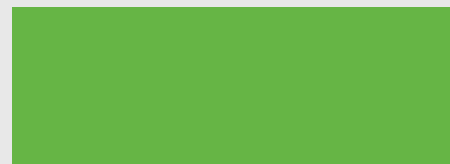
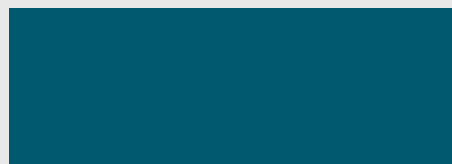
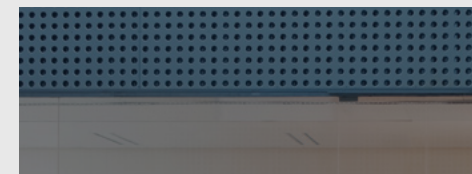
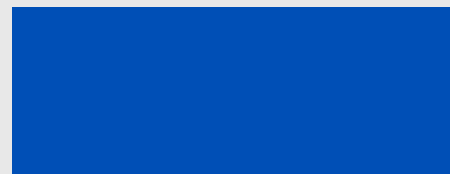
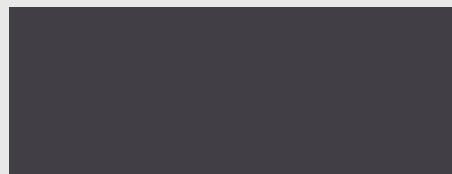


Aviva's Modern Slavery and Human Trafficking Statement 2021

In line with the requirements of the Modern Slavery Act 2015 (the “Act”), this statement outlines the steps Aviva plc (‘The Group’ or ‘We’) has taken during the financial year ending 31 December 2021 to prevent any form of modern slavery from occurring within our business operations and supply chain.

Modern Slavery forced or compulsory labour, servitude and human trafficking are severe violations of fundamental human rights and freedoms. We are fully committed to respecting human rights, ensuring we do not infringe the rights of others and addressing any risk or instance of modern slavery within our operations and supply chain as set out in the **United Nations Guiding Principles on Business and Human Rights** (UNGPs). We fully 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 are also a signatory of **the United Nations Global Compact** and report annually against their ten Principles.

Our purpose at Aviva is to be ‘with you today for a better tomorrow’. Acting responsibly is vital to achieving that purpose. Doing the right thing is essential for our customers, our employees, and our business. Our work to address modern slavery and human trafficking is fundamental to this and to our wider approach to respecting human rights. In line with Aviva’s values and principles detailed in the Aviva Business Ethics Code 2021, we are committed to contributing to the eradication of modern slavery.





Our organisation

The Aviva Group

We are the UK's leading Savings, Retirement, Investments and Insurance business, helping 18.5 million customers across our core markets of the UK, Ireland and Canada. To make the most out of life, plan and have the confidence that if things go wrong, we'll be there to put it right.

In the UK we are one of the largest insurers and the number one provider of workplace pensions. Aviva's diverse workforce includes over 22,000 colleagues, with almost 16,000 in the UK, working across different locations including London, Norwich, Bristol, Manchester, York, Perth, Sheffield, Birmingham, Worthing, Leatherhead and Glasgow.

Our customers can interact with us in several ways: online, by phone, through brokers, financial advisers, strategic partners and price comparison websites.

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



Globally we work with around 4700 suppliers across the countries we operate in to procure products and services for Aviva and for our customers. We also outsource a range of operational functions and activities including asset management, policy administration, claims handling, finance and IT. Our service providers are predominantly based in the UK but also in Ireland, Canada, India and China.

Additional details of our business, operations and supply chain can be found in our **Annual Report and Accounts 2021**.

The table below summarises our global business footprint:

Market	Contribution to 2021 Group adjusted operating profit ¹ (£m)	% of employees (Group total)	% of managed suppliers (Group total)
UK & Ireland Life	1,428	39	40
UK & Ireland GI	356	34	13
Canada	406	20	14
Aviva Investors ²	41	5	18
International Investments ³	97	0	15
Other Group activities ⁴	(694)	2	0
Total	2,265	100	100

¹ 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

² Includes operations in the UK, Canada, Ireland, United States, Singapore, Australia, Switzerland, Luxembourg, Germany, Netherlands, Norway and Finland

³ International Investments includes China, India and Singapore.

