

The Aviva Business Ethics Code

August 2020



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This 2020 update of the Aviva Business Ethics Code has been reviewed by the Institute of Business Ethics.

A message from George Culmer, Chairman, Aviva

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 people, and our business. It means that when our customers need us, we will be there.

Our Business Ethics Code is a fundamental part of the way we run our business. It sets out a practical set of principles, and minimum standards of behaviour that make sure we all act appropriately and earn the trust of our customers and wider stakeholders.

Aviva does not tolerate breaches of our Business Ethics Code. Breaches of the Code, and the relevant standards and policies that underpin it, can result in disciplinary action, up to and including dismissal. In certain cases, Aviva may report a breach to the relevant authorities, which could also lead to fines, regulatory action, legal action, or imprisonment.

Everybody at Aviva is required to read, understand and sign up to accept and adhere to the Code each year. We take this very seriously – anyone who does not do so may have any annual bonus withheld or face disciplinary action.

We all have a role in reporting concerns about behaviour or decisions which could be unethical. I want you to know that it is absolutely safe to call out any unethical behaviour at Aviva. If you have a genuine concern, please report it in line with the guidance in this Code. Even if it means we lose business we will never tolerate any retaliation against anyone who speaks up. Our business will be stronger, more trusted and more able to deliver for our customers if we all take accountability for doing the right thing.

Thank you for your support and if you have any questions, please discuss them with your manager or the Group Corporate Responsibility Team.



George Culmer,
Chairman, Aviva





Introduction

As Aviva employees, we are expected to meet the highest standards of behaviour and to manage and conduct ourselves and our business according to rigorous ethical, professional and legal standards. This means acting with integrity, transparency, openness and in alignment with our values. It means treating everyone fairly and respecting the human rights of others. Acting in the best interests of our customers, colleagues, communities and partners as well as Aviva. It also means adhering to our key regulators' requirements and principles, including the UK FCA's Conduct rules and other country equivalent regulations.

The principles set out in this Code apply to all Aviva operations around the world and we expect equivalent standards from our business partners.

The Aviva Business Ethics Code applies to all the Group's business dealings. It is not intended to be an exhaustive guide to rules and regulations. Rather, its purpose is to provide a common understanding of the Group's ethical principles and its underlying Business Standards and to promote operation in accordance with these Standards. Additionally, we expect Aviva Investors employees to abide by the Aviva Investors Code of Ethical Conduct in addition to this Code.

The principles and Business Standards set out in the Code are fundamental to Aviva. Failure to comply with the Code can result in dismissal or other disciplinary action. In certain cases, Aviva may report a breach to the relevant authorities, which could also lead to fines, regulatory action, legal action, or imprisonment.

Applying the Code

1. What does it mean for Aviva employees?

Aviva employees

We abide by the principles set out in this Code (as must contractors, contingency workers, and other persons acting on behalf of the Group).

We read and provide signed acceptance of and adherence to the Code every year by 31st December at the latest. We understand that failure to certify our acceptance and adherence to the Code once a year may result in the automatic withholding of any annual bonus we would otherwise have been awarded and may lead to further disciplinary action.

Aviva Investors employees also abide by the Aviva Investors Code of Ethical Conduct in addition to this Code.

We read and provide signed acceptance of and adherence to the Code every year by 31st December at the latest





We actively support the promotion of Speak Up and a Speak Up culture

Aviva line managers

We lead by example, actively encouraging responsible and ethical behaviour. We ensure that our team read, understand and accept the Code each year and where necessary remind them that failure to do so may result in the automatic withholding of any annual bonus they would otherwise have been awarded and may lead to further disciplinary action.

We empower our teams to conduct business in an open and honest environment in line with the Code. Managers at Aviva set the tone. We lead by example and remind our team that doing the right thing and acting ethically must be core to how we work, how we act, and how we deliver our strategy.

We report legitimate concerns of improper behaviour or suspected wrong doing to your business unit head, Group Investigations or **Speak Up**, which includes a confidential independent reporting service. We do not attempt to investigate a potential act of non-compliance.

Reporting requirements in respect of reportable concerns are set out in the Financial Crime Business Standard.

Aviva business unit head

As an Aviva business unit head we have overall responsibility for ethics and compliance within our business unit. Alongside managers, we must set the tone.

We actively support the promotion of Speak Up and a Speak Up culture and ensure that the Code is comprehensively shared with all employees, and other relevant stakeholders in the business unit, such as our partners and suppliers. We ensure that:

- All new employees are provided a copy of the Code and are given access to, and directed to, the **full policies and Business Standards supporting the Code**.
- The business keeps an audit trail of signed acceptance from all employees (new and existing) each year.
- All our employees are fully aware that they are required to sign their acceptance to the Code by 31st December every year, and that failure to sign their acceptance to the Code may result in the automatic withholding of any annual bonus they would otherwise have been awarded and may lead to further disciplinary action.



2. How do we raise a concern?

Everyone connected to Aviva must do the right thing to protect our customers, assets, reputation and each other. By everyone we mean employees, contractors, outsource providers and other third parties.

