

# Aviva's Modern Slavery and Human Trafficking Statement 2025



# Executive Summary

This is Aviva's tenth Modern Slavery Statement, prepared in accordance with section 54 of the UK Modern Slavery Act 2015. It outlines the steps taken during 2025 to identify, address and mitigate the risk of modern slavery and forced labour across Aviva's operations, supply chain and investments.

## **Our approach and progress in 2025**

Aviva recognises modern slavery as a serious violation of human rights and remains committed to align our approach and practice with the UN Guiding Principles on Business and Human Rights and ILO Fundamental Conventions. In 2025, we strengthened our risk-based approach, prioritising effective implementation and transparency in line with updated Home Office Transparency in Supply Chains guidance.

## **Understanding our risk exposure**

Aviva's direct operations continue to be assessed as low risk, reflecting the nature of our knowledge-based workforce and findings from independent external reviews. Our primary exposure to modern slavery risk arises within parts of our supply chain, particularly in labour-intensive services such as cleaning, security, construction and repair services, logistics and temporary labour. We also recognise exposure through investment activities in high-risk sectors such as agriculture, manufacturing, and construction.

To deepen our understanding of these risks, we completed a comprehensive supply-chain risk-mapping exercise, in collaboration with Good Business as our long-term partner. This work combined sector risk, geography and supplier-level indicators. This work enabled more targeted prioritisation of suppliers for engagement and due diligence.

## **Due diligence and issue management**

During the year, we conducted 18 modern slavery supplier assessments, including in-person site visits, one of which involved a Tier 2 (a supplier to our direct supplier), and worker interviews, informed by our risk-mapping methodology. The majority of suppliers assessed were categorised as low risk, with recommendations provided to further strengthen practices even where no issues were identified.

One higher-risk issue relating to recruitment fees at a supplier supporting Aviva India was identified. Follow-up verification, including direct engagement with workers, is planned for 2026 to confirm alignment with Aviva's employer-pays expectation, whereby all employment-related costs such as training and recruitment, must be borne by the supplier as the employer, not by workers. Across our supplier base, corrective action plans continued to be actively managed, with five closed during 2025 and six new plans opened for monitoring in 2026.

Accessible reporting channels remain in place through Aviva's Speak Up service. One human-rights-related concern was investigated during the year and did not meet the threshold for modern slavery.

## **Strengthening systems, governance and capability**

Strong governance underpins our approach, with Board-level oversight, executive sponsorship and cross-functional delivery through dedicated working groups.

We maintained and strengthened key policies and standards, including our Human Rights Policy, Business Ethics Code, and Third-Party Business Code of Behaviour, with 100% of registered suppliers in the UK, Ireland and Canada agreeing to the Code. We continued targeted training and awareness-raising for colleagues and suppliers, supported by specialist partners, and reinforced expectations on responsible recruitment, living wage and working hours.

Through Aviva Investors, we engaged an investee company in 2025 to address identified modern slavery risks within its supply chain.

## **Looking ahead**

In 2026, Aviva will continue to enhance the effectiveness of its approach by expanding supply-chain visibility beyond our direct supply chain (beyond our Tier 1), increasing engagement with higher-risk suppliers, strengthening outcome-focused indicators, and continuing collaboration with external experts to support continuous improvement.

Together, these actions reflect Aviva's ongoing commitment to transparency, accountability and meaningful action to address modern slavery risks across our value chain.

# 2025 Modern Slavery Statement

In line with the requirements of the Modern Slavery Act 2015 (the “Act”) and in accordance with section 54 of the Act<sup>1</sup> this statement outlines the steps Aviva plc (‘The Group’ or ‘We’) has taken in the past twelve months (financial year ending 31 December 2025) to prevent, and if ever found occurring, to address any form of modern slavery within our business operations and supply chain. This statement applies to Aviva plc and its subsidiaries that are required to publish an annual statement by the UK Modern Slavery Act 2015. This is the tenth statement that we have issued.

Aviva recognises that modern slavery is a violation of fundamental human rights and freedoms. We are fully committed to respecting human rights, we will endeavour not to infringe the rights of others and will eradicate, address and mitigate any risk or instance of modern slavery that might arise within our operations and supply chain as set out in the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs). We support the principles of the [International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#) and we are determined to act in alignment with the guidance of the UNGPs. We have also been a signatory and supporter of the [United Nations Global Compact, since 2001](#).

## Executive Summary

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<sup>1</sup> Section 54 of the Modern Slavery Act 2015 requires a commercial organisation to write a slavery and human trafficking statement each financial year if its total turnover is not less than an amount prescribed by the Secretary of State.



## Our organisation and supply chain

Aviva is the UK's only diversified insurer across Insurance, Wealth and Retirement, with over 25 million customers in the UK, Ireland and Canada. We also have international investments in China and India.



Our customers can interact with us in several ways: online, by phone, through brokers, financial advisers, strategic partners and price comparison websites. Aviva's diverse workforce includes around 31,000 colleagues<sup>2</sup>, with approximately 25,000 in the UK, working across different locations including London, Norwich, Bristol, Manchester, York, Perth, Sheffield, Birmingham, Worthing, Leatherhead and Glasgow. More information about our business can be found [here](#).

Globally, we have an active supplier base of more than 3,000 suppliers and third parties across the countries we operate in providing products and services for Aviva and for our customers, which includes a range of outsourced operational functions and activities. More than 2,000 of these suppliers are based in the UK<sup>6</sup>. Our suppliers deliver good and perform services across a wide range of countries, including Australia, Brazil, Canada, Czechia, France, Germany, India, Ireland, Italy, Japan, Luxembourg, Malaysia, Netherlands, Philippines, Poland, Romania, South Africa, Spain, Sri Lanka, United States of America, Vietnam. We work collaboratively with suppliers to contribute to the eradication of modern slavery and are committed to continuously strengthening our efforts, particularly where goods and services originated from higher risk countries.

