

The Aviva Human Rights Policy

2023



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Our Policy Scope

The Aviva Human Rights Policy applies to all entities part of the Aviva Group. The Policy sets out the Group’s commitment to respect human rights and the expectations we set for our own people, no matter where they are based. Where applicable, it also applies to our joint ventures (JVs), and outsourcing arrangements. These are referred to generally as “the business” or “businesses.” We will use this Policy to measure adherence to our own standards and expected behaviours. Set out below are the details of how this Policy applies to the respective areas of Aviva’s business.

Introduction

As the UK’s leading Insurance, Wealth, and Retirement businesses, helping 18.7 million customers across our core markets. 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,¹ and the principles on fundamental rights in the International Labour Organization (ILO) core conventions². 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 Children’s Rights and Business Principles³ and the OECD’s guidance on responsible business conduct for institutional investors.⁴

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 or contribute 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 human rights assessments across all our markets every two years to ensure that we respect human rights in the countries in which we operate by better understanding the local context and identifying where there is a potential conflict and/or a heightened risk of human rights abuses so that we can take preventive action. We also maintain Group-wide procedures to conduct due diligence on the people we do business with, including risk-based background screening designed to identify any known involvement in modern slavery, people trafficking or other potential human rights abuses.



¹ 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>

² For more information, please visit: <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

³ 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 <https://www.unicef.org/documents/childrens-rights-and-business-principles>

⁴ <https://mneguidelines.oecd.org/RBC-for-Institutional-Investors.pdf>

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.

Our human rights work, including our efforts to comply with the requirements of the UK Modern Slavery Act 2015 (prevent modern slavery in our operations, activities and through our business relationships), are led by our Group General Counsel and Company Secretary. They approve plans, review progress, and help to provide visibility of human rights issues at the Executive Committee level. They also help remove barriers to

implementation across the business and represent our human rights agenda in external stakeholder engagements.

Our Procurement and Sustainability senior management support implementation of the Policy. They ensure that our human rights efforts by developing strategies, workplans, and collaborating with other teams to embed our commitments across our operations and within our business relationships.

Aviva has a collaborative, cross-functional Human Rights and Anti-Modern Slavery working group, which meets at least twice a year. The group consists of representatives from Sustainability, Procurement, Supplier Management, Company Secretarial, Legal, Group Investigations, our People (Human Resources) function and Aviva Investors. This group supports the implementation of key activities, including policy improvement and development, enhancing approach to

addressing modern slavery and other human rights issues, providing advice on employee training, supporting supplier training and assessments, and ensuring progress against our human rights and anti-modern slavery commitments.

We remain committed to continuously assessing and enhancing our business processes, training, communication, and management systems. We will work to integrate human rights considerations into our risk management processes and relevant Risk Policies across all our businesses. Our group risk management function monitors compliance with our Business Standards⁵.

We offer awareness raising and training on human rights (including modern slavery) to our employees via the Aviva University. We also share training tools with our suppliers for their employees.

⁵ See Appendix

Our Salient Human Rights Issues

We recognise the importance of identifying, prioritising, and addressing our salient human rights issues.⁶ Even though salient issues often also represent a risk to our business, we are committed to ensuring that we assess human rights risks in line with the UNGPs. This means also identifying negative human rights impacts on communities, which may emerge from Aviva activities or its business relationships. We will embed a saliency assessment as part of our human rights due diligence.

⁶ Those issues most at risk of severe negative impact associated with our activities and business relationships. 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 people⁷ are at the heart of our business and human rights are embedded in our employment policies. We respect 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 workplace⁸. Diversity and inclusion are key to Aviva being a responsible and successful business. Our People Standard 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 Standards⁹ we do not tolerate bullying and harassment. Our progress toward creating diversity is monitored and publicly disclosed on an ongoing basis¹⁰.

Developing our people also remains central to the work we do. We provide opportunities for apprentices and graduates, and leadership development and training and coaching for all employees.

We recognise that a living wage is a human right. We pay all eligible employees working at Aviva across the UK, including those contracted by our main facilities management suppliers, from catering to cleaning employees, the living wage¹¹.

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 policy¹² in accordance with the human rights standards.

We offer and encourage flexible working arrangements where appropriate.

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 information 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 2022 | Living Our Values, to which our employees must attest every year.

⁷ For more information on our people approach, please visit "Our People" section on Aviva.com: <https://www.aviva.com/about-us/our-people/>

⁸ For our wider approach on Diversity and Inclusion please visit: <https://www.aviva.com/about-us/diversity-and-inclusion/>

⁹ See Appendix

¹⁰ For more information on Diversity and Inclusion at Aviva please visit: <https://www.aviva.com/about-us/diversity-and-inclusion/>

¹¹ 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.

