

# Aviva's Modern Slavery and Human Trafficking Statement 2022



AVIVA

**In line with the requirements of the Modern Slavery Act 2015 (the “Act”) and in accordance with section 54 of the Act<sup>1</sup> this statement outlines the steps Aviva plc (‘The Group’ or ‘We’) has taken in the past twelve months (financial year ending 31 December 2022) to prevent, and if ever found occurring, to address and resolve any form of modern slavery within our business operations and supply chain. This statement applies to Aviva plc and its subsidiaries. This is the seventh statement we have issued.**

Modern slavery is an umbrella term that encompasses the offences of human trafficking and slavery, servitude, forced or compulsory labour, as set out in the anti slavery legislation in place in the UK. Modern slavery is often a hidden crime hence difficult to detect<sup>2</sup>.

Aviva recognises that modern slavery is a violation of fundamental human rights and freedoms. We are fully committed to respecting human rights, we will endeavour not to infringe the rights of others and will eradicate, address and mitigate any risk or instance of modern slavery that might arise within our operations and supply chain as set out in the **United Nations Guiding Principles on Business and Human Rights** (UNGPs). We fully support the principles of the **International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work** and we are determined to act in alignment with the guidance of the UNGPs. We have also been a signatory and supporter of **the United Nations Global Compact, since 2001**. We endorse their work in the areas of human rights, labour, environment and anti-corruption, which includes the elimination of all forms of forced labour and the abolition of child labour, and we report annually against their ten Principles.

Our purpose at Aviva is to be ‘with you today for a better tomorrow.’ Acting responsibly is vital to achieving this purpose. Doing the right thing is essential for our customers, our employees, our investors, the communities in which we live and ultimately our business. Our work to address modern slavery and human trafficking is fundamental to this and to our wider approach to respecting human rights. In line with our purpose and with Aviva’s values and principles detailed in the Aviva Business Ethics Code 2022, we are committed to the eradication of modern slavery and are progressively embedding human rights considerations into our business.



## 6. Our approach in action

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

<sup>2</sup> Definition adapted from definition contained in Home Office (2017) A Typology of Modern Slavery Offences in the UK – Research report 93 <https://www.antislaverycommissioner.co.uk/media/1190/a-typology-of-modern-slavery-offences.pdf>



# Our organisation and supply chain

## **The Aviva Group**

We are the UK's leading Insurance, Wealth and Retirement businesses, with 18.7 million customers in the UK, Ireland and Canada. We also have joint ventures in China and India.



Our customers can interact with us in several ways: online, by phone, through brokers, financial advisers, strategic partners and price comparison websites. Aviva's diverse workforce includes around 22000 colleagues across the UK, with approximately 16000 in the UK, working across different locations including London, Norwich, Bristol, Manchester, York, Perth, Sheffield, Birmingham, Worthing, Leatherhead and Glasgow. More information about our business can be found [here](#).

Globally, we have an active supplier base of around 3500 suppliers and third parties across the countries we operate in. They provide products and services for Aviva and for our customers. We also outsource a range of operational functions and activities including asset management, policy administration, claims handling and IT. Our service providers are mostly based in the UK but we do have providers in Ireland and Canada, and in India and China (where our joint ventures are based). We are committed to collaborating with these suppliers to play our part in the eradication of modern slavery.

Additional details of our business, operations and supply chain can be found in our [Annual Report and Accounts 2022](#).

The table below summarises our global business footprint:

Market	Contribution to 2022 Group adjusted operating profit <sup>3</sup> (£m)	% of employees (Group total)	% of managed suppliers (Group total)
<b>UK &amp; Ireland Life</b>	1,908	38	16
<b>UK &amp; Ireland GI</b>	338	32	42
<b>Canada</b>	433	18	19
<b>Aviva Investors<sup>4</sup></b>	25	4	10
<b>International Investments<sup>5</sup></b>	52	6	13
<b>Other Group activities</b>	(543)	2	n/a
<b>Total</b>	<b>2,213</b>	<b>100</b>	<b>100</b>

<sup>3</sup> Group adjusted operating profit is an alternative performance measure (APM) which is used by the Group to supplement the required disclosures under IFRS. Please refer to note B in the 'Accounting Policies' section and to the 'Other Information' section within the Annual Report and Accounts for further information  
<sup>4</sup> Includes operations in the UK, Canada, Ireland, United States, Singapore, Australia, Switzerland, Luxembourg, Germany, Netherlands, Italy and France  
<sup>5</sup> International Investments includes China, India and Singapore.



# Our commitment and our work

We recognise that the risk of modern slavery exists across our businesses, and our approach aims to go beyond the basic requirements of the Act, for example we include Aviva businesses outside of the UK as well as our joint ventures and seek opportunities to influence others in this area. In 2022, we continued to review modern slavery risks in the UK, Canada, Ireland, India and China, and monitored our wider human rights risk across all the countries we operate in.

In 2022, we enhanced our human rights and anti-modern slavery action plan. This was based on the findings of the human rights due diligence work carried out across all our businesses, including our joint ventures, and evolving external guidance and best practice. As a result, we have advanced our human rights and anti-modern slavery commitments and have selected an additional external expert partner to support us. We reviewed and further expanded our supplier ethical assessment processes working with our partner Slave Free Alliance<sup>6</sup>. We continue to raise awareness internally and externally with our suppliers and we are expanding partnerships with charities and social enterprises tackling modern slavery and supporting modern slavery survivors.