Additional details of our business, operations and supply chain can be found in our [Annual Report and Accounts 2025](#).

The table below summarises our global business footprint:

Market	Contribution to 2025 Group adjusted operating profit <sup>3</sup> (£m)	% of employees (Group total)	% of managed suppliers (Group total)
<b>Insurance, Wealth &amp; Retirement</b>	1,078	33	17
<b>UK &amp; Ireland GI</b>	1,077	43	40
<b>Canada GI</b>	408	15	21
<b>Aviva Investors<sup>4</sup></b>	47	3	9
<b>International Investments<sup>5</sup></b>	60	4	-
<b>Other Group activities</b>	(467)	2	13
<b>Total</b>	<b>2,203</b>	<b>100</b>	<b>100</b>

<sup>2</sup> This includes our Direct Line colleagues

<sup>3</sup> Group adjusted operating profit is an alternative performance measure (APM) which is used by the Group to supplement the required disclosures under IFRS. Please refer to note B in the 'Accounting Policies' section and to the 'Other Information' section within the Annual Report and Accounts for further information

<sup>4</sup> Includes operations in the UK, Canada, Ireland, United States, Singapore, Switzerland, Luxembourg, Germany, Netherlands, and France

<sup>5</sup> International Investments includes China, and India

<sup>6</sup> Based on their registered address.

# Our Policies and Standards related to modern slavery

In 2025, we continued to review and monitor our human rights risks, which include risks of modern slavery, across all the countries that we operate in: UK, Canada, Ireland, India and China.

We recognise that robust risk policies (“Policies”) and business standards (“Standards”) are crucial to help us uphold human rights and prevent modern slavery. Our Policies are guided by internationally recognised human rights standards<sup>7</sup>. We regularly assess our Policies and Standards to ensure their effectiveness, working with internal subject matter experts and external partners.



<sup>7</sup> 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.

## **Our Human Rights Policy**

We regularly review our Human Rights Policy to incorporate new developments. The Policy is reviewed in consultation with internal stakeholders and in collaboration with BSR, an external expert on business and human rights. The Policy includes our human rights governance, and our commitment to respect the human rights of others including our employees and other rights-holders impacted by our underwriting, our investments, and our purchasing practices. We continue to monitor implementation of group policy across markets and activities. We will refresh our human rights policy in 2026.

## **Aviva's Business Ethics Code**

The Code is reviewed biannually, and the latest version was published in Q1 2025. It sets out a practical set of principles and the minimum standards of ethical behaviour to provide clear guidance of what everyone who works at Aviva should and shouldn't do. The Code requires employees to abide at all times by the principles set out in the Code (as must Directors and officers, certain contractors and temporary staff, contingency workers and other persons acting on behalf of Aviva and its subsidiaries). It sets out Aviva's expectations of our business partners, like contractors and suppliers, to follow the rules set out in the Code. The Code requires us to act with integrity, responsibly, transparently, and encourages our people and the people we work with to report unethical and illicit behaviour, including raising any issues relating to modern slavery.

We report annually on the percentage of employees who confirm that they have read, understood, and will comply with our Code. In 2025, 99.5% of our employees attested to their understanding and acceptance of the Code. Our Aviva Business Ethics Code can be found here. Direct Line colleagues attested to a separate conduct code.

## **Our Third Party Business Code of Behaviour**

The Code outlines the minimum standards that we expect our suppliers to adhere to, as well as our commitment to ensure that individuals and communities have access to remedy for any human rights and modern slavery harm linked to our operations and value chain.

The Code aligns with all the provisions contained in the **ILO Fundamental Conventions**, which include the prohibition of forced and child labour. We require our suppliers to acknowledge our Aviva Business Ethics Code and abide by the expectations of The Aviva Third Party Business Code of Behaviour. The Code requires that Third Parties should, when conducting their own procurement activities, seek similar behavioural commitments from their own supply chain, in addition to any legally binding commitments within a formal contract.

We track annually the number of our registered<sup>8</sup> suppliers who have agreed to abide by the principles detailed in our Code. In 2025, 100% of registered suppliers in the UK, Canada and Ireland (excluding Direct Line) agreed to abide by the provisions of our Code.

<sup>8</sup> A Registered Supplier means a supplier that has completed the Aviva supplier registration form on the Ariba network, and that form has been checked and approved by the supplier registration team. All suppliers to the UK, Ireland and Canada are required to complete this process.

# Our reporting mechanism



Any concerns regarding unethical conduct, including modern slavery can be raised by employees, contractors, outsource providers and others via our Speak Up team.

**Speak Up** is Aviva's whistleblowing service, offering both confidential and anonymous channels for raising concerns. Allegations can be reported directly to the Speak Up team at [speakup@aviva.com](mailto:speakup@aviva.com), or anonymously via our independent third-party provider, EthicsPoint, at [AvivaSpeakUp.ethicspoint.com](https://www.avivaspeakup.ethicspoint.com) (available 24/7). All concerns are triaged by the Speak Up team to determine the appropriate course of action. Modern slavery is specifically listed as an issue that should be reported through the Speak Up service. Each year, the Aviva subsidiary boards and the Audit Committee of Aviva plc receive an annual Speak Up report outlining case volumes and categories to ensure effective oversight. We do not tolerate retaliation against anyone who raises a genuinely held concern.

