employment screening requires prospective employees to prove their identity, provide a 2 to 5 years work and address history (which we verify), pass an Asylum and Immigration check, a credit check and a CRB check before their contract of employment can be finalised. We are therefore certain of our employees' identity and background.

#### Working hours

Once an individual passes the pre-employment checks, they will be contracted to work either a standard or non-standard working pattern with "standard" working hours. Standard working hours are set out in our contracts of employment as 1827 hours annually for a full-time person which is an average of 35 hours per week. This is explained in our Working Patterns policy which also available in our Intranet.

#### Pay

Aviva is a voluntary Living Wage employer.

#### Diversity and Employee Training

We have a Fairness and Equality policy in place which, although not related to slavery and human trafficking issues, does provide employees with detailed guidance about how to treat protected characteristics and demonstrates our awareness of our diverse workplace. It should serve to help employees' awareness of someone who might be abused or troubled.



## Governance framework

### Cross-functional working group

In 2016, we set up a working group including representatives from: Corporate Responsibility, Procurement, Company Secretarial, Legal, and our People (HR) function. The purpose of this working group is to design and implement the Aviva action plan on modern slavery which includes development of: policy improvements, risk management processes, training for staff and suppliers, communications regarding modern slavery etc. A representative from the Group Corporate Responsibility Team leads this working group.

### Senior managers and Executive sponsors

Procurement, Corporate Responsibility and Public Policy senior management review progress against the action plan regularly, ensuring it is resourced appropriately and the implementation is well aligned with corporate priorities, and to sign off specific actions from the plan as appropriate. The Group General Counsel and Company Secretary and the Group Chief Operations and IT Officer are active co-sponsors of our work on modern slavery, approving plans and reviewing progress. They also help to provide visibility of the issue at the group executive level, remove barriers to implementation, and represent the agenda in external stakeholder engagements (e.g. with other businesses within the UNGC and on the UK Home Office's Business against slavery forum).

### Subsidiary boards

The boards of directors of all the Aviva entities included in scope for this statement review and approve the information disclosed in this statement.



### Governance committee

The Committee's role is to assist the Board in shaping the culture and ethical values of the Group through overseeing and advising on conduct, reputation, community, people and financial crime matters. All Committee members are independent Non-Executive Directors. The Committee reviews the human rights and modern slavery action plan, receive updates on progress against the plan and review and approves the Aviva's statement before final submission to the Plc Board.

More information is available at

<https://www.aviva.com/about-us/governance-committee/>

### Aviva plc Board

The Board reviews and approves this statement. The Group CEO / Executive Chairman signs the statement on behalf of Aviva plc. More information on our Board and business leaders is available at

<https://www.aviva.com/about-us/our-board-and-business-leaders/>





# Risk assessment

Our work on modern slavery is part of our wider approach to risk management and delivering on our responsibility to respect human rights.

Aviva provides insurance and asset management services. We consider that the risk of modern slavery within the business is low. Our sector has not been identified as a risk sector by current external, publicly available research and almost all our employees work in roles that are low risk e.g. office-based roles, roles that requires specialist qualifications e.g. accountancy, actuarial, procurement, human resources.

We consider that our risks are most likely to be found in our supply chain. Areas identified by our risk mapping exercise as relative high risk in our supply chain include: cleaning, catering, and car valeting. This assessment is based on an understanding of the support services we receive across our businesses, data from our procurement systems and publicly available research about high risk sectors and activities. This assessment informed our decision on which suppliers to include in our threat assessments in 2018.

## Due diligence

### Aviva threat assessment

We engaged the Slave Free Alliance (SFA) to perform an independent review of Aviva's work on modern slavery. SFA is managed by Hope for Justice, a charity with extensive independent expertise in this area. A summary of the findings appears below.

The report from the Slave Free Alliance issued in December 2018 concluded that:

- Aviva's business risk of modern slavery is low in its core functions in the UK;
- There is a clear engagement and support from senior management (there are two Group Executives sponsors for the specific work on modern slavery and one for the wider approach to human rights)
- There is a commitment to continuous improvement and an evolving strategy to deal with emerging risks globally;
- There are areas of good practice that can be share across the Aviva supplier community.

