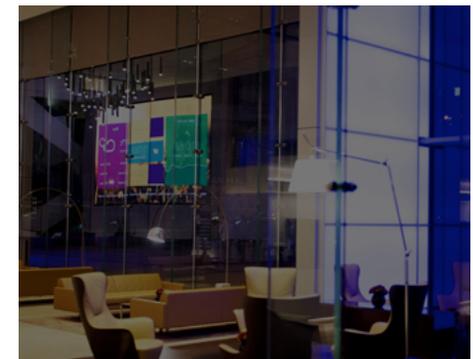
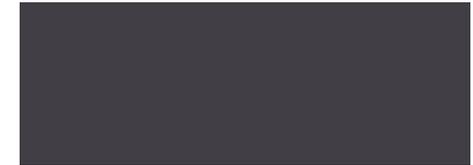




Aviva's Modern Slavery Act Transparency Statement 2019

In line with the requirement of the Modern Slavery Act 2015 (the "Act"), this statement describes the steps Aviva plc ('The Group' or 'We') has taken during the financial year ending 31 December 2019 to prevent any form of modern slavery from taking place within our business operations and supply chain.

One of the ways in which we run our business in a responsible and sustainable way is to have respect for *human rights*. Modern slavery, servitude, forced or compulsory labour and human trafficking are grave violations of fundamental human rights and freedoms. In line with our core values of *Care More* and *Create Legacy* we are therefore committed to managing our risks relating to modern slavery and supporting wider societal efforts to stamp out modern slavery.



Our organisation

Aviva Group

We are a leading international savings, retirement and insurance business, serving 33 million customers. Our c.30,000 employees aim to earn customers' trust as the best place to save for the future, navigate retirement and insure what matters most to them. We operate through five business divisions:



Investments, Savings, and Retirement
Aviva Investors, UK Savings & Retirement



UK Life
Annuities and Equity Release, Protection, Health, Heritage



General Insurance
UK, Canada, Europe, Singapore



Europe Life
France, Italy, Poland, Ireland, Turkey



Asia Life
Singapore, China, India, Indonesia, Vietnam

In the UK we are one of the largest insurers and the number one provider of workplace pensions. We have over [15,000] UK employees, working across different locations including London, Norwich, Bristol, Manchester, York, Perth, Sheffield, Birmingham, and Glasgow. Our customers can interact with us in several ways: online, by phone, through brokers, financial advisers, strategic partners and price comparison websites.

More info about our business can be found [here](#)

The table below summarises our global business footprint:

Market	Contribution to 2019 Group operating profit (£m)	% of employees (Group total)	% of managed suppliers (Group total)
United Kingdom	2,105	51	49
Canada	191	14	10
France	473	12	5
Italy	195	2	12
Poland	194	6	3
Asia	275	6	5
Ireland	106	4	2
Aviva Investors	96	5	14

Globally we work with over 1500 suppliers across the various countries we operate in to procure products and services for Aviva and for our customers. We also outsource a range of operational functions and activities including asset management, policy administration, claims handling, finance and IT. Service providers are mostly based in the UK but also in France, Italy, Canada, China, Singapore, India and Sri Lanka.

Our approach

We are fully committed to respecting human rights, ensuring we do not infringe the rights of others and tackling any risk or instance of modern slavery within our operations and supply chain. We fully support the principles of the ILO Declaration on Fundamental Principles and Rights at Work and we aim to act in alignment with the guidance of the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We are a signatory of the UN Global Compact and strive to comply with their ten Principles.

Scope of our work

We acknowledge that the risk of modern slavery exists across our businesses in the UK and in 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 2019 we continued our work on modern slavery risks in the UK, Canada, France, Ireland, Italy, Poland and Singapore. We also expanded this scope to our joint ventures (JVs), conducting human rights due diligence in China, Hong Kong, Indonesia, India and Turkey. We have also commenced anti-modern slavery training in China, Indonesia and Hong Kong. We are on track to align the JVs where we have operational control, with Aviva's approach to modern slavery by the end of 2020. A list of the Aviva entities included in this statement can be found in the appendix to this statement.