Throughout 2025, we continued to roll out our 'Speak Up and Listen Up' campaign to empower colleagues to confidently use the Speak Up service. We increased visibility through in-person roadshows across our core markets and used insights from our 2024 Voice of Aviva (VoA) data to deliver targeted training and awareness sessions to colleagues who reported lower levels of familiarity with the service. This contributed positively to our VoA results, with 92% of colleagues stating they knew how to raise a Speak Up concern in 2025 (+1% from 2024) (excluding Direct Line).

Any allegations that potentially breach our Business Ethics Code and relate to human rights— including suspected modern slavery—are allocated by the Speak Up team to the Aviva Group Investigations Team. During 2025, we received **one report** related to alleged breaches of human rights, including potential modern slavery or forced labour concerns. Following a formal review, we concluded that the matter did not constitute modern slavery, but an isolated instance regarding overtime.

Our current provisions include our Speak Up service, our customer support and complaints helplines, the requirement for suppliers to provide access to remedy under the Aviva Third Party Business Code of Behaviour, signposting the reporting channels with our regulators and the wider criminal and civil proceedings before the ordinary courts.

# Our approach to risk assessment and management

We recognise the importance of identifying high-risk areas where our activities might be causing, contributing, or linked to adverse human rights impacts, including instances of modern slavery.

## Our Operations

Insurance and Asset Management's own operations have not been identified as high-risk sectors, i.e., those in which direct employees might experience modern slavery or forced labour. Our direct operations rely on knowledge-based activities where almost all our employees work in roles that are low risk e.g., office-based roles, and include roles that require specialist qualifications such as accountancy, actuarial, procurement, human resources. This low-risk rating for the Aviva group was reaffirmed by the Slave Free Alliance in their most recent independent external review.

## Our Supply Chain

We have a certain degree of exposure to forced labour risks in our supply chain, including both our operational supply chain and our claims supply chain, particularly where we source services and goods produced by manual labour. In 2025, Aviva undertook a comprehensive supply chain modern slavery risk-mapping exercise (excluding Direct Line) in partnership with Good Business, an external specialist in business, ESG, and human rights. The aim of this work was to deepen our understanding of modern slavery risks across our extended supplier network and ensure alignment with evolving expectations, including the Home Office's Transparency in Supply Chain guidance. Following Direct Line acquisition by Aviva, we also reviewed their modern slavery risk repository to ensure alignment of approaches.

Building on this work, we will integrate Aviva's supply chain risk-mapping framework within DL to create a unified and more robust assessment of supply chain risks across the combined organisation in 2026.

Good Business reviewed detailed supplier-level data from our procurement platform and categorised our suppliers by service type and inherent modern slavery risk exposure. Their analysis combined category-level inherent risk ratings that were developed through desk based research using recognised sources, including the ILO Indicators of Forced Labour, the US Department of Labor reports, and sector analyses from KnowTheChain, as well as Good Business' sector risk expertise- with supplier-level indicators such as service type, sector profile, workforce characteristics, subcontracting likelihood and delivery complexity.



Based on this mapping exercise, we identified suppliers across high-, medium-, and low-risk categories:

### High-risk suppliers



Our high-risk suppliers were concentrated in seven sectors across both our primary value chain (services we deliver directly to customers) and secondary value chain (activities that support core operations):

- Construction, Refurbishment & Fit-Out
- Catering & Hospitality
- Claims Repair & Restoration Network
- Security & Guarding Services
- Cleaning & Janitorial Services
- Temporary Labour & Staff Agencies
- Logistics, Courier & Small Parcel Delivery

### Medium-risk suppliers



Our medium-risk suppliers typically operated in categories such as:

- IT Infrastructure & Hosting
- Recruitment & HR Agencies
- Real Estate & Property Services
- Events, Sponsorship & Hosting
- Other operational support services

### Low-risk suppliers



Our low-risk suppliers were concentrated in skilled, professional or highly regulated service categories, including:

- Professional Services - Consulting & Advisory
- Knowledge, Membership & Information Services
- Legal, Tax & Regulatory Services
- Insurance, Policy Administration & Support Services
- Data, Applications & Automation Services
- Software, Platforms & Licences
- Financial, Banking & Treasury Services
- Creative, Digital & Brand Marketing Services



Our modern slavery risk within the supply chain is driven primarily by labour conditions, the nature of work carried out by suppliers, and geographical considerations, rather than procurement scale. For example, although more than 60% of Aviva's annual supplier spend is allocated to low-risk categories, the highest exposure to modern slavery risk remains in labour-intensive sectors where subcontracting and low-wage or temporary workforces are more common.

Since 2024, we have been collecting data from our suppliers to deepen our understanding of potential forced labour risks within our supply chain. As part of this exercise, we also identified opportunities to improve the granularity and consistency of supplier data collected—particularly in relation to suppliers' geographical locations and, where feasible, the locations of their own suppliers. This will help Aviva build a more complete picture of risk beyond our direct suppliers (Tier 1) and strengthen visibility across the wider value chain. The enhanced risk mapping also enables us to better prioritise our resources toward suppliers and categories with the highest modern slavery risk, ensuring our engagement and due diligence efforts are focused where they can have the greatest impact.

In 2026, we will focus on improving completion rates of our due-diligence questionnaire among suppliers identified as high and medium risk.

To date, 9% of high-risk suppliers and 13% of medium-risk suppliers have submitted the questionnaire. Based on this representative sample we continue to work closely with our Procurement team to increase supplier engagement and improve response rates as part of our ongoing commitment to responsible sourcing.

Based on the data we have received, we learned that:

- More than 90% of the suppliers have a dedicated whistleblowing channel and procedure for their workforce and/or other stakeholders to report suspicions of wrongdoing.
- Around 30% of the suppliers engage third parties (such as subcontractors) in delivering products or services to Aviva. More than 90% of these suppliers reported having requirements to ensure responsible employment, ethical sourcing practices, or similar measures to respect labour rights.