Taking a risk-based approach, we focus on those suppliers that directly provide Aviva with goods or services, specifically those that are actively managed by the business, including the suppliers that represent Aviva's highest commercial risk and/or most significant expenditure.

We also understand that the risk of modern slavery is present within our sub-suppliers. What is more, in some cases, the risks within these suppliers may be higher. Hence, in 2022 we piloted a new approach to assess the labour and ethical practice of our sub-suppliers. We worked jointly with our direct suppliers and our external sustainability partner EcoVadis<sup>7</sup> to either access existing ESG assessments or requesting the sub-supplier to undergo an ESG evaluation. We plan to refine this approach in 2023.

<sup>6</sup> Slave-Free Alliance is a social enterprise owned by international charity Hope for Justice. Its mission is to end modern slavery and human trafficking.

<sup>7</sup> EcoVadis is an established provider of business sustainability ratings. Increasingly global supply chains, private and public organisations partner with EcoVadis to monitor and improve the sustainability performance of their business and trading partners. More information can be found at [www.Ecovadis.com](http://www.Ecovadis.com)

# Our Policies and Standards related to modern slavery

We recognise that robust risk policies (“Policies”) and business standards (“Standards”) are crucial to help us uphold human rights and prevent modern slavery. Our Policies are guided by internationally recognised human rights standards<sup>8</sup>. We regularly assess our Policies and Standards to ensure their effectiveness, working with internal subject matter experts as well as with external partners.

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<sup>8</sup> Including but not limited to the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation’s Declaration on fundamental Principles and Rights at work, International Labour Organisation Conventions, the UN Global Compact principles on Human Rights and Labour Standards, the Women’s Empowerment Principles and the UN Guiding Principles on Business and Human Rights, which detail the “Protect, Respect and Remedy” framework.



**Our Human Rights Policy** During 2022, we reviewed our Human Rights Policy to incorporate new developments. The Policy was reviewed in consultation with internal stakeholders and an external expert on business and human rights. The Policy includes our human rights governance, and our commitment to respect the human rights of others including our employees, our customers and our suppliers. It clarifies our approach to mapping our salient human rights issues; our commitment to investing our money and our customers' money in a responsible manner, considering human rights issues, our approach to remedy<sup>9</sup>, and our future plans in this space.

**Our Aviva Business Ethics Code** The Code was reviewed in 2022. It outlines the minimum standards of ethical behaviour required from Aviva directors and employees, guides us to act responsibly and transparently, and encourages our colleagues and the people we work with to report unethical and illicit behaviour, including raising any issues relating to modern slavery. In 2022, we included a decision-making tool in the Code. This tool helps our employees navigate complex situations, and it guides us when making challenging decisions on ethical issues while living up to Aviva's values.

Our directors and employees are required to read and agree to adhere to the Code each year. We track and report externally on the percentage of directors and employees who sign up to our Code annually. We share the Code with our suppliers to ensure they understand what standard of behaviour we expect. In 2022, 99.6% of our employees signed an understanding and acceptance of the Code. Our Aviva Business Ethics Code 2022 can be found [here](#).

### **Our Third Party Business Code of Behaviour**

The Code outlines the minimum standards we expect our suppliers to adhere to. In 2021, we consulted with Slave-Free Alliance to update the Code and further enhance the sections on human rights and labour standards, to ensure the Code aligns with all the provisions contained in the **Ethical Trading Initiative Base Code** and **ILO Fundamental Conventions**.

The purpose of this Code is for a Third Party and Aviva to confirm a commitment to behave in a certain way when dealing with each other. It covers key areas including vulnerable customers, human rights, respect and promotion of key labour standards, diversity, inclusion and equal opportunities, health and safety and many others. When referring to labour standards this is what we specifically ask of our suppliers:

- No form of modern slavery or forced labour, including human trafficking, involuntary prison labour, indentured labour, bonded labour or otherwise is permitted
- Children under the age of 15 or under the minimum legal working age (whichever is higher) must not be employed. Where young people (15-17 years old) are employed, the employer must comply with the relevant legal requirements in that region/country to provide sufficient protection

- The right of employees to join and organise associations of their own choosing and to bargain collectively must be recognised and respected
- Employees should receive fair compensation and benefits. In all cases, wages must meet or exceed the minimum wage required by law
- Working hours should not exceed 48 hours per week and should comply with national laws and industry standards. Overtime shall be voluntary, and employees should be compensated at the rate legally required in the country or at a rate exceeding regular hourly wage
- Employees should enjoy secure and stable employment and regular income
- Employees must be treated with dignity and respect. The workplace must be free of harassment, abuse, and degrading treatment
- No employee will be subject to physical, sexual, mental or any other form of abuse or harassment or corporal punishment.

We track annually the number of our registered<sup>10</sup> suppliers who have agreed to abide by the principles detailed in our Code. In 2022, 99.8% of suppliers in the UK, Canada and Ireland agreed to abide by the provisions of our Code.

<sup>9</sup> In line with the Remedy pillar of the United Nations Guiding Principles businesses have the responsibility to prevent and remediate to any adverse human rights impacts they cause or to which they contribute. Remediation refers to both providing remediation for causing or contributing to cause a negative human rights impact or turning a negative impact into a positive one. More information on the Remedy Pillar of the United Nations Guiding Principles and its applicability: [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

<sup>10</sup> A Registered Supplier means a supplier that has completed the Aviva supplier registration form on the Ariba network, and that form has been checked and approved by the supplier registration team. All suppliers to the UK, Ireland and Canada are required to complete this process.

