

The Aviva Business Ethics Code – living our values

February 2025



Contents

A message from George Culmer, Chair, Aviva plc	3
Introducing our Code	4
Our ten principles	6
How to make an ethical decision	7
How to raise a concern	8
Guidance notes: our principles explained	9 - 25
Guidance notes: how to raise a concern	26 - 28
Appendix 1 – Group Business Standards, policies and other codes	29



The Institute of Business Ethics (also known as IBE) is a non-profit professional organisation which champions the highest standards of ethical behaviour in business. The IBE reviews Aviva's Business Ethics Code on a two-year cycle.

A message from George Culmer, Chair, Aviva plc



We act in line with our Code which forms an essential part of living our values of care, commitment, community, and confidence.

Our purpose at Aviva is to be ‘with you today, for a better tomorrow’. Acting responsibly is vital to us achieving that purpose.

This means we act with integrity, transparency, openness and in alignment with our values.

It means we treat everyone fairly, respect the human rights of others and act in the best interests of our customers, colleagues, communities, and partners as well as Aviva. It also means that we adhere to our key regulators’ requirements and principles, including but not limited to the UK Financial Conduct Authority’s (“FCA”) Conduct Rules, applicable Canadian and Irish rules and regulations and other countries’ equivalent regulations where we operate.

Our Business Ethics Code (“Code”) helps us do that. It sets out a practical set of principles and minimum standards of behaviour to provide clear guidance of what we should and shouldn’t do. We all have a role in reporting concerns about behaviour or decisions which could be unethical. I want you to know that it’s absolutely safe to call out any unethical behaviour at Aviva. We won’t tolerate retaliation against anyone who speaks up and raises a genuinely held concern in connection with perceived wrongdoing.

If you have a genuine concern, please report it in line with the guidance in this Code. 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 leader or the Group Investigations team, they’re here to support you.

A handwritten signature in black ink, appearing to read 'G Culmer'. The signature is fluid and cursive, written on a white background.

George Culmer,
Chair, Aviva plc

Introducing our Code

Let's talk about how we should behave and follow the rules at Aviva.

This is really important because it helps us do the right thing, even when no one is watching. The Code is like our guidebook. It helps us act with care, commitment, community, and confidence.

Care	Because we understand the positive difference we make in our customers' lives every day. We truly listen to see beyond the policyholder to a person with plans and dreams. We solve problems for our customers, and for each other. We build relationships that no-one else can. Empathy is our strongest force.
Commitment	Because we stand up for what we believe in. We act with courage, keep our promises , and take ownership of our work. We understand the impact we have on the world and take seriously the responsibility that brings with it. We play our part in tackling the climate crisis . We commit to a better tomorrow .
Community	Because we recognise the strength that comes from working as one team, collaborating and winning together for Aviva, for each other and for our customers. Aviva is built on a foundation of trust and respect. Our strength comes from our connection - to each other, to our customers and partners and to the communities around us.
Confidence	Because we believe that the best is still to come - for our customers, our people, and society. We're not just here for now; we're here to imagine and to innovate for the future, creating value for customers and shareholders. We are brave and passionate , setting new standards for ourselves and the competition. With a humility that is as important as the ambition that drives us.

The Code applies to all of Aviva's business dealings. It's not a complete list of all rules and regulations, but it helps us understand Aviva's ethical principles and Business Standards. It ensures we do business according to these minimum standards. It's what makes Aviva a great company and place to work.



Who needs to follow the Code?

We all do!	How do leaders help?	What's the role of senior leaders?
<p>Everyone who works at Aviva must follow these rules. Everyone means all our colleagues, this includes:</p> <ul style="list-style-type: none">• Employees.• Contractors and temporary staff.• Contingency workers.• Anyone acting on behalf of Aviva and its subsidiaries. <p>We also expect our business partners, like contractors and suppliers, to follow these rules. These principles apply to all Aviva operations around the world.</p>	<p>Leaders have a special role. They:</p> <ul style="list-style-type: none">• Help their teams do business openly and honestly.• Set a good example by doing the right thing.• Handle any concerns confidentially.• Encourage their team to report any suspicions or concerns.	<p>Senior leaders and the CEO are responsible for making sure everyone follows the rules.</p> <p>They work with leaders to create a culture of compliance and support the idea of speaking up and living our values.</p>

Additionally, persons employed by Aviva Investors Canada Inc. (AIC) are subject to the AIC Code in addition to this Code.



Our ten principles

Think of our Code like a rule book with our principles being ten important rules that we all need to follow. These rules help us do the right thing. Here's what they are and how they apply to us:

Our principles	What this means	How it applies - some examples
1. Act with integrity and live our values	Always be honest and follow the rules. This means being transparent, ethical, and truthful in all your actions.	If we find an error in a customer's policy, we inform them and correct it immediately, even if it was our mistake. This builds trust and shows that we value honesty.
2. Reject financial crime	Help stop financial crime and follow the laws. This includes being vigilant and proactive in identifying and reporting suspicious activities.	If we notice a suspicious claim that seems fraudulent, like someone trying to claim for a car accident that never happened, we report it immediately to the compliance team. This helps protect our customers and the company from fraud.
3. Conduct business fairly	We don't use our job or role to get special treatment for ourselves, family or friends. We always act in the best interest of the company and our customers.	If a friend asks us to approve a claim that doesn't meet the criteria, we explain why we can't do that and follow the proper procedures. This ensures fairness and integrity in our business dealings.
4. Deliver good customer outcomes	Think about how our actions affect customers and make sure they're happy. This means providing excellent service and ensuring customers/clients understand their policies, investments or services being provided.	If a customer is confused about their coverage, we take the time to explain it clearly and help them understand their policy. This ensures they feel valued and supported.
5. Respect confidentiality and follow competition laws	Keep information safe and don't share information we shouldn't. This includes protecting sensitive information and complying with competition laws.	If we have access to sensitive customer information, we ensure it stays secure and don't share it with anyone who shouldn't see it. Similarly, we ensure that confidential information is not shared with competitors and vice versa. This protects customer privacy and maintains trust and upholds competition law.
6. Handle data appropriately - data ethics and privacy	Protect people's personal information and use it properly. This involves managing data responsibly and respecting privacy rights.	If we're managing customers' or clients' financial data, we make sure it's stored securely and only used for the right purposes. This prevents misuse and ensures compliance with data protection laws.
7. Report accurately and honestly	Record all financial transactions correctly and on time. This means being diligent and precise in our work.	If we're processing claims, we ensure all details are accurate and submitted promptly. This maintains financial integrity and accountability.
8. Pay our fair share of taxes	Pay taxes honestly and follow the tax laws. This involves being transparent and compliant with tax regulations.	If we're handling the company's finances, we make sure all taxes are calculated correctly and paid on time. This supports the community and upholds our legal obligations.
9. Care for people and the planet	Treat everyone with respect and take care of the environment. This includes fostering a positive workplace culture and promoting sustainability.	If we see a colleague being treated unfairly, we speak up. If we notice wasteful practices, we suggest more sustainable options. This creates a supportive and eco-friendly work environment and protect Aviva's reputation.
10. Refrain from making political donations	Don't give money or support to political groups on behalf of Aviva. This ensures we remain neutral and focused on our business values.	If we're in charge of donations, we ensure that all contributions are appropriately approved and go to charities or community projects, not political campaigns. This maintains our integrity and public trust.