¹² 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 benefits¹³.

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 Code¹⁴ for all employees.

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 Charter¹⁵ describes our approach personal data security and use.



¹³ To learn more on how we endeavour to do the right thing for our customers please consult "Doing the Right Thing for Our Customers" on Aviva.com: <https://www.aviva.com/social-purpose/customer/>

¹⁴ For more information please consult "The Aviva Business Ethics Code 2022" on Aviva.com: <https://www.aviva.co.uk/content/dam/aviva-public/gb/pdfs/personal/services-and-support/our-uk-business/products-and-services/business-ethics-code/the-aviva-business-ethics-code.pdf>

¹⁵ For more information on how we protect our customers data please consult our "Customer Data Charter" on Aviva.com: <https://www.aviva.co.uk/services/aboutour-business/about-us/customer-data-charter/>



Our Underwriting

We recognise that our underwriting practices could have an adverse impact on human rights and that new or updated insurance products may create unfair outcomes for customers or prospective customers.

To minimise this risk, we have taken the following steps:

- Our General Insurance underwriting boundaries define the customers, activities, and risks which we will not provide cover for. This includes exclusions in relation to the manufacture of tobacco products or the manufacture, sale, or supply of Controversial Weapons¹⁶.
- We have systems and processes in place to ensure compliance with sanctions screening requirements.

¹⁶ For more information, please consult "Aviva ESG Baseline Underwriting Statement" on Aviva.com <https://www.aviva.com/sustainability/reporting/>

Our Insurance Products

We are conscious of the human rights risks which can occur from the design and provision of insurance products as well as during the design and delivery of the end-to-end customer journey.

We have governance in place to ensure our products and propositions consider human rights including:

- 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 consumers in their target market, particularly consumers with protected characteristics as defined under the Equality Act 2010, or other local equivalents.
- Our Business Standard Customer Experience requires Business Units to have in place a vulnerable customer definition and policy.





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.

We build strong working relationships with our suppliers to ensure we deliver the highest level of customer service and manage any risks effectively. To this end we conduct detailed due diligence in evaluation, selection, and review of suppliers. This includes our ethical supplier assessments. Part of this process asks our suppliers to agree to abide by our Aviva Third Party Business Code of Behaviour¹⁷ 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 its 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. We reserve the right in our supply contracts to take action and if necessary, end the business relationship if modern slavery and related abuses are identified in our supply chain.

¹⁷ Aviva Third Party Business Code of Behaviours can be found on <https://www.aviva.com/sustainability/reporting/>