⁴ France, Italy, Poland, Lithuania, Turkey and Vietnam are classified as discontinued operations. Each disposal was completed during 2021.



Scope of our work

We recognise that the risk of modern slavery exists across our businesses, in the UK and in all other markets where Aviva operates. Our approach aims to go beyond the basic requirements of the Act – we include majority owned Aviva businesses outside of the UK and seek opportunities to influence others in this area. In 2021 we continued to review specific modern slavery risks in the UK, Canada, Ireland and in our joint ventures in India and China and monitored our wider human rights risk across all the countries we operate in.

This year we refreshed our human rights and anti-modern slavery action plan for 2021-2023, based on the findings of the human rights due diligence carried out across all our markets (including joint ventures) in 2021.

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

We understand that the risk of modern slavery is also present within our sub-suppliers. In some cases, the risks within these suppliers may be higher. In 2021, the Coronavirus pandemic limited our access to sub-suppliers and therefore we have focussed our efforts on a few key parties. We will continue to include these in our anti modern slavery work in 2022.

Our policies and standards

We recognise that strong risk policies (“Policies”) and business standards (“Standards”) are crucial to help us uphold human rights and address related violations of those rights, including modern slavery and human trafficking. We believe that our employees, customers, suppliers and the people touched by our business must all be treated with dignity, fairness and respect.

Our Policies are guided by internationally recognised human rights standards⁵. We regularly assess our Policies and Standards to ensure their effectiveness.

⁵ 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.