Looking ahead to 2026, we intend to further strengthen our approach by overlaying Good Business' risk scoring with insights from our supplier questionnaires.

Our expectations of suppliers in addressing modern slavery include:

- Supplier responding to a UK request for proposal are required to agree to the inclusion of our standard human rights and modern slavery clauses in their contract. Support Aviva's anti modern slavery commitment by replying to the relevant anti-slavery and human trafficking questions contained within Aviva's supplier due diligence questionnaires.
- Commitment to implementing due diligence procedures for its own suppliers, subcontractors, and other participants in its supply chain in relation to the services provided to Aviva to ensure that there is no slavery or human trafficking in its 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 goods and services), this requirement is communicated and emphasized to suppliers participating in our annual modern slavery risk assessment.
- A requirement to notify Aviva as soon as it becomes aware of a case or potential case of modern slavery in its own operations or supply chain.
- Publish an annual Modern Slavery statement if they meet the criteria set by the legal requirement.



In addition, expectations of our suppliers when it comes to the living wage and contracted hours, include:

- Pay Eligible Employees not less than the Living Wage in respect of that work. Where an increase to the Living Wage is officially announced, pay Eligible Employees the increased amount within 6 months of the official announcement; and
- Notify Eligible Employees of the date of the next increase to the Living Wage within one month of the official announcement unless such Eligible Employees have been previously notified about the date on which they will receive at least the increase in Living Wage
- No Zero Hours Contracts, unless the employee or worker has provided his or her express consent. The supplier (or its sub-contractor) can, on request, provide to Aviva written evidence of such employee or worker's consent.

### **Our Investment**

Like other peers within the financial sector, our risk of contributing or being linked with modern slavery, particularly forced labour, is higher within our investment portfolios. This includes potential exposure to higher-risk sectors such as agriculture, manufacturing, and construction.

Aviva Investors – Aviva's in-house asset manager, has a multi-disciplinary ESG team of thematic and sector analysts. Analysts use a combination of quantitative and qualitative information to research the human rights practices, including modern slavery and forced labour risks, of existing and prospective holdings across corporate, sovereign, and real asset investments. For real assets, Aviva Investors integrates human rights considerations during the due diligence phase of new transactions and, using reasonable endeavours and where appropriate, on an ongoing basis to ensure that we are actively addressing human rights risks and impacts. Additional due diligence is required and conducted at the ESG referral stage and thereafter on a reasonable endeavours basis for certain sectors, assets or counterparties that are particularly exposed to human rights risks.

We aim to continue strengthening our risk-based approach to avoid and prevent adverse human rights impacts.



# Our Due Diligence

Our Sustainability Business Standard requires us to conduct human rights, including modern slavery, due diligence in all our businesses every two years. It covers our Aviva businesses which include UK, Ireland, Canada, Aviva Investors, and our investment in India. We completed a due diligence assessment in 2023, where we reviewed our internal systems and processes to identify, prevent and mitigate, and remediate instances of human rights abuse such as modern slavery, to provide overview of potential gaps to meet international standards and emerging external good practice. We completed our human rights saliency assessment in 2024 to deepen our understanding and identification of modern slavery and human rights risks.

We are actively engaging with a broader range of internal stakeholders to implement the key priority areas identified in our saliency assessment. In 2025, we conducted a group-wide human rights due diligence process, prioritising high-risk areas. The findings will be used to inform stewardship activities to be carried out by Aviva Investors in 2026.

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<sup>9</sup> BSR is an organisation that support companies to implement the UN Guiding Principles on Business and Human Rights and other responsible business conduct frameworks.

## Our Employees<sup>9</sup>

In the UK, we manage the risk of modern slavery by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. We work with third-party service providers to make sure all our people go through a vetting process by conducting pre-employment checks. Prior to starting employment, each new joiner will be issued with a contract of employment which confirms that 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. Our businesses outside of the UK establish their own pre-employment checks and working patterns, always abiding by local legislation. Despite our operations being rated low risk we are adding an extra level of due diligence for our own employees. We are undertaking a review of duplicate bank accounts (3 or more people using the same account details) as well as shared addresses. These checks will be performed within our UK businesses with the aim of extending the approach to all our core businesses.

Sharing bank accounts, addresses or telephone numbers can be a red flag as they may be an indication of unethical behaviour and can be linked to modern slavery. We performed some checks at the end of 2025, and we have found no concerns.

During our 2023 due diligence, we also reviewed our third-party recruitment agencies’ practices. Within this dialogue we confirmed their low-risk status and alignment with employer pays principle, given no recruitment fees are charged to potential candidates, no false promises made, and all terms and conditions are disclosed at the recruitment stage.

We expect the same practices from our suppliers when they engage recruitment agencies, particularly when recruiting operational-level employees in high-risk sectors. Our practices and the low-risk associated with engaging third-party recruitment agencies remain unchanged in 2025.

### ‘Living Hours’ employer

Aviva has been a member of the Living Wage Foundation and a living wage employer since April 2014. Everyone working at Aviva in the UK, whether they are a permanent employee, or an on-site contractor, receive at least the real Living Wage.

In October 2020, Aviva also became one of the first two UK organisations to receive accreditation as a Living Hours employer. We continue to uphold the Living Hours standard aimed at reducing the pressures of constant uncertainty over hours and pay by encouraging employers to provide workers with security of hours alongside a real Living Wage. We are committed to ensuring that in addition to the real Living Wage, our eligible

direct employees in the UK are: (1) provided with at least four weeks’ notice of shifts; and (2) have a contract that accurately reflects hours worked, while offering a guaranteed minimum contract of 16 hours a week.