We continue to focus on suppliers that directly provide Aviva with goods or services. These are the suppliers that are actively managed by the business, including the suppliers that represent Aviva's highest commercial risk and/or most significant expenditure. Aviva markets included in scope of this statement have established criteria to identify which suppliers should be actively managed. This includes considerations such as: potential regulatory impact, spend and whether they provide services on behalf of Aviva.

We understand that the risk of modern slavery is also present within our sub-suppliers. In some cases, the risks with these suppliers may be higher. We have begun exploring how we can extend our work with these suppliers and this will form part of our action plan for 2020

Our policies and standards

We recognise that strong governance and clear policies are key to helping us promote human rights and tackle related violations of those rights, including modern slavery and human trafficking. We believe that our employees, customers, suppliers and the people touched by our business must all be treated with dignity, fairness and respect. Our Policies are guided by internationally recognised human rights standards¹. We are committed to regularly assessing our Policies and Standards to ensure their effectiveness.

Our Human Rights Policy:

This defines Aviva's commitment to human rights including, but not limited to the prevention of modern slavery, in our operations and supply chains. This Policy is developed in consultation with internal stakeholders and external experts on international law and human rights. It 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 right 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;
- grievance mechanisms so we can address any potential human rights violations.

We will review and enhance our Human Rights Policy in 2020. This will include specific consideration of modern slavery risks and remedies.



Our Business Ethics Code outlines:

Our minimum standards of ethical behaviour at Aviva and guides us to act responsibly and transparently. In 2019 we revised the Code to further highlight our commitment to tackle human rights abuses (including slavery, child labour and forced labour in our business or supply chain). All our employees must abide by and sign-up to the Code and we publicly report on the percentage of employees who sign up every year. We share the Code with our suppliers as part of our Business Code of Behaviour.



Supplier or Business Code of Behaviour:

We expect our suppliers to adhere to and uphold high standards of business behaviours as communicated in our Code of Behaviour. In the UK, suppliers are asked to agree with the Code as part of our tender process. Managed suppliers are also asked to agree to our Code as part of our corporate responsibility supplier engagement activities in Canada, France, Ireland, Italy, Poland, Singapore and the UK. The Code refers to our joint responsibility to respect human rights, including children's rights, and refers specifically to modern slavery and forced labour:

“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”

¹ Including but not limited to the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation's Declaration on fundamental Principles and Rights at work, International Labour Organisation Conventions, 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.

Reporting mechanisms



We clearly communicate and signpost how our employees, business partners, suppliers and third parties can raise any concerns regarding unethical conduct, including modern slavery related risks or issues. These can be raised via the following channels:

Speak Up

An independent and confidential reporting service, accessible 24/7. Guidance on what should be reported via Speak Up 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 on our intranet and in Aviva's offices via posters, information boards and internal video screens. Anyone can raise a concern via:

Website:

We have a link on our website through which issues can be raised and further information can be found.

Telephone:

We have a free phone telephone service for each business location²

Email:

By emailing directly the independent provider
avivaspeakup@expolink.co.uk

Corporate Responsibility Team:

We also monitor our Corporate Responsibility email account for any communication regarding modern slavery risks or issues – **CR.team@aviva.com**

² 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

Our approach to risk management and due diligence

At Aviva, our work on modern slavery is part of our wider approach to risk management and delivering on our responsibility to respect human rights. As a provider of insurance and asset management services, we have assessed our risk of modern slavery risk to be low. Insurance has not been identified as a key 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. This low risk rating was confirmed by an independent assessment that we commissioned from The Slave Free Alliance on Aviva plc in 2018.³

We consider that our risks are most likely to be found in our supply chain. Areas in our supply chain identified by our risk mapping exercise as relative high risk 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 modern slavery threat assessments in 2019.

We continue to assess our modern slavery risk across the business. During 2019 we conducted a human rights due diligence exercise across all our wholly owned and JV markets. We commit to act upon any potential risks identified and any risks will be addressed in our local and groupwide human rights action plans in 2020.