Want to know more? Guidance notes with further details and examples on each of our ten principles are set out below on pages 9 to 25.

How to make an ethical decision

When we're faced with a decision at work, it's important to make sure it aligns with our values and our ten principles. Here's a step-by-step guide to help us:

What we do	How we do it	Why it's important
Step 1: Check the basics	<p>Aviva's Values: Does your decision match our values of care, commitment, community, and confidence?</p> <p>The Law: Is it legal? Make sure your decision follows all laws.</p> <p>Financial Regulations: Does it comply with financial rules and regulations?</p>	Following these basics means that our decisions are in line with what Aviva stands for and keeps us out of trouble. It also helps to keep the trust of our customers and regulators, which is crucial in the financial services industry.
Step 2: Think about explaining it	<p>Would you be comfortable explaining your decision to:</p> <ul style="list-style-type: none"> • your colleagues? • your manager/leader? • our customers/clients? • the Compliance or Financial Crime team? • Group Investigations? • your family? • our regulators? • the police or other local enforcement agencies? 	<p>If we can't comfortably explain our decision to these groups of people, it might not be the right choice.</p> <p>Transparency is key to maintaining trust and integrity, which are essential for an insurance and financial services company that deals with sensitive and personal information.</p>
Step 3: Does it feel right?	<ul style="list-style-type: none"> • Will you regret making this decision? • Will it make you proud? • Is it fair? • How would you feel if this happened to you? • Would you want to be treated this way? 	<p>Trust your instincts. If something feels off, it probably is. Making decisions that we can be proud of and that are fair to everyone involved is crucial.</p> <p>In insurance, fairness and ethical behaviour build long-term relationships with customers, clients and partners.</p>
Step 4: Consider the impact on others	How will your decision affect other people?	<p>Our decisions can have a big impact on others. Make sure you're considering how your actions will affect your colleagues, customers, and the community.</p> <p>Positive impacts strengthen our reputation and customer loyalty.</p>
Still unsure?	If you're still in doubt after going through these steps, talk to your line manager, the Compliance team, or the Speak Up team. They can help guide us to the right decision.	Seeking guidance ensures that you're making the best possible decision. It helps maintain a culture of integrity and compliance, which is vital for the trust and reliability that customers expect from a financial services company.

Following these steps will help us make ethical decisions that align with Aviva's values and principles, ensuring that we maintain our reputation and trust in our industry.

What happens if we don't follow the rules?

If someone breaks the rules, we must all help with any investigation. Not following the Code can lead to dismissal or other disciplinary actions. In some cases, Aviva might report the breach to the authorities, which could lead to fines, regulatory action, legal action and/or imprisonment.

How to raise a concern

At Aviva, we believe in maintaining a safe and supportive environment for everyone. It's everyone's job to report concerns as soon as possible. We don't wait for someone else to do it. Speaking up when something doesn't feel right is crucial. Here's how we can raise a concern (further detail is included on pages 26 to 28 below):



What to report:	When to report:	How to report:
<p>If something doesn't feel right, it's important we raise it. Here are some examples of concerns we should raise:</p> <ul style="list-style-type: none"> • Breaking Aviva's rules, like the gifts and entertainments policy. • Data privacy issues. • Acts of bribery or corruption. • Money laundering or insider trading. • Fraud, tax evasion, or incorrect reporting of things like financial and non-financial results and key risks. • Breaking competition laws. • Bullying or harassment based on race, gender, religion, sexual orientation, or other protected characteristics. <p>If we're unsure, we should reach out to the Speak Up team. They're here to help us.</p>	<p>We report a concern as soon as we suspect something is wrong.</p> <p>We don't try to investigate it ourselves. If our concern is genuine, it's okay even if it turns out to be a mistake.</p> <p>Be assured there will be no retaliation against anyone who speaks up about a real concern.</p>	<p>Step 1 - Talk to our line manager/leader:</p> <p>It's important to protect our customers and each other. If we have a concern, we talk to our line manager or leadership team first. They're here to listen and support us.</p> <p>Step 2 - Use the Speak Up service:</p> <p>If we can't talk to our manager or leadership team, or if they're involved in the problem, we can use the Speak Up service. We can report or discuss issues confidentially with our Speak Up team at speakup@aviva.com or contact a team member directly. They will handle our concern with care and confidentiality.</p> <p>Step 3 - Use EthicsPoint:</p> <p>If we prefer to stay anonymous, we can use EthicsPoint. It's run by an independent company and is available 24/7. We can report by phone or online at AvivaSpeakUp.ethicspoint.com (or scan the QR code). Only the Speak Up team can see the concerns (anonymous or otherwise) and they will action as appropriate. EthicsPoint allows two-way communication between us and the Speak Up team, even if we've raised our concern anonymously, so we need to remember to make a note of our login details and check the portal for messages and updates.</p> <p>Step 4 - External reporting:</p> <p>In the UK, we can report to the Financial Conduct Authority or the Prudential Regulation Authority at any time. We don't have to report to Aviva first.</p> <p>In Ireland, we can report to the Central Bank or the Protected Disclosures Commissioner. Check the Irish Government's Protected Disclosure website for more details.</p> <p>If we need more information, we can find it in the Speak Up Charter on the Speak Up site on Aviva World or on Aviva.com.</p>

Raising concerns helps us all work together better and keeps Aviva a great place to be. Our voice matters, and management and the Speak Up team are here to listen.