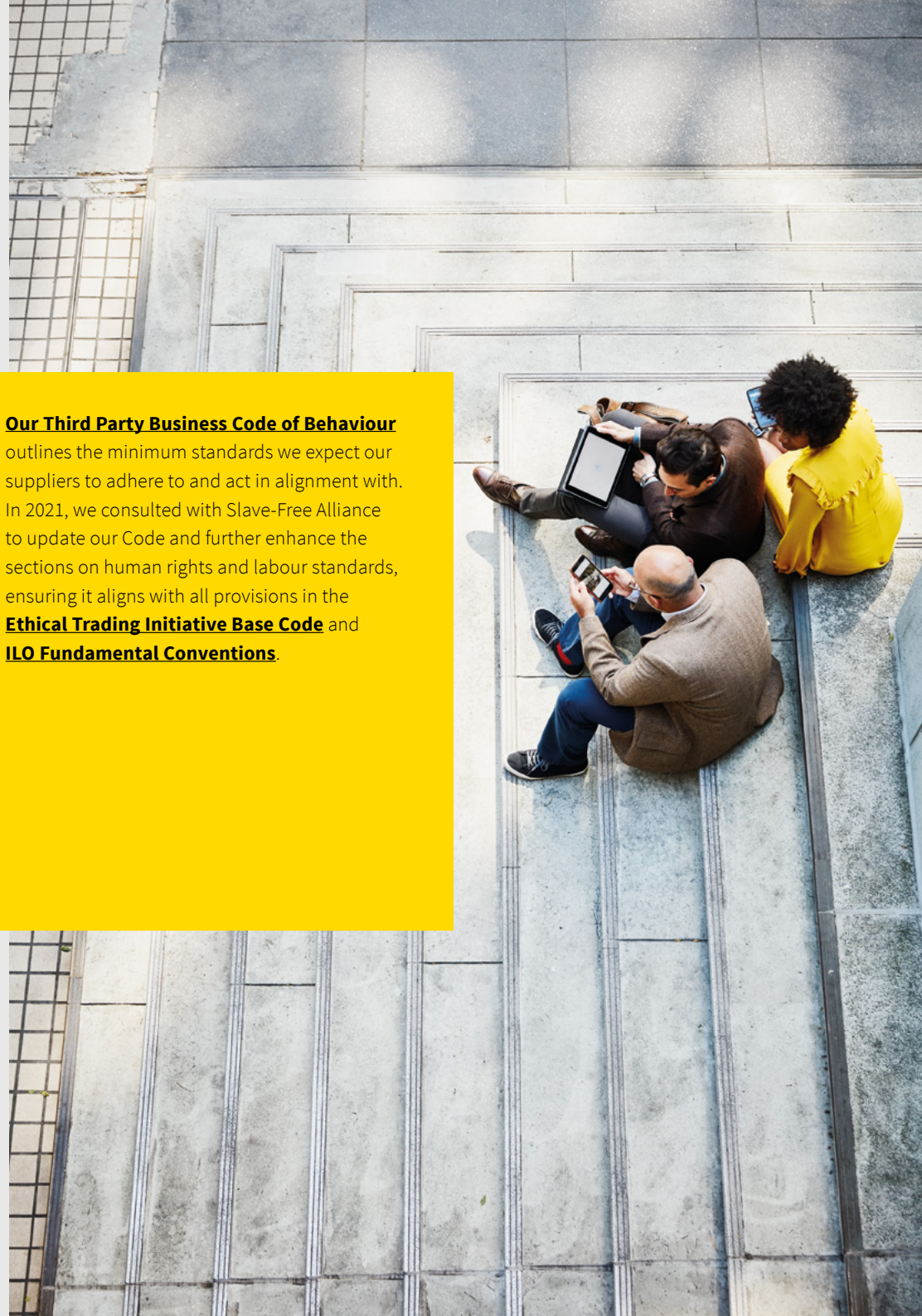


Our Human Rights Policy has been updated this year, in line with our commitment to review our Policies annually and incorporate key developments in the human rights agenda. The Policy defines Aviva's commitment to human rights including, but not limited to, the prevention of modern slavery and the provision of remediation⁶ when necessary, in our operations and supply chains. This Policy has been developed in consultation with internal stakeholders and external experts on international law and human rights. It identifies our main stakeholders, as well as the most salient human rights issues for our business. In 2021 we updated sections regarding Human Rights risk screening and our responsibility to use our influence to promote Human Rights.

Our Business Ethics Code outlines the minimum standards of ethical behaviour required from Aviva employees, guides us to act responsibly and transparently and outlines how to raise any potential violations, including issues relating to modern slavery. Our employees are required to read and agree to adhere to the Code each year. We take this very seriously – anyone who does not sign up to the Code may have any annual bonus withheld or face disciplinary action. We track and report externally on the percentage of employees who sign up to our Code every year and we share the Code with our suppliers to ensure they understand what standard of behaviour to expect from Aviva employees. In 2021, [99.6%] of eligible Aviva employees signed an understanding and acceptance of the Aviva Business Ethics Code.

Our Third Party Business Code of Behaviour outlines the minimum standards we expect our suppliers to adhere to and act in alignment with. In 2021, we consulted with Slave-Free Alliance to update our Code and further enhance the sections on human rights and labour standards, ensuring it aligns with all provisions in the **Ethical Trading Initiative Base Code** and **ILO Fundamental Conventions**.

⁶ In line with the Remedy pillar of the United Nations Guiding Principles businesses have the responsibility to prevent and remediate to any adverse human rights impacts they cause or to which they contribute. Remediation refers to both providing remediation for causing or contributing to cause a negative human rights impact or turning a negative impact into a positive one. More information on the Remedy Pillar of the United Nations Guiding Principles and its applicability: https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf



Our reporting mechanisms



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

Speak Up is a confidential independent reporting service, accessible 24/7. Speak Up is available to Aviva employees, suppliers and third-parties. Concerns can be raised via: **website**, telephone for each business location⁷, via email or by contacting our **Sustainability Team directly**. Modern slavery is stated specifically under a list of disclosures as an issue to report via Speak Up in **The Aviva Business Ethics Code 2021**.

In 2021 we refreshed how Speak Up is communicated to ensure employees are fully aware of how they can raise issues and we reinforced the escalation process. The communications refresh included e-mails sent to business areas/functions from relevant market CEOs, posts on internal communications areas (Yammer and Avivaworld), Leader Essentials communications, office reels and posters in the UK and Canada. The Speak Up Charter was made accessible to third parties and non-employees via **Aviva.com**

In the event of a concern relating to actual or potential abuses of human rights, including modern slavery, being raised, the concern is escalated to the Aviva Group Investigations Team. During 2021, we received 72 contacts through Speak Up, but none were concerns relating to actual or potential abuses of human rights.

This year, we have reviewed the current access to remedy that we provide for human rights and modern slavery issues. The provisions include; our Speak Up malpractice reporting line; our employee complaints, harassment and resolution (sometimes called grievance) procedures; our customer support and complaints helplines; **The Aviva Third Party Business Code of Behaviour** and the requirement for suppliers to provide access to remedy; signposting the reporting channels with our regulators; and the wider criminal and civil proceedings before the ordinary courts which are accessible to all citizens. In 2022, we will continue to consider how we can improve these provisions and raise awareness of them.