This is supported by adopting and supporting a ‘speak up’ culture across our business. It is vital that we live by our values so that we help to protect Aviva, our customers and each other.

- Through caring more, we will actively seek out and address what is wrong, and we will not let fear stand in the way of what is right.
- By never resting, we will always strive to make and do things better.
- By making the right decisions now, we will create a legacy we can all be proud of in years to come.

If we have a legitimate concern about improper behaviour or suspected wrongdoing within the workplace (by Aviva or Third parties), we act immediately considering the following:

What to report

We report any concerns of improper behaviour within the workplace¹ such as:

- failure to comply with a legal obligation (including committing a criminal offence)
- breaches of Aviva’s standards, policies and procedures
- breaches of data privacy (such as theft or deliberate/accidental loss)
- miscarriages of justice
- dangers to health and safety or the environment

- fraud or accounting misstatement
- inaccurate, misleading or fraudulent reporting of key risks
- facilitation of tax evasion
- bribery and/or corruption
- market abuse
- human rights abuses and violations (including modern slavery, forced labour, child labour and any form of discrimination in our business or supply chain)
- bullying and harassment and acts of unfair bias and discrimination on grounds of race, gender, religion, sexuality and other characteristics
- behaviour that harms or is likely to harm the reputation or financial well-being of Aviva
- the cover-up of any of the above whether or not the information is confidential
- concern about the ethical behaviour of a supplier or partner

Some examples are included in our Speak Up leaflets and employee/manager guides. You can download these from the [Speak Up site on Aviva World](#).

When to report

We report a concern as soon as there is a reasonable and genuine suspicion. We do not try to investigate the matter ourselves or try to prove that our concern is well-founded. Providing our concern is reasonable and genuinely held it doesn’t matter if it ultimately turns out to be wrong.

¹ This list is not intended to be exhaustive and we encourage our employees, contractors, contingency workers, outsource providers, suppliers and other third parties to report any behaviour that violates the spirit of the Code and Aviva’s high ethical standards even if not explicitly listed in this section of the Code

How to report

We encourage each other to raise all concerns openly and with our line manager. If we are uncomfortable with this (for example, where the concern is about our line manager) or if we have already raised this with our line manager but no appropriate action has been taken, we can contact Speak Up.

The Speak Up team is responsible for the operation of Aviva's Speak Up whistleblowing service that provides multiple channels for reporting concerns. All concerns received are passed through an assessment and triage process to determine next steps, including investigation as appropriate. The Speak Up team reports directly to our Chief Audit Officer.

We can confidentially report or discuss our concerns directly with the Speak Up team by:

Email

speakup@aviva.com

For India: transparency@avivaindia.com

Telephone

UK & Group + 44 (0) 1738 895855

Asia + 44 (0) 1904 453321

Canada (1) 437 -215-1306

France, Italy,
Poland & Turkey +33 (0)1 7662 4614

You can also contact the Speak Up team directly, and anonymously should you wish, via a secure webpage using the "Reporting a Concern" page on Aviva World.



There may be occasions when reporting a concern internally is not appropriate or doesn't feel like the right approach. Expolink is an independent company that provides a dedicated and secure Speak Up facility to our employees, contractors, suppliers, business partners, joint venture partners and agents.

The independent whistleblowing reporting service provided by Expolink allows us to report our concerns confidentially and anonymously should we wish.

The Speak Up facility provided by Expolink is a free 24-hour service which operates seven days a week offering the facility to report in our local language.

We can contact Speak Up via Expolink by:

Email

avivaspeakup@expolink.co.uk

Website

<http://www.expolink.co.uk/avivaspeakup>

Telephone

Canada 1855 223 2807

France 0800 918 479

Hong Kong 800 908 589

India 000 800 440 1286

Ireland (Eire) 1800 806 186

Italy 800 797 552

Poland 800 442 1245

Singapore 800 4411 140

UK 0800 915 4043

Vietnam 120 11527



We can contact the Speak Up team or the Chief Audit Officer

How Aviva protects its employees

We must not let fear stand in the way of what is right. If we genuinely believe that unethical or improper behaviour has occurred we report these concerns. We will not tolerate retaliation against anyone who speaks up and raises a concern.

If we believe we have been unfavourably impacted or treated as a consequence of raising a concern, we can contact the Speak Up team or the Chief Audit Officer, who will independently review our concerns.

We have a relationship with **Protect**, a charity set up to support people considering raising concerns. We can use its Freephone Advice Line, 0800 221 8927 or utilise the **online form** for independent guidance to help understand whether we should raise a concern to Speak Up.

If we raise a concern we know to be false

It doesn't matter if we are mistaken; the important thing is that we act on a genuine concern. However, this assurance is not extended to anyone who raises a concern they know is untrue with malicious intent. Any employee who is found to have done so is likely to face disciplinary action, up to and including dismissal.