Guidance notes: our principles explained

1. Act with integrity and live our values

What we need to do

We must uphold the highest standards of corporate ethics, transparency, integrity, and honesty. We're 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 Group standards and values. We must comply with both the spirit and the letter of all laws and regulations 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 being open and cooperative with regulators and adhering to: (i) key regulators' requirements and principles including the UK FCA's Conduct Rules, the PRA's Fundamental Rules and/or the Central Bank of Ireland's (CBI) Conduct Standards¹ (where applicable); or (ii) the applicable local regulations in the countries/markets in which we operate.

We must not make false or misleading statements or fail to state material facts in connection with transactions.

Why is this important?

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

Scenario

Q: In the country/province 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 and policies are the minimum standards which apply to all Aviva businesses and colleagues. If there is a difference between Group policies/standards and local laws and regulations, colleagues are expected to follow the highest standards in all cases and must always comply with the law.



¹ In the UK, the Senior Managers and Certification Regime (SMCR) Conduct Rules apply, and Conduct Rule 1 is 'You must act with integrity' and Conduct Rule 3 is 'You must be open and cooperative with the FCA, the PRA and other regulators'. In Ireland, the Individual Accountability Framework (IAF) Conduct Standards apply and Conduct Standard 1 is 'that the person acts with honesty and integrity and Conduct Standard 3 is 'that the person cooperates in good faith and without delay'.



2. Reject financial crime

What we need to do

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

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

1. Bribery and corruption.
2. Fraud.
3. Facilitation of tax evasion.
4. Market abuse.
5. Money laundering and terrorist financing.
6. Sanctions (including Proliferation Financing).

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 colleagues to the risk of substantial fines and even imprisonment. Aviva will investigate and seek to sanction or discipline agents, colleagues, directors, or others suspected of engaging in acts of financial crime within Aviva.

a) Bribery and corruption

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

It's a criminal offence² and could result in imprisonment. Aviva could also face criminal prosecution or regulatory sanction if it can't evidence adequate and effective controls to prevent bribes made by someone acting on its behalf.

For further details please review our [Prevention of Bribery and Corruption Statement](#).

What we need to do

1. We refuse to pay or offer a bribe, no matter how small, anywhere in the world.
2. We don't make, promise or offer facilitation payments nor inducements to public or government officials.
3. Any person associated with Aviva is strictly prohibited from doing anything that supports, encourages or facilitates bribery and corruption.
4. We reject the offer or payment of a bribe in any part of our business activity, anywhere in the world.
5. We complete relevant training to be able to identify and manage the bribery risks that may arise in our roles.
6. We report all offers of a bribe, requests for a bribe or suspected corruption immediately to the local Financial Crime or Compliance team or through the Speak Up service.
7. We carry out appropriate and proportionate due diligence on all Aviva's associated persons and Third Parties.
8. We maintain an accurate record of gifts and entertainment (offered, given and/or received) in accordance with our local requirements (see Conduct business in a fair manner section for further details).

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 or council office to provide insurance cover. The public officer that you're dealing with suggests that another insurer has offered them a weekend break to advance its 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 team, Compliance team or through the Speak Up service.



b) Fraud

Fraud consists of acts of deception intended to secure an unfair or unlawful financial or other benefit. Aviva may be the victim of fraud from internal sources (e.g. employee expense fraud), and/or from external sources (e.g. underwriting or claims fraud).

We have a responsibility and role to play in protecting our customers from fraud involving Aviva products or services, for example where they may fall victim to a ‘scam’ that targets their pension or investment funds.

What we need to do

We must not engage in any fraudulent activity. All of us have a responsibility to play an active role in preventing, detecting, and reporting fraud. We must be vigilant, act with honesty and integrity and help protect Aviva and our customers. We complete the fraud training required for our role and adhere to Aviva’s control requirements. Where we have a suspicion of fraud, we report it to our local Financial Crime team, Compliance team, our line manager or through the Speak Up service.

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 colleagues, 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 we need to do

We refuse any requests to facilitate tax evasion. We strictly prohibit any person associated with Aviva from doing anything that supports, encourages, or facilitates tax evasion. We complete the tax evasion training required for our role and adhere to Aviva’s control requirements. We act with honesty and integrity and report any suspicion of tax evasion to our local Financial Crime team, Compliance team, our line manager or through the Speak Up service.

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 intentionally or unintentionally 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. A breach of competition law can also amount to market abuse by companies and/or by employees.

What we need to do

We mustn't engage in market abuse activities, such as: insider dealing, unlawful disclosure, market manipulation or attempted manipulation. Any market conduct that may also be perceived as an abuse of market dominance and, in particular, conduct intended to have a predatory, exclusionary or disciplinary negative effect on a competitor or an adverse effect on competition could also be deemed to be market abuse.

Directors, employees, advisers, and agents must comply with our internal controls and processes 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 of up to 10 years. In Canada, for breaches of the Competition Act, Canada's Competition Bureau can also impose significant financial penalties and other relief.

Directors, employees, advisers, and agents:

1. 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 Aviva Group (the "Group") and be on guard to avoid careless or unintentional disclosures which may damage the Group's business or that of its customers or suppliers.
2. Should not deal in shares of Aviva whilst prohibited to do so under the Aviva Share Dealing Policy (refer to Aviva World or your local intranet equivalent for further details).

3. other person except where it is necessary to do so to carry out their duties and is appropriately approved and recorded.
4. Should not deal in securities of any other company whilst in possession of 'inside information' in connection with that company.
5. Directors and all 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 (3) days of dealing.

Laws and regulations in the jurisdictions in which Aviva Investors operate prohibit employees from (i) trading in securities and other related financial instruments while in possession of material, non-public information, and (ii) improperly disclosing that information to others (i.e. "tipping off"). Violation of these laws and regulations may expose employees and the Group to severe regulatory, civil and criminal sanctions, and potential significant reputational risk. It is important to note that the prohibitions on insider trading remain in force until the information ceases to be inside information, i.e. the information is adequately disseminated in the public domain or is no longer material.