# Our reporting mechanisms



Any concerns regarding unethical conduct, including modern slavery related risks or issues can be raised by employees, business partners, suppliers and third parties via the following channels:

**The Speak Up service** is Aviva's whistleblowing facility that includes a confidential and secure service to raise concerns, including anonymously. It includes both internal and external channels for reporting concerns, all of which are received and triaged by our dedicated Speak Up team. Concerns can be raised directly to the Speak Up team at [speakup@aviva.com](mailto:speakup@aviva.com). Concerns can also be raised 24/7 via EthicsPoint at [AvivaSpeakUp.ethicspoint.com](http://AvivaSpeakUp.ethicspoint.com). Modern slavery is stated specifically as an issue to report via Speak Up. Each year the Aviva Subsidiary boards, and the Audit Committee of Aviva plc receive an annual Speak Up report to ensure oversight of any reported issues.

Throughout 2022 we have rolled out the 'Speak Up and Listen Up' Campaign, with the aim of empowering our people to have open and honest conversations and providing them with the skills and tools to know how to raise a concern. Utilising all key communication platforms internally and working with senior leaders across the business has ensured a positive impact on our 2022 Voice of Aviva Results; with 85% of our people feeling safe to raise concerns, in comparison to 75% in 2021.

The Speak Up Advocates Network was launched in the UK and Ireland to help drive key messages from Speak Up throughout the business. Speak Up information is also published externally on our Corporate pages and careers pages for the UK and Ireland.

In the event of a concern relating to human rights, including modern slavery, being raised, the concern is escalated to the Aviva Group Investigations Team. During 2022, we received 131 reports via Speak Up, with none related to actual or potential abuses of human rights.

We review our approach to providing access to remedy for human rights and modern slavery issues on a regular basis. We are working with an external human rights partner to enhance our approach to providing remedy so that we can assist victims should a case of modern slavery, human rights or labour rights violation take place within our operations or supply chain. Our current provisions include our Speak Up service; our customer support and complaints helplines; the requirement for suppliers to provide access to remedy under The Aviva Third Party Business Code of Behaviour; signposting the reporting channels with our regulators; and the wider criminal and civil proceedings before the ordinary courts which are accessible to all citizens.

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



# Our approach to due diligence and risk management

We have determined the risk of modern slavery in relation to our direct employees to be low. This is because insurance and asset management have not been identified as a key risk sector and almost all our employees work in roles that are low risk e.g., office-based roles, and include roles that require specialist qualifications e.g., accountancy, actuarial, procurement, human resources.

This low-risk rating for the Aviva group was reaffirmed by the Slave Free Alliance in 2021. While we are aware that modern slavery could still be found in our business operations, we consider that our risks are most likely to be found in our supply chain.

In our supply chain higher-risk areas include cleaning, catering and car valeting. Medium-risk areas include manufacturers we buy from, outsourcers (e.g., call centre suppliers) and some facilities management providers (e.g., office furniture, electrical maintenance, printing services, facilities management, construction, manufacturing, logistics and warehousing).

Our approach to risk assessment combines internal expertise, data from our Procurement systems and teams, and publicly available research regarding high-risk sectors and activities. We continue to review and assess our modern slavery risk across the business every year.

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





# Our approach in action

## What is our approach to recruitment?

In the UK, we manage the risk of modern slavery by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. We work with third-party service providers to make sure all our people go through a vetting process by conducting pre-employment checks. Pre-employment screening helps us ensure that anyone recruited to work for Aviva in the UK has the right to do so. We perform Criminal Record Checks as part of this pre-employment screening process. Prior to starting employment, each new joiner will be issued with a contract of employment which confirms that they will be contracted to work either a standard or non-standard working pattern with “standard” working hours. Standard working hours are set out in our contracts of employment as 1827 hours annually for a full-time person which is an average of 35 hours per week. Our businesses outside of the UK establish their own pre-employment checks and working patterns, always abiding by local legislation.

Despite our operations being rated low risk we are adding an extra level of due diligence for our own employees. We are undertaking a review of duplicate bank accounts (3 or more people using the same account details) as well as shared addresses. These checks will be performed within our UK businesses with the aim of extending the approach to all our core businesses. Sharing bank accounts, addresses or telephone numbers can be a red flag as they may be an indication of unethical behaviour and can be linked to modern slavery. We performed some checks at the end of 2022, and we have found no concerns. We have suggested that our suppliers include a similar check if not already in place, as part our supplier assessment. We plan to further expand this approach in 2023 including reviewing shared emergency contact details and shared home addresses.



## What is our approach to group wide due diligence and risk assessment?

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

### Achievements in 2022 include:

- Going beyond onboarding checks and supplier threat assessments to implement enhancements into our supplier management system by using the Sustainability Ecovadis platform
- Continuing to raise awareness internally
- Continuing to evolve our approach to integrating human rights considerations into investment decisions and our influence as an investor
- Continuing to review and share wider best practice internally and externally
- Continuing to expand and promote our anti-modern slavery training<sup>11</sup>
- Selecting suppliers to undergo an ethical supplier assessment.

### Priorities in 2023 include:

- Continuing to build our understanding of how to use our People systems proactively to detect any potential modern slavery risks factors (e.g., shared bank accounts, shared home addresses, next of kin emergency contacts)
- Building an understanding of the potential risks related to using second tier recruitment agencies and helping assess smaller local recruitment providers with a key focus on their human rights and anti-modern slavery approach.