Reporting Externally

In the UK, both the Financial Conduct Authority and the Prudential Regulation Authority support the use of whistleblowing procedures. We can report to the regulators at any time. We do not have to report to Aviva or Speak Up before doing so and we can also report through both channels simultaneously.

Information on the Regulators' reporting processes can be found by visiting their websites:

FCA: <https://www.the-fca.org.uk/whistleblowing>,

PRA: <http://www.bankofengland.co.uk/pr/Pages/contactpra/whistleblowing.aspx>

Further information on the process can be found in the **Speak up Charter and Group Investigations** pages on Aviva World.

Aviva's business ethics principles explained

1. Act with integrity

What is required from us?

We must uphold the highest standards of corporate ethics, transparency, integrity and honesty. We are required to conduct our personal and business dealings in accordance with the principles set out in this code, all laws and regulations applicable to the market in which we operate, and in accordance with the Aviva's Group standards and values. We must comply with both the spirit and the letter of all laws and regulations in order to maintain the highest standards of business integrity in our dealings with our customers, colleagues, communities and partners as well as regulators. It also means adhering to key regulators' requirements and principles including the UK FCA's Conduct rules and the applicable local regulations in the countries/markets in which we operate.

Why is this important?

It is fundamental to the values of Aviva's businesses and its employees, and to the reputation of the Group, that we operate with integrity and within the spirit and letter of all standards and policies.

Scenario

Q: In the country in which I work the law does not require the level of compliance that the Group standards require – how do I deal with that?

A: The Group standards are the minimum standards which apply to all Aviva businesses and employees. If there is a difference between Group policies / standards and local laws and regulations employees are expected to follow the highest standards in all cases.





2. Reject Financial Crime

Aviva will always seek to comply with financial crime legislation and regulation and work proactively to help protect our customers, shareholders and employees from financial crime. We expect employees, business partners, suppliers, agents and other associated third parties to follow our lead. Aviva Group has no appetite for intentional or repeated breaches of law, regulation or policy related to financial crime.

What is expected from us?

There are six key areas of financial crime which we need to be aware of:

- Bribery and corruption
- Fraud
- Facilitation of tax evasion
- Market abuse
- Money laundering and terrorist financing
- Sanctions

Why is this important?

Financial crime can be detrimental to our customers and shareholders, undermine market integrity and investor confidence or even support terrorism. We risk compromising Aviva's reputation and exposing the company and its employees to the risk of substantial fines and even imprisonment. Aviva will investigate and seek to sanction, or discipline agents, employees, directors or others suspected of engaging in acts of financial crime within Aviva.

a) Bribery and corruption

Bribery involves the offer, promise, payment, transfer, request, or receipt of anything of value, to induce someone to perform their role improperly.

Offering or accepting a bribe is a criminal offence². Paying or offering a bribe while acting on behalf of Aviva can also expose the company to criminal action.

We operate under the UK Bribery Act 2010. The Act has extensive powers and broad jurisdictional reach that makes it applicable across all of Aviva. Under this law, employees and directors of the Group may be prosecuted if a bribe is paid in any part of the world to induce improper behaviour for the benefit of Aviva.

What is expected from us?

- Any person associated with Aviva is strictly prohibited from doing anything that supports, encourages or facilitates bribery and corruption.
- We reject the offer or payment of a bribe in any part of our business activity, anywhere in the world.
- We refuse to pay or offer a bribe, no matter how small, anywhere in the world.
- We complete relevant training to be able to identify and manage the bribery risks that may arise in our roles.
- We report all offers of a bribe, requests for a bribe or suspected corruption immediately to the local Financial Crime or Compliance team.

² Including active bribery (the offering of, promising or giving of a bribe / inducement), passive bribery (the requesting of, agreeing to receive, or acceptance of a bribe / inducement), facilitation payments or inducements to public officials (the giving of a small bribe / inducement to facilitate routine government action)



Scenario

Q: You are due to sign an agreement with a local government office to provide insurance cover. The public officer that you are dealing with suggests that another insurer has offered him a weekend break to advance their tender and asks if you can do the same. What should you do?

