The Aviva Human Rights Policy ›

2026

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Our Policy Scope

This Policy sets out Aviva's commitment to respect internationally recognised human rights, as described in the Introduction, and our aim to align our activities with relevant international standards, including the UNGPs. This commitment applies across all entities within the Aviva plc Group[1].

This Policy focuses on the core human rights practices and approaches applied within Aviva's principal branded business activities —own employment, investment, underwriting, and procurement—within our markets in the United Kingdom, Ireland, and Canada[2]. We seek to promote alignment with our human rights expectations across the Group and, where relevant, to use our influence to encourage consistent application of these standards, recognising that our level of control and ability to influence may vary depending on the nature of the relationship.

1 In which Aviva plc (for its wholly owned subsidiary) directly or indirectly holds an interest of (50.1%) or more, or management control

2 While this Policy establishes a Group-wide framework, it should be noted that certain subsidiaries, joint ventures, associates, and other significant holdings operate with a degree of operational independence and are out of scope of this policy. As such, they may have implemented their own policies, safeguards, and practices that are tailored to the specific human rights risks associated with their activities, geographies, and regulatory environments. In addition, newly acquired businesses may require a period of integration before the requirements and expectations set out in this Policy are fully embedded within their operations

Introduction

Aviva is the UK's only diversified insurer across Insurance, Wealth, and Retirement businesses, with over 25 million customers in the UK, Ireland, and Canada. Our purpose at Aviva is to be "With you today for a better tomorrow."

Aviva, like all businesses, has a responsibility to respect internationally recognised human rights, including social, labour, economic, cultural, civil, political, and environmental rights in our operations and business activities, and through our business relationships, including in our investments and activities with customers, business partners and suppliers.

At a minimum, our commitment extends to the rights described in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights,[3] and the principles on fundamental rights in the International Labour Organization (ILO) core conventions[4]. Where relevant, additional human rights standards will also apply.

To operationalise this commitment, Aviva seeks to align its activities with the standards set out by the authoritative global framework on business and human rights—the UN Guiding Principles on Business and Human Rights (UNGPs). Where relevant, Aviva also seeks to align to issue or industry specific frameworks that help operationalize the UNGPs, such as the Organisation for Economic Co-operation and Development's (OECD) guidance on responsible business conduct for institutional investors[5] and the Children's Rights and Business Principles[6].

In line with the UNGPs, we commit to conducting human rights due diligence (HRDD) to review our business activities and relationships regarding the risk that they could cause, contribute, or be directly linked to breaches of human rights principles, and to address the effects if they occur.

This commitment requires Aviva to uphold international human rights standards even where they may not be reflected in local legal requirements or under the domestic laws in which we and our business relationships operate. Where these standards are in conflict with local law, we are committed to seeking ways to honour these standards in principle as far as possible.

We conduct group-wide human rights due diligence every two years, applying a risk-based approach across our activities in the UK, Ireland, and Canada. This process seeks to identify, prevent, and mitigate adverse human rights impacts, and to address any gaps identified, such as providing or using our leverage to enable remedy where impacts have occurred.

3 These are known collectively as the International Bill of Human Rights. For more information, please visit: https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights

4 For more information, please visit: https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations

5 https://mneguidelines.oecd.org/RBC-for-Institutional-Investors.pdf

6 The Children's Rights and Business Principles, created by the UN Global Compact, UNICEF and Save The Children are the first encompassing set of principles that help companies on a wide range of responsibilities and actions that they can take in the workplace, marketplace, and community to respect and support the rights of children. More information can be found at Children's Rights and Business Principles | UNICEF

Human Rights Governance

We understand that taking our human rights responsibilities seriously requires support and leadership from the highest levels of the business. Therefore, Aviva's CEO signs our Human Rights Policy and the heads of each core market are ultimately responsible for its implementation.

The Board Customer and Sustainability Committee reviews and approves this policy and receives updates on its implementation at least biannually.