Any Aviva Investors employee in possession of inside information in respect of securities or other related financial instruments must follow the requirements of the Aviva Investors Global Market Conduct Policy, the Market Conduct FAQs and the AIMART Step by Step Procedures.

What is personal account dealing?

Where we invest on our own behalf, rather than on behalf of customers. Examples include, but aren't limited to:

1. The sale of Aviva shares from Aviva share ownership schemes or the purchase and sale of shares of other listed companies.
2. Saving via a stocks and shares ISA.
3. Having an investment account with a company such as Wealthify or Hargreaves Lansdown.

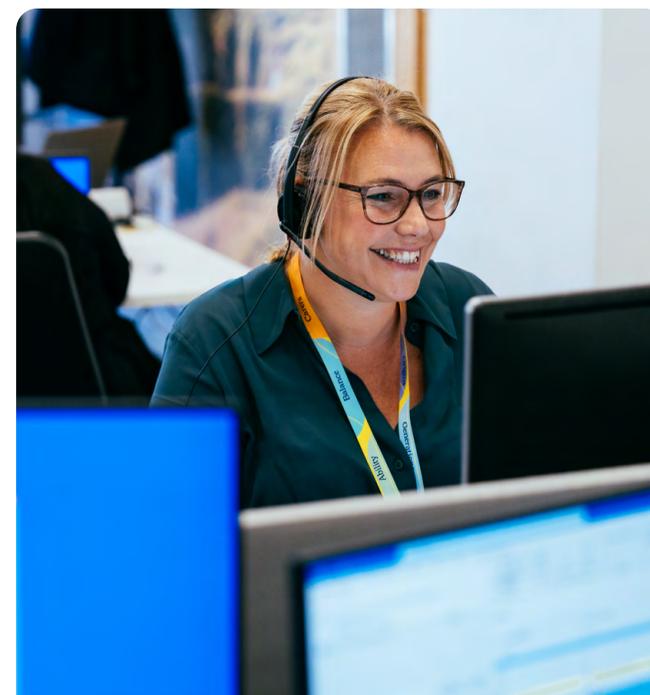
What are the restrictions?

We and our connected persons must not use or share information obtained by virtue of our role in Aviva, (i.e. it isn't publicly available), to our advantage when carrying out personal account dealing. Further, we must ensure that our personal account dealing activity doesn't: (i) come into conflict with the interest of Aviva or its clients/customers; (ii) disadvantage clients/customers; or (iii) conflict with Aviva's regulatory and legal obligations to its clients/customers in the jurisdictions in which it operates.

This information isn't limited to that defined as inside information or that's covered by non-disclosure agreements. It could include, amongst other things:

1. Detailed knowledge of Aviva pricing processes and fund operations.
2. Advance knowledge of upcoming internal transactions that could affect the price of listed securities.

To avoid potential or actual conflicts of interest, or insider dealing, certain transactions are expressly prohibited. Please refer to your local market/business unit policies and procedures for details.





e) Money laundering and terrorist financing

Money laundering is when individuals and/or entities 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 or through legitimately derived funds. Whilst there are additional responsibilities for businesses regulated for money laundering (for example the life business), the primary offences apply to everyone and every business.

What we need to do

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 and role; complete due diligence on our customers/clients; monitor their activities; and keep their information accurate and up to date.

We report suspicions of money laundering to our local Financial Crime team, Compliance team, our line manager, or through the Speak Up service.

f) Sanctions (including Proliferation Financing)

Governments and multinational organisations, including the United Nations, EU, UK and Canada impose trade and economic sanctions to pursue foreign policy or national security interests.

Sanctions targets may include individuals, entities, groups, governments, or government agencies. This may impact our business relationships with customers, clients, business partners, distributors, claims handlers or others. Generally, any business conducted that's subject to sanctions is prohibited. Breaching sanctions is a crime for the individuals involved, and Aviva and its employees.

What we need to do

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

We ensure records are accurate and up to date, complete the sanctions training required for our role, comply with applicable sanctions laws and regulations, and adhere to Aviva's control requirements.

We should refer to the Financial Crime Business Standard and associated Minimum Compliance Standards for further details.



We take care not to seek to improperly influence or be compromised by gifts and entertainment when doing business.

3. Conduct business fairly

a) Gifts and entertainment

What we need to do

We take care not to seek to improperly influence or 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/or received.

Business entertaining can form part of a normal business relationship. However, it should always be proportionate, appropriate, and transparent. Further, it must comply with policy requirements and must not create an actual, potential, or perceived conflict of interest.

All Aviva colleagues are: (i) subject to specific thresholds as set out in our local policies and procedures; and (ii) required to keep an accurate record of gifts and entertainment in accordance with local policies and procedures.

This applies to gifts and entertainment both given and received regardless of whether these are accepted or declined. We must take particular care when dealing with public officials.

Gifts to public officials are prohibited and all entertainment given or offered to a public official must be pre-approved and recorded on the StarCompliance/Compliance Central system (or local equivalent), regardless of the value.

For further information, we should refer to our local Financial Crime or Compliance sites on Aviva World (or local equivalent).

Why is this important?

Offering or accepting gifts and entertainment could be seen as a bribe if it is lavish, disproportionate, or intended to influence the recipient. It may also create an actual or perceived conflict of interest.

Offering or accepting gifts and entertainment in contravention of Aviva's rules could be a serious disciplinary offence for Aviva colleagues and may result in criminal liability for Aviva.

Scenario

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

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, it must also be entered into the StarCompliance/Compliance Central system (or local equivalent).

b) Supplier relationships and third-party partnerships

What we need to do

We always: (i) strive to respect and comply with the terms of our contracts; (ii) with financial crime legislation and regulation; and (iii) our local policies and procedures. Aviva doesn't purchase goods and services from a prospective supplier with any condition of purchase being that the supplier buys products or services from Aviva.

Why is this important?

We believe that fair and honest relationships make Aviva a trusted business partner.

It is fair to do our utmost 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 of our suppliers, brokers and other business introducers of this Code and ask them to agree to abide by our [Third Party 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 we need to do

We don't 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 must always be mindful of the privileged access³ we have, by virtue of our employee status, that may create an actual or perceived conflict. We read, understand, and follow the relevant policies and procedures, and we will always make sure any perceived, potential or actual conflict of interest is appropriately managed and disclosed on the StarCompliance/Compliance Central system (or local equivalent).

