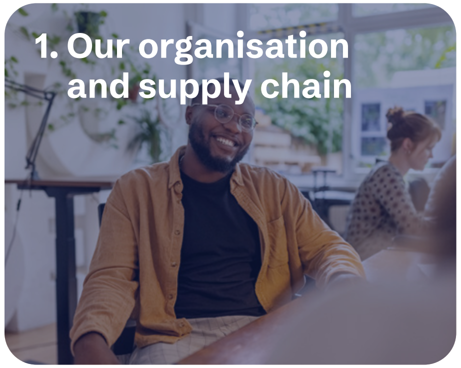
Aviva's Modern Slavery and Human Trafficking Statement 2023

AVIVA

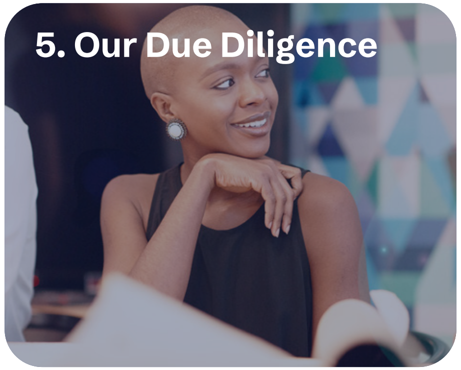
2023 Modern Slavery Statement

In line with the requirements of the Modern Slavery Act 2015 (the "Act") and in accordance with section 54 of the Act[1] this statement outlines the steps Aviva plc ('The Group' or 'We') has taken in the past twelve months (financial year ending 31 December 2023) to prevent, and if ever found occurring, to address any form of modern slavery within our business operations and supply chain. This statement applies to Aviva plc and its subsidiaries that are required to publish an annual statement by the UK Modern Slavery Act 2015. This is the eighth statement that we have issued.

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








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

Our organisation and supply chain

We are the UK's leading Insurance, Wealth and Retirement businesses, with 19.2 million customers in the UK, Ireland and Canada. We also have international investment in China and a joint venture in India.

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

Aviva's diverse workforce includes around 22000 colleagues, with approximately 16000 in the UK, working across different locations including London, Norwich, Bristol, Manchester, York, Perth, Sheffield, Birmingham, Worthing, Leatherhead and Glasgow. More information about our business can be found **here**.

Globally, we have an active supplier base of more than 3000 suppliers and third parties across the countries we operate in providing products and services for Aviva and for our customers, which includes a range of outsourced operational functions and activities. We collaborate with suppliers to play our part in the eradication of modern slavery.

Additional details of our business, operations and supply chain can be found in our **Annual Report and Accounts 2023**.

The table below summarises our global business footprint:

Market	Contribution to 2023 Group adjusted operating profit[2] (£m)	% of employees (Group total)	% of managed suppliers (Group total)
Insurance, Wealth & Retirement	994	37	15
UK & Ireland GI	452	33	45
Canada GI	399	18	17
Aviva Investors[3]	21	4	10
International Investments[4]	63	6	-
Other Group activities	(462)	2	13
Total	**1,467**	**100**	**100**

[2] 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

[3] Includes operations in the UK, Canada, Ireland, United States, Singapore, Australia, Switzerland, Luxembourg, Germany, Netherlands, Italy and France

[4] International Investments includes China, and India.

Our Policies and Standards related to modern slavery

In 2023, we continued to review and monitor our human rights risks, which include risks of modern slavery, across all the countries that we operate in: UK, Canada, Ireland, India and China.

We recognise that robust risk policies ("Policies") and business standards ("Standards") are crucial to help us uphold human rights and prevent modern slavery. Our Policies are guided by internationally recognised human rights standards[5]. We regularly assess our Policies and Standards to ensure their effectiveness, working with internal subject matter experts and external partners.

[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 During 2023, we reviewed our Human Rights Policy to incorporate new developments. The Policy was reviewed in consultation with internal stakeholders and an external expert on business and human rights. The Policy includes our human rights governance, and our commitment to respect the human rights of others including our employees and other rights-holders impacted by our underwriting, our investments, and our purchasing practices. We continue to monitor implementation of group policy across markets and activities. We will continue to conduct further review of our human rights policy in 2024.