We have a clear governance structure to oversee the implementation of our human rights commitments. Aviva's Sustainability Ambition (ASA) Executive Committee drives and monitors the delivery of our plan - with delegated authority from the Board Customer & Sustainability Committee. Our Sustainability function reports to the Chief Brand and Corporate Affairs Officer, who chairs the ASA Executive Committee and is the Aviva senior executive responsible and accountable for sustainability, including the human rights agenda. The team provides expertise to enable delivery and coordination of local activity across Aviva's businesses.

Aviva maintains a collaborative, cross-functional approach to Human Rights and Anti-Modern Slavery. The Human Rights team brings specialist expertise, updates, emerging risks, and proposed actions to relevant business functions and working groups and through the ASA governance structure. This helps ensure that human rights considerations are informed by subject matter expertise and are embedded through coordinated challenge, decision-making and implementation across the business.

This includes engagement with representatives from Sustainability, Procurement (including our insurance claim-related sourcing activities), Supplier Management, Group Risk, Company Secretarial, Legal, Underwriting, and Aviva Investors. These forums support consultation, challenge and alignment on key activities, including policy development, approaches to addressing modern slavery and wider human rights risks, and progress against our commitment to respect human rights.

We remain committed to continuously assessing and enhancing our business processes, training, communication, and management systems. We work to integrate human rights considerations into our risk management processes and relevant policies across all our businesses. Our group risk management function monitors compliance with our Business Standards and Policies[7].

We aim to review and refresh of our Human Rights Policy on a biennial basis to ensure it remains fit for purpose and aligned with evolving risks, best practice, emerging standards, and regulatory developments.

7 See appendix

Our Salient Human Rights Issues

We recognise the importance of identifying, prioritising, and addressing our salient human rights issues[8], we aim to align our human rights risks assessment with the UNGPs.

We conducted a human rights saliency assessment in 2024, considering the severity and likelihood of potential human rights risks across our value chain. This assessment covered relevant rightsholders, including our employees, customers, workers in our supply chain, and groups who may be more at risk of adverse impacts, such as children, women, indigenous communities and migrant workers who may be affected by our activities or those of our business partners.

We have a range of safeguards and internal practices in place to help identify and mitigate these salient risks. These include, for example, policies promoting equal treatment, non-discrimination and freedom of association for our employees; our UK Customer Data Charter, and Data Privacy Statement which safeguard customers' rights to data privacy; and our Third-Party Code of Conduct and Modern Slavery Statement, which set out our approach to managing modern slavery risks in our supply chain and outline our due diligence, and stewardship investment activities where relevant.

We recognise that our approach will continue to evolve, including through strengthening safeguards and enhanced coverage of salient human rights across our value chain. We therefore endeavour to identify and address areas where further development may be needed, and to periodically review and refresh our human rights saliency assessment to ensure it remains up to date and responsive to emerging risks.

8 Those issues most at risk of severe negative impact associated with our activities and business relationships. We prioritize salient human rights issues based on the severity of potential impacts on people, in line with the UN Guiding Principles on Business and Human Rights. Severity is a combination of three factors focused on impact on people: scope, which considers how many people may be impacted by a harm; scale, which assesses the gravity of the impact; and remediability, which looks at the possibility of restoring victims to their prior state of well-being.

Our Employees

Our people[9] are at the heart of our business and human rights are embedded in our employment policies. We respect and protect our employees' human rights, including the right to equal pay for work of equal value, non-discrimination and equal treatment, privacy, and freedom of association.

We value the views of our employees and promote a collaborative, open and transparent environment which helps us maintain a healthy, inclusive workplace[10]. Diversity and inclusion are key to Aviva being a responsible and successful business. Our People policies prohibits any form of discrimination based on gender, sexual orientation, gender identity, marital status, family status, creed, colour, race, religion or belief, age, ethnic origin, nationality, union status, disability, and other characteristics. As set out in our Policies and Business Standards[11] we do not tolerate bullying and harassment. Our progress toward creating diversity is monitored and publicly disclosed on an ongoing basis[12].