We put in place and follow effective processes to ensure that we are aware of our responsibilities and to ensure appropriate controls are in place to identify, prevent and remediate any CoI.

We're expected to avoid any employment, business activity outside of Aviva, or outside interests which might interfere with normal business activities, create a perception of impropriety, or jeopardise Aviva's integrity and/or reputation.

We don't lend to or borrow money from any of Aviva's suppliers, customers, or clients (other than as part of a publicly available arrangement with high street banks and credit providers).

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



We must appropriately manage any personal relationship⁴ with another individual so that it doesn't impair objective decision-making, result in an unauthorised exchange of confidential information, or otherwise negatively impact the interests of Aviva. We do this by discussing any personal relationship that may create a potential conflict with our leader or someone more senior so that any appropriate action can be taken to safeguard us and Aviva.

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 colleagues. 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, the Relationships at Work Policy, our Conduct and Improving Performance policy hub and equivalent local policies on Aviva World (or the local equivalent).

³ For example (but not limited to), the ability to view, transact or update product accounts or access to policy and/or claims data.

⁴ Examples of personal relationships include (but aren't limited to): (i) family relationships; (ii) romantic/dating relationships; (iii) a relationship between a leader and colleague; and (iv) a business/commercial/financial relationship.

4. Deliver good customer outcomes

What we need to do

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 deliver good outcomes, including but not limited to, vulnerable customers who need particular attention and care. We must ensure that we understand and comply with the regulatory requirements relating to customers of the markets in which we operate.

Under the UK Consumer Duty, the four customer outcomes represent the key elements of relationship between customers and firms to help drive good outcomes for customers. In summary, the four outcomes are:

- 1. Products and services** - should be (i) fit for purpose; (ii) designed to meet the needs, characteristics, and objectives of the target market; and (iii) distributed appropriately.
- 2. Price and value** - there should be a reasonable relationship between the price a consumer pays for a product or service and the benefits they receive from it.
- 3. Consumer understanding** - communications should support and enable customers to make informed decisions about products and services and be presented in a way they can understand and give them the information they need.
- 4. Consumer support** - Customers should be provided with a level of support that meets their needs throughout their relationship with the firm and be supported in pursuing what is suitable for them financially.

⁵ Regulatory bodies, other than the FCA, exist within the international markets in which we operate. They provide fair treatment of customer regulations and govern accordingly. We must ensure that we also operate in accordance with these requirements as appropriate. It's important to understand what the relevant requirements means for you and how we do business.

⁶ Under the IAF Conduct Standards there is an equivalent principle for Irish employees who hold a regulated role. Conduct Standard 4 requires 'that the person acts in the best interests of the customers and treats them fairly and professionally'. For more information on the IAF Conduct Standards please visit the IAF Hub on AvivaWorld.

These four customer outcomes are informed and supported by the following cross-cutting rules: (i) acting in good faith; (ii) avoiding foreseeable harm; and (iii) enabling customers to pursue their financial objectives.

Why is this important?

Aviva is authorised and regulated by the FCA, the UK conduct regulator for the financial services industry⁵. Aviva must be able to satisfy its internal governance leadership and the FCA that, across the Group, we're operating in accordance with the FCA principles for businesses.

The Consumer Duty is a set of regulations from the FCA and is intended to introduce clearer and higher standards for firms, for the purposes of continuing to improve the outcomes that customers receive from financial services. It aims to raise the standards that customers can expect across the whole financial services sector.

At Aviva, we support the Consumer Duty and its principle of acting to deliver good outcomes for customers. Through the Consumer Duty and the Senior Managers and Certification Regime (SMCR), there are Conduct Rules which apply to all UK Aviva employees. Conduct Rule 4 states that you must pay due regard to the interests of the customer and treat them fairly⁶. Conduct Rule 6, which is introduced by the Consumer Duty regulation, imposes a high obligation that we must act to deliver good outcomes for retail customers. For more information about the FCA Conduct Rules and what they mean for you in your role please visit the IAR Hub on Aviva World (or local equivalent).



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.

Always ensure that you refer and adhere to your local complaint handling policy and procedures.

5. Respect confidentiality and follow competition laws

What we need to do

We ensure that neither we as individuals 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 previous employers or mis-using company and client assets.

We don't discuss, share, or receive confidential or commercially sensitive information with competitors. Commercially sensitive information includes any information which isn't 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 colleagues – 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 must never use confidential information for our own purposes or publish or disclose it to any Third Party, without specific authorisation. We must never use confidential information to the detriment or prejudice of Aviva, its partners, or our colleagues.

In relation to certain confidential projects and transactions, we may receive highly sensitive and secret information in relation to Aviva's commercial objectives, strategy, or new business opportunities ("Secret Information"). Where we're in receipt of such information we're

required to adhere strictly to the protocols in place within our local business unit for managing such secret Information and must only disclose or discuss matters pertaining to Secret Information with those persons on the Restricted List maintained by the relevant team (e.g. Company Secretarial).

We must always be mindful of the access to information we have, by virtue of our employment status, and must ensure we follow established data access procedures. Where unsure, we should speak with our line manager in the first instance.

We must comply with and uphold relevant competition laws.

Further information and guidance can be found in the Information Classification and Handling Policy, the Acceptable Use Policy, and on the Group Competition Aviva World page (or local equivalent).

Why is this important?

We must act with integrity in relation to information obtained during our employment. This extends to any information bought in, including any commercially confidential information, to Aviva from a previous role or employer (e.g., customer renewal data). 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's 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 (postal code/Eircode (or local equivalent) and house numbers) allowing individual preferences to be deduced and identities derived from other sources (e.g. electoral roll). What should you do?

A: You must recommend removing both house numbers and postcodes. The primary justification for doing so is protecting personal privacy (house number) as well as avoiding the disclosure of potentially identifiable health information (postal code/Eircode (or local equivalent)).

If in ANY doubt you should seek advice from the Data Governance and Privacy team in your business area or local in-house legal team.