Our Aviva Business Ethics Code The Code is reviewed annually and the latest version will be published in Q1 2024. The Code sets out a practical set of principles and the minimum standards of ethical behaviour required from Aviva employees. The Code requires employees to abide at all times by the principles set out in the Code (as must Directors and officers, contractors and temporary staff, contingency workers and other persons acting on behalf of Aviva and its subsidiaries). The Code requires us to act with integrity, responsibly, transparently, and encourages our people and the people we work with to report unethical and illicit behaviour, including raising any issues relating to modern slavery.

Our directors and employees are required to read and agree to adhere to the Code each year. We track and report externally the percentage of employees who have read, understood, and accepted our Code annually. In 2023, 99.4% of our employees signed an understanding and acceptance of the Code. Our Aviva Business Ethics Code can be found **here**.

Our Third Party Business Code of Behaviour The Code outlines the minimum standards that we expect our suppliers to adhere to, as well as our commitment to ensure that individuals and communities have access to remedy for any human rights and modern slavery harm linked to our operations and value chain. In 2023, we refreshed our Third-Party Business Code of Behaviour, where we added new sections on Our Customers, Gifts and Hospitality, as well as Whistleblowing.

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

We track annually the number of our registered[6] suppliers who have agreed to abide by the principles detailed in our Code. In 2023, 99.83% of suppliers in the UK, Canada and Ireland agreed to abide by the provisions of our Code.

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

Our reporting mechanism

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

Speak Up is Aviva's whistleblowing service that provides confidential and secure channels to raise concerns, including anonymously. There are internal and external channels for reporting concerns, all of which are received and triaged by our dedicated Speak Up team. Concerns can be raised directly to the Speak Up team at **speakup@aviva.com**. Alternatively, concerns can be raised anonymously via our third-party provider EthicsPoint at AvivaSpeakUp.ethicspoint.com (available 24/7). Modern slavery is specifically stated as an issue to report via Speak Up. Each year the Aviva Subsidiary boards, and the Audit Committee of Aviva plc receive an annual Speak Up report noting case volumes and case categorisation to ensure oversight of any reported issues. We do not tolerate retaliation against anyone who raises a genuinely held concern.

Throughout 2023, we continued to roll out our 'Speak Up and Listen Up' campaign to help our people feel empowered and confident in the Speak Up service. We committed to increasing the visibility of the team and delivered in person roadshows across UK & Ireland. Enhancing our internal Speak Up site and building wider networks with our core markets including our subsidiaries has continued to make a positive impact on our 2023 VoA Results; with 87% of our people feeling safe to raise concerns, in comparison to 85% in 2022.

In the event of a concern relating to human rights, including modern slavery, being raised, the concern is escalated to the Aviva Group Investigations Team. During 2023, we received one report alleging a breach of human rights via Speak Up, with none related to actual or potential abuses of modern slavery or forced labour cases.

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

Our approach to risk assessment and management

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

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

Like other peers within the financial sector, our risk of contributing or being linked with modern slavery is higher within our investment portfolios. We aim to continue strengthening our risk-based approach to avoid and prevent adverse human rights impacts. We are progressing with our human rights saliency assessment to continue mapping out the human rights risks on our operations and supply chain, and to prioritise areas where we have the highest risk exposure to negative human rights impact, including modern slavery, across our underwriting and investment activities.

We also have a certain degree of exposure to forced labour practices in our supply chain, especially where we source services and goods produced by manual labour. Higher-risk areas include cleaning, catering, car valeting, and manufacturing where we source white goods to support our insurance claims activities. Medium-risk areas include manufacturers we buy from, outsourcers (e.g., call centre suppliers) and some facilities management providers (e.g., office furniture, electrical maintenance, printing services, facilities management, construction, manufacturing, logistics and warehousing).

Our approach to risk assessment combines internal expertise, data from our Procurement systems and teams such as the review of suppliers' independent assessment tool score, and publicly available research.