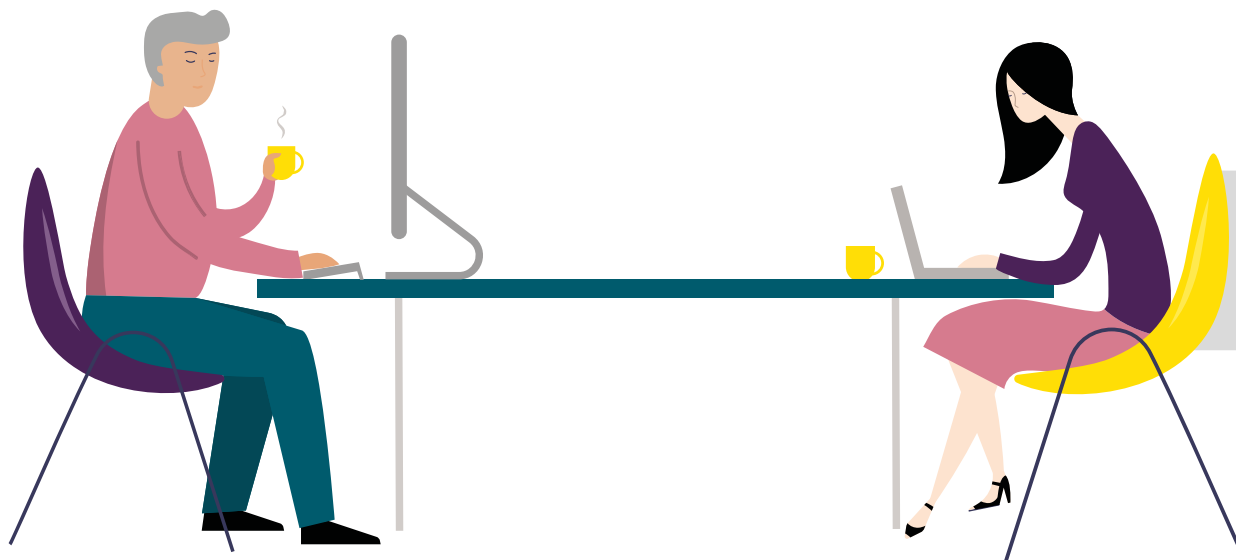
A: You must politely refuse this suggestion and report the incident to your local Financial Crime or Compliance team.

b) Fraud

Fraud can occur in many ways. At its core fraud consists of acts of deception designed to secure unfair or unlawful financial or other benefit. Aviva may be the victim of fraud from internal sources (e.g. employee expense fraud or theft of Aviva's data), and from external sources (e.g. underwriting or claims fraud). We also have a role to play in protecting our customers from fraud involving Aviva products, for example where they may fall victim to a 'scam' that targets their pension or investment funds.

What is expected from us?

We must not engage in any fraudulent activity. All of us have a responsibility to play an active part in anti-fraud activity and to be vigilant. We must act with honesty and integrity ourselves and help protect Aviva's assets. Where we have a suspicion of fraud, we report it immediately, in line with local escalation process to our manager or through Speak Up if appropriate.



c) Facilitation of tax evasion

Tax evasion is the illegal non-payment or under-payment by a taxpayer of taxes due to the relevant authorities. As individuals, it is also illegal for us to help anyone evade tax. Aviva can be held criminally liable if we allow employees, or any other person associated with the company, to deliberately and dishonestly assist someone to evade tax. This could be a customer, supplier, business partner or other external party that has criminally evaded tax – we need to be able to show that we have not 'facilitated' that evasion.

What is expected from us?

We strictly prohibit any person associated with Aviva from doing anything that supports, encourages or facilitates tax evasion. We act with honesty and integrity and report any suspicion of tax evasion to our local Financial Crime or Compliance team, our line manager or through Speak Up.

All of us have a responsibility to play an active part in anti-fraud activity and to be vigilant

d) Market abuse

Market abuse includes engaging or attempting to engage in insider dealing; recommending or inducing another person to engage in insider dealing; actual or attempted market manipulation and unlawful disclosure of inside information.

What is expected from us?

We must not engage in market abuse activities. Directors, employees, advisers and agents must comply with our internal controls designed to mitigate and manage the risks of market abuse. For breaches of the Market Abuse Regulations the FCA can impose unlimited fines and criminal sanctions can incur custodial sentences up to 7 years.

Directors, employees, advisers and agents:

- Must observe appropriate standards of market conduct in carrying out their own role and act with integrity regarding any information obtained and held on behalf of the Group and be on guard to avoid careless or inadvertent disclosures which may damage the Group's business or that of its customers or suppliers.
- Should not deal in shares of Aviva whilst prohibited to do so under the **Aviva Share Dealing Policy**.
- Should not disclose unpublished inside information to any other person except where it is necessary to do so to carry out their duties and is appropriately approved and recorded.
- Should not deal in securities of any other company whilst in possession of 'inside information' in connection with that company.

Directors and certain employees are prohibited from dealing in Aviva's shares during so called "closed periods" and must seek clearance before dealing at other times. The share dealings of Directors and some senior executives must be announced externally and reported to the FCA within three days of dealing.