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. Handle data appropriately - data ethics and privacy

What we need to do

Data ethics in Aviva is about handling the data of our customers, colleagues, and other stakeholders in a transparent, respectful, fair, and ethical manner. Data Privacy is about ensuring that Personal Data (of customers, colleagues, and other stakeholders) is protected; we must appropriately manage how much data is collected, how it's used and how it's managed. We must ensure that we keep data safe including against theft, loss or improper use, and respect and that we protect the privacy rights of our, customers, colleagues, and other stakeholders.

To ensure we deliver on this commitment, we must follow the following principles:

1. We understand and comply with our legal and regulatory obligations in respect of Data Privacy. Further, we manage/process data in accordance with the Aviva Data Privacy Business Standard and our local policies and requirements. This applies throughout the Personal Data lifecycle – from collection to destruction.
2. Processing of data:
 - The amount of Personal Data processed is limited to what is necessary for the specific purpose that it is being processed (e.g. for the product, service or process that we're delivering) and it isn't further processed for incompatible purposes.
 - Personal Data is kept secure and processed lawfully, fairly and in a transparent way. Further, there are appropriate controls in place to ensure the integrity of the data throughout the processing.
 - Personal information is kept up-to-date and held only for as long as we need it and in accordance with our Business Retention requirements.
 - We don't use systems that aren't approved by Aviva to store or send any of our customers' or other Third Party's personal data.

- We don't transfer Personal Data to another country/ jurisdiction without appropriate safeguards and authorisation in place.
 - We all take responsibility and be accountable for the processing and use of Personal Data.
3. We ensure our usage of Personal Data aligns with the principles of Fairness and Human Rights and we commit to the principles of Contestability and Human Empowerment. This means allowing individuals to challenge the decisions we make.

Why is this important?

Our customers, colleagues and other stakeholders trust us to process their data responsibly, ethically and keep it secure. Failure to do so could destroy the trust our customers and other stakeholders place in us, subject Aviva to large financial fines, and/or prevent us from processing some or all Personal Data needed to deliver products or services to our customers.

To demonstrate our top-level commitment to data ethics and privacy across Aviva, training on data privacy and cyber security is provided to all colleagues annually through Essential Learning (or local equivalent) and our colleagues with specialist and high-risk roles receive additional training.

For further information, refer to your Business Unit Data Privacy team and local Privacy policies (details can be found on Aviva World or local equivalent), and to Aviva's UK [Customer Privacy Policies](#) which are publicly available documents setting out what Personal Information we collect about our customers and how we use it, how customers can contact us if they wish to exercise their rights and the procedures that we have in place to safeguard customers privacy.

7. Report accurately and honestly

What we need to do

We act with due skill, care and diligence and record all financial transactions and non-financial information 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, conceal the nature of transactions, or otherwise change the substance of any transaction or activity are strictly prohibited.

Further information can be found in the Group Financial Reporting Business Standard on Aviva World (or local equivalent).





8. Pay our fair share of taxes

What we need to do

We operate in a transparent manner with all relevant tax authorities and conduct our business dealings in accordance with both the letter and spirit of all tax law.

We act with honesty and integrity, engaging with HMRC and other relevant tax authorities on a transparent and cooperative basis. We provide all relevant information to enable the tax authorities to assess current, future, and past tax risks.

We pay the right amount of tax at the right time in each of the countries in which we operate. We comply with tax laws and regulations and don't enter into schemes or structures which result in an abusive tax result.

When we undertake tax planning, we only do so in the context of wider business activity with a real and commercial basis.

Further information can be found in the Group Tax Business Standard on Aviva World (or local equivalent), and in our published [Aviva Tax Strategy](#).

9. Care for people and the planet

What we need to do

People

Aviva is committed to providing a working environment that respects and is supportive of the dignity of all individuals. All colleagues have the right to work in an environment that's free from discrimination, harassment, sexual harassment, and violence.

We treat our people with respect. We don't tolerate any form of discrimination, abuse or harassment of colleagues, contractors, suppliers, customers, or anyone else we deal with.

We have confidential processes in place to allow colleagues to report any incidents or concerns. All reports are assessed, investigated, and remediated as appropriate. We provide training on this annually to all colleagues through Essential Learning to ensure this is ingrained in our business culture.

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

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

Where applicable in the markets we operate, we respect our colleague'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, safety and security

Aviva must provide a secure, safe, and healthy environment for all colleagues, 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, and 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're encouraged to participate actively in achieving high standards of health and safety and colleagues, contractors and contingency workers are reminded that they must co-operate with management, so that we're compliant with our statutory duties.

Accessibility standards

Aviva is committed to meeting the requirements of the relevant laws in which it operates.

Aviva Canada is supportive of the Accessibility for Ontarians with Disabilities Act (AODA), and its goal of achieving accessibility with respect to goods, services, facilities, and employment.



Safeguarding

All colleagues are responsible for safeguarding children that come into contact with Aviva. Details about your local procedures can be found on Aviva World (or local equivalent).



Community

Aviva is committed to helping address some of the major issues that society faces. We do this by understanding the challenges our customers and communities are experiencing, identifying what is needed to tackle them, and exploring where Aviva's support can make the greatest difference. We have developed a clear and demanding future-facing sustainability ambition that's focused on three core areas: being a climate champion, supporting stronger, more inclusive communities, and running ourselves as a sustainable business.

We aim to extend our positive impact through providing financial support to local communities and expert partners, building their resilience in the face of climate and financial pressures. This support is strengthened by the provision of skilled volunteering opportunities for our staff to contribute to our sustainability and community goals.

Charitable donations

Corporate donations play a positive role in Aviva's sustainability ambition and strategy and enable us to demonstrate our commitment to:

1. Helping our customers and communities build resilience to climate, financial and health shocks.
2. Creating diverse, inclusive, and engaging workplaces and communities.

We don't authorise charitable partnerships or donations that meet any of the following criteria:

- Individuals, organisations on a relevant international or local sanctions list.
- Organisations with current bribery and/or corruption or other criminal investigations, prosecutions, or allegations.
- To individuals or organisations involved in political activity/influencing/lobbying to an extent which could give rise to unacceptable reputational political risk, or a commercial conflict of interest.

- For projects that favour the propagation of a religious belief or where participants/beneficiaries are required to belong to a particular religion.
- Must never be used to improperly influence business decisions.