We continue to consider the key recommendations provided by Slave Free Alliance during their 2018 independent modern slavery threat assessment to ensure continuous improvement in our approach to tackling modern slavery together with our people, partners and suppliers.

³ We engaged the Slave Free Alliance (SFA) in 2018 to perform an independent review of Aviva's work on modern slavery. The SFA is managed by Hope for Justice, a charity with extensive independent expertise in this area. For more details on this please consult of 2018 modern slavery statement on [Aviva.com](https://www.aviva.com)

Our approach in action

What is our approach to recruitment?

In the UK, we continuously manage the risk of modern slavery and related labour rights violations by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. We work with reliable third-party service providers to conduct pre-employment checks. Pre-employment screening and prevention of illegal working policies help ensure that anyone recruited to work for Aviva in the UK has the right to do so. We perform Criminal Record Checks (CRB) as a condition of employment. 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 is also available on our Intranet. Markets outside of the UK establish their own pre-employment checks and working patterns, always abiding by local legislation.

What is our approach to group wide due diligence?

In 2019 we engaged with all our markets (wholly owned and JVs) to conduct human rights due diligence, specifically including modern slavery risks. The due diligence covered our governance, supply chain, our customers, investments and our people⁴. Through this exercise we identify any gaps in our approach and will work with local and group leadership to create action plans to strengthen our anti-modern slavery agenda. We have also continued to build wider human rights and modern slavery awareness via enhanced training sessions which are being rolled out to all our markets in 2019- 2020.

⁴ This exercise was as a result of the suggestions offered by Slave Alliance during the Aviva plc threat assessment consultation in 2018



What is our approach to modern slavery risk in our supply chain?

We recognise that our responsibility to respect human rights extends beyond our own operations to our suppliers and supply chain. We expect our suppliers to forbid any form of modern slavery or forced labour and continue to work together with them to this end. We screen suppliers at the onboarding phase and as part of the payment process. This screening is currently used to check for sanctions violations and in some instances also includes PEPs (politically exposed persons). In 2020 we will explore the use of more advanced screening systems to flag potential human rights and modern slavery issues with third parties which Aviva may consider working with.

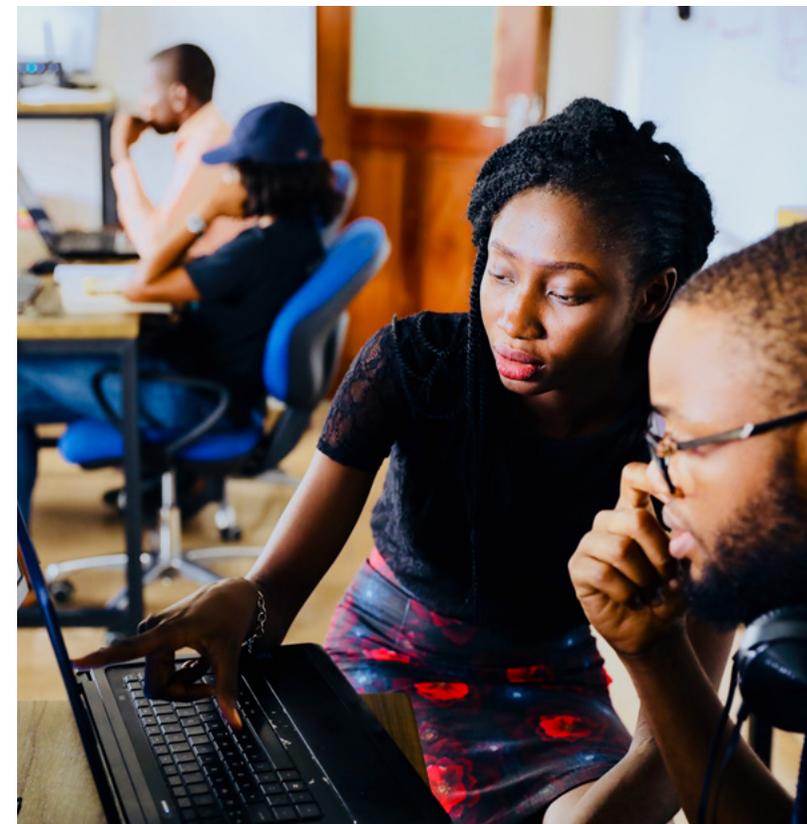
Our procurement teams work with our suppliers asking them to agree to the Business Code of Behavior when responding to a request for a proposal as part of a tender process. In the UK we ask our suppliers to agree to our standard clauses on human rights and modern slavery included in our contracts. This includes:

- Compliance with the provisions of the International Labour Organisation's 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;
- Providing 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; and
- No Zero Hours Contracts; unless the employee or worker has provided his or her positive, expressed consent to enter 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.

From April 2019 all new suppliers must notify Aviva whether they are required to comply with the UK Modern Slavery Act 2015, and if so, provide confirmation that they have published a modern slavery statement.

Suppliers are encouraged to offer the living wage to their workers. We are proud to say via the work that we do with the Living Wage Foundation that all eligible employees working on Aviva's buildings in the UK, contracted by our main facilities management suppliers, from catering to cleaning employees, are paid at least the Living Wage or the London Living Wage.

We have grievance mechanisms available to suppliers, their employees and the public.





Supplier threat assessments

In 2019, we increased the number of modern slavery threat assessments with key suppliers that represent higher risk areas of our supply chain. In the year, ten threat assessments were completed with suppliers in the UK, Singapore and Italy. 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. We selected suppliers based on spend and sector risk (e.g. car valeting, car hire, catering and system maintenance companies as these sectors are historically more exposed to modern slavery risks).

Recommendations we have shared with our suppliers:

Although we did not find instances of, or any potential, modern slavery cases, we identified opportunities for improvements including:

- Reviewing recruitment policies and processes to incorporate measures to raise awareness of modern slavery and include ways of reporting it where there were concerns.
- Raising awareness of modern slavery during employee induction sessions.
- Updating their Modern Slavery Statement on an annual basis, where relevant.
- In one specific case, we found that some of the employees were still improving their English language skills and so could not understand the modern slavery related documentation. As a result, we suggested that the supplier considered translating modern slavery related documents and/or providing the content in an audio format.

What is our approach to the Living Wage and Zero Hours Contracts?

In addition to being a living wage employer, Aviva is a principal partner and long-term supporter of the UK Living Wage Foundation. We also believe that no worker should have unduly precarious working conditions. In 2019 we won the Global Sourcing Association Award for Social Programme of the Year based on our work in piloting and implementing the new Living Wage Foundation standard 'Living Hours'. This will see us move beyond prohibiting zero hours contracts, to now ensuring that all 'in scope' employees have guaranteed minimum hours contracts by 2020.

Implementing living hours – Aviva

'The most in-depth pilot we conducted was with Aviva – a Living Wage employer since 2014 - and one of its contractor companies on two Aviva sites in London and Norwich. The contractor put the Living Hours standard in place in June 2018 so we could follow the employer journey. Implementing this change impacted 36 staff across six different roles.

The pilot is based on focus groups with workers and interviews with managers during the process. Managers felt that there had been an increase in commitment from workers. Workers felt they benefitted from this pilot because they now know when their shifts will happen with more notice – enabling them to plan better. They also felt that Living Hours created parity between different roles.'

'Living Wage – Providing the security of hours alongside the living wage' – the Living Wage Foundation



Our role as responsible investor

As an investor, we have a history of active stewardship. This means that we monitor, engage, and where appropriate, intervene on matters that can have a material impact on the long-term value of our investments, including human rights abuses and modern slavery.

We actively promote dialogue around ESG issues among companies we invest in and use our leverage to influence companies to take actions on human rights and modern slavery. We are proud to be founding partners of the Work Benchmarking Alliance⁵ (WBA) and a key supporter of the **Corporate Human Rights Benchmark** (CHRB). These initiatives increase transparency and accountability for businesses in relation to the SDGs, including Goal 8 regarding decent work.