In 2024, Cherie MacCarthy, Director of Reward Consulting and Delivery, joined the Living Wage Foundation Advisory Council. Aviva continues to engage closely the Living Wage Foundation and other organisations to test proposals for introducing a Living Pension.

For more information on our approach to becoming a ‘Living Hours’ employer please visit our update on [Aviva.com](https://www.aviva.com)



<sup>9</sup> This description excludes Direct Line’s employment practices. Going forward, Direct Line’s employment practices will align with Aviva’s.



## Our Supply Chain

18<sup>10</sup> suppliers participated in our 2025 Modern Slavery assessment process, where 9 of the assessments, including one Tier 2 (a supplier to our direct suppliers), were conducted through in-person site visit and include workers' voice element. It covered our operations across the UK, Ireland, Canada, India, Aviva CofCo China, our subsidiaries Solus, and suppliers previously part of Direct Line (DL). Suppliers fall into the following sectors, which align with the findings of our supply chain mapping and have been identified as high risk: car repair, car valeting, health care claim management support, property repair service provider, and security and housekeeping manpower providers.

The assessments were conducted through management interviews, document reviews, and worker interviews to evidence suppliers' practices. Using risk-based approach and informed by our risk-mapping exercise, we excluded low-risk suppliers such as strategy consultancy and legal service providers. Suppliers were prioritised for assessment based on the modern slavery risk-mapping methodology outlined in

Section 4: Our Approach to Risk Assessment and Management. This approach considers factors including sector-specific risk, geographic exposure, and the extent to which suppliers rely on manual labour—particularly where potentially vulnerable workers, such as low-skilled migrant workers, may be present. We also reviewed the modern slavery due-diligence assessments completed on suppliers of the former Direct Line (DL) business prior to its acquisition by Aviva. As part of this review, we noted the corrective action plans arising from these assessments and will be following up on the completion of the associated improvement measures to ensure continuity and alignment with Aviva's human rights and modern slavery standards.

In addition, our modern slavery due diligence this year continue to:

- Focusing on our suppliers' recruitment and employment practices guided by the ILO 11 Forced Labour Indicators<sup>11</sup>. We specifically focus on forced labour indicators linked to recruitment activities such as debt bondage and deception where low-skilled migrant workers are present at the suppliers' operation and recruited through third-party agencies.

Our assessment found that all but one of Tier 1 suppliers assessed in 2024 recruit low-skilled workers directly. We further evaluated the recruitment agency used by this supplier through publicly available information and concluded that the agency has a low forced labour risk due to the transparency of job descriptions, no indication of the possibility to charge recruitment fees to job applicants, and the fact that workers hired are not at high risk of exploitation.

- Assessing the suppliers' responsible purchasing practices where outsourcing or sub-contracting is identified.
- Assessing suppliers' grievance mechanism policy to understand presence of anonymous channel for workers to report their grievances without fear of retaliation or presence of other grievance channel such as workers' representative.
- Engaging an independent third-party assessor to conduct announced, in-person modern slavery assessments.
- Integrating an element of workers' voice by interviewing them during the assessment.

We categorise suppliers into three areas based on our assessment:

- **Low Risk:** the company has good practice and system to prevent instances of modern slavery.
- **Medium Risk:** the company has one or more gaps in their current practice and system to ensure effective prevention of instances of modern slavery.
- **High Risk:** the company does not have any system to prevent instances of modern slavery and/or a non-compliance or non-conformance are found.

Our preferred approach if performance is poor is to collaborate with suppliers and to enable remedy as part of a corrective action plan. We also make recommendations to improve suppliers' practice even where no current violation is present to reduce likelihood of human rights violations. The table below summarises our 2025 supplier due diligence results.

Management will monitor the corrective action plans for medium and high risks issues to ensure proper remedy is completed.

<sup>10</sup> This includes three supplier assessments that began in late 2025 and were finalised in early 2026

<sup>11</sup> [ILO indicators of Forced Labour](#)

Forced Labour Risk Category	Number of suppliers	Summary	Remedy and recommendations
Low	17	<p>17 out of 18 suppliers assessed in 2025 have low forced labour risk. This is based on the low prevalence of potentially high-risk of exploitation workers and good management systems to prevent instances of modern slavery.</p> <p>Despite the low risk, we made recommendations to further improve their recruitment, employment and responsible purchasing practices.</p>	<p>Examples of recommendations we made to low-risks suppliers were:</p> <ul style="list-style-type: none"> <li>- Ensure adoption of a zero recruitment fees approach during recruitment of operational level workers, especially when recruiting low-skilled migrant workers through third-party agencies.</li> <li>- Engage sub-contractors to establish a system that can raise red flags for duplicate bank accounts and addresses.</li> </ul>
High	1	<p>We identified potential non-compliance at one supplier based in India that provides services to Aviva India.</p> <p>This relates to the supplier's policy requiring workers to pay recruitment and training fees at onboarding or through monthly salary deductions.</p>	<p>The supplier's management representative has stated that none of their employees assigned to Aviva India's office are required to pay recruitment or training fees, in line with Aviva's Code of Conduct.</p> <p>In 2026, we will conduct a more comprehensive assessment, which include directly engaging with workers employed by the supplier and assigned to Aviva India's office. This is to help us verify that no workers are affected and ensure that our purchasing practices support responsible employment practices.</p>

Our assessment identified some suppliers' best practice examples including:

- Payment of living wages to all workers employed at the site.
- Inclusion of mandatory human rights due diligence before onboarding new suppliers.
- Conduct regular health and safety assessment to all sites, which include workers' welfare dialogue.
- An effective grievance mechanism, demonstrated by the receipt of reports on serious issues such as discrimination and the prompt resolution of concerns to workers' satisfaction.