We recognise that a living wage is a human right. We pay all eligible employees working at Aviva across the UK the living wage.[13]

We are committed to providing an environment which is safe, secure, and healthy for all employees, as well as managing risks to contractors, customers, and the public on Aviva premises. Each office or workplace implements its own health and safety policy[14] in accordance with the human rights standards.

We support our employees' rights to trade union membership. We engage with our employees and their representatives on human rights and other workplace issues affecting them.

We respect our employees' right to privacy. We have policies and processes in place to ensure that employee information, like all other personal data we handle, is respected, and protected.

We continue to raise awareness and commit to expand training for relevant employees on human rights, including modern slavery. All our employees are expected to meet the highest standards of ethical behaviour and to act in accordance with The Aviva Business Ethics Code 2025 | Living Our Values, to which our employees must attest every year.

9 For more information on our people approach, please visit "Our People" section on Aviva.com: https://www.aviva.com/about-us/our-people/

10 For our wider approach on Diversity and Inclusion please visit: https://www.aviva.com/about-us/diversity-and-inclusion/

11 See Appendix

12 For more information on Diversity and Inclusion at Aviva please visit: https://www.aviva.com/about-us/diversity-and-inclusion/

13 We support the development of an equivalent scheme to the UK living wage for other markets working with the Living Wage Foundation and others. Additionally, please see in the annex information on our accreditation as Living Hours, as well as Living Pensions Employer.

14 Including the suitable incident/accident management procedures and systems

Our Customers

We act to deliver good outcomes for our customers respecting their rights. We consider the interests of all our customers, including but not limited to vulnerable customers who need attention and care. Our customers' needs are the basis on which we design our products and services. Our communications strive to be clear, fair, and not misleading and to clearly articulate any risks alongside the benefits[15].

We are committed to providing products that are accessible and we listen to feedback from customers (including regarding any human rights considerations), and we adapt our products, services, and processes accordingly. These commitments are contained in our Business Ethics Code[16] for all employees. We require all our people, at every level, to read and sign-up to our code every year.

We have a legal and regulatory obligation to protect our customers data, respect their rights, including the right to privacy, and to be clear and open about the way we use their data. Using data helps us improve how our customers interact with us – we do this by making it easier for our customers to find what they need and communicate in a way which is more relevant to them. Fair and transparent use of customer data is important to us and our customers, so we are adding extra checks into our processes to ensure fairness, non-biased treatment, and non-discrimination. When processing personal data, we comply with our legal obligations under the applicable law and are committed to upholding international human rights standards when those protections are more robust. Our Customer Data Charter describes our approach personal data security and use.

We seek to ensure that the design, development and use of Artificial Intelligence (AI) is aligned with our commitment to respect human rights. Through our internal Ethical AI Framework, we apply a set of principles that guide our approach, including Fairness and Alignment to Human Rights, alongside Human Centricity, Environmental Sustainability, Accountability and Responsibility, Transparency and Explainability. These principles are intended to promote fair outcomes, mitigate bias and support responsible decision-making in the use of AI.

We embed this commitment through our control environment, aligning our AI practices with relevant internal standards and governance frameworks. This includes the application of our Data Privacy Business Standard, which supports the protection of individuals' rights and freedoms through privacy by design and appropriate data governance, and our Model Risk Business Standard, which provides structured oversight, validation and monitoring of AI systems and models across their lifecycle.

Together, these frameworks and controls support the consistent application of our Ethical AI principles in practice, helping us to identify, assess and manage potential impacts on individuals and groups, and to ensure that our use of AI remains responsible, proportionate and aligned with our human rights commitments.

15 To learn more on how we endeavour to do the right thing for our customers please consult Our customers - Aviva plc

16 For more information please consult "The Aviva Business Ethics Code 2025" https://www.aviva.co.uk/services/about-our-business/about-us/business-ethics-code/

Our Underwriting, Insurance Products, and Investments

Our Investment and Underwriting Baseline Exclusion Policy[17] sets out the minimum standard for what we deem to be investable or insurable. We seek to avoid investing in or insuring specific sectors and economic activities that fundamentally misalign with Aviva's purpose, values, and our ambition to be a sustainable business. These include activities such as tobacco, civilian firearms or violators of the UN Global Compact (UNGC), which is a global initiative that sets baseline expectations for corporate behaviour including human rights, labour issues. Our Policy applies to investment portfolios where Aviva has investment decision-making control, including those managed by external asset managers.