e) Money laundering and terrorist financing

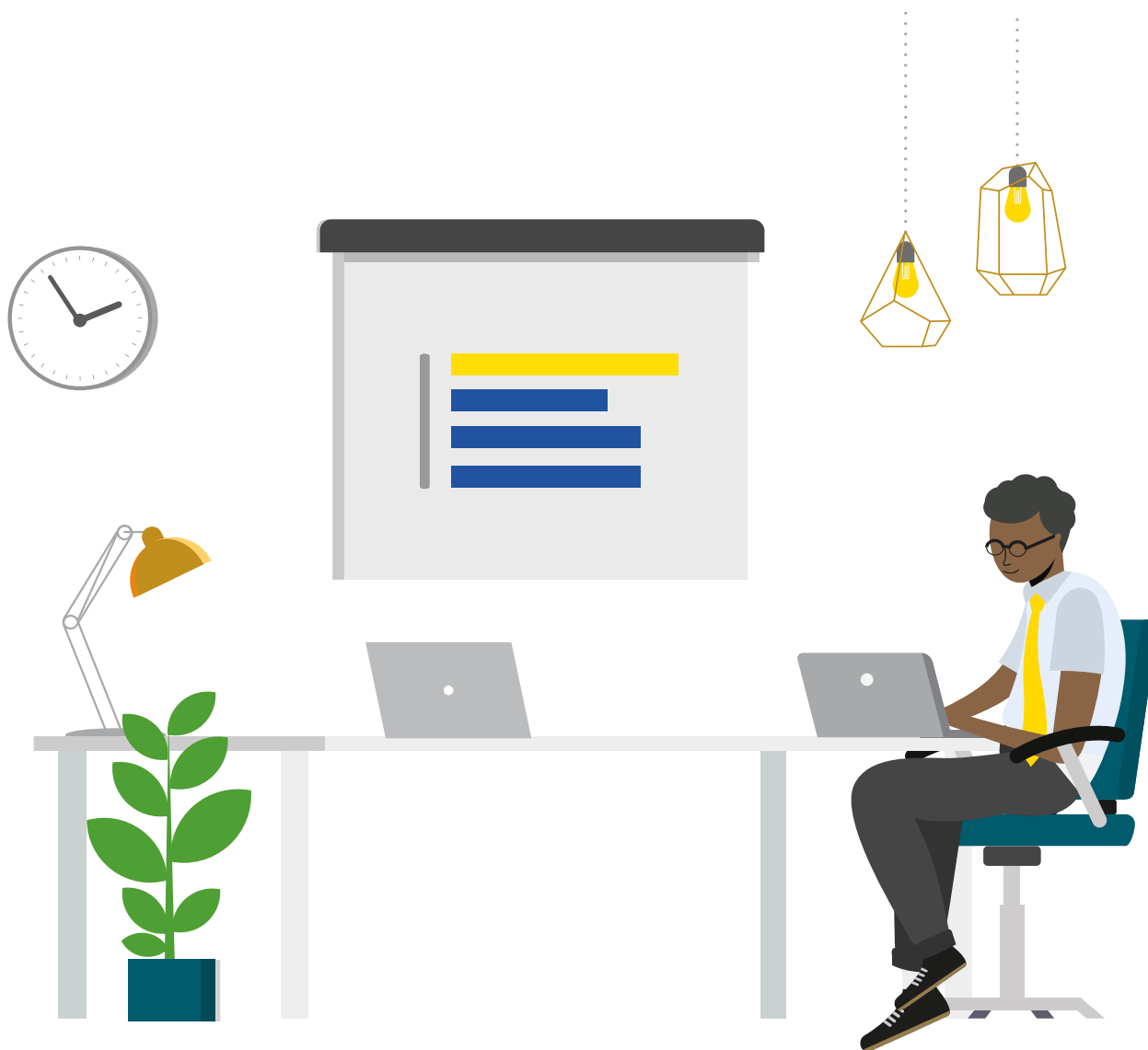
Money laundering is the process by which individuals attempt to hide, disguise, move or use the proceeds of crime, such as narcotics trafficking, fraud or corruption. Terrorist financing is the use of funds, assets or services to fund or support terrorist activities. Terrorism may be funded through the proceeds of criminal activity (e.g. kidnapping) or through legitimately derived funds.

What is expected from us?

We take care to avoid engaging in or facilitating money laundering and terrorist financing by, at, or through Aviva. We complete anti-money laundering training, are aware of the money laundering risks in our business; complete due diligence on our customers, monitor their activities and keep their information up to date.

We report suspicions of money laundering to the local Financial Crime or Compliance team.





f) Sanctions

Governments and multinational organisations, including the United Nations, EU and UK impose trade and economic sanctions to pursue foreign policy or national security interests. Sanctions targets may include individuals, entities, governments or government agencies. This may impact our business relationships with clients, business partners, distributors, claims handlers or others. Generally, any business with sanctions targets is prohibited. Breaching sanctions is a crime for the individuals involved and for Aviva and its employees.

What is expected from us?

We complete due diligence on our customers, business partners, suppliers, and others to ensure that we are legally able to deal with them and escalate any concerns of potential sanctions breaches to the local Financial Crime or Compliance team.

We complete sanctions training required for our role, comply with applicable sanctions laws and regulations, and adhere to Aviva's control requirements.

Please refer to the Financial Crime, and Legal and Secretarial Business Standards for further information regarding the areas set out above.



3. Conduct business in a fair manner

a) Gifts and Hospitality

What is expected from us?

We take care not to be compromised by gifts and entertainment when doing business with suppliers, business introducers or other third parties. This applies to gifts, entertainment and hospitality offered, given and received.

Business entertaining can form part of a normal business relationship. However, it should always be proportionate, appropriate and transparent. All Aviva employees (including contingent workers) are required to keep an accurate record of all gifts valued at £25 or more, and all entertainment valued at £50 per head or more (or local equivalent) on Aviva's register, 'STAR Compliance'. This applies to gifts and entertainment both given and received and irrespective of whether these are accepted or declined.