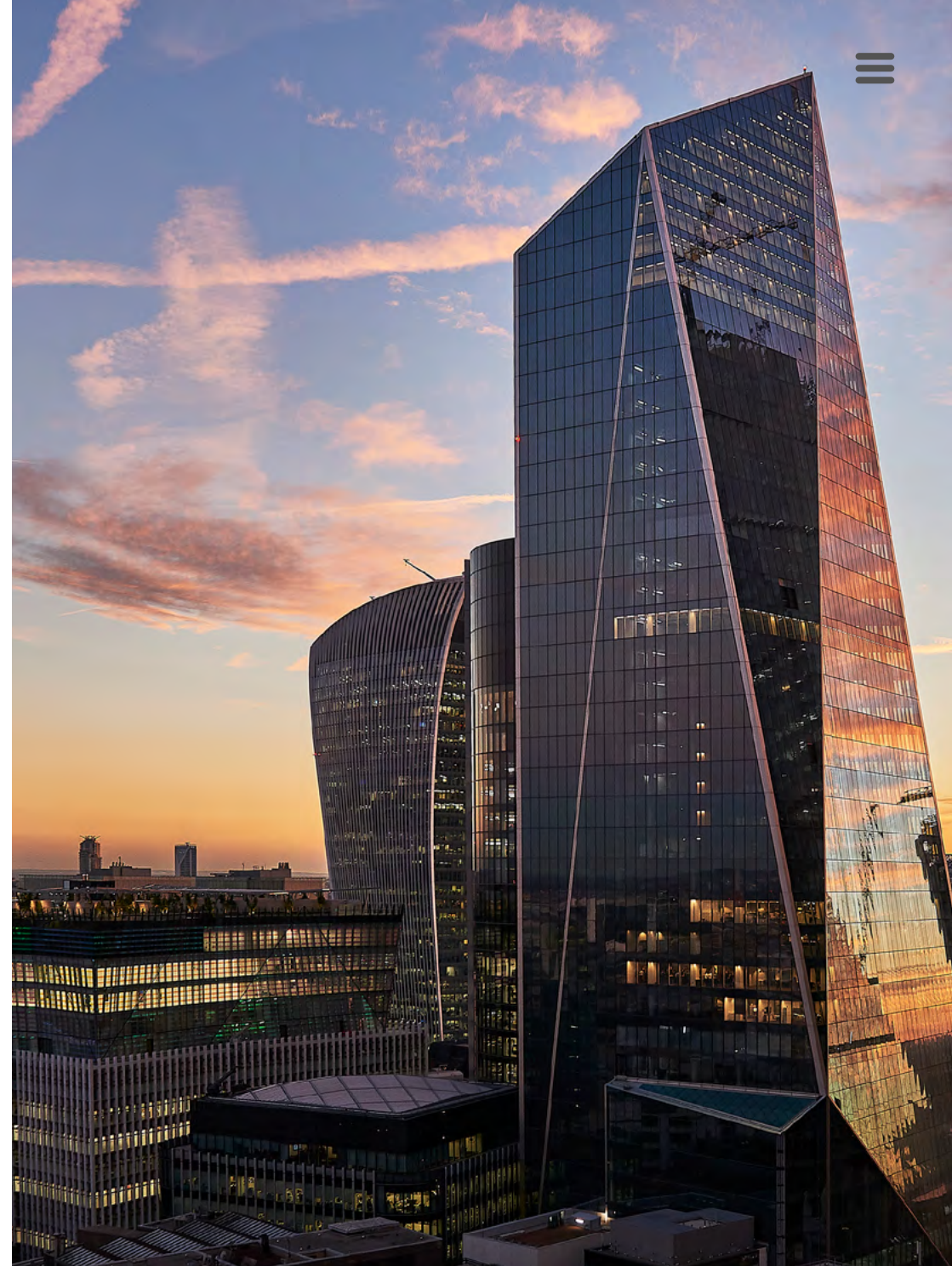
Our Investments

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 them, 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 real assets). 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 Baseline Exclusion Policies.¹⁸ 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 our Responsible Investment Philosophy and 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 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 real asset investments. The extent to which research informs our investment view and engagement expectations will depend on individual investment strategies.

For real assets, Aviva Investors integrates human rights considerations during the due diligence phase of new transactions and 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 for certain sectors, assets or counterparties that are particularly exposed to human rights risks.

See the Appendix for more information on our research and integration work.

¹⁸ <https://static.aviva.io/content/dam/aviva-investors/main/assets/about/responsible-investment/downloads/esg-baseline-exclusions-policy.pdf>
<https://static.aviva.io/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-ESG-Investment-Baseline-Exclusions-Policy.pdf>



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-risk¹⁹ 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, we 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 pillars of Aviva Investors' voting policy²⁰. The policy states that we will 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 includes taking into consideration the findings of key global initiatives which measure and track company performance, such as the Corporate Human Rights Benchmark and the World Benchmarking Alliance, as well as research and information from relevant third parties such as journalists, civil society, and trade unions.

Aviva Investors also engages with sovereign issuers, in recognition of the state's duty to protect human rights and reflecting a belief that adhering to the UNGPs is essential for the safeguarding of investments and delivery of long-term returns for clients²¹.

In line with the UNGPs and OECD Guidelines for Multinational Enterprises and the associated guidance for institutional investors²², 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.

¹⁹ 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.

²⁰ <https://static.aviva.io/content/dam/aviva-investors/main/assets/about/responsible-investment/our-approach-to-responsible-investment/downloads/2023-voting-policy.pdf>

²¹ Aviva Investors included Business and Human Rights as a sovereign engagement priority for the first time in 2022, urging finance ministers to support the development and implementation of National Action Plans.

²² <https://mneguidelines.oecd.org/RBC-for-Institutional-Investors.pdf>

Macro stewardship

We recognise that endemic human rights issues are also partly due to market failures – market-wide and systemic risks that have the potential to undermine the long-term health and stability of financial markets and society at large. As responsible stewards of capital we also need to act as stewards of the markets into which our clients' capital is invested and therefore recognise the need for government and regulatory action to bring about the necessary policy changes to correct market failures that are at the root of human rights harms.

Our macro stewardship team engages with governments and regulators, particularly in our key markets, to call for policy action such as mandatory disclosure on human rights issues, directors' disqualification and mandatory human rights and environmental due diligence. We also work with civil society and other experts to inform our approach and to support collective calls for greater government intervention.

We support a race to the top in implementing the highest standards of protection for human rights, particularly in the context of the responsibilities of business. At a national level, we believe this should include the development and implementation of National Action Plans that embed the three pillars of the UNGPs.

We will continue to engage with governments on their human rights obligations and collectively address human rights risks and impacts.