During 2021 we consulted across the group to refresh our escalation protocol regarding human rights and modern slavery issues. This helps ensure that the relevant business functions are prepared to investigate, effectively escalate and remediate risks or issues that are raised. We also document the case and any lessons learnt, to help us and our suppliers address root causes and continuously improve our practices.

⁷ Canada 1855 223 2807; Ireland (Eire) 1800 806 186; UK 0800 915 4043; India 000 800 440 1286

Our approach to risk management and due diligence

As a provider of insurance and asset management services, we have evaluated the risk of modern slavery to our direct employees to be low. This is because insurance has not been identified as a key risk sector by current external, publicly available research and almost all our employees work in roles that are low risk e.g., office-based roles, and include roles that require specialist qualifications e.g., accountancy, actuarial, procurement, human resources. This low-risk rating for the Aviva group was reaffirmed by the Slave-Free Alliance in 2021.

We consider that our risks are most likely to be found in our supply chain and we assess for high and medium risk areas in our supply chain. High-risk areas include cleaning, catering and car valeting. Medium-risk areas include manufacturers we buy from, outsourcers (e.g., call centre suppliers), some facilities management providers e.g., office furniture, electrical maintenance, printing services and warehousing. Our approach to risk assessment combines internal expertise, data from our Procurement systems and teams and publicly available research about high-risk sectors and activities. We continue to review and assess our modern slavery risk across the business every year.

Aviva recognises that we can also use our influence to support efforts to prevent and mitigate human rights violations in business relationships with corporate customers, suppliers and third parties. We maintain group-wide procedures for due diligence of customers, employees, suppliers, intermediaries and other third parties that we do business with to ensure that we know who we are dealing with and that these relationships align to our risk appetite and values. These procedures include risk-based background screening that, amongst other things, is designed to identify any known involvement in modern slavery, people trafficking or other human rights abuse.





Our approach in action

What is our approach to recruitment?

In the UK, we manage the risk of modern slavery and related labour rights violations by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. We work with reliable third-party service providers to conduct pre-employment checks. Pre-employment screening and prevention of illegal working policies help us ensure that anyone recruited to work for Aviva in the UK has the right to do so. We perform Criminal Record Checks as part of our pre-employment screening process. Prior to starting employment, each new joiner will be issued with a contract of employment which confirms 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. Markets outside of the UK establish their own pre-employment checks and working patterns, always abiding by local legislation.

What is our approach to group wide due diligence?

In 2021, we concluded our human rights due diligence action plan started in 2020. It included strengthening our anti-modern slavery agenda, raising awareness at all levels of the business and embedding our approach to supplier due diligence across all markets. To ensure delivery of the plan, we held bi-monthly calls with all Markets to support execution of activities.

Human Rights Due Diligence Assessment of all Markets with Slave-Free Alliance

Our Sustainability Business Standard requires us to conduct human rights, including modern slavery, due diligence in all our Markets every two years. We completed a full due diligence assessment in 2021. In collaboration with Slave-Free Alliance, we reviewed and improved our existing question set with a focus on asking intelligence-driven questions that enabled us to gain supporting evidence on Market actions to uphold human rights and address modern slavery risk. The Human Rights Due Diligence Assessment was distributed to our six Aviva Markets (UK, Ireland, Canada, Aviva Investors and our joint ventures in India and China) in August 2021 and we received responses from all. We analysed the responses with Slave-Free Alliance and together we identified areas of best practice to be shared around the group, potential risks to be explored and mitigating actions to be included in our action plan for 2022-2023.

Priority areas for action in 2022 include:

- Going beyond onboarding checks, relationship management and supplier threat assessments to implement enhancements in our supplier management system to proactively, and continuously, assess labour and human rights risks in our supply chain
- Working more with our recruitment and labour agencies on their anti-modern slavery risk management
- Exploring ways to use our People systems proactively to detect modern slavery risk factors
- Continuing to evolve our approach to integrating human rights considerations in investment decisions and our influence as an investor, as we continue to review and share wider best practice internally and externally.

“

Throughout our four-year partnership, Aviva has continuously made strides with its human rights agenda. The Market Human Rights Due Diligence Assessment is part of Aviva's vast commitment to and use its leverage to ensure people in its operations and supply chain are protected and treated with fairness, dignity and respect.