We also continue to support the work of the Workforce Disclosure Initiative and we were part of the group of investment firms that wrote to a selection of FTSE100 companies which had not fulfilled their duty toward tackling modern slavery.

More info on our responsible investment approach.

⁵ In September 2018, we launched the World Benchmarking Alliance (WBA) as a founding partner with the Index Initiative and the UN Foundation at the UN General Assembly.



Our governance

Senior Managers and Executive Sponsors

The Group General Counsel and Company Secretary and the Group Chief Operations and Group 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).

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.

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. This group continues to lead the design and implementation of the Aviva action plan on modern slavery - this includes development of: policy improvements, risk management processes, training for staff and suppliers, and communications regarding modern slavery etc. A representative from the Group Corporate Responsibility Team leads this working group. In 2020 we are reviewing the membership roles and responsibilities, strategy and work plan to enhance our impact.

Subsidiary boards

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

Board 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, receives updates on progress against the plan and reviews and approves the Aviva statement before final submission to the 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 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/>.



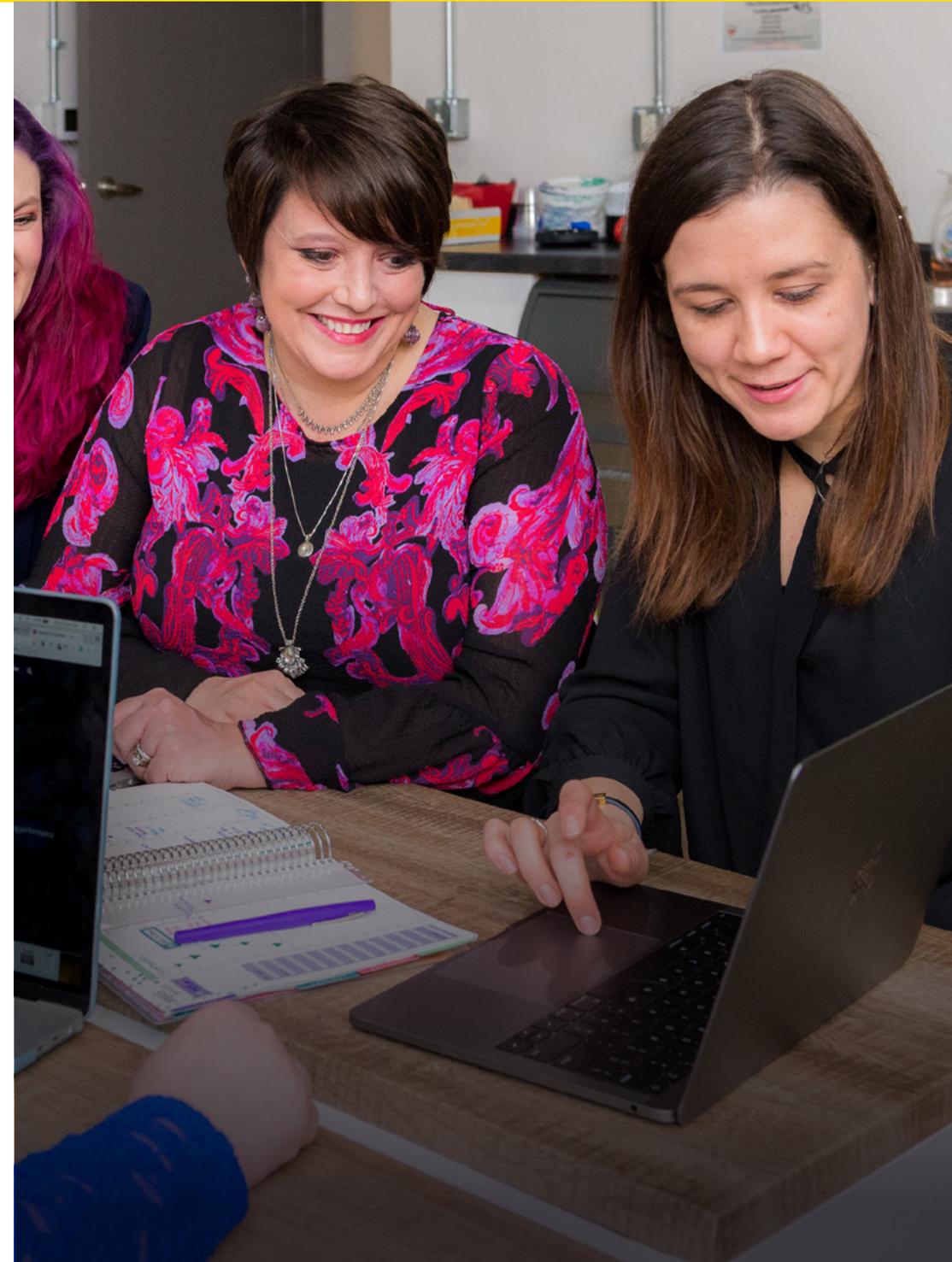
Training and communication

At the heart of any policy and process are our people, so we communicate with them to raise awareness of our work on modern slavery so that they can understand it, promote and cascade it further within our organisation.

Modern slavery training for Markets and Functions⁶

We have delivered training to specific markets - both face to face and via video facilities. These in-depth training sessions, which will continue throughout 2020, are targeted to the context, maturity and modern slavery risk in each market. Training and awareness sessions are delivered to employees at different levels within our business functions including senior people in Procurement, Corporate Responsibility, Risk, Legal and the People function. In the training we cover modern slavery, its scale and pervasiveness and how to identify and act on modern slavery risks and issues. In 2019 trained colleagues in the UK, Singapore, China, Vietnam and Indonesia. The Asian market training was conducted on the 10th of December to honour the 71st anniversary of the International Declaration on Human Rights. We aim to include all overseas markets and joint ventures within the scope of Aviva's anti-slavery training by the end of 2020 by further developing our in-house training capabilities.