Why is this important?

Accepting gifts and entertainment could be seen as a bribe if it is lavish, disproportionate, or intended to influence the recipient.

Offering or accepting gifts and entertainment in contravention of Aviva's rules could be a serious disciplinary offence for Aviva employees.

We take care not to be compromised by gifts and entertainment when doing business

Scenario

Q: A supplier contract is due for renewal. Your main contractor invites you to the races for a day, with all travel, food and drink included. Should you accept this hospitality?

A: As the contract is due for renewal, no form of entertainment is acceptable to or from the supplier. Even though the entertainment must be declined, if it has a value over £50 (or local equivalent), it must be entered into the STAR Compliance system.

Trust and integrity are an important part of maintaining our reputation as a fair business partner



b) Supplier relationships and third-party partnerships

What is expected from us?

In addition to avoiding inappropriate offers of gifts and entertainment, we always respect and comply with the terms of our contracts. Aviva do not purchase goods and services from a prospective supplier if a condition of purchase is that the supplier buys products or services from the Group.

Why is this important?

We believe that fair and honest relationships make Aviva a trusted business partner. It is fair to ensure that we comply with the terms of our contracts, e.g. paying for services provided within the agreed timeframe, complying with non-disclosure of information, and fully respecting the terms of licence of copyrighted goods, e.g. computer software.

We inform all our suppliers, brokers and other business introducers of our Code and of our Business Code of Behaviour, which details our commitments and expectations as a trusted business partner. Additionally, where applicable, our contracts include anti-bribery and modern slavery provisions in relation to the UK Bribery Act 2010 and the UK Modern Slavery Act 2015.

c) Conflicts of interest (“COI”)

What is expected from us?

We do not use our position at Aviva, our influence, or any company assets or resources in a way that will benefit us personally, or our family, friends, or the organisations they work with, or would lead to a conflict with the interests of Aviva or our customers. We will always make sure any perceived, potential or actual conflict of interest is appropriately managed and disclosed on the STAR compliance system.

Why is this important?

By managing and mitigating perceived, potential and actual conflicts of interest, we protect the reputation of Aviva and the relationships we have with others, including our customers and employees. Trust and integrity are an important part of maintaining our reputation as a fair business partner. By effectively managing and mitigating conflicts of interest we maintain our integrity and the trust that partners place in us.

Further Information can be found in the Group Conflicts of Interest Policy.

4. Treat customers fairly

What is expected from us?

We always act with integrity, considering what impact any decisions we take will have on Aviva's customers. We must pay attention to the interests of all our customers and treat them fairly and with respect, including but not limited to vulnerable customers who need particular attention and care.

Our customers' needs must be the basis on which we design our products. Our communications must be clear, fair and not misleading (jargon-free) and clearly articulate any risks alongside benefits. When giving advice, we take reasonable care to ensure that advice is suitable for the customer's circumstances. We listen to feedback from customers and change our products, services and processes accordingly.

Why is this important?

Aviva is authorised and regulated by the Financial Conduct Authority (FCA), the UK regulator for the financial services industry. The principle of treating customers fairly is central to the delivery of the FCA's retail regulatory agenda, which aims to ensure an efficient and effective market for consumers. Aviva must be able to satisfy its internal governance leadership and the FCA that, across the Group, we are operating in accordance with the FCA principles for businesses – and importantly, that we have a culture of delivering fair outcomes for customers.



Scenario

Q: A customer contacts you to complain about an aspect of our service. What should you do?

A: You should treat the customer with respect and care by listening to their complaint. Record the details and pass to the relevant team ensuring that they have received the complaint.

5. Respect confidentiality of information and uphold competition laws

What is expected from us?

We ensure that neither us nor Aviva are in possession of, or make use of, confidential information or material improperly obtained from any third party, including for example confidential material belonging to your previous employers or mis-using company and client assets.

We do not discuss, share or receive confidential or commercially sensitive information with competitors. Commercially sensitive information includes any information which is not in the public domain including details of price, premiums, commission, costs, margins and distribution strategies.

We treat all information obtained concerning Aviva – its businesses, practices, operations and employees – as strictly confidential and ensure that we only use it for legitimately carrying out our duties and using only approved Aviva IT equipment (e.g. you should not send Aviva data to your personal email address for any reason).

During and after employment with Aviva, we never use confidential information for our own purposes, or publish or disclose it to any third party, without specific authorisation. We never use confidential information to the detriment or prejudice of Aviva, its partners or employees.

Why is this important?

All employees must act with integrity in relation to information obtained about Aviva during their employment. The exchange of commercially sensitive information, at formal or informal discussions, that could be used to influence Aviva's or other's pricing strategy or pricing decisions could be a breach of competition law.