”

Rachel Hartley, Training and Technical Service Manager at Slave-Free Alliance



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

We require our suppliers to forbid any form of modern slavery or forced labour through acknowledging our Aviva Business Ethics Code 2021 and abiding to **The Aviva Third Party Business Code of Behaviour 2021**. We continue to screen suppliers at the onboarding phase and as part of the payment process. This screening is currently also used to check for sanctions violations.

Our Procurement teams work with our suppliers and request they agree to The Aviva Third Party Business Code of Behaviour 2021. When responding to a request for a proposal in the UK we ask our suppliers to agree that our standard clauses on human rights and modern slavery be included in contract. These clauses include reference to the UNGPs remedy pillar, and all markets have guidance on local laws or internationally recognised standards that they can use.

Expectations of our suppliers include:

- Paying eligible employees, no less than the real Living Wage in respect of work provided to Aviva at our premises in the UK;
- Commitment to replying to the relevant anti-slavery and human trafficking questions within Aviva's supplier due diligence questionnaires;
- Commitment to implement due diligence procedures for its own suppliers, subcontractors and other participants in its supply chain in relation to services provided to Aviva to ensure that there is no slavery or human trafficking in 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);
- Requirement to notify Aviva as soon as it becomes aware of a case or potential case of modern slavery in its supply chain; and
- No Zero Hours Contracts; unless the employee or worker has provided his or her positive, expressed consent to enter such a contract and the supplier (or its sub-contractor) can, on request, provide to Aviva written evidence of such employee or worker's consent.

We request new suppliers to notify Aviva if they are required to comply with the UK Modern Slavery Act 2015, and in 2021 we began requesting evidence of their compliance with the reporting requirement of the UK Modern Slavery Act 2015. As per the commitment made in our Modern Slavery Statement 2019, we have now completed checks on a risk based random sample of twelve suppliers to assess compliance with the Modern Slavery Act's requirements.

In December 2021 we agreed to enhance our Ariba Supplier Risk tool to improve our risk and control environment by providing Procurement and Supplier Management professionals with a clear and regularly updated overview of supply chain risks regarding Environmental, Social and Corporate Governance risk factors including labour and human rights issues. We will implement these upgrades in 2022 to improve the speed at which potential supply chain risk can be identified and management actions taken to mitigate any potential risks posed by both direct and indirect suppliers.



Supplier assessments

In 2021, twelve assessments were conducted – three in Canada (Healthcare services and document services), three in Ireland (claims and workplace services), two in India (communications and marketing services) and four in the UK (recruitment, workplace services, claims and UK property). The assessments covered areas such as modern slavery, child labour, labour rights, Health and Safety, Freedom of Association and the Right to Collective Bargaining, discrimination and working hours in alignment with existing established standards (e.g., SA8000 and the ILO principles)⁸. The suppliers⁹ were selected based on spend and sector risk. The supplier assessments were conducted in-house and remotely. The assessment was based on a desktop approach whereby suppliers' existing documentation was assessed to obtain key data on their approach¹⁰. We then provided the suppliers with improvement plans and suggestions, and we are now tracking their progress.

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

- Offering suppliers and their employees' access to our comprehensive business and human rights and modern slavery training
- Requesting them to consider developing a standalone human rights policy
- In some cases, completing supplier risk checks to strengthen or add specific reference to modern slavery and human rights indicators (e.g., checking that employees do not share the same address or bank account, etc.)
- Introducing them to Aviva's approach to Living Hours and asking them to consider adopting this approach.

We also identified some best practice including:

- Becoming members of ethical trading and sustainability organisations
- UK employers signing up to the Real Living Wage Scheme
- Overall good practice in place when it comes to modern slavery for small businesses
- Having a dedicated Health and Safety representative
- Willingness to undertake Aviva business and human rights and modern slavery training
- The presence of robust Codes of Conduct

From our 2020 supplier assessments we closed 14 of the 16 corrective action plans.

⁸ These assessments were developed by our CR Manager who received specific training as a Lead SGS social systems lead auditor; providing the main skills and knowledge required to audit social systems under SA 8000 requirements. The assessments were finalised capturing invaluable insights from our Group Procurement team.

⁹ Tier 1 suppliers are companies that supply parts, products or services directly to another company. They usually supply key product or services to a client company. Tier 2 suppliers are the key suppliers to tier 1 companies in the same supply chain.