During 2022, we also worked more closely with Sesame Bankhall Group Limited, a member of the Aviva plc group of companies. The board of Sesame Bankhall Group Limited oversees adherence to the Aviva Standards and compliance with local corporate governance requirements. We have worked closely with Sesame Bankhall Group Limited and shared the Aviva Business Ethics Code, so that their approach to ethics is aligned to that of Aviva plc. In terms of supplier approach, we have obtained a list of material suppliers and checked their credentials via desktop research. To help them with supplier due diligence, we shared an anti-modern slavery and labour rights supplier focused questionnaire made up of key questions that they can use with their own suppliers to address the most pressing issues going forward. Lastly, we have offered Sesame Bankhall Group Limited employees access to our comprehensive Business and Human rights Modern slavery training and to our supplier contract clauses which they can use in their own supplier contracts.

<sup>11</sup> Prior having obtained employees and companies' consent to use their data in alignment with the GDPR (General Data Protection Regulation).



We have taken a similar approach with Solus Accident repair groups the UK's premier car accident repair group, owned by Aviva plc. We have shared our Business Ethics Code, the focused supplier questionnaire and provided access to our comprehensive training for key employees. We plan to work further with both organisations in 2023.

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

We require our suppliers to acknowledge our Aviva Business Ethics Code and abide with The Aviva Third Party Business Code of Behaviour. We continue to screen suppliers at the onboarding phase and as part of the payment process.

When responding to a request for a proposal in the UK, we ask our suppliers to agree that our standard clauses on human rights and modern slavery be included in the contract. These clauses include reference to the UNGPs remedy pillar, and all businesses have guidance on local laws or internationally recognised standards that they can use.

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

- Pay Eligible Employees not less than the Living Wage in respect of that work. Where an increase to the Living Wage is officially announced, pay Eligible Employees the increased amount within 6 months of the official announcement; and
- Notify Eligible Employees of the date of the next increase to the Living Wage within 1 month of the official announcement unless such Eligible Employees have been previously notified about the date on which they will receive at least the increase in the Living Wage
- No Zero Hours Contracts; unless the employee or worker has provided his or her express consent to enter such a contract. The supplier (or its sub-contractor) can, on request, provide to Aviva written evidence of such employee or worker's consent.

## Tackling modern slavery expectations include:

- Commitment to replying to the relevant anti-slavery and human trafficking questions contained within Aviva's supplier due diligence questionnaires
- Commitment to implementing due diligence procedures for its own suppliers, subcontractors and other participants in its supply chain in relation to the services provided to Aviva to ensure that there is no slavery or human trafficking in its supply chain
- Providing training on modern slavery for relevant employees (e.g., those that are responsible for the recruitment of staff and/or the procurement of goods and services)
- A requirement to notify Aviva as soon as it becomes aware of a case or potential case of modern slavery in its own operations or supply chain.

We request that new suppliers notify Aviva if they are required to comply with the UK Modern Slavery Act 2015. As in previous years, we have continued requesting evidence of compliance with the reporting requirements of the UK Modern Slavery Act 2015. In line with the commitment made in our previous Modern Slavery Statements; we have now completed checks on a risk based random sample of 10 suppliers to assess compliance with the Modern Slavery Act's requirements.

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



## Supplier assessments

In 2022, we enhanced our supplier assessment to cover all the main requirements relating to worker welfare, including investigating modern slavery. We have partnered with Slave-Free Alliance and our new supplier template now covers three existing established standards and Codes, these being The International Labour Organisation's core principles, the **Ethical Trading Initiative Base Code** (ETI), **The Social Accountability Standard- 8000 Standard**.

11 assessments were conducted across all our core businesses in the UK, Ireland, India and Canada. Suppliers fall in the following sectors: IT consulting, services and business solutions, property repair, catering services, property restoration, printing facilities, construction, security services and stationery suppliers.

### The assessment covered the following areas:

- Modern slavery
- Labour (Forced, compulsory or child labour)
- Worker rights and freedoms (including discrimination)
- Working hours
- Remuneration
- Health and safety
- Management Systems (including disciplinary procedures and grievance mechanisms)
- Wider related issues: e.g., use of sub-contractors, use of recruitment agencies, access to training.

The suppliers<sup>12</sup> were selected based on spend and sector-based risk. The supplier assessments were conducted in-house and mostly remotely with some assessments being conducted face to face. The assessment was based on a desktop approach whereby suppliers' existing documentation was assessed to obtain key data on their approach<sup>13</sup>.

Improvement plans were provided following the assessment, where relevant, with key recommendations for improvement. We are actively collaborating with these suppliers and monitoring their progress.

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

- Offering suppliers and their employees' access to our comprehensive business and human rights and modern slavery training
- Requesting them to start investigating any duplications of bank accounts, shared addresses, next of kin and emergency contacts for their workforce
- Requesting them to reference child labour and have specific reference to workers welfare and labour rights in key policies
- Sharing a high-level due diligence questionnaire for suppliers to share with their supply chain
- Introducing them to Aviva's approach to Living Hours and asking them to consider adopting this approach.

We also identified some best practice examples including:

- Use of key sustainability partners and platforms for supplier assessments
- Overall good practice in place when it comes to modern slavery (e.g., modern slavery statement in place, key checks in supply chain)
- Responsible recruitment practice and accurate vetting of employees
- Willingness to undertake Aviva business and human rights and modern slavery training
- The presence of key policies, code of conducts and other documents<sup>14</sup>.