This list isn't exhaustive, and we should refer to the Aviva Group Charitable Giving Policy and our local policies and procedures for full details.

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 as part of our risk management approach.

Donations at the request of a public official are prohibited. There's a high risk that this type of donation would be considered a bribe under the UK Bribery Act 2010 and other applicable laws in the countries/markets in which we operate.

Environment

We're aware of and adhere to local environmental regulations.

Aviva seeks to demonstrate leadership in our effort to reduce our carbon footprint where we have influence and control as well as other adverse impact on the environment. We look to minimise, where possible, Aviva's contribution to climate change across the whole of our business activities including our operations, supply chain, investments, and underwriting activities.

Our strategic approach and increased transparency through regularly disclosing our progress will enable customers, investors, and regulators to clearly assess how we intend to act in transitioning to a Net Zero economy.

Our climate ambition is delivered in a way that takes into accounts, and positively supports, associated issues such as protection and restoration of nature. This is to ensure that our focus isn't only on greenhouse gas reduction, but that we also support the health and functioning ecosystem. To this end, we all have a responsibility to minimise our adverse impacts on nature through the use of natural resources (e.g. wood, paper, and water) use of natural resources (paper, water) and energy use, including business travel.

Our Climate Action Plan outlines our goal of becoming Net Zero by 2040. More information can be found on [Aviva.com](https://www.aviva.com).

Why is our approach to these issues important?

Aviva aims to attract and retain the best talent available as the foundation for being a talented and sustainable workforce.

We have a responsibility to minimise the risk of greenwashing by being proactive in avoiding any statements about Sustainability at Aviva that could be misleading in either our reporting or communications (if ever unsure please refer to the [Aviva Anti-Greenwashing guidance](#) and take internal advice).

We have a duty to uphold our corporate reputation, and our commitments to corporate responsibility and sustainability 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 prevent our business activities from causing or contributing to violations of human rights of others.

Further information can be found in our Human Rights Policy and our Sustainability Business Standard on [Aviva.com](https://www.aviva.com).





10. Refrain from making political donations

What we need to do

We don't make any political donations in cash, in-kind or any other forms, or incur any political expenditure on behalf of Aviva.

Additionally, all engagement with public policymakers in the UK Government, Parliament and EU institutions is with the prior approval of the Group Public Affairs team.

Why is this important?

It's Aviva Group policy not to make political donations. Political 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, and under other applicable laws in the countries/markets in which we operate, 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 Financial Crime and Group Legal, Group Investigations and Individual Accountability Regime (IAR) Office Business Standards.

It's Aviva Group policy not to make political donations.

Guidance notes: how to raise a concern



Introduction

We all must do the right thing to protect our customers, assets, reputation, and each other. By all we mean colleagues, contractors, Directors, and any other Third Party with information about wrongdoing related to their work activities with Aviva and its subsidiaries.

We have a 'speak up' and 'live our values' culture. Being brave enough to speak up allows us to address issues before harm is done and helps us improve the way we do business.

Delivering on our responsibilities towards our people, **community** and the environment also means:

- **Care** by addressing things that don't seem right and reporting breaches of our Code.
- Staying **committed** by striving to do things better and following the principles set out in our Code.
- Being **confident** by making decisions that we can be proud of in years to come.

If we have a concern about improper behaviour connected to Aviva which was or may be a breach of our Code or appears/is unlawful or unethical, we can use the Speak Up service to report it.

What to report

There may be a specific definition of what constitutes a protected disclosure/relevant concern (or other legal term for whistleblowing) in your country. If you're unsure you should contact [the Speak Up team](#) who will make sure the right action is taken. Examples of the types of concerns you should raise include:

- Breaches of Aviva's Standards, policies, and procedures e.g. gifts and entertainments policy.
- Data privacy breaches (such as theft or deliberate/accidental data loss).
- Acts of bribery and/or corruption.
- Fraud, accounting misstatement and/or facilitation of tax evasion.
- Inaccurate, misleading, or fraudulent reporting of key risks or performance.
- Facilitation of tax evasion.
- Breaches of conduct rules/conduct standards under the SMCR or IAF (or local equivalent).
- Price fixing, market abuse, breaches of competition law, sanctions breaches, money laundering or insider trading.
- Human rights abuses and violations (including modern slavery, forced labour and any form of discrimination in our business or supply chain).
- Miscarriages of justice, dangers to health and safety or the environment.
- Bullying and/or harassment of others on the grounds of race, gender, religion, sexual orientation and/or other protected characteristics.

This list isn't exhaustive, and we encourage our colleagues, Directors, contractors, contingency workers, outsource providers, suppliers and other third parties to report any behaviour that violates the spirit of our Code and Aviva's high ethical standards, even if not explicitly listed in this section of our Code.

Further detail is available in our Speak Up Charter that can be found on the [Speak Up site on Aviva World](#) (or local equivalent) or on [Aviva.com](#).

When to report

We report a concern as soon as there's a reasonable suspicion of wrongdoing. We don't try to investigate concerns ourselves. If our concern is reasonable and genuinely held it doesn't matter if it turns out to be wrong.



How to report a concern

It's not always easy to raise concerns and we encourage you to discuss issues with your leadership team in the first instance.

The Speak Up service gives you an alternative route if you can't do this, for example if your leader is involved in the alleged wrongdoing, or you feel the right action won't be taken.

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

Email

speakup@aviva.com

Alternatively, we can contact a member of [the Speak Up team](#) directly.

There may be occasions where you'd prefer to raise your concerns anonymously and you can do that using EthicsPoint. EthicsPoint is operated by Navex, an independent company unconnected to Aviva. EthicsPoint can be used by anyone with information about wrongdoing related to their work activities with Aviva and its subsidiaries.