We continue to request that new suppliers notify Aviva if they are required to comply with the UK Modern Slavery Act 2015. As in previous years, we have continued requesting evidence of compliance with the reporting requirements of the UK Modern Slavery Act 2015. In line with the commitment made in our previous Modern Slavery Statements; we have now completed checks on a risk based random sample of 12 Tier 1 and Tier 2 suppliers to assess compliance with the Modern Slavery Act's requirements.

From our 2025 supplier assessments we closed 5 of the 10 corrective action plans and opened 6 new corrective action plans to monitor in 2026.

## Our Subsidiaries

In 2024, we conducted a modern slavery risk assessment on the value chains of our subsidiaries, Succession Wealth and Probitas. The assessment was carried out by our independent third-party partner, Slave Free Alliance (SFA), through document reviews and interviews with senior management of the respective companies. The SFA report confirms that both Succession Wealth and Probitas possess a low risk of modern slavery in their operations, but have some risk exposure from suppliers operating in high-risk sectors such as building housekeeping and security. SFA highlighted the good level of awareness

and understanding of modern slavery from the subsidiaries.

SFA recommended our subsidiaries to strengthen procurement practices by limiting the number of subcontractors further down the supply chain, improving internal awareness by adopting relevant modern slavery training, conducting due diligence on high-risk suppliers, and specifying clauses related to modern slavery prevention in supplier agreements. We will continue our collaboration with both subsidiaries to implement these recommendations and share Aviva's best practice.



In 2025, Aviva partnered with the Slave-Free Alliance (SFA) to undertake an in-depth modern slavery site assessment at one of Solus' operational locations<sup>12</sup>. The assessment, delivered by an SFA Senior Advisor, involved management interviews, worker interviews—including subcontracted and temporary staff—onsite observations, and a review of relevant employment and health & safety documentation. This process helped Aviva evaluate how effectively Solus manages risks of modern slavery and labour exploitation, including within the operations of two high-risk suppliers that were also assessed.

Across the assessment, SFA identified several areas of strong performance. These included a notably effective grievance mechanism, with workers reporting that they felt comfortable raising concerns and that issues previously reported were resolved to their satisfaction. In addition to these findings, a positive working culture was also evident on-site: workers demonstrated strong collaboration, positive interpersonal relationships, and respectful interactions—both among Solus colleagues and between

Solus and supplier staff working at Solus' site. This reflects an environment where communication flows openly, and teams work cohesively regardless of employment relationship.

The assessment highlighted potential opportunities for improvement, including SFA recommendations that are currently being discussed regarding the provision of a specific tooling used in one workshop activity. We will work closely with Solus to review these recommendations and determine proportionate actions as appropriate, reinforcing our shared commitment to the continuous improvement of working conditions across the repair network.

In 2026, Aviva will continue its partnership with SFA to deepen supply chain transparency through structured supply chain mapping. This work supports the identification of high-risk categories within Solus' tier-one suppliers and strengthens due diligence efforts by focusing attention where risks of modern slavery and labour exploitation are most concentrated.

## Our Investment

We are committed to investing our capital and our customers' capital in a responsible manner. Our asset management firm, Aviva Investors, is a founding signatory to the United Nations Principles for Responsible Investment (UNPRI) and we recognise and embrace our duty to act as responsible long-term stewards of our clients' assets. We believe that being a responsible financial actor means our investment approach must respect, not undermine, human rights and support the long-term sustainability of capital markets, economies and society.

We recognise the adverse impacts on individual and collective human rights may arise through the activities of our investee issuers. We also recognise that human rights impacts can have a material impact on business outcomes, and client outcomes.

As a large asset manager, where relevant, we acknowledge that this commitment involves setting clear human rights expectations for investee companies. It also means building and using our leverage to engage

with companies to ensure they prevent and mitigate human rights risks and impacts, including those relating to modern slavery, and provide access to remedy where harms occur. We will explore exercising our voting rights at company general meetings, if we feel companies have not appropriately managed modern slavery impacts.

We applied this approach in a recent engagement with an investee company following allegations of forced labour within its supply chain. The case involved a subcontractor on a large-scale project, where forced labour risks were identified. The company reported taking immediate remedial action, and we conducted engagement due to ongoing concerns regarding supply chain oversight and historical labour rights risks.

<sup>12</sup> The assessment started in late 2025 and completed in the beginning of 2026

# Our governance

## Senior Managers and Executive Sponsors

We have a clear and robust governance structure in place. Aviva's Sustainability Ambition Executive Committee drives and monitors the delivery of our human rights plan, including our progress on human rights and modern slavery - with delegated authority from the Customer & Sustainability Committee.

The group's Sustainability senior management monitor and review progress against the action plan regularly, ensuring it is resourced appropriately and the implementation is well aligned with corporate priorities. The Sustainability function, which leads and co-ordinates our work on human rights and anti-modern slavery, reports to Stephen Doherty, Chief Brand and Corporate Affairs Officer who chairs the executive committee and is the Aviva senior executive responsible for sustainability. The team provides expertise to enable delivery and coordination of local activity across Aviva's businesses.

Our progress and key performance metrics are reviewed regularly and overseen by the Customer & Sustainability Committee. Progress updates are shared through internal governance forums such as Global Supply Governance Forum and the group wide Sustainability Working Group.

## Human Rights and Anti-Modern Slavery Working Group

Our cross-functional human rights working group convened four times in 2025 to monitor progress on the ongoing human rights saliency assessment. During the year, we also updated the group's membership to ensure alignment with our priority activities for 2024.