From our 2022 supplier assessments we closed 17 of the 38 corrective action plans.

<sup>12</sup> Tier 1 suppliers are companies that supply parts, products or services directly to another company. They usually supply key product or services to a client company. Tier 2 suppliers are the key suppliers to tier 1 companies in the same supply chain.

<sup>13</sup> This included but was not limited to suppliers' policies, standards, MSA statements, internal risk systems and process details, employee handbook and any other externally shareable documentation.

<sup>14</sup> This included but was not limited to suppliers' policies, standards, MSA statements, internal risk systems and process details, employee handbook and any other externally available documentation.



## Sub-suppliers or tier 2

We are piloting an approach whereby we work with our tier 1 or direct suppliers to identify key and potentially high-risk sub-suppliers involved in delivering products and services to Aviva. Having obtained a list of these suppliers we have worked with a third-party sustainability expert Ecovadis to assess their sustainability profile and review their ESG (environmental, social and governance) scorecard.

The scorecard provides data on their labour, human rights and modern slavery performance and any corrective action plans. We are collaborating and monitoring these closely to make sure these suppliers are operating ethically, and we will continue to monitor their profile. Our preferred approach where performance is poor is to collaborate with suppliers so that they can improve their practice, rather than immediately deselecting them. Where their sustainability scorecard is not available, we have conducted a desktop based due diligence accessing their publicly available sustainability documents, e.g., modern slavery statement and consulted other external sources (e.g., MSCI and Sustainalytics) as well as accessing other company's publicly available documents.

## High risk jurisdictions

Beyond what was covered in the supplier assessments, we have also obtained a list of high-risk suppliers from our joint ventures, Aviva Cofco in China and Aviva India. While some of them had available scorecards on Ecovadis, allowing us to access their sustainability profile, most of them did not. We therefore conducted more desktop checks and reviewed their MSCI sustainability profile. These suppliers had average scores; and their Sustainalytics risk profile was medium. We will require these suppliers to undertake further due diligence both via Ecovadis and/or via our desktop assessment. Based on the outcome of these further checks we will select a supplier sample for an in-depth assessment in 2023.

## Resourcing and recruitment companies

Many organisations rely on external recruitment agencies to recruit staff. While most recruitment agencies will be established providers of labour, some agencies can become the target of modern slavery and human trafficking operators. Considering this, we continue to review our own recruitment agencies.

Aviva plc relies on a few key recruitment agencies for most permanent, contractor and temporary employees. We selected two agencies, based on how material their relationships are with Aviva, and assessed their ESG profiles using Ecovadis scorecards. We are comfortable that both agencies have adequate ESG credentials as both have been given a “good”<sup>15</sup> rating on Ecovadis and have policies related to modern slavery, child labour and human trafficking, adequate whistleblowing services in place, and their modern slavery statements meet all the legal requirements.

Both agencies undertake key recruitment checks in relation to all registered candidates introduced to Aviva in alignment with Aviva recruitment standards.

Alongside these main agencies, we also use smaller recruitment agencies. We have conducted internal basic desktop checks, risk assessments and accessed these agencies' Ecovadis scorecard where available. Considering that awareness of modern slavery and responsible labour practices may be lower at this level, we will consider conducting further due diligence on them if appropriate in 2023. A questionnaire covering the principal areas of recruitment including fees, treatment of workers and specifically treatment of migrant workers, and where applicable, ID checks, has already been drafted and is being piloted with more recruitment suppliers in 2023.

<sup>15</sup> The Ecovadis scoring scale includes, as stated on their website: Outstanding (score 85-100); Advanced (score 65-84); Good (score 45-64); - Insufficient (score 0-24). More info can be found [here](#)



## ‘Living Hours’ employer

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

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

Karen Paterson, our Group Property Director based in Group Sourcing, sits on the Living Wage Foundation Advisory Council. Through-out 2022 Aviva has played a key role in helping make Norwich a *Living Wage City*. Aviva together with other Norwich based living wage accredited organisations formed an Action Group, developed a plan which has been approved by the Living Wage Foundation and have launched a 3-year initiative aimed at increasing living wage accreditations in Norwich and the surrounding area. Aviva continues to engage closely the Living Wage Foundation and other organisations to test proposals for introducing a Living Pension.

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

# Our role as responsible investor



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

We recognise our investments may have adverse impacts on individual and collective human rights. We also recognise that human rights impacts can have a material impact on business outcomes, investment returns and client outcomes.

As a large asset manager, we acknowledge that this commitment involves setting clear human rights expectations for investee companies. It also means building and using our leverage to engage with companies to ensure they prevent and mitigate human rights risks and impacts, including those relating to modern slavery, and provide access to remedy where harms occur. We are committed to integrating human rights standards and frameworks into our investment activities, including decision-making and engagement across

all asset classes. As a financial institution, we also recognise that building our leverage may require engaging with other investors, policy makers, and wider stakeholders to address market failures which enable human rights abuses to persist in our society and in our investment portfolios. The 'Our Investments' section of the Aviva Human Rights Policy provides more detail on this work and is available [here](#).