Scenario:

Q: On reviewing a data set that is due to be sent to a contractor to provide marketing analytics, you notice that whilst some personally identifiable information has been removed (name, date of birth) some remains (postcode and house numbers) allowing individual preferences to be deduced and identities derived from other sources (electoral roll). What would you do?

A: You must recommend removing both house numbers, post codes. The primary justification for doing so is protecting personal privacy (house number) as well as avoiding the disclosure of potentially identifiable health information (post code). If in ANY doubts you should seek in-house Legal advice.

Ethics

Ethics is just as important in the digital world. If using social media, we must think of the impact of what we share about Aviva, our people, partners and customers. We must always respect confidentiality and the right to privacy of others.



6. Data privacy

What is expected from us?

We respect and protect the privacy of our employees, customers, and other stakeholders. To ensure we deliver on this commitment, we:

1. Only use personal information for the process or purpose that has been agreed by our business area.
2. Will not collect or use any extra personal information other than that which we need for the product or process that we are delivering.
3. Keep personal information up to date.
4. Only hold personal information for as long as we need it, in accordance with our Business Unit Retention requirements.
5. Make sure that personal information is kept secure in accordance with CISO Standards and Guidance.
6. Respect individual privacy rights.
7. Make sure that Personal Data is processed lawfully, fairly and in a transparent way.
8. Will not transfer Personal Data to another country/ jurisdiction without appropriate safeguards in place.

Why is this important?

Our customers, employees and other stakeholders trust us to process their data responsibly and keep it secure. Failure to do so could destroy the trust our customers placed on us, subject Aviva to large financial fines, or prevent us from processing some or all personal data needed to deliver products to our customers

Further information can be found in the Aviva Global Privacy Standard or from your Business Unit Data Privacy Team

7. Report accurately and honestly

What is expected from us?

We act with due skill, care and diligence and record all financial transactions in an accurate and timely manner according to generally accepted accounting principles and relevant laws and regulations.

We ensure that all payments and transactions are supported by appropriate documentation which clearly identifies and describes their nature and purpose.

We ensure that all funds and balances are accurately reflected in the books and records of the relevant companies. Accounting practices that suppress records, misstate results, obscure the nature of transactions or otherwise alter the substance of any transaction are strictly prohibited.

Further information can be found in the Group Financial Reporting Business Standard.



8. Deliver on our responsibilities towards our people, community and the environment

What is expected from us?

People

We treat our people with respect. We do not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we deal with.

We ensure that access to employment, development opportunities and promotions are:

- Free from discrimination on the grounds of gender, gender reassignment, sexual orientation, pregnancy and maternity, marital status, creed, colour, race, religion, age, ethnic origin, nationality, union status or disability (which can include both physical and mental conditions).
- Based on the objective assessment of ability, relevant job-related criteria, and any relevant legislation.
- In the case of training and career development, based on agreed need.

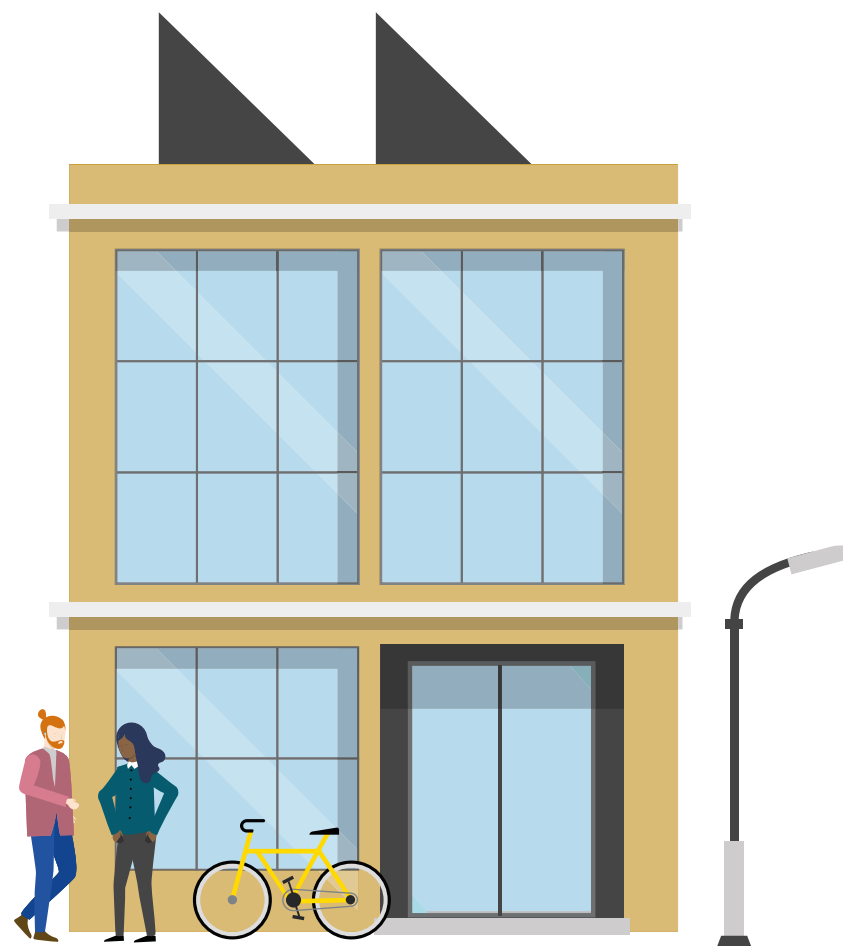
We respect our people's right to freedom of association and collective bargaining. All our workers are free to independently associate or join organisations that represent them, including trade unions, without previous approval from Aviva.