⁶ This is part of the work we are doing to meet one of the suggestions resulting from Slave Free Alliance's independent review of Aviva's work on modern slavery, was to develop a more structured, detailed and targeted global training strategy regarding human rights/modern slavery for employees. This is also aligned with what we committed in 2019 as expressed in our previous year statement.



Training for small to medium (SMEs) sized suppliers

In December 2019 we piloted training for a small number of higher risk small to medium size suppliers. We provided an overview of modern slavery risks and issues with a focus on common salient issues for small and medium enterprises (e.g. low wages, confiscation of documents and other unethical recruitment practice). We discussed how we can better engage SMEs suppliers in the modern slavery dialogue, and we supported the suppliers to create their own modern slavery action plans.



Market briefing on Human Rights

As part of the human rights due diligence process, we conducted briefings with all our markets regarding the assessment of human rights risks including modern slavery.

Diversity 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 inclusiveness as a workplace. It serves to help reinforce our approach to safeguarding the rights of all employees.

Collaborating and partnering

We continue to engage with different organisations across the charity, business, academic and public sectors to collaborate and partner on events and projects that advance the anti-slavery cause.

Corporate Human Rights Benchmark



As discussed⁷, as a founding partner Aviva continues to support the work of the Corporate Human Rights Benchmark.

Aviva And The World Benchmarking Alliance

On the 15th of November 2019 Aviva and the World Benchmarking Alliance (WBA) hosted the 'Measuring what matters the most' conference; launching the 2019 Corporate Human Rights Benchmark (CHRB) rankings. Aviva is a founding and funding partner (via the Aviva Foundation) of this work. The event enabled a great discussion on how companies can make sure they progressively meet the SDGs and align with the United Nations Guiding Principles on Business and Human rights. Aviva is proud to be able to foster this dialogue and contribute to driving better business performance on Human rights.

UK Government Home Office Business Against Slavery Forum

In 2019 we continued the work with the Business Against Slavery (BAS) Forum; a partnership between Government and businesses championing the anti-modern slavery agenda. Themes we have discussed vary from finding solutions to support survivors of modern slavery as well as achieving greater transparency in supply chains and understanding the remediation processes and the role business should and can play.