Our specific human rights commitments and safeguards across underwriting, insurance and investment activities are outlined below.

17 Our Investment and Underwriting Baseline Exclusions Policy is available on the following page https://www.aviva.com/sustainability/sustainability-resources-overview/resources-and-reporting-hub/

Our Underwriting and Insurance Products

We recognise that our underwriting practices, and the design and provision of insurance products and customer journeys, may present human rights risks, including the potential for adverse impacts and unintended unfair outcomes for customers or prospective customers[18].

To minimise this risk, we have governance in place to ensure our underwriting activities and products and propositions consider human rights including:

- The systems and processes we have in place ensure compliance with sanctions screening requirements.
- Our Customer Propositions Business Standard requires that propositions are developed and maintained considering the needs of the customer and the delivery of customer outcomes; avoidance of foreseeable harm, and consideration of sustainability factors.
- Our Proposition Oversight & Governance Framework, which develops the requirement of the Customer Propositions Standard, and covers all key lifecycle stages of insurance product creation including a Risk Assessment stage that looks at the key risks, impacts and opportunities for the activity and associated approach to managing these. Social impacts (which include human rights) are part of this assessment.
- Diversity and Inclusion factors are part of the design of products and services. Aviva businesses seek to meet the diverse needs of customers in their target market, particularly customers with protected characteristics as defined under the Equality Act 2010, or other local equivalents.
- Our Customer Experience Business Standard requires Business Units to have in place a vulnerable customer definition and policy.

18 For further information on how Aviva implements its Baseline Exclusion Policy, including its application to underwriting and insurance products, as well as any relevant scope limitations and thresholds, please refer to the Baseline Exclusion Policy available here: https://static.aviva.io/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-ESG-Investment-Baseline-Exclusions-Policy.pdf

Our Investments

We are committed to investing our money and our customers' money in a responsible manner. We believe that being a responsible asset manager and asset owner means our investment approach must respect, not undermine, human rights and support the long-term sustainability of capital markets, economies, and society.

We recognise our investments may have adverse impacts on individual and collective human rights. We also recognise that human rights impacts can have a material impact on business outcomes, investment returns and client outcomes.

We acknowledge that this commitment involves setting clear human rights expectations for asset managers and investees. It also means building and using our leverage to engage with investee companies, so they prevent and mitigate human rights risks and impacts and provide access to remedy where harms occur.

We are committed to integrating human rights standards and frameworks into our investment activities, including decision-making and engagements across all asset classes (e.g., listed equities, corporate and sovereign debt, and private markets). As a financial institution, we also recognise that building our leverage may require engaging other investors, policy makers, asset managers and other stakeholders to address market failures which enable human rights abuses to persist in our society and in our investment portfolios.

This commitment guides our investments and informs our current approach in the following ways:

Screening

Aviva excludes companies and industries from our investment universe based on criteria set out in our Investment and Underwriting Baseline Exclusion Policy.[19] These outline the specific sectors and economic activities where we consider the sustainability risks to the climate, planet and people are so severe that providing equity and debt funding is fundamentally misaligned with **Responsible Investment Philosophy** of Aviva Investors, our in-house asset manager, and with our corporate values e.g. companies which derive prescribed levels of revenue from the manufacture of controversial weapons and arms.

We may also exclude companies we do not consider meet the principles of the United Nations Global Compact (which include human and labour rights and alignment with the UNGPs) and where there has been insufficient remedial action. We acknowledge the limitations of existing datasets and endeavour to regularly review our exclusions based on emerging human rights issues and company performance.

Research and integration

Aviva Investors, in-house asset manager for Aviva plc and its business units, managing the majority of our assets[20], 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 of existing and prospective holdings across corporate, sovereign, and private markets investments. The extent to which research informs our investment view and engagement expectations will depend on individual investment strategies.