We are requesting more data from our suppliers to enhance our understanding of forced labour risks within our supply chain based on their sector, countries in which they source their goods (i.e., our Tier 2 suppliers), as well as their sub-contracting practices through our Supplier Risk tool as part of our effort to map our modern slavery risk exposure throughout the supply chain.

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 the contract.

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

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

Tackling modern slavery expectations for Suppliers include:

- Support Aviva's anti modern slavery commitment by replying to the relevant anti-slavery and human trafficking questions contained within Aviva's supplier due diligence questionnaires.
- Commitment to implementing due diligence procedures for its own suppliers, subcontractors, and other participants in its supply chain in relation to the services provided to Aviva to ensure that there is no slavery or human trafficking in its supply chain.
- Providing training on modern slavery for relevant employees (e.g., those that are responsible for the recruitment of staff and/or the procurement of goods and services), this requirement is communicated and emphasized to suppliers participating in our annual modern slavery risk assessment.
- A requirement to notify Aviva as soon as it becomes aware of a case or potential case of modern slavery in its own operations or supply chain.
- Publish an annual Modern Slavery statement if they meet the criteria set by the legal requirement.

Our Due Diligence

Our Sustainability Business Standard requires us to conduct human rights, including modern slavery, due diligence in all our businesses every two years. It covers our Aviva businesses which include UK, Ireland, Canada, Aviva Investors, and our investment in India. We completed a due diligence assessment in 2023, where we reviewed our internal systems and processes to identify, prevent and mitigate, and remediate instances of human rights abuse such as modern slavery, to provide overview of potential gaps to meet international standards and emerging external good practice. Deeper understanding and identification of modern slavery and human rights risks has been highlighted as the main gap, therefore, we are prioritising human rights saliency assessment in 2024. We continue our engagement with wider internal stakeholders to improve other areas highlighted by the due diligence and strengthen our systems to safeguard human rights in 2024 and 2025.

We also engaged our subsidiaries during the 2023 human rights due diligence. We reviewed Sesame Bankhall Group (SBG) practice to safeguard human rights and prevent occurrence of modern slavery. SBG has low risk of modern slavery in their direct employment practice since their core business rely on knowledge-based activities where employees are required to have specialist qualifications. SBG is a living wage employer in the UK and the Company's supplier contracts include a commitment by the supplier to pay their eligible employees not less than the Living Wage in respect of work provided to the Company at its premises in the UK. In 2024, we plan to conduct further assessment of SBG’s value chain to understand areas where modern slavery risks might be more prevalent.

Our Employees

In the UK, we manage the risk of modern slavery by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. We work with third-party service providers to make sure all our people go through a vetting process by conducting pre-employment checks. Prior to starting employment, each new joiner will be issued with a contract of employment which confirms that they will be contracted to work either a standard or non-standard working pattern with "standard" working hours. Standard working hours are set out in our contracts of employment as 1827 hours annually for a full-time person which is an average of 35 hours per week. Our businesses outside of the UK establish their own pre-employment checks and working patterns, always abiding by local legislation. Despite our operations being rated low risk we are adding an extra level of due diligence for our own employees. We are undertaking a review of duplicate bank accounts (3 or more people using the same account details) as well as shared addresses.

These checks will be performed within our UK businesses with the aim of extending the approach to all our core businesses. Sharing bank accounts, addresses or telephone numbers can be a red flag as they may be an indication of unethical behaviour and can be linked to modern slavery. We performed some checks at the end of 2023, and we have found no concerns.

As part of our 2023 due diligence, we also reviewed our third-party recruitment agencies' practices. Within this dialogue we confirmed their low-risk status and alignment with employer pays principle, given no recruitment fees are charged to potential candidates, no false promises made, and all terms and conditions are disclosed at the recruitment stage. We expect the same practices from our suppliers when they engage recruitment agencies, particularly when recruiting operational-level employees in high-risk sectors.