⁷ Please refer to section Our role as responsible investor

UN Global Compact

This year Aviva continued its active membership of the UN Global Compact, playing a key role within the United National Global Compact UK Working Group on Modern Slavery. Aviva has also continued to work in peer reviewing participants modern slavery statements (including Aviva's) and to keep abreast of anti-modern slavery best practice.



Living Wage Foundation

Aviva continues to be a principle partner and key supporter of the Living Wage Foundation. We continue supporting the Global Living Wage Initiative, set up to explore the potential to coordinate the global movement towards a unified global living wage standard. As mentioned in our case study above, Aviva has piloted the launch of Living Hours.

Slave Free Alliance⁸

We continued to work with the Slave Free Alliance and are considering how we will implement key recommendations they provided to Aviva as part of their independent threat assessment. In 2019, Slave Free Alliance ran enhanced training for our UK market. The training focused on identifying the signs of modern slavery and appropriate responses to slavery risks.

Transport Initiative for Survivors of Modern Slavery

This year we helped fund the launch of the Transport Initiative for Survivors of Modern Slavery, a UK project aiming to understand and address the transport needs of survivors of modern slavery in London. The initiative, led by the UK charity, Hestia, the Rights Lab from The University of Nottingham, The Salvation Army and Transport for London, amongst others, aims to build the evidence base for policy change in this vital area of mobility.

⁸ The alliance is managed by Hope for Justice, an international charity which aims to end human trafficking and modern slavery.



Other events we supported this year via our UK facilities and speakers

- Responsible and Ethical Leadership in Global Construction Supply Chains Conference
 - Modern slavery related conference organised by the BRE Trust and Sustain Worldwide.
- Modern slavery conference with the City of London Police.
 - City of London Police conference focused on modern slavery related offences within the City of London.
- Modern Slavery Art Exhibition
 - Awareness raising exhibition with Hestia, a UK charity focusing on modern slavery and victim support in London and the South East.

Key Performance Indicators and our future plans

We recognise that it is not easy to quantify and measure some of the outcomes and impacts regarding our approach to human rights and efforts to tackle modern slavery as these are multi-dimensional issues. We are committed to further enhancing our key performance indicators (KPIs). The KPIs that follow help summarise some of the activities, efforts and progress we made this year:

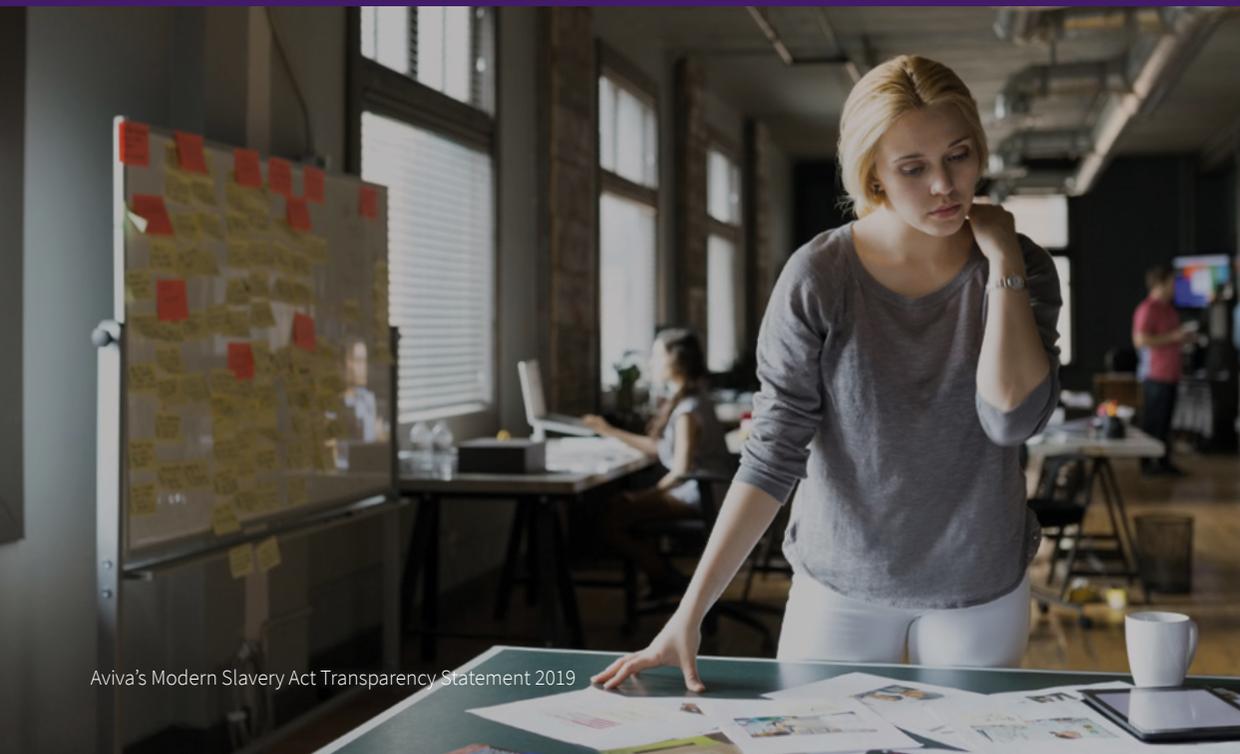
- **Number of cases of modern slavery discovered at Aviva or in our supply chain [0]**
- **Number of speak-up cases related to Modern slavery or related issues: [0]**
- **Number of modern slavery threat assessments conducted on high risk suppliers [10]**
- **Number of markets who have received anti-modern slavery training targeting contract owners in 2019: [5]**
- **Percentage of UK & Ireland registered suppliers that have agreed to the supplier Code of Behaviour [98%]**