For private markets, Aviva Investors, as Aviva's in-house asset manager, integrates human rights considerations during the due diligence phase of new transactions 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 endeavour basis for certain sectors, assets or counterparties that are particularly exposed to human rights risks.

19 Our Investment and Underwriting Baseline Exclusions Policy is available on the following page https://www.aviva.com/sustainability/sustainability-resources-overview/resources-and-reporting-hub/

20 Customer and shareholder assets are managed by several asset managers through mandates in line with the objectives of different investment portfolios, with Aviva Investors managing a majority.

Active ownership

Aviva Investors engages with companies on human rights issues individually and as part of collaborative efforts with like-minded investors. We commit to prioritising engagement with companies based on a human rights approach in line with the UNGPs, considering salient issues, as well as whether companies are considered high-risk[21] and/or where there have been allegations of serious harm. We also prioritise engagement with companies using a combination of other factors, including our holding type, size, and leverage (i.e., our ability to influence).

In general, Aviva Investors as Aviva's in-house asset manager, may engage with companies on their alignment with the UNGPs, including by asking them to:

- Publicly disclose a human rights commitment or policy
- Conduct ongoing human rights due diligence processes
- Have in place an operational grievance mechanism to enable access to remedy in line with the UNGPs' effectiveness criteria.

Human rights are one of the three thematic pillars of Aviva Investors' voting policy[22]. The policy states that we may not support the re-election of the chair of the board or the chair of the sustainability committee (or most relevant resolution) where we have concerns in relation to a company's alignment with the UNGPs, including breaches of global conventions, its approach to human rights or human rights due diligence, including failings in its duties to treat employees and workers fairly and responsibly. Where appropriate, we will support shareholder proposals calling for improvements in human rights performance and disclosures.

We use data from a range of sources, where available, to evaluate a company's practices in line with the UNGPs and to inform our engagement priorities. This may include insights from ESG rating providers, media, civil society, and trade unions.

In line with the UNGPs and OECD Guidelines for Multinational Enterprises and the associated guidance for institutional investors[23], we believe it is more effective to use our influence to attempt to drive change among investees, rather than divest. However, we will exclude certain investments as a last resort if we judge our attempts to influence behaviour have not been successful, taking into consideration the saliency of the human rights impacts, the company's efforts to address the impacts, and any potential adverse impacts that may result from divestment. When divestment is necessary, we are committed to doing so responsibly.

21 High-risk companies are those that we deem to be more likely to adversely impact human rights, for instance owing to certain features of a company's business model, sector or sub-industry, and the geographic location of a company's operations and value chain.

22 Our Voting Policy is available on the following page https://www.avivainvestors.com/en-gb/about/responsible-investment/policies-and-documents/

23 https://mneguidelines.oecd.org/RBC-for-Institutional-Investors.pdf

Our Suppliers

We operate in conjunction with a wide range of suppliers to deliver services to our customers, and we are committed to promoting respect for human rights throughout our supply chain. We forbid any form of modern slavery including trafficked, forced or child labour and require compliance with relevant ILO standards.

We build strong working relationships with our suppliers to ensure we deliver the highest level of customer service and manage risks effectively. To this end we conduct due diligence in evaluation, selection, and review of suppliers. This includes our human rights risk mapping and annual ethical supplier assessments. Part of this process requests our suppliers to agree to abide by our Aviva Third Party Business Code of Behaviour[24] which covers environmental impacts, ethical business conduct, respect for human rights, including the prevention of modern slavery, the protection of children's rights and the need to provide remediation if harm is found.

We commit to refining our supplier due diligence process to assess high-risk relationships and identify salient human rights issues, including how our suppliers address them. In addition, we include clauses in our standard procurement contracts to address modern slavery.

We require that suppliers pay at least the living wage to key eligible employees that are subcontracted to Aviva and working on Aviva's premises. Adherence to our standards is monitored across the business after a contract has been signed.