¹⁰ This included but was not limited to suppliers' policies, standards, MSA statements, internal risk systems and process details, employee handbook and any other externally shareable documentation.

‘Living Hours’ employer

In October 2020 Aviva 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 2021, Danny Harmer, Chief People Officer, was **quoted** on a press release for the Living Wage Foundation’s (LWF) report on research on low paid work in the UK. Our Property and Facilities Director Stuart Wright was also awarded the Lifetime Achievement award from the LWF in June 2021. During Living Wage Week in November 2021, we expressed public support for LWF and the Living Hours accreditation through **LinkedIn** engagement.

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



Our role as responsible investor



As a founding signatory to the UNPRI (United Nations Principles for Responsible Investment) we recognise and embrace our duty to act as responsible long-term stewards of our clients' assets. We integrate environmental, social and governance (ESG) issues, including human rights issues and modern slavery, into our investment analysis and decisions across asset classes.

In 2021 our UK Life Investment Committee requested an update on our anti modern slavery activity within investment. This committee reviewed the approach of Aviva Investors and our key external investment partners (e.g., Blackrock and Schroders) as well as how we use our influence as a large asset manager to engage with the companies we invest in to drive positive change in their behaviour.

We exercise this influence through research and active ownership, exclusions and driving industry change. Below are examples of some of our investment actions on human rights including modern slavery:

- We support and use the Corporate Human Rights Benchmark (CHRB), which we helped found in 2013, to assess companies' performance on how they embed human rights, including tackling modern slavery.

We include the CHRB results in our ESG research and voting policy to ensure we hold companies that scored poorly accountable at their Annual General Meeting (AGM). In 2020 we voted against [97] companies and we were pleased to see that 23 of these have companies have now improved their approach.

- In 2021, we voted against [85] companies due to human rights concerns. We worked with the Investor Alliance for Human Rights to send an investor statement to all companies scoring 0 on all human rights' due diligence indicators, representing over US\$4.5 trillion in assets under management.
- To help ensure FTSE350 companies are meeting minimum requirements within the Modern Slavery Act we collaborated with Rathbones to support the Business and Human Rights Resource Centre's efforts to identify a list of 38 companies who have failed to meet the minimum reporting standards of the Act. We have written to these firms requesting compliance.
- We are also working with the charity fund manager CCLA and a group of investors on the **Find it, Fix it, Prevent it** project which goes beyond minimum compliance of the law and instead focuses on how companies are working to tackle modern slavery in their operations.
- Aviva and Aviva Investors recognise that some human rights issues are market failures and therefore need addressing through government and regulatory action. We engage with governments and regulators, particularly in our key markets, to call for and support policy action to tackle these challenges, such as through mandatory disclosure and mandatory human rights due diligence.

Our governance

Senior Managers and Executive Sponsors

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

Human Rights and Anti-Modern Slavery Working Group

Our collaborative, cross-functional working group continued to meet bi-monthly in 2021. The group contains representatives from Sustainability, Procurement, Supplier Management, Company Secretarial, Legal, Group Investigations, our People (HR) function and Aviva Investors also provide their expert view when required. This group supports the progression of key activities including policy improvement and development, enhancing supplier approach to addressing modern slavery, providing advice on employee training, supporting supplier assessments and training, and ensuring detailed progress against our commitments.





Subsidiary boards

The boards of the Aviva entities identified within scope¹¹ review and approve the information disclosed in this statement.

Board Customer, Conduct and Reputation Committee

This Committee's role is to assist the Aviva Board PLC in shaping the culture and ethical values of the Group through overseeing and advising on customer, conduct, reputation and community matters. All Committee members are independent Non-Executive Directors. The Committee reviews the Human Rights and Modern Slavery action plan, The Aviva Business Ethics Code 2021 and related documents and papers, receives timely updates on progress against the plan and reviews and approves the Aviva Modern Slavery statement before final submission to the Board of Aviva PLC. More information is available [here](#).

Aviva plc Board

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

¹¹ 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, Friends Life Holdings plc, General Accident plc, Gresham Insurance Company Limited, Solus Limited, Sesame 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.