‘Living Hours’ employer

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

In October 2020, Aviva also became one of the first two UK organisations to receive accreditation as a Living Hours employer. We continue to uphold the Living Hours standard aimed at reducing the pressures of constant uncertainty over hours and pay by encouraging employers to provide workers with security of hours alongside a real Living Wage. We are committed to ensuring that in addition to the real Living Wage, our eligible direct employees in the UK are: (1) provided with at least four weeks’ notice of shifts; and (2) have a contract that accurately reflects hours worked, while offering a guaranteed minimum contract of 16 hours a week.

In 2023, Karen Paterson (Aviva Group Property Director based in Group Sourcing) joined the Living Wage Foundation Advisory Council. Aviva continues to engage closely the Living Wage Foundation and other organisations to test proposals for introducing a Living Pension.

For more information on our approach to becoming a ‘Living Hours’ employer please visit our update on **Aviva.com**

Our Supply Chain

20 suppliers participated in our additional 2023 Modern Slavery threat assessment process. It covered our operations across the UK, Ireland, Canada, India, Aviva CofCo China, and our subsidiaries Solus and Succession Wealth. Suppliers fall into the following sectors that have been identified as high-risk: car repair, recruitment agency, IT hardware, software, and service provider, security and housekeeping manpower providers, scrap metal merchant, clothing and merchandise providers, and emergency construction services.

The assessments were conducted through management interviews and document reviews to evidence suppliers' practices. Using risk-based approach, we excluded professional service suppliers such as strategy consultancy and legal service providers. We assessed suppliers based on modern slavery risks link to their sector, geographical location, and reliance on manual labour where potentially vulnerable workers might be present e.g., low-skilled migrant workers.

In addition, we also enhanced our modern slavery due diligence this year by:

- Focusing on our suppliers' recruitment and employment practices guided by the ILO 11 Forced Labour Indicators[7]. We specifically focus on forced labour indicators linked to recruitment activities such as debt bondage and deception where low-skilled migrant workers are present at the suppliers' operation and recruited through third-party agencies. Our assessment found that all Tier 1 suppliers assessed in 2023 recruit low-skilled workers directly. In 2024, as part of our risk mapping exercise, we are requesting our suppliers to provide information related to their engagement with third-party recruitment agency.
- Assessing the suppliers' responsible purchasing practices where outsourcing is identified.
- Assessing suppliers' grievance mechanism policy to understand presence of anonymous channel for workers to report their grievances without fear of retaliation.
- Assessing four Tier 2 suppliers. This includes reviewing 2 independent semi-announced Sedex Members Ethical Trade Audit (SMETA)[8] audit reports of Solus' suppliers in which worker voice forms a key part of the assessment.
- Conducting an announced site visit assessment to one of our Tier 2 suppliers and one of our car repair facilities, as part of our high-risk direct operations.

We categorise suppliers into three areas based on risk identified during our assessment:

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

Our preferred approach if performance is poor is to collaborate with suppliers and to enable remedy as part of a corrective action plan. We also make recommendations to improve suppliers' practice even where no current violation is present to reduce likelihood of human rights violations. The table below summarise our 2023 supplier due diligence results.

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

[7] ILO indicators of Forced Labour
[8] SMETA (Sedex Members Ethical Trade Audit) is one of the most widely used format for social audits, enabling businesses to assess their sites and suppliers to understand working conditions in their supply chain.