We recognise that human rights due diligence is a process of continuous improvement. As stated in our Aviva Third Party Business Code of Behaviour, we expect active engagement with suppliers to understand and address any concerns around human rights issues that may arise during the period of the contract, and we keep a record of these engagements. However, our primary approach is to engage constructively with suppliers to use our leverage to support effective, worker-centred remediation and to ensure that workers' rights are upheld.

We recognise that our purchasing practices can influence suppliers' ability to uphold labour and human rights standards. We are therefore committed to acting as a responsible buyer, including through our participation in the UK Fair Payment Code (FPC)[25].

We have embedded fair payment key performance indicators into supplier scorecards, supported by regular monitoring and monthly reporting to help identify and address issues at an early stage.

24 Our Third Party Business Code of Behaviour is available on the following page https://www.aviva.com/sustainability/sustainability-resources-overview/resources-and-reporting-hub/

25 About - The Fair Payment Code

Our Speak Up Mechanism

We encourage anybody affected by our operations to report any known or suspected human rights violations via our Speak Up (whistleblowing) service. Our Speak Up service provides anonymous, confidential, and secure channels to report concerns of alleged wrongdoing within the workplace, including breaches of Aviva's Business Ethics Code. This includes any actual or suspected human rights violations. Details for how to raise concerns using our Speak Up service, including anonymously should you wish, can be found **here**.

All concerns received via the Speak Up service are passed through an assessment and triage process and assessed against whistleblowing legislation to determine if they qualify for formal investigation. The Speak Up team do not investigate concerns and will allocate all matters to the appropriate team internally based on the subject matter.

At Aviva we encourage those we do business with to have a culture which encourages their people to raise legitimate concerns of alleged wrongdoing where they suspect them. This should be through a formal whistleblowing process or similar. More importantly, we expect organisations to make clear that those who raise concerns will not be penalised or disadvantaged in any way. We do not tolerate retaliation against anyone who speaks up and raises a genuinely held concern.

Aviva is committed to continuously improving and enhancing our Speak-Up service and ensuring that it remains compliant with applicable whistleblowing regulation.

Access to Remedy

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.

This includes working with suppliers to address instances of non compliance in our supply chain, using our leverage to support corrective actions and enable appropriate remediation for affected workers.

Where relevant and appropriate, we engage with investee companies through our stewardship activities to exercise our leverage in enabling access to remedy for impacted rightsholders.

Disclosure of Human Rights Performance

We aim to report on our human rights performance in line with the expectations set out in the UNGPs and the relevant benchmarks and framework requirements for financial services companies.

We communicate progress on issues ranging from diversity and inclusion, labour rights, to modern slavery as well as human rights awareness-raising and training activities and supplier assessments. We currently communicate progress through various channels, including our Aviva Plc annual report and accounts, as part of our Sustainability reporting (e.g. our Sustainability Data Sheet and Sustainability web pages). We also disclose through our annual UN Global Compact Communication on Progress.

Our Collaborations and Partnerships

Where we can, we use our influence and networks to bring others together and improve the industry's wider understanding of, and impact on, human rights. We seek engagement and collaboration with third parties which includes, but is not limited to, memberships, charitable organisations, industry peers, other likeminded organisations, NGOs[26] and people whose rights are affected by our operations, activities, and business relationships, as well as their representatives. By collaborating and learning from others and keeping up to date with evolving internal and external guidance,[27] we can play our part in ensuring human rights are respected and celebrated in our business and wider communities.

Our collaborations and partnerships seek to:

- Support the development of tools and analysis that enhance our ability to manage the human rights risks in our investment portfolios
- Address issues regarding availability and quality of data on human rights for investors[28]
- Use the leverage that working in coalition with other investors or stakeholders to engage companies to improve their human rights practices[29]
- Collaborate and share best practice with international businesses experiencing similar challenges to Aviva, and to continue to leverage expertise on both human rights and modern slavery.[30]

26 Non-Governmental Organisations.

27 Including legislation, soft laws, and industry standards.

28 E.g., Corporate Human Rights Benchmark and the World Benchmarking Alliance. Both organisations benchmark companies on their policies and practices, to drive up standards.