Looking forward:

Although we have taken several steps to integrate human rights considerations in our investments, more remains to be done, such as enhancing our human rights due diligence and continuing to assess the outcomes of this process to inform successive revisions of this policy and determine our commitments for the future.²³

²³ In line with the UNGPs and growing expectations of institutional investors, Aviva Investors will continue to strengthen its approach to managing human rights risks associated with our business. In 2023, we will be assessing our existing activities to identify gaps across our corporate bonds, equity, sovereign and real asset portfolios.



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.

Disclosure of Human Rights Performance

We ensure that we report on our human rights performance in line with the expectations set out in the UNGPs and in accordance with relevant benchmarks and frameworks 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, and 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, governments, memberships, charitable organisations, industry peers, other likeminded organisations, NGOs²⁴ 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,²⁵ 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 investors²⁶
- Use the leverage that working in coalition with other investors or stakeholders to engage companies to improve their human rights practices²⁷
- 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.²⁸

²⁴ Non-Governmental Organisations.

²⁵ Including legislation, soft laws, and industry standards.

²⁶ E.g., Corporate Human Rights Benchmark and the World Benchmarking Alliance. Both organisations benchmark companies on their policies and practices, to drive up standards.

²⁷ 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/>

²⁸ Examples of this approach include: our work with partners including the Home Office Business Against Slavery Forum and the UN Global Compact UK Network, seeking feedback on this policy from external experts such as Business for Social Responsibility (BSR)





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.

- Sustainability Business Standard
- People, Internal Control Customer Experience Procurement and Outsourcing Business Standard
- Health, Safety and Security Business Standard
- Diversity and Inclusion Policy
- Aviva Data Privacy Business Standard
- Health and Safety Business Standard
- Customer Experience Business Standard

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

Our Codes, Policies, Business Standards, and statements available on Aviva.com

- [The Aviva Business Ethics Code 2022| Living our values](#)
- [Global Voting Policy](#)
- [Responsible Investment & The Stewardship Funds](#)
- [Modern Slavery Act Statement](#)
- [Diversity, equity, and inclusion](#)
- [Aviva Third party Business Code of Behaviour](#)
- [Aviva Investors Stewardship Statement](#)
- [Aviva Investors Responsible Investment philosophy](#)
- [The Speak Up Charter](#)
- [Biodiversity Policy](#)
- [Climate Transition Plan](#)

Some of our commitments supporting human rights

- The Race at Work Charter²⁹, we are signatories and in 2020, we published a “Black Lives Matter” action plan to support our colleagues, educate our people, assess our wider impact on society and help address root causes of discrimination³⁰.
- 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 employer³¹ 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. As part of our sovereign engagement, we wrote to the finance ministers of thirty-five countries in January 2022, encouraging them to actively contribute to the development and implementation of National Action Plans on business and human rights, drawing on UN guidance, as a core element of creating a positive environment for responsible business and sustainable GDP growth.

Internal Working Groups

Aviva has established six global employee resource groups called the “Aviva Communities”³², 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.

Aviva Investors – Research and Integration – further information:

- Corporate and Sovereigns: Analysts use information from a range of sources, such as ESG data providers, company reporting and direct dialogue, stakeholder dialogue and research (trade unions, civil society groups, journalists), NGO benchmarks and analysis.

This information is used to improve our understanding of an issuer’s human rights risks and impacts, including salient human rights issues in the case of corporates, to inform our investment view and determine our engagement/ stewardship expectations. ESG teams also work closely with investment colleagues so that human rights considerations (alongside other issues such as governance, climate change and biodiversity loss) are considered as part of the fundamental research process and investment decision-making.

- Real assets, Aviva Investors integrates human rights considerations during the due diligence phase of new transactions and on an ongoing basis to ensure that we are actively addressing human rights risks and impacts. This involves ensuring that the proposed transaction or project does not breach our firmwide Baseline Exclusions Policy and assesses transactions against criteria in the ‘Asset/ Counterparty Social & Stakeholder Risk’ and ‘Social & Employee Matters’ sections of our Real Assets ESG tool. These sections assess whether the counterparty or borrower for each proposed deal is aligned with the UNGPs, including with policies and processes in place relating to human rights, and discloses information on their wider human rights performance. Additional due diligence is required and conducted at the ESG referral stage for certain sectors, assets or counterparties that are particularly exposed to human rights risks.

²⁹ For more information on our support to the Race at Work Charter please visit our “ Diversity and Inclusion” section on Aviva.com: <https://www.aviva.com/about-us/diversity-and-inclusion/>

³⁰ For more information on our support to the ‘Black Lives Matter Movement’ and our action plan please visit our “Black Lives Matter action plan” section on Aviva.com: <https://www.aviva.com/about-us/black-lives-matter-action-plan/>

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/>

³² For more information about the Aviva Communities, please visit <https://www.aviva.com/about-us/aviva-communities/>



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