Training for employees¹²

Modern slavery: We have a comprehensive e-learning module, designed in collaboration with Slave-Free Alliance, to help our colleagues understand the link between business and human rights and to raise awareness around modern slavery, its pervasiveness, the role of corporations and their staff in helping tackle it. This training has been rolled out to specific employees directly involved in anti-modern slavery activity within their role including Sustainability, Procurement and Supply Chain, Risk, the People (HR) function, Corporate Affairs and Property & Facilities with [763] global completions since 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 with our future leaders. The training materials address each individual market by providing case studies and dilemmas relating to modern slavery in that context.

¹² 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.





Diversity, inclusion and child safeguarding: We have a Fairness and Equality policy in place which, although not directly related to slavery and human trafficking issues, does provide employees with detailed guidance about how to treat protected characteristics and demonstrates our inclusiveness as a workplace. It serves to help reinforce our approach to safeguarding the rights of all employees. All subsidiary boards have noted our Diversity and Inclusion policy for 2021. In 2021, we launched Aviva Anti-Racism training for employees. To date, 95% of Aviva employees have voluntarily completed the training and we will refresh the training annually.

During 2021 we have also consulted with an external child rights expert to refresh our child safeguarding code and support the development of an e-module, which was rolled out to all Aviva Markets.

Training for suppliers: Since 2020 we have expanded the training we make available to our suppliers. We worked with our e-learning function to share our comprehensive Business and Human Rights and Modern Slavery training. This included small and medium enterprises who would not have the capability to access training for their employees. We will continue to explore how we will share our Modern Slavery-related resources with suppliers and third parties in 2022.

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.

UK Government Home Office Business

Against Slavery Forum: We have continued our membership of Business Against Slavery Forum (BASf), a partnership between Government and businesses championing the anti-modern slavery agenda. In October 2021, we led a BASf session to share our insights and learnings from developing human rights and anti-modern slavery KPIs. We were also active participants in the BAS CEO Forum in July 2021.

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 Modern Slavery.

UK Living Wage Foundation: Aviva has been a principal partner and key supporter of the Living Wage Foundation since 2014 and continues supporting the Global Living Wage Initiative. We are one of the first accredited Living Hours employers and in 2021 we are working with others to progress Living Wage Places and Living Pensions in the UK and globally.

Slave-Free Alliance:¹³ This year we renewed our membership with Slave-Free Alliance to continue our commitment to addressing the risk of modern slavery in our operations and supply chains. Together as 'critical friends', we conducted due diligence on our Markets, reviewed our approach to supplier remote audits and updated the Aviva Third-Party Business Code of Behaviour to further enhance the sections on human rights and labour standards. They have also acted as a trusted partner in drafting this statement.

¹³ The Alliance is managed by Hope for Justice, an international charity which aims to end human trafficking and modern slavery.

Our key performance indicators and future plans

We recognise that it is not easy to quantify and measure some of the outcomes and impacts regarding our approach to human rights and efforts to tackle modern slavery, as these are multi-dimensional issues. We are committed to further enhancing our key performance indicators (KPIs). The KPIs below help summarise some of the activities, efforts and progress we made in 2021:

- **Number of cases of modern slavery discovered at Aviva or in our supply chain via our due diligence work and assessments [0]**
- **Number of modern slavery or related complaints actual or alleged raised via formal or informal channels: [1]**
- **Number of speak-up cases related to Modern slavery or related issues: [0]**
- **Number of modern slavery threat assessments conducted on high-risk suppliers [12]**
- **Number of corrective action/improvement plans shared with suppliers which are completed [10]**
- **Number of corrective actions/improvement plans shared with suppliers which are being monitored [14]**

- **Number of markets that underwent a human rights impact assessment [6]**
- **Number of markets provided with an action plan to further improve their approach to human rights [6]**
- **Number of markets who have received anti-modern slavery training: [6]**
- **Number of key employees who were trained on Business and Human Rights and Modern Slavery in 2020: [501]**
- **Percentage of UK, Ireland and Canada registered suppliers that have agreed to The Aviva Third Party Business Code of Behaviour [99.4%]**

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





Our process and the steps followed to issue this statement

The boards of the Aviva entities identified within scope have reviewed and approved this statement¹⁴. The Aviva plc Board reviewed and approved this statement on the 9th May 2022 and the Group CEO signed the statement on behalf of Aviva plc.

A. Blanc

Amanda Blanc

Aviva plc CEO

London, 17/05/2022

¹⁴ A member of Aviva Sustainability team, and or a member of our Cossec 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 2021*, please contact our CR team: [**crteam@aviva.com**](mailto:crteam@aviva.com)