29 For instance, we have been working closely with the Investor Alliance for Human Rights and a large group of investors to improve the human rights policies and practices of the poorest performing companies on the Corporate Human Rights Benchmark. For a full list of collaborations and partnerships, see Aviva Investors' latest Annual Review https://www.avivainvestors.com/en-gb/about/responsible-investment/

30 Examples of this approach include seeking feedback on this policy from external experts such as Business for Social Responsibility (BSR)

We are fully committed to continue working to align our activities and business relationships with the UNGPs.

At Aviva, we believe that respecting human rights is an obligation that all businesses must take seriously. We are also conscious that ensuring respect for human rights is a journey and we look forward to continuing this journey with our partners and other stakeholders, including rightsholders who may be affected by our business.

We welcome feedback on this policy and our progress. For comments and queries about The Aviva Human Rights Policy please contact our Sustainability Team.

This Human Rights Policy has been approved by the Aviva Group Chief Executive Officer and assessed and approved by the Board of Directors.

Amanda Blanc
Chief Executive Officer, Aviva plc Group

Policy Appendix

Group Policies and Business Standards

The list below shows some of the most relevant Policies, Business Standards, and other governance papers relating to The Aviva Human Rights Policy.

- Aviva Business Ethics Code 2025| Living our values
- Aviva Data Privacy Statement
- Aviva Investment and Underwriting Baseline Exclusion Policy
- Aviva Investors Global Voting Policy
- Aviva Investors Responsible Investment philosophy
- Aviva Sustainable Procurement Statement
- Aviva Third party Business Code of Behaviour
- Canada Health and Safety Policy
- Customer Experience Business Standard
- Diversity and Inclusion approach
- Health, Safety and Security Business Standard
- Ireland Health and Safety Policy
- Modern Slavery Act Statement
- Sustainability Business Standard
- The UK Health and Safety Policy
- The Speak Up Charter
- UK Customer Data Charter

People procedures at market level cover, among other areas, the following:

- Managing age in the workplace
- Managing disability in the workplace
- Managing gender in the workplace
- Managing race in the workplace
- Managing religion in the workplace
- Managing sexual orientation in the workplace
- Managing pregnancy & maternity in the workplace
- Managing marriage & civil partnership in the workplace
- Harassment Procedure
- Resolution Procedure
- Equal Parental Leave

Some of our commitments supporting human rights

- UK Living Wage Foundation, we have been a Living Wage employer since 2014. In 2020, we became one of the first UK organisations to receive accreditation as a Living Hours employer[31] to combat insecure working contracts and unpredictable hours. We will work with our fully owned markets to explore an equivalent scheme to the UK living wage. Our aim is to align the approach across all our operations by 2030.

- Living Pension, to become a Living Pension Employer, organisations must provide a Living Pension savings level which equates to 12% of a full-time real Living Wage salary, of which at least 7% must come from the employer. From July 2023, Aviva will automatically enrol new starters on a pension contribution of 14%, of which 10% is contributed by Aviva and 4% by the employee.

United Nations Principles for Responsible Investment (UNPRI), Our asset management firm, Aviva Investors, is a founding signatory to the and we recognise and embrace our duty to act as responsible long-term stewards of our clients' assets.

31 As a result, 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. For more information on Aviva becoming a Living hours employer please visit "Aviva becomes Living Hours employer" on Aviva.com: https://www.aviva.com/newsroom/news-releases/2020/10/aviva-becomes-living-hours-employer/

Policy Appendix

Group Policies and Business Standards

Internal Working Groups

Aviva has established six global employee resource groups called the "Aviva Communities" , which are one of the ways we are actively engaging with employees and working together to become more diverse and inclusive. The Communities help to ensure everyone can have a fair share of voice at Aviva and are a key feature in representing the diversity of the global workforce.

For queries about The Aviva Human Rights Policy 2023, please contact our CR team: **crteam@aviva.com**