Forced Labour Risk Category	Number of suppliers	Summary	Remedy and recommendations
Low	16	16 out of 20 suppliers assessed in 2023 have low forced labour risk. This is based on the low prevalence of potentially vulnerable workers and good management systems to prevent instances of modern slavery. Despite the low risk, we made recommendations to further improve their recruitment, employment and responsible purchasing practices.	Examples of recommendations we made to low-risks suppliers were: - Ensure adoption of a zero recruitment fees approach during recruitment of operational level workers, especially when recruiting low-skilled migrant workers through third-party agencies. - Ensure all sub-contractor workers have access to the sites' anonymous grievance channels. - Review and adopt relevant clauses under the Model Contract Clauses (MCCs)[9]. MCCs are designed to integrate human rights due diligence principles into every stage of the supply contract, recognising responsibilities of the buyers and the site.
Medium	2	We found two suppliers with medium forced labour risk due to the combination of the following: - use of sub-contractors in high-risk sectors such as construction. - lack of requirements for, and monitoring of, their sub-contractors' employment practices.	We have requested suppliers to improve visibility by monitoring employment practices of their subcontractors. We also suggested including responsible employment clauses in their agreements with sub-contractors.
High	2	We identified non-compliance in two suppliers based in India that provide services to our joint venture in India. Both suppliers do not compensate workers' wages for time spent to participate in mandatory training. Training was conducted before workers' placement at Aviva India office buildings. In addition, we found one supplier deducted and withheld part of workers' wages to prevent them from resigning before the end of their contract. We have communicated to the suppliers that if not addressed, these practices might lead to higher risks of forced labour under the indicator of withholding of wages and restriction of movement.	We have requested these suppliers to change their practices. We have ensured that all time spent for training during their assignment at Aviva India's office buildings have been properly compensated. We instructed the suppliers to compensate workers on all time spent on mandatory training before they are assigned at Aviva India office buildings. We have confirmed that everyone working at Aviva India office buildings do not experience any withholding of wages. We communicated our expectations to the supplier and have obtained their commitment to discontinue the practice of withholding workers' wages. We will be monitoring this practice closely going forward by engaging the workers who might be affected by this practice. We will reflect these requirements in our commercial agreements with both suppliers.

[9] https://www.americanbar.org/content/dam/aba/administrative/human_rights/contractual-clauses-project/mccs-full-report.pdf

Our assessment identified some suppliers' best practice examples including:

- Payment of living wages to all workers employed at the site.
- Availability of updated supply chain mapping against their forced labour risks.
- Regular social compliance audits conducted by SMETA as an independent third-party expert.
- Inclusion of mandatory human rights assessment before onboarding new suppliers.
- Responsible Business Alliance (RBA) membership and adopting their Code of Conduct (CoC).
- Conduct regular visits to key suppliers, which include workers' welfare dialogue.
- Engagement with workers' union and updated Collective Bargaining Agreements (CBA).

We continue to request that new suppliers notify Aviva if they are required to comply with the UK Modern Slavery Act 2015. As in previous years, we have continued requesting evidence of compliance with the reporting requirements of the UK Modern Slavery Act 2015. In line with the commitment made in our previous Modern Slavery Statements; we have now completed checks on a risk based random sample of 8 suppliers to assess compliance with the Modern Slavery Act's requirements.

From our 2023 supplier assessments we closed 6 of the 21 corrective action plans and opened 12 new corrective action plans to monitor in 2024.

Our Investment

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

We recognise 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.

As a large asset manager, we acknowledge that this commitment involves setting clear human rights expectations for investee companies. It also means building and using our leverage to engage with companies to ensure they prevent and mitigate human rights risks and impacts, including those relating to modern slavery, and provide access to remedy where harms occur. We are committed to integrating human rights standards and frameworks into our investment activities, including decision-making and engagement across all asset classes. As a financial institution, we also recognise that building our leverage may require engaging with other investors, policy makers, and wider stakeholders to address market failures which enable human rights abuses to persist in our society and in our investment portfolios. The 'Our Investments' section of the Aviva Human Rights Policy provides more detail on this work and is available **here**.

Examples of our work with other investors as part of long-term collaborative programmes on modern slavery:

- To help ensure FTSE350 companies are meeting minimum requirements within the Modern Slavery Act, we collaborated with Rathbones and engaged with 29 companies who have failed to meet the minimum reporting standards of the Act.
- Find it, Fix it, Prevent it, coordinated by CCLA, is a collaborative engagement focusing on improving the management of modern slavery risks and impacts in high-risk sectors in the UK. The programme has initially focussed efforts on the hospitality sector and recently expanded its scope to cover the construction. During the year we supported engagement with 4 UK housebuilders.

Both initiatives lean on the expertise of NGO and academic partners, providing timely insights into current trends and helping to ground truth in corporate practices.