The working groups primary focus in 2025 was to enhance our supplier mapping, including improving the availability and quality of data such as the geographical locations of our Tier 1 suppliers and expanding visibility into Tier 2. The group also explored options for deeper engagement with high-risk Tier 1 suppliers.

In addition, the Good Business team participated in two sessions to provide recommendations on how Aviva can further strengthen its approach to identifying and addressing modern slavery risks within our supply chain.



## Remediation Governance

As part of our responsibilities under the UNGPs, we recognise that if we cause or contribute to adverse human rights impacts, we must provide for and cooperate in remediation efforts through legitimate processes. We are committed to supporting a robust remedy ecosystem so that individuals and communities have access to remedy for harm linked to our operations and value chain.

The diagram below outlines our governance and escalation process for addressing issues identified within our supply chain.

### Remediation and Escalation of High-risk labour issues (including Modern Slavery) in our supply chain

#### Issues Identified

Potential labour-rights concerns, including modern slavery risks, may be identified through a range of channels. These include our human rights due diligence activities, in-depth supplier assessments, and other available mechanisms such as grievance and whistleblowing channels. These processes are designed to help surface potential risks and issues across our supply chain.

#### In-Depth Assessment

Where a potential high-risk issue is identified, we seek to undertake an appropriate assessment to understand its scale, affected rights-holders and underlying causes, including whether the issue is systemic. In some cases, we may engage independent third-party expertise to support this work.

#### Remedy and Corrective Action

We support the development of corrective actions and, where possible, informed by the perspectives of affected workers. Aviva's role is determined by our connection to the impact and aligned with the UN Guiding Principles on Business and Human Rights. Remedies may vary by context and can include financial and non-financial measures to address harm and reduce the likelihood of recurrence.

#### Governance and Implementation

- **Engagement with affected rights-holders:** Engagement with affected rights-holders is considered throughout the lifecycle of an issue, including during identification, assessment, and the development and implementation of corrective actions.
- **Implementation roles:** Corrective actions are implemented led by the relevant Supplier Manager, with support from Group Sustainability subject-matter experts.
- **Oversight and accountability:** Oversight of remediation and corrective actions sits with Aviva Sustainability and Procurement Senior Management.



## Subsidiary boards

The boards of the Aviva entities identified within scope<sup>13</sup> review and approve the information disclosed in this statement.

The Customer and Sustainability Committee: assists the Board of Aviva plc in its oversight of customer and sustainability issues and is responsible for overseeing Aviva's ambition to be a leading customer centric company. It provides oversight of the customer agenda across the Group and is responsible for supervising Aviva's Sustainability Ambition, ensuring alignment with the Group's purpose, culture, values, strategy, and business plans. This includes reviewing Aviva's human rights and modern slavery activities, The Aviva Business Ethics Code and related documents before final submission to the Board of Aviva plc.

## Aviva plc Board

The Board assesses and approves this statement. Our Group CEO signs the statement on behalf of Aviva plc.

<sup>13</sup> The Aviva entities within the scope of "the Act" are: Aviva Insurance Limited, Aviva plc, Aviva Central Services UK Limited, Aviva Employment Services Limited, Aviva Equity Release UK Limited, Aviva Group Holdings Limited, Aviva Health UK Limited, Aviva Investors Global Services Limited, Aviva International Insurance 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, General Accident Limited, Gresham Insurance Company Limited, Solus (London) Limited, Succession Group Ltd, Succession Wealth Management Ltd, Aviva EFRA 15 UK Limited, Probitas Managing Agency Limited, Probitas Holdings (UK) Limited, Aviva Pension Trustee UK Limited, Aviva Protection UK Limited, Direct Line Insurance Group Limited, UK Insurance Limited, DL Insurance Services Limited, UK Assistance Accident Repair Centres Limited.

# Our training and communication

At the heart of any policy and process are our employees and we communicate with them to raise awareness of our work on modern slavery so that they can understand, promote, and cascade it further within our organisation. We know that training and raising awareness is the best way to detect and combat modern slavery and the various forms of labour exploitation and we are committed to increasing the effectiveness of our communication in this space.

## Training for employees<sup>14</sup>

We have a comprehensive e-learning module designed in collaboration with Slave-Free Alliance, to help our employees understand the link between business and human rights and to raise awareness around modern slavery, its pervasiveness, and the role of corporations and their staff in helping tackle it. This training has been refreshed in 2022 to reflect both changes in Aviva and relevant trends in the modern slavery agenda. It has been rolled out to specific employees directly involved in anti-modern slavery activity including those employees in the Sustainability, Procurement and Supply Chain, Risk, the People (HR) function, Corporate Affairs and Property & Facilities teams with 3,582 completions by the end of 2025 since its launch in September 2020. We have made the training available to all employees within the Aviva University and we have shared it with those on our graduate training programme so that this is embedded within our future leaders. The training material has also been shared with our investment in India. The training materials address each individual market by providing case studies and dilemmas relating to modern slavery that are relevant for our commercial activities.

<sup>14</sup> 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. Their recommendation 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.



In 2022, established institutions such as the Independent Anti-slavery Commissioner, the UK National Modern Slavery Training Delivery Group, and Themis, with support from Unseen, RedCompass Labs and Alliance Bernstein joined forces and developed an innovative new anti-slavery digital learning platform<sup>15</sup> for the financial services industry. In 2024, Aviva plc, supported by Themis, have identified and adopted most relevant modules regarding Modern Slavery risks for our insurance and investment activities. These modules have now been integrated into our internal training materials. Completion of this training is mandatory for colleagues in specific roles including Sustainability, Procurement and Supply Chain, Risk, the People (HR) function, Corporate Affairs and Property & Facilities teams.