As described above, we will continue to develop and improve our approach to respecting human rights and preventing modern slavery. We will do this by learning from our business areas and suppliers on their modern slavery risk management. We will also continue to collaborate and partner with external experts to identify, apply and share best practice in combatting modern slavery. We aim to achieve greater transparency, being open and clear in the way we communicate in our reporting, including our modern slavery statement.

We have considered the disruption caused by the Coronavirus pandemic and the impact on our operations and supply chain. We are working to ensure we continue to progress our anti-modern slavery agenda and deliver on our 2020 priorities.

Key priorities for 2020

- Review and enhance the Aviva Human Rights Policy, including the coverage regarding modern slavery
- Strengthen our approach to identifying and managing modern slavery risk via our human rights' due diligence activity across our business operations and supply chain in all our markets – creating local and group level action plans
- Review our managed supply chain risk controls and widen the scope of supplier threat assessments
- Explore opportunities to expand and improve our approach to SME and tier 2 suppliers
- Ensure all in scope UK employees have guaranteed minimum hours contracts
- Continue to consider the recommendations resulting from the Slave Free Alliance independent assessment report on Aviva plc
- Refresh the membership of our Human Rights and Anti-Modern Slavery working group and revise our action plan
- Roll-out in-depth modern slavery training to all Aviva Markets addressing markets specificity where possible
- Explore the Remedy pillar of the UNGPs as we recognise that this is key for modern slavery victims to receive care and support
- Continue using our leverage and influence as a responsible investor to protect human rights and address modern slavery
- Enhance our anti-modern slavery KPIs



Process followed to issue this statement

The boards of the Aviva entities identified within scope, as well as the Aviva plc Board have reviewed and approved this statement. The Group CEO has signed the statement on behalf of Aviva plc.



Maurice Tulloch
Aviva plc CEO
London, 21/05/2020

To see our 2018 Modern Slavery statement and our previous statements please follow this [link](#).

Annex 1

Annex to the Modern Slavery Statement

List of Aviva entities in scope of the Act

Aviva Insurance 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

List of Aviva entities in scope of the Act

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 Holdings plc

Aviva Management Services UK Limited

List of Aviva entities in scope of the Act

Aviva Administration Limited

General Accident plc

Gresham Insurance Company Limited

Solus (London) Limited

Sesame Limited