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

- Votes Against Slavery, coordinated by Rathbones, focusses on ensuring FTSE 350 companies are compliant with section 54 of the UK Modern Slavery Act (2015). Companies that remain non-compliant and show no sign of positive engagement risk investors taking voting action at the company's next AGM. The initiative acknowledges that greater Government oversight and enforcement is necessary to maximise the full potential of the Act, and to ensure companies move beyond compliance towards improved management of modern slavery risks and impacts. In the interim, investor scrutiny remains a valuable tool to ensure minimum requirements of the Act are being met.

- Find it, Fix it, Prevent it, coordinated by CCLA, is a collaborative engagement focusing on improving the management of modern slavery risks and impacts in high-risk sectors in the UK. The programme has initially focussed efforts on the hospitality sector and recently expanded its scope to cover the construction sector - both sectors which are likely to face heightened modern slavery risks because of the pandemic, the cost-of-living crisis and changes to immigration policy. The initiative operates on the presumption that modern slavery exists in the value chains of almost every company - engagement aims to educate companies while also ensuring companies have robust processes in place to find, address (through effective remedy) and prevent instances of modern slavery in the future.

Both initiatives lean on the expertise of NGO and academic partners, providing timely insights into current trends and helping to ground truth in corporate practices. Through participation in these initiatives, we are also able to influence policy makers to ensure work continues to strengthen the Modern Slavery Act in the UK, and to promote calls for additional mandatory human rights due diligence legislation in the UK.



# Our governance

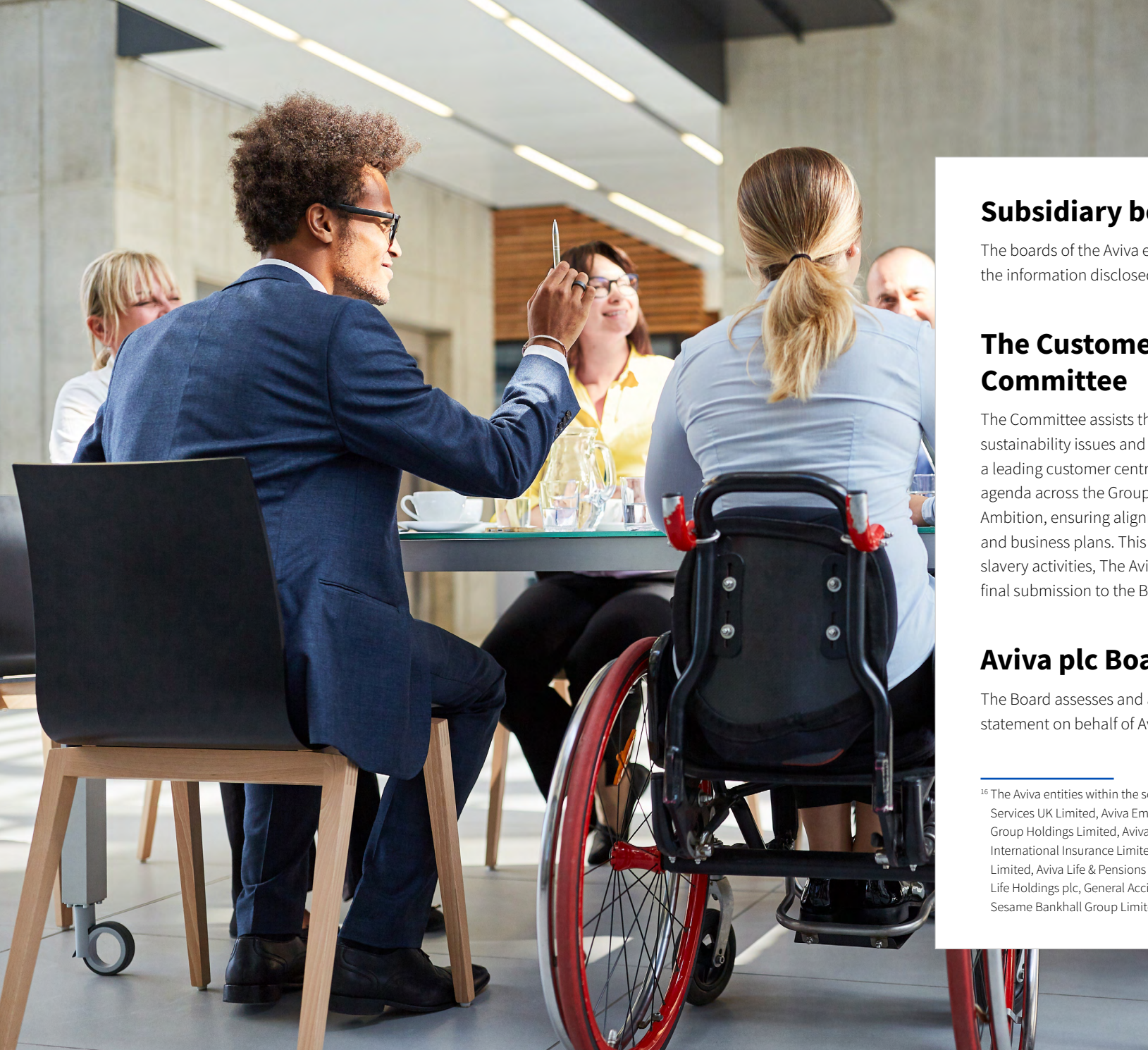
## Senior Managers and Executive Sponsors

The Group General Counsel and Company Secretary is the sponsor of our work on human rights and modern slavery, approving plans and reviewing progress. The Group General Counsel and Company Secretary also helps to provide visibility of the issue at the Executive Committee level, remove barriers to implementation and represent the agenda in external stakeholder engagements (e.g., with other businesses within the United Nations Global Compact and other key forums). Procurement and Sustainability senior management review progress against the action plan regularly, ensuring it is resourced appropriately and the implementation is well aligned with corporate priorities, and to sign off specific actions from the plan as appropriate.