Our governance

Senior Managers and Executive Sponsors

The Group Company Secretary is the sponsor of our work on human rights and modern slavery, approving plans and reviewing progress. The Group Company Secretary also helps 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 other key forums). The group Sustainability senior management monitor and review progress against the action plan regularly, ensuring it is resourced appropriately and the implementation is well aligned with corporate priorities, and to sign off specific actions from the plan as appropriate. Progress updates are shared through internal governance forums such as Global Supply Governance Forum and Human Rights Working Group.

Human Rights and Anti-Modern Slavery Working Group

Our cross-functional working group has met quarterly during 2023 and we also further revised its membership. The group is comprised of representatives from Sustainability, Procurement, Supplier Management, Company Secretarial, Legal, Group Investigations, Group Audit, the People function (HR) and Aviva Investors, market representatives from our Canada and Ireland operations, as well as representatives from our subsidiaries; Solus (London) Limited, and Succession Wealth also provide their expert view when required. This group supports the progression of key activities including policy improvement and development, enhancing our supplier approach to addressing modern slavery, providing advice on employee training, supporting supplier assessments and training, and ensuring detailed progress against our commitments. We continuously review the effectiveness of this group to ensure engagement across the organisation, and that key stakeholders are identified and included.

Subsidiary boards

The boards of the Aviva entities identified within scope[10] review and approve the information disclosed in this statement.

The Customer and Sustainability Committee

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

Aviva plc Board

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

[10] The Aviva entities within the scope of "the Act" are: Aviva Insurance Limited, Aviva plc, Aviva Central Services UK Limited, Aviva Employment Services Limited, Aviva Equity Release UK Limited, Aviva Group Holdings Limited, Aviva Health UK Limited, Aviva Investors Global Services Limited, Aviva International Insurance Limited, Aviva Investors UK Fund Services Limited, Aviva Life Holdings UK Limited, Aviva Life & Pensions UK Limited, Aviva Life Services UK Limited, Aviva UK Digital Ltd, General Accident plc, Gresham Insurance Company Limited, Solus (London) Limited, Sesame Bankhall Group Limited, Succession Wealth.

Our training and communication

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

Training for employees[11]

We have a comprehensive e-learning module designed in collaboration with Slave-Free Alliance, to help our employees understand the link between business and human rights and to raise awareness around modern slavery, its pervasiveness, and the role of corporations and their staff in helping tackle it. This training has been refreshed in 2022 to reflect both changes in Aviva and relevant trends in the modern slavery agenda. It has been rolled out to specific employees directly involved in anti-modern slavery activity including those employees in the Sustainability, Procurement and Supply Chain, Risk, the People (HR) function, Corporate Affairs and Property & Facilities teams with 1,127 completions by the end of 2023 since its launch in September 2020. We have made the training available to all employees within the Aviva University and we have shared it with those on our graduate training programme so that this is embedded within our future leaders. The training material has also been shared with our joint venture in India. The training materials address each individual market by providing case studies and dilemmas relating to modern slavery in each jurisdiction.

[11] 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.

Overall enhanced financial sector industry focused training

In 2022, established institutions such as the Independent Anti-slavery Commissioner, the UK National Modern Slavery Training Delivery Group, and Themis, with support from Unseen, RedCompass Labs and Alliance Bernstein joined forces and developed an innovative new anti-slavery digital learning platform[12] for the financial services industry. Aviva plc is working with Themis, and we have identified most relevant modules regarding Modern Slavery risks for our insurance and investment activities. We will adopt and rollout the training internally in 2024.

Awareness raising

We continue to raise awareness across our organisation. In 2023, our internal staff participated in Ride for Freedom's awareness raising activity. Ride for Freedom is an organisation focusing on awareness raising, education, and providing remedy to survivors of Modern Slavery.

Towards the end of 2023, Aviva hosted Net Zero Supplier Summit where we shared key activities, commitment, and progress of our human rights and anti-modern slavery agenda to our suppliers.