Health and Safety

Aviva must provide a secure, safe and healthy environment for all employees, as well as managing risks to contractors, customers and members of the public on Aviva premises.

Aviva encourages a good work/ life balance. We offer flexible working arrangements including working remotely and adjusting working hours to fit personal and business circumstances. Remote working comes with its own challenges, so we need to look after our well-being, and ensure we continue to behave in line with the ethical standards described in this code.

We are encouraged to participate actively in achieving high standards of health and safety and employees, contractors and contingency workers are reminded that they must co-operate with management, so we are compliant with our statutory duties.



Community

Aviva is committed to help address the challenges that people and society face. We do this by acting responsibly in our communities, extending our positive impact through insight, expertise and partnership. We channel financial and organisational support into our local communities. We share our time and skills by volunteering for the causes that matter to us.

Charitable donations

Any charitable initiative should contribute to the delivery of our Corporate Responsibility strategy. We do not authorise charitable partnerships or donations that meet any of the following criteria:

- With or for individuals. Any donations must always be paid directly into a charitable organisation's account
- With or for political organisations
- For projects that favour the propagation of a religious belief or where participants/beneficiaries are required to belong to a particular religion
- For extreme, 'high risk' sports

Due diligence must be carried out on all charities before a donation or a partnership is agreed. This is to assess the viability of the charity and also as part of our risk management approach.

Donations at the request of a public official are prohibited. There is a high risk that this type of donation would be considered a bribe under the UK Bribery Act 2010.



Environment

We are aware of and adhere to local environmental regulations.

Aviva seeks to demonstrate leadership in our effort to reduce our adverse impact on the environment, both in terms of our operations and through our role as an investor, insurer, purchaser (both for Aviva and on behalf of our customers) and employer. To this end, we all have a responsibility to minimise our use of natural resources (paper, water) and energy use, including business travel and minimise and recycle waste where possible. We also understand that climate change is a key risk for Aviva and our customers. We are committed to regularly disclosing our understanding of climate-related risks and opportunities which may impact Aviva and our customers.

Why is our approach to people, health and safety, community, and the environment important?

Aviva aims to attract and retain the best talent available as the foundation for being a talented and sustainable workforce. We have a duty to uphold our corporate reputation and our commitments to corporate responsibility are a key part of protecting our reputation.

Aviva has publicly stated commitments to reduce our environmental impact, to work with our suppliers to manage our impacts, to be transparent in our reporting and communications.

Respecting our customers, colleagues, communities, partners and the environment is part of our approach to human rights. As a company, we have an obligation to ensure our business activities do not cause or contribute to violations of human rights of others.

Further information can be found in Human Rights Policy and our Corporate Responsibility, Climate Change and Environment, People, and Health and Safety Business Standards



9. Refrain from making political donations

What is expected from us?

We do not make any political donation in cash, in-kind or any other forms, or incur any political expenditure on behalf of Aviva unless explicit permission has been sought and approval granted in advance by the Group Company Secretary.

Why is this important?

It is Aviva Group policy not to make political donations. Donations are illegal in some jurisdictions and other jurisdictions have strict requirements to ensure that corporate approval has been sought and that donations are disclosed. Under the UK Bribery Act 2010 some payments (in the UK or elsewhere) to political candidates or individuals holding elected legislative office may be considered as bribes.

Further information can be found in the Group Legal and Secretarial Political Donations guidelines.

It is Aviva Group policy not to make political donations

Appendix 1 – Group policies and business standards

Group Business Standards

We read the following Group Business Standards and policies in conjunction with the Business Ethics Code:

- Corporate Responsibility, Climate Change and Environment
- Financial Crime
- Financial Reporting
- Health and Safety
- People
- Customer Experience
- Procurement and Outsourcing
- Internal Controls
- Legal and Company Secretarial
- Conflicts of Interest Policy
- Aviva Investors Code of Ethical Conduct
- Global Data Privacy Standard
- Business Code of Behaviour
- Human Rights Policy
- Global Social Media Policy

We read and understand all Business Standards and Policies applicable to our roles. All Aviva Business Standards and Policies can be found on the Aviva intranet or the local intranet.

Where appropriate to our role, we are encouraged to familiarise ourselves with the Speak Up Charter, and the Aviva Share Dealing Policy.

In some instances, business units may have additional local policies or guidelines for conducting business in their country. It is the responsibility of management to ensure all employees are made aware of such policies.



For queries about The Aviva Business Ethics Code
please contact our CR team: **crteam@aviva.com**