## Human Rights and Anti-Modern Slavery Working Group

Our cross-functional working group has met quarterly during 2022 and we also further revised its membership. The group is comprised of representatives from Sustainability, Procurement, Supplier Management, Company Secretarial, Legal, Group Investigations, Group Audit, the People function (HR) and Aviva Investors also provide their expert view when required. This group supports the progression of key activities including policy improvement and development, enhancing our supplier approach to addressing modern slavery, providing advice on employee training, supporting supplier assessments and training, and ensuring detailed progress against our commitments. We continuously review the effectiveness of this group to ensure engagement across the organisation, and that key stakeholders are identified and included.





## Subsidiary boards

The boards of the Aviva entities identified within scope<sup>16</sup> review and approve the information disclosed in this statement.

## The Customer and Sustainability Committee

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

## Aviva plc Board

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

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<sup>16</sup> The Aviva entities within the scope of "the Act" are: Aviva Insurance Limited, Aviva plc, Aviva Central Services UK Limited, Aviva Employment Services Limited, Aviva Equity Release UK Limited, Aviva Group Holdings Limited, Aviva Health UK Limited, Aviva Investors Global Services Limited, Aviva International Insurance Limited, Aviva Investors UK Fund Services Limited, Aviva Life Holdings UK Limited, Aviva Life & Pensions UK Limited, Aviva Life Services UK Limited, Aviva UK Digital Ltd, Friends Life Holdings plc, General Accident plc, Gresham Insurance Company Limited, Solus (London) Limited, Sesame Bankhall Group Limited.

# Our training and communication

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

## Training for employees<sup>17</sup>

We have a comprehensive e-learning module designed in collaboration with Slave-Free Alliance, to help our employees understand the link between business and human rights and to raise awareness around modern slavery, its pervasiveness, and the role of corporations and their staff in helping tackle it. This training has been refreshed in 2022 to reflect both changes in Aviva and relevant trends in the modern slavery agenda. It has been rolled out to specific employees directly involved in anti-modern slavery activity including those employees in the Sustainability, Procurement and Supply Chain, Risk, the People (HR) function, Corporate Affairs and Property & Facilities teams with 962 completions since its launch in September 2020. We have made the training available to all employees within the Aviva University and we have shared it with those on our graduate training programme so that this is embedded within our future leaders. The training material has also been shared with our joint venture in India. We plan on sharing this with our joint venture in China in 2023. The training materials address each individual market by providing case studies and dilemmas relating to modern slavery in each jurisdiction.

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<sup>17</sup> This is part of the work we are doing to meet one of the suggestions resulting from Slave-Free Alliance's independent review of Aviva's work on modern slavery. Their recommendation was to develop a more structured, detailed and targeted global training strategy regarding human rights/modern slavery for employees. This is also aligned with what we committed in 2019 as expressed in our previous year statement.





### **Awareness raising**

We continue to raise awareness across our organisation and during anti-Slavery week 2022 (17-23 October 2022) we shared modern slavery updates via our intranet and an anti-modern slavery video across all the Aviva UK sites. The video shows how modern slavery is closer than we think and offers some examples of modern slavery, how we can report cases of modern slavery or abuses and how to support charities who help modern slavery survivors. Our post received around 7000 views and has also been shared with key working groups. We plan to organise more group-wide campaigns in 2023.

### **Ecovadis Training**

Given that the risk of modern slavery for Aviva sits mainly in our supply chain, the support from Aviva's Procurement team is essential for a successful sustainable supply chain that helps us manage the risk of modern slavery with our suppliers. Our Procurement team has received training on the use of the Ecovadis system, including how to work with suppliers and how to access supplier data and scorecards on their ESG (environmental, social and governance) profile, including labour issues, environmental ethics and responsible procurement matters. They are also able to interpret the scorecard results and therefore understand which suppliers are high risk for Aviva and need to be monitored closely, including implementing Corrective Action Plans to achieve improvements. In 2022 approximately 150 people were trained on the use of the Ecovadis platform.

**Training for suppliers:** since 2020 we have offered our suppliers access to our Business and Human Rights and Anti-Modern Slavery training. In 2022, we continued to explore opportunities to share our modern slavery-related resources with suppliers and third parties and asked each supplier, who underwent an assessment, to nominate key employees to take part in our training. The training helps delegates understand:

- Why addressing business and human rights is important for business
- What modern slavery is and recognise the different types that exist
- How to recognise the different signs and indicators of different labour issues and modern slavery instances
- Where the main risks are within Aviva globally in our operations and supply chains and the steps to take to mitigate these
- Current instances of modern slavery and the way it can manifest itself in different countries and sectors
- How to respond appropriately if a victim of modern slavery or a human right violation is identified, and provides contact numbers and a helpline if case a case of modern slavery is suspected or identified.

In 2022, 94 critical and high-risk suppliers' and partners<sup>18</sup> employees and confirmed their interest in the Aviva Business and Human Rights and Anti-Modern Slavery training. They will undertake the training throughout 2023.

<sup>18</sup> This includes employees of Sesame Bankhall Group Limited and Solus Accident Repair Centres.