Independent Assessment Tool Training

The support from Aviva's Procurement team is essential for a successful sustainable supply chain that helps us manage the risk of modern slavery with our suppliers. Our Procurement team has received training on the use of the independent assessment tool system, including how to access supplier data and scorecards on their ESG (environmental, social and governance) profile, including labour issues, environmental ethics and responsible procurement matters. They are also able to interpret the scorecard results and therefore understand which suppliers are a higher risk for Aviva and need to be monitored more closely, including implementing Corrective Action Plans to achieve improvements. In 2023, approximately 200 employees were trained on the use of the independent assessment tool platform.

During our 2023 suppliers' due diligence, we confirm that the UK-based suppliers participated in the assessment have provided Modern Slavery training to their relevant team members, the trainings are tailored to their business sector and activity.

[12] This training is also accredited by the London Institute of Banking and Finance.

Our collaborations and partnerships

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

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

United Nations Global Compact:
We remain members of the UN Global Compact and an active participant of the United National Global Compact UK Working Group on Modern Slavery sharing insights with other peer organisations

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

Slave-Free Alliance:
In 2023, 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.

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

Ride for freedom:
In 2023, we have supported the work of Ride For Freedom CIC[13], a not-for-profit social enterprise which uses cycling to provide remedy to survivors to give them confidence, independence and a sense of freedom to help their mental and physical health and rehabilitation into society.

[13] Aviva partnered to support the delivery of the Freewheel West Midlands Hub that empowers service users to cycle, through the provision of bikes, accessories and training, this helps with their rehabilitation with positive impact both on their mental and physical health.

Our key Performance Indicators to measure effectiveness

The KPIs below summarise progress on our key outcomes made in 2023:

- **Number of cases of high-risk modern slavery discovered at Aviva or in our supply chain via our due diligence work and assessments: [2]**
- **Cases reported through Speak Up where reporters have specifically alleged a breach of the UK Modern Slavery Act 2015: [0]**
- **Number of modern slavery suppliers' assessments conducted on high-risk suppliers: [20]**
- **Number of corrective action/ improvement plans shared with suppliers successfully closed: [6]**
- **Number of corrective actions/ improvement plans shared with suppliers which are being monitored: [27]**
- **Average independent assessment tool Sustainability score for unique suppliers overall: [59.4]**
- **Percentage of UK, Ireland and Canada registered suppliers that have agreed to the Aviva Third Party Business Code of Behaviour: [99.83%]**
- **Number of specialist staff that were trained on Business and Human Rights and Modern Slavery since 2020: [1,127]**
- **Number of unique suppliers assessed onto independent assessment tool with a valid scorecard: [485]**
- **Number of Board and Sub-boards of Aviva who approved this statement: [19]**

Our future plans

As described above, we will continue to develop and improve our approach to respecting human rights and preventing modern slavery. We will do this by learning from the experiences of our businesses and suppliers as they address modern slavery risks. We will also continue to collaborate and partner with external experts to identify, apply and share best practice in addressing and mitigating the risks of modern slavery. We aim to achieve greater transparency, by being open and clear in the way we communicate in our reporting, including our modern slavery statement.

In 2024 and 2025, we plan on:

- Improving our internal systems and processes related to human rights and modern slavery. Specifically, to identify, prevent and mitigate, as well as enable remedy based on areas highlighted by our 2023 due diligence activities.
- Completing our human rights saliency assessment, which includes understanding risks of modern slavery.
- Rolling out financial services-focused modern slavery training in collaboration with Themis.
- Updating our supply chain mapping and requesting further data from our suppliers to understand modern slavery risks.
- Continuing our supplier due diligence for high-risk sectors and countries.
- Continuing our internal dialogue and exploring external best practices to enhance our remedy approach, particularly in our underwriting and investment activities.
- Updating and ensuring alignment of Aviva Human Rights policy implementation across all markets.

Our process and the steps followed to issue this statement

The boards of the Aviva entities identified within scope have reviewed and approved this statement[14]. The Aviva plc Board reviewed and approved this statement on 21 May 2024 and the Group CEO signed the statement on behalf of Aviva plc.

A.J. Blanc

Amanda Blanc
Aviva plc CEO
London, 06/06/2024

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

For queries about *Aviva's Modern Slavery and Human Trafficking Statement 2023*, please contact our CR team:

crteam@aviva.com

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