In 2025, we collaborated with Slave Free Alliance to deliver targeted training for members of our Anti-Modern Slavery Working Group. The session focused on the updated Home Office Transparency in Supply Chains guidance and its implications for Aviva's supply chain expectations, and reporting obligations. This training strengthened the Group's understanding of evolving requirements and ensured that those responsible for oversight and implementation are equipped with the latest best-practice insights.

### **Independent Assessment Tool Training**

The support from Aviva's Procurement team is essential for a successful sustainable supply chain that helps us manage the risk of modern slavery with our suppliers. Our Procurement team has received training on the use of the independent assessment tool system, including how to access supplier data and scorecards on their ESG (environmental, social and governance) profile, including labour issues, environmental ethics and responsible procurement matters.

During our 2025 suppliers' due diligence, we confirm that the relevant suppliers participated in the assessment have provided Modern Slavery training to their relevant team members, the trainings are tailored to their business sector and activity.



<sup>15</sup> This training is also accredited by the London Institute of Banking and Finance.

# Our collaborations and partnerships



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 a founding partner Aviva continues to be supportive of the work of the Corporate Human Rights Benchmark.

**United Nations Global Compact:**

We remain members of the UN Global Compact and an active participant of the United National Global Compact UK Working Group on Human Rights and Climate Change sharing insights with other peer organisations.

**UK Living Wage Foundation:**

Aviva has been a principal partner and key supporter of the Living Wage Foundation since 2014 and continues to support the Global Living Wage Initiative. We are working with others to progress Living Wage Places in the UK and globally. We are one of the first accredited Living Hours employers and in 2023, Aviva is delighted to be one of the first UK employers to be awarded the Living Pension accreditation.

**Slave-Free Alliance:**

we continue our membership with Slave-Free Alliance as part of our commitment to addressing the risk of modern slavery in our operations and supply chains. This partnership supports our efforts to strengthen due diligence processes, including undertaking on-site assessments of high-risk suppliers and conducting interviews with workers to better understand working conditions.

**Business for Social Responsibility:**

In 2022, we began a partnership with Business for Responsibility (also known as BSR), a sustainable business network and consultancy focused on helping companies improve their sustainability practices. BSR will help us better understand our human rights impacts and identify the most salient issues across our operations and value chain.

# Our key Performance Indicators to measure effectiveness

The KPIs below summarise progress on our key outcomes made in 2025:

- **Number of cases of high-risk modern slavery discovered at Aviva or in our supply chain via our due diligence work and assessments: [0]**
- **Cases reported through Speak Up where reporters have specifically alleged a breach of the UK Modern Slavery Act 2015: [1]**
- **Number of modern slavery suppliers' assessments conducted on high and medium-risk suppliers: [19]**
- **Number of corrective action/ improvement plans shared with suppliers successfully closed: [5]**
- **Number of corrective actions/ improvement plans shared with suppliers which are being monitored: [11]**
- **Average independent assessment tool Sustainability score for unique suppliers overall: [64.1/100]**
- **Percentage of UK, Ireland and Canada registered suppliers that have agreed to the Aviva Third Party Business Code of Behaviour: [100%]**
- **Number of specialist staff that were trained on Business and Human Rights and Modern Slavery since 2020: [3,582]**
- **Number of unique suppliers assessed onto independent assessment tool with a valid scorecard: [620]**
- **Number of Board and Sub-boards of Aviva who approved this statement: [28]**



# Our future plans

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 the experiences of our businesses and suppliers as they address modern slavery risks. We will also continue to collaborate and partner with external experts to identify, apply and share best practice in addressing and mitigating the risks of modern slavery. Going forward, Direct Line will align with Aviva's approach to modern slavery, including the application of Group-wide risk mapping and due diligence processes, and supplier compliance with Aviva's third-party code of behaviour once the business integration is completed.

We aim to achieve greater transparency, by being open and clear in the way we communicate in our reporting, including our modern slavery statement.

Over the next three years, we plan to:

- **Enhance supply chain mapping** to improve visibility of our supplier base, including more accurate information on the geographical locations and contextual risks associated with our Tier 1 and Tier 2 suppliers.
- **Expand supply chain mapping across subsidiaries**, working collaboratively with local teams to improve transparency and gain a clearer view of modern slavery risks across the wider group.
- **Strengthen modern-slavery-related KPIs** by shifting towards more outcome-focused measures that better reflect the effectiveness and impact of our due diligence activities.
- **Increase completion and quality of our supplier risk-profiling questionnaire**, with a particular emphasis on high-risk suppliers to ensure more robust and consistent data for risk assessment.
- **Explore medium- to long-term capability-building initiatives with high-risk suppliers**, aimed at improving their capacity to identify, prevent, and remediate modern slavery risks within their own operations and supply chains.





# Our process and the steps followed to issue this statement

The boards of the Aviva entities identified within scope have reviewed and approved this statement<sup>16</sup>. The Aviva plc Board reviewed and approved this statement on 12 May 2026, and the Group CEO signed the statement on behalf of Aviva plc.

*A. Blanc*

Amanda Blanc, DBE  
Aviva Group CEO  
London, 12 May 2026

<sup>16</sup> A member of Aviva Sustainability team, and or a member of our Cosec team (briefed by Aviva Sustainability) has provided each of the Boards (including sub-boards and the Board of Aviva Plc) with an update and a brief on this modern slavery statement, answering key questions and incorporating any feedback received prior to obtaining their full approval.

For queries about *Aviva's Modern Slavery and Human Trafficking Statement 2025*, please contact our CR team:  
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