The report also identified opportunities for improvement and made recommendations, including:

- Country specific threat assessments and the inclusion of all overseas markets within the scope of Aviva's anti-slavery activities.
- Aviva's codes of conduct and policies are well signposted to suppliers, but the documents could be even more specific about Aviva's expectations regarding modern slavery and how any policy breaches will be dealt with.
- An even more structured, detailed and targeted global training strategy regarding human rights/modern slavery for employees.
- The development of a structured performance management system covering quantitative and qualitative elements including: details of supplier engagement plans; a review of existing targets to ensure these are not causing vulnerabilities along the supply chain and relationship managers, procurement officers and similar having personal KPI's to ensure best practice and influence with suppliers.
- A global remediation strategy for human rights/modern slavery issues which provides all concerned parties with even clearer access to remedy.

Aviva already has plans in place for 2019-2020 that address some of the recommendations from this report. We commit to consider the rest of the recommendations and provide a response in 2019.



## Due diligence

### Supplier threat assessments

In 2018, we conducted eight threat assessments with key suppliers representing higher risk areas of our supply chain in the UK, Singapore and Poland. These assessments included a review of recruitment processes, policies and procedures in place to manage human rights issues, awareness of modern slavery risks and processes in place to manage these, and interviews with employees in the premises where possible.

#### Key facts:

- The length of these assessments ranged from 90 minutes to 5 hours.
- Two assessments were carried out by a representative of the Slave Free Alliance accompanied by two Aviva employees
- Seven assessments were carried out by Aviva employees using the capability and tools shared by the Slave Free Alliance.
- Assessments took place in: Singapore, Poland and the UK and covered: car valeting, cleaning, catering, digitisation, and media production.
- We chose suppliers in sectors that are deemed high risk (car valeting, cleaning, catering) as well as sectors where we wanted to gain a better understanding of the potential risks (media production and digitisation.)

#### What we learned:

- We did not find evidence of modern slavery. However, challenges and opportunities were revealed, and we will address these in our 2019 action plan:
- Levels of awareness of modern slavery issues vary greatly. Some suppliers have a good understanding of modern slavery risks in their sector e.g. our cleaning supplier in the UK. Others had far less awareness of modern slavery risks and our proactive engagement was a learning exercise for them e.g. in Singapore.
- Suppliers are open to collaboration with their clients on this agenda. However, for most of the suppliers engaged, Aviva was the first client to contact them about modern slavery
- We found instances of good practice that we can share across our supplier community, such as a cleaning services provider in the UK with strong policies and controls in place.

Recommendations we have shared with our suppliers:

Although we did not find instances of, or potential modern slavery cases, we identified opportunities for improvement regarding how the suppliers engaged through these assessments manage their modern slavery risks and we have shared these recommendations with them.

The recommendations include:

- Reviewing their recruitment policies and processes to incorporate measures to raise awareness of modern slavery and include ways of reporting it where there were concerns.
- Including questions during recruitment interviews to identify potential cases of exploitation.
- Raising awareness of modern slavery during employee induction sessions so that they can spot and report risks.
- Use existing capabilities, e.g. from current human resources systems, to flag potential signs of modern slavery such as: home addresses and bank accounts shared by more than one employee.
- Development of guidelines to respond to modern slavery including: who to contact if a potential case of modern slavery is identified.
- The supplier's area managers should receive specific training (defining modern slavery and spotting the signs) so this can be incorporated in their oversight.

## Due diligence

### Business as usual supplier checks and controls

- We ensure that suppliers pay at least the Living Wage (National Living Wage or London Living Wage) to eligible employees that are working on behalf of Aviva on our premises in the UK. We monitor compliance with this requirement as part of our procurement and risk reporting processes.
- We have grievance mechanisms available to suppliers, their employees and the public. Speak Up is our confidential service for reporting concerns including human rights issues. We also have an email account CRTeam@aviva.com where any party can report human rights related concerns. Details of both channels are available on our corporate website and on our Business Ethics Code (which is available to our suppliers).
- We screen suppliers at onboarding phase and as part of the payments process prior to each payment being made. This screening is currently used to check for sanctions and in some instances also includes PEPs (politically exposed persons). We are investigating options for expanding our screening to identify potential human rights and modern slavery concerns which could be flagged early in the process.