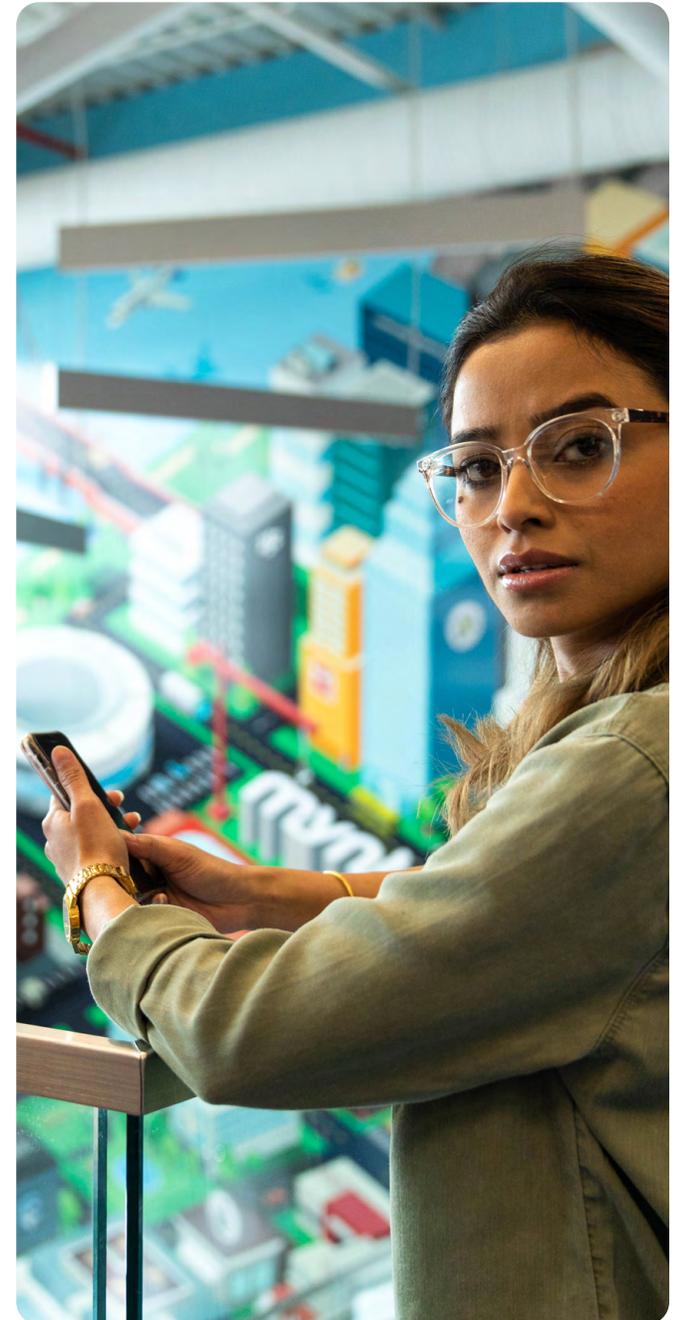
EthicsPoint is a free 24-hour service. It operates seven days a week and is a safe and secure way to raise a report by telephone in your local language or by submitting a report online.

Further details can be found by clicking on the following link:

AvivaSpeakUp.ethicspoint.com

Alternatively, scan the QR code below to raise a report directly via your mobile device.

All reports received are treated in a confidential manner and triaged by the Speak Up team.





We can contact the Speak Up team or the Group General Counsel if we believe we have been unfavourably impacted or treated as a consequence of raising a concern.

How Aviva protects its employees

We won't tolerate retaliation against anyone who speaks up and raises a genuinely held concern in connection with perceived wrongdoing. Retaliation, or any attempt to try and identify somebody raising a genuinely held concern is an example of gross misconduct and could lead to disciplinary action. If we believe we have been unfavourably treated because of raising a concern, we can contact the Speak Up team or the Group General Counsel, who will independently review our concerns.

Thanks to our relationship with [Protect](#), a UK charity set up to support people considering raising concerns and to provide confidential advice, we can use its Freephone Advice Line or utilise its [online form](#) for independent guidance on whether we should raise a concern to Speak Up. Contact details can be found at: www.protect-advice.org.uk.

If we raise a concern we know to be false

It's ok if we're mistaken; what matters is that we act on a genuine concern. However, this assurance isn't extended to anyone who raises a concern they know is untrue with malicious intent. Any colleague 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 don't 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.fca.org.uk/firms/whistleblowing>

PRA: <https://www.bankofengland.co.uk/whistleblowing>

In Ireland, an individual may, in certain circumstances, make a report to a prescribed person such as the Central Bank or to the [Protected Disclosures Commissioner](#). The current list of prescribed persons in Ireland can be found on the Irish Government's Protected Disclosure [website](#).

Reporting to regulators in other locations in which we operate varies. Further information on the Speak Up process and applicable regulators in the markets in which we operate can be found in the [Speak Up Charter](#) located on the Speak Up site on Aviva World (or local equivalent) or on Aviva.com.

Appendix 1 – Group Business Standards, policies and other codes

We read the following documents in conjunction with our Code:

Business Standards:

- Customer Experience.
- Customer Propositions.
- Data Governance.
- Data Privacy.
- Financial Crime.
- Financial Reporting.
- Group Legal, Group Investigations and IAR Office.
- Health, Safety and Security.
- Internal Controls.
- Model Risk Management.
- People.
- Procurement and Outsourcing.
- Sustainability.
- Taxation.

Policies:

- Acceptable Use.
- Anti Bullying, Harassment and Sexual Harassment Policy.
- Aviva Group Charitable Giving.
- Aviva Share Dealing.
- Conduct Risk.
- Conflicts of Interest.
- Information Classification and Handling.
- Information Security.
- Human Rights.
- Social Media.
- Relationships at Work.
- Respect at work.

Aviva Investors specific:

- Aviva Investors Global Conflicts of Interest Policy.
- Aviva Investors Global Financial Crime Policy.
- Aviva Investors Global Gifts and Hospitality Policy.
- Aviva Investors Global Market Conduct Policy.
- Aviva Investors Global Personal Account Dealing Policy.
- Aviva Investors Global Regulatory Engagement Policy.

Codes:

- AIC Code.
- Business Code of Behaviour.

We read, understand, and follow all Business Standards, policies, and procedures applicable to our roles. Our conduct must also meet the relevant expectations laid out in any Risk Appetite Statements applicable to our roles. All Aviva Codes, Business Standards, and policies can be found on the Aviva intranet or the local intranet equivalent.

We're 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, procedures, or guidelines for conducting business in their country/market. It is the responsibility of management to ensure all employees are made aware of and have access to such policies, procedures, and guidelines.

For queries about The Aviva Business Ethics Code
please contact our Group Investigations team:
groupinvestigations@aviva.com