**Overall enhanced financial sector industry focused training**

In 2022, established institutions such as the Independent Anti-slavery Commissioner, the UK National Modern Slavery Training Delivery Group, and Themis, with support from Unseen, RedCompass Labs and Alliance Bernstein joined forces and developed an innovative new anti-slavery digital learning platform<sup>19</sup> for the financial services industry. Aviva plc is working with Themis, and we aim to embed the training across Aviva's core businesses in 2023.

**Diversity, inclusion and safeguarding:**

We have a Fairness and Equality policy in place which, although not directly related to slavery and human trafficking issues, does provide employees with detailed guidance about how to treat protected characteristics and demonstrates our inclusiveness as a workplace. It serves to help reinforce our approach to safeguarding the rights of all employees. All subsidiary boards have reviewed our Diversity and Inclusion policy and in 2021, we launched Aviva Anti-Racism training for employees which is ongoing. In 2022, we developed training focused on inclusive behaviours which is mandatory for all employees.

<sup>19</sup> This training is also accredited by the London Institute of Banking and Finance.

# Our collaborations and partnerships

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



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

**UK Government Home Office Business**

**Against Slavery Forum:** We have continued our membership of Business Against Slavery Forum (BASF), a partnership between Government and businesses championing the anti-modern slavery agenda. We continued our attendance at these meetings and exchanged views and best practice with peers.

**United Nations Global Compact:** We remain members of the UN Global Compact and an active participant of the United National Global Compact UK Working Group on Modern Slavery sharing insights with other peer organisations. When drafting this statement, Aviva considered feedback and recommendations received by other industry peers in 2022.

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

**Slave-Free Alliance:** This year we renewed our membership with Slave-Free Alliance to continue our commitment to addressing the risk of modern slavery in our operations and supply chains. Together as ‘critical friends’, we reviewed our approach to supplier remote audits, enhanced our current supplier assessment methodology. They have also acted as a trusted partner in reviewing this statement.

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

**Ride for freedom:** We are very keen to collaborate with charities and social enterprises to support modern slavery victims and survivors and have started to select some partners. This year we have supported the work of [Ride For Freedom CIC](#)<sup>20</sup>, a not-for-profit social enterprise which uses cycling to provide remedy to survivors to give them confidence, independence and a sense of freedom to help their mental and physical health and rehabilitation into society.

<sup>20</sup> Aviva partnered to support the delivery of the Freewheel West Midlands Hub that empowers service users to cycle, through the provision of bikes, accessories and training, this helps with their rehabilitation with positive impact both on their mental and physical health.

# Our key Performance Indicators to measure effectiveness

The KPIs below help summarise some of the activities, efforts and progress we made in 2022:

- **Number of cases of modern slavery discovered at Aviva or in our supply chain via our due diligence work and assessments: [0]**
- **Cases reported through speak up where reporters have specifically alleged a breach of the UK Modern Slavery Act 2015: [0]**
- **Number of modern slavery suppliers' assessments conducted on high-risk suppliers: [11]**
- **Number of corrective action/improvement plans shared with suppliers successfully closed: [17]**
- **Number of corrective actions/improvement plans shared with suppliers which are being monitored: [21]**
- **Average Ecovadis Sustainability score for unique suppliers overall: [57.3]**
- **Percentage of UK, Ireland and Canada registered suppliers that have agreed to the Aviva Third Party Business Code of Behaviour: [99.8%]**
- **Number of specialist staff that were trained on Business and Human Rights and Modern Slavery since 2020: [962]**
- **Number of Board and Sub-boards of Aviva who approved this statement: [18]**
- **Number of unique suppliers assessed onto Ecovadis with a valid scorecard: [180]**
- **Number of survivors supported jointly with other companies by joining the Ride for Freedom campaign: [15]**



# Our future plans

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

In 2023, we plan on:

- continuing to enhance internal due diligence in our operations and in Aviva investors,
- conducting more external due diligence, including more tier 2 suppliers and suppliers based in our high-risk jurisdictions of China and India
- requesting that suppliers, especially those identified as high risk or key (e.g., recruitment agencies) undergo an Ecovadis assessment and further due diligence
- conducting on-site ethical trading audits and assessments working with third parties
- enhancing our approach to assessing recruitment agencies to ensure they use ethical hiring practices
- exploring additional opportunities to contribute to initiatives supporting modern slavery survivors
- progressing work on identifying and reviewing the most salient human rights issues for Aviva
- improving our approach to ensuring access to 'remedy' to (potential) victims of modern slavery and labour violations should these be identified in our operations or supply chain
- launching a more extensive financial service industry focused training, working in partnership with Themis.







# Our process and the steps followed to issue this statement

The boards of the Aviva entities identified within scope have reviewed and approved this statement<sup>21</sup>. The Aviva plc Board reviewed and approved this statement on 23/03/2023 and the Group CEO signed the statement on behalf of Aviva plc.

Amanda Blanc  
**Aviva plc CEO**  
London, 07/06/2023

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<sup>21</sup> A member of Aviva Sustainability team, and or a member of our Cosec team (briefed by Aviva Sustainability) has provided each of the Boards (including sub-boards and the Board of Aviva Plc) with an update and a brief on this modern slavery statement, answering key questions and incorporating any feedback received prior to obtaining their full approval.

For queries about *Aviva's Modern Slavery and Human Trafficking Statement 2022*, please contact our CR team: [crteam@aviva.com](mailto:crteam@aviva.com)