### Human Rights Due Diligence

- Aviva businesses are required to complete a human rights due diligence at least once every two years. This process includes checks on labour rights and specifically modern slavery.
- Examples of modern slavery related checks include checks on: minimum pay, recruitment policies, and work with suppliers (e.g. checks to ensure employees are paid at least the legal minimum wage or the Living Wage where applicable).
- Aviva businesses are required to develop an action plan to address any gaps identified as a result of a due diligence review.
- We launched our first due diligence template in Q4 2017. In 2019, we will start a review to understand how the requirement to conduct due diligence is being implemented across our businesses and identify improvement opportunities including modern slavery related areas.

### Case study

Car valeting companies are recognised as a high-risk sector for modern slavery. We performed a supplier threat assessment on one supplier delivering car valeting services in our supply chain. We visited the site and interviewed local and area management. Our conversation surfaced opportunities to improve controls to ensure employees were not at risk of exploitation. These included simple checks such as: the payroll system flagging employees with the same addresses or bank accounts (which are risk indicators,) and following up with additional checks on those employees identified as at potential risk. The supplier committed to incorporate these additional steps into their HR processes.

While interviewing the area manager, it became clear that this person had witnessed instances of modern slavery but not at their current employer. The area manager described how they know the people they manage quite well, and even visit them in their own homes where this was appropriate. We suggested the area manager should share their experience and knowledge within the company and with the other area managers. The area manager was aware of the signs of modern slavery but was unsure as how to act. We provided information on who to contact (e.g. Our Speak up line or the Slavery Helpline 08000 121 700) and encouraged them to report their concerns wherever they were found.



Performance indicators

# Performance indicators

We are adopting the following performance indicators to track Aviva's impact on preventing modern slavery issues.

Indicator	2018
Number of cases of modern slavery discovered at Aviva or in our supply chain.	0
Number of risk of modern slavery assessments conducted on suppliers.	8
% of supplier and contract owners in Aviva that have received training on modern slavery during the year.	To be reported from 2019
Number of suppliers engaged by Aviva that declare they have improved their management of modern slavery risks because of our engagement .	To be reported from 2019



The rationale for choosing these indicators is as follows:

- Corporate disclosure about cases of modern slavery identified in the business or supply chain is key to ensuring accountability both by the supplier and Aviva.
- Ability to measure our internal and external facing efforts is important in addressing the risks of modern slavery.
- They address the need to train our employees, as well as working collaboratively with our suppliers
- Risk focused approach. Compared to the majority of our Aviva employees, supplier and contract owners are more likely be exposed to instances of modern slavery as they work directly with our suppliers. Therefore, training on modern slavery is more relevant for this sector of our employee population.
- Identify impact. As well as disclosing how many times we have engaged our suppliers, it is important to focus on what change we have contributed to because of this engagement.
- Allows us to cover a range of value-adding interactions with our suppliers from: formal training, in person assessments, written communications.



## Training and Communications

### In 2018:

Supplier governance leads in Canada, France, Ireland, Italy, Poland, Singapore, and the UK were briefed on Aviva's responsibilities regarding modern slavery. These sessions were delivered via WebEx or teleconference as part of our preparation for the launch of the corporate responsibility task in these markets.

In addition to this, more intensive face to face sessions on human rights and Aviva's obligations regarding modern slavery were provided to procurement teams in Singapore and Poland and company secretary and legal in Singapore.

We also briefed our company secretary colleagues from all Aviva markets on our work on modern slavery and how it fits within Aviva's responsibility to respect human rights.

To raise awareness around Modern Slavery we celebrated Anti Slavery Day on 18 October with a display exhibition at our head office. This showed the connection between the anti slavery movement and Aviva ancestor companies, the current state of the issue, and the connection to the sustainable development goals. This display will also be installed at our offices in Norwich.

We celebrated the 70th anniversary of the International Declaration on Human Rights by holding a workshop with a group of employees in London to increase their understanding of human rights consideration in a business context, including specific requirements regarding modern slavery. The event included presentations on modern slavery issues. We shared a summary of this workshop and some materials (including video interviews) with employees across Aviva markets. Presenters at this workshop included representatives from: Slave Free Alliance, the Corporate Human Rights Benchmark, DLA Piper, UNICEF, and an online retailer.

## Collaboration

### UN Global Compact UK-Modern Slavery Working Group

This working group brings together peers from across industry sectors to share approaches and learnings to support business activity in tackling modern slavery. As part of this collaboration we: peer-reviewed participants modern slavery statements (including Aviva's), received training on modern slavery issues, and shared experiences and feedback to specific proposals from civil society and government organisation working in the area of modern slavery.



### Modern Slavery Act Review

Aviva contributed to the review of the Modern Slavery Act 2015 commissioned by the UK Government to strengthen and enhance the current legislation. We participated in workshops organised by the Home Office and the Modern Slavery Review Secretariat.

Some of the views shared during these consultations included:

- Aviva committed to not doing business with suppliers who have not issued a modern slavery statement when required by law to do so. We encourage all companies to do the same and we will work to deliver on this commitment in 2019. We should all explore how would this apply beyond our supply chain to all our business relationships.
- All companies within scope of the Act should be required to submit their statements to an official register (there is no legal requirement for companies to place their statements in a central register). This is critical for all stakeholders to track the quality of statements and to assess year-on-year progress in tackling and preventing the risks of modern slavery.
- Businesses can also play a greater role in offering support to survivors of slavery in the UK and internationally and Government can facilitate this. Some businesses are finding ways to support survivors of slavery using their assets to provide employment opportunities or other forms of support.

### Business against Slavery Forum

As part of the Business Against Slavery working group convened by the UK Home Office, Aviva's Group CEO participated in a high-level meeting with other CEOs and a Home Office Minister to discuss what more can be done to accelerate progress in tackling modern slavery.

Further details of this engagement can be found at <https://www.gov.uk/government/news/victoria-atkins-chairs-business-against-slavery-forum-today>

Aviva continues to work with other corporates in this working group to deliver a solution to support survivors identified through the National Referral Mechanism (the UK's mechanism for identifying and supporting potential victims of modern slavery) including access to a bank account, mobile phone, internet access, home and contents insurance.

### Slave free alliance

In 2018, we joined the Slave Free Alliance (<https://www.slavefreealliance.org/>). The alliance is managed by Hope for Justice, an international charity which aims to end human trafficking and modern slavery. As a result of this membership we have:

- Accessed consultancy and training based from the Slave-Free Alliance;
- Conducted a threat assessment for Aviva which provides us with an independent, external view on where our business is in relation to understanding how modern slavery could manifest in your business, what our response would look like if we found it and what next actions are recommended to help Aviva work towards a slave-free supply chain.
- Access to Helpline for bespoke advice.



SLAVE - FREE  
ALLIANCE

Working Towards a  
Slave-free Supply Chain



**Collaboration**

**Marine Cargo Insurance initiative**

In 2018, we joined other insurers working in association with industry bodies, on an initiative to produce standard cargo clauses. These clauses will be used by the insurance industry to refuse claims under cargo insurance cover where the goods may have been produced using child labour or forced labour.

Work with this initiative continues into 2019, as we address the potential legal and industry adoption challenges that such innovative initiative presents

**World Benchmarking Alliance**

In 2018, Aviva, Index Initiative, and the United Nations Foundation announced the launch of the World Benchmarking Alliance (WBA), with the aim of helping businesses do more to achieve the Sustainable Development Goals (SDGs). The WBA, launched in New York on the eve of the General Debate of the 73rd session of the United Nations General Assembly.

The benchmark will develop free, publicly available benchmarks which rank companies on their contributions to achieving the SDGs.



**Funding the international living wage standard**

Aviva is a key contributor to The Global Living Wage Initiative, set up to explore the potential to coordinate the global movement towards a unified global Living Wage standard.

In 2015 and 2017, The Living Wage Foundation conducted a series of engagements with stakeholders interested in developing successful Living Wages around the world, and in finding a way to progress the growth of a global Living Wage movement. The Foundation and other stakeholders are now consolidating ideas and opinions from the dialogue participants and considering next steps to develop the Global Living Wage movement.

More information is available at:  
<https://www.livingwage.org.uk/global-living-wage-initiative>



# Our role as a responsible investor

As an investor, we have a history of active stewardship and we actively promote good practice among companies we invest in.

We have £348 billion of assets under management – and we use this leverage to influence on modern slavery. Some specific actions taken include:

- As part of a collaborative engagement to promote compliance with Section 54 of the Modern Slavery Act, we co-signed letters to six FTSE 100 companies that have not issued a modern slavery statement.
- We are one of the founding partners of the Corporate Human Rights Benchmark (CHRB). It ranks globally listed companies on their human rights performance (which includes issues relating to modern slavery), so people can use the information to decide who they do business with. The 2018 Corporate Human Rights Benchmark assessed 101 of the largest publicly traded companies in the world on a set of human rights indicators in a few industries: agricultural products, apparel and extractives. The results of this assessment are available at <https://www.corporatebenchmark.org/>
- Support for the Workforce Disclosure Initiative, asking listed companies to disclose information about how they tackle modern slavery challenges and harness opportunities in their direct operations and supply chains
- In 2018, we have focused on child labour in several industries including palm oil, tobacco and cocoa.

Reporting mechanisms

**Reporting mechanisms**

We encourage and signpost how employees, business partners, and suppliers with any concerns regarding modern slavery can report them through any of the following channels:

Speak Up, an independent reporting service, accessible 24/7. Guidance on what should be reported is included in our Business Ethics Code (which all employees must sign up to every year and is publicly available on Aviva.com). Information is also available in our intranet and in Aviva locations via posters, information boards and internal video screens.

Website:

**<http://www.expolink.co.uk/avivaspeakup>**

Telephone:

**Canada 1855 223 2807**

**France 0800 918 479**

**Hong Kong 800 908 589**

**Ireland (Eire) 1800 806 186**

**Italy 800 797 552**

**Singapore 800 4411 140**

**UK 0800 915 4043**

**Vietnam 120 11527**

Through our Corporate Responsibility teams and inbox at:

**[CR.team@aviva.com](mailto:CR.team@aviva.com)**





**Next steps**

**Next steps**

We are committed to continue improving our approach to respecting human rights and preventing modern slavery. We will do this by; learning from internal insight from our engagement with business areas and suppliers on their modern slavery risk management, partnering with external experts like the NGO Slave Free Alliance and learning from and contributing to the identification of business best practice in combatting modern slavery.

In 2019 we will:

- Continue to expand the scope of our work in markets outside of the UK, including bringing our influence and support to our JV's.
- Deliver enhanced training on modern slavery for employees in procurement, those managing supplier relationships, and other relevant business areas incorporating the lessons learnt from our threat assessments.
- Seek opportunities to deliver capability building sessions for our small and medium size suppliers (including a sample of non-managed suppliers) and corporate clients e.g. training sessions, opportunities to partner with recognised NGOs, etc.
- Begin efforts to operationalise our commitment to not doing business with suppliers that have not issued a modern slavery statement though being required by law to do so.
- Enhance our risk-based approach, developing further criteria for all Aviva markets within scope to easily classify suppliers according to their potential exposure to modern slavery risk.
- Perform threat assessments on suppliers in each market included in scope.
- Provide a response to the recommendations included in the Slave Free Alliance's report to Aviva.
- Continue actively collaborating in initiatives with other peers, government and civil society.
- Incorporating Modern Slavery reporting in our mainstream ESG reporting document.

**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.

Maurice Tulloch  
**Aviva plc CEO**  
 London, 22 May 2019



# Annex to the DRAFT Modern Slavery Statement

## List of Aviva entities in scope of the Act

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



# Previous Aviva Modern Slavery Statements – 2017 & 2016

## 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/>

## Previous Aviva Modern Slavery Statements – 2017 & 2016

### 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.

## Previous Aviva Modern Slavery Statements – 2017 & 2016

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

## Previous Aviva Modern Slavery Statements – 2017 & 2016

### Aviva's Modern Slavery Statement and Human Trafficking Statement 2016

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 supply . 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.

- **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.



## Previous Aviva Modern Slavery Statements – 2017 & 2016

### 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](mailto: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](mailto: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:

#### List of Aviva entities in scope of the Act

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