

Aviva Third Party Business Code of Behaviour

This document forms part of the Aviva Group Procurement and Outsourcing Business Standard.



Introduction

The purpose of this Code of Behaviour is for Aviva and a Third Party to make a commitment to behave in a certain way when dealing with each other.

Performance and adherence to high business standards is an important and integral part of Aviva's values and Aviva expects the application of robust legal, ethical, environmental and employee related standards within our own business and among the Third Parties we work with.

We understand that Third Parties may have values, standards, and sustainability objectives, which are different to those of Aviva, however, where significant gaps are identified, we will seek to address such gaps through open and honest conversations.

Please also take time to read our **Business Ethics Code**, which is one of the policies that guides our business and behaviours, and our **Sustainable Procurement Statement**, which sets out our approach to further evolving sustainability in our supply chain.



Behaviours:

Our customers:

We should always act to deliver good customer outcomes along the distribution chain, acting in good faith, avoiding foreseeable harm, and helping consumers to achieve their financial objectives. We should have the right conversations and take the right actions to always ensure that we are working together to deliver these good outcomes for our customers.

Fair treatment of customers in vulnerable situations:

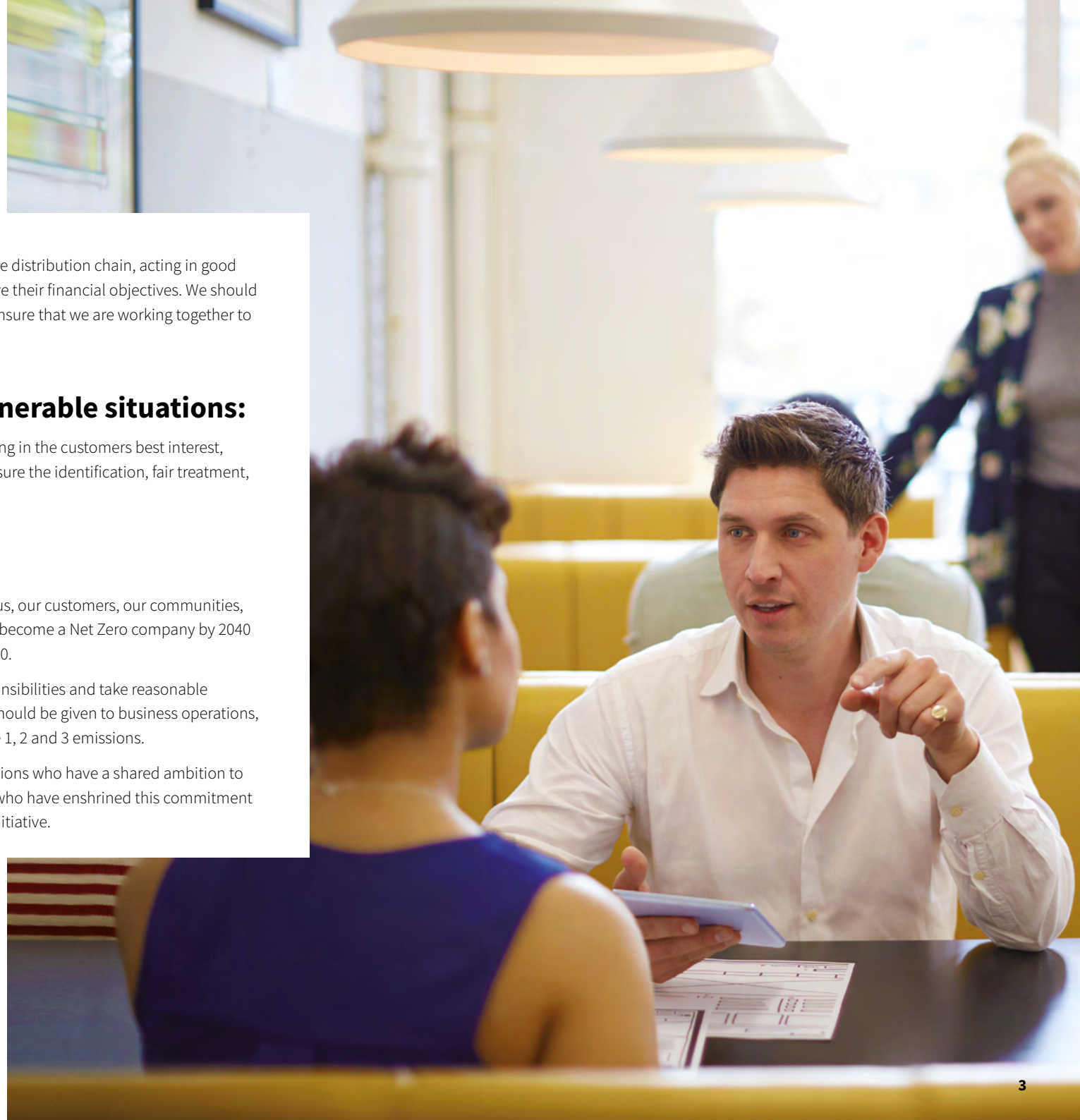
In addition to always delivering good customer outcomes and acting in the customers best interest, where appropriate, we should also have procedures in place to ensure the identification, fair treatment, and protection of vulnerable customers.

Environment:

At Aviva, the climate and biodiversity crisis are a key challenge for us, our customers, our communities, and our stakeholders, which is why we've announced our plans to become a Net Zero company by 2040 with Net Zero emissions in our operations and supply chain by 2030.

We ask that Third Parties we work with respect our collective responsibilities and take reasonable measures to prevent damage to the environment. Consideration should be given to business operations, supply chain sustainability, and product lifecycles, including scope 1, 2 and 3 emissions.

We are increasingly looking to collaborate and work with organisations who have a shared ambition to reduce our environmental impact globally, and particularly those who have enshrined this commitment through external benchmarks such as the Science Based Targets Initiative.



Human rights:

We must respect all internationally proclaimed human rights and should be guided in the conduct of our business by national laws, international Standards, the provisions of the UN Universal Declaration of Human Rights, the UN Guiding Principles, and the International Labour Organisation (ILO) Eight Fundamental Conventions.

We recognise that if we cause or contribute to adverse human rights impacts, we must provide for, and cooperate in, remediation efforts through legitimate processes. We are committed to supporting a robust remedy ecosystem so that individuals and communities have access to remedy for any harm linked to our operations and value chain.

Labour standards:

Among others, we all respect and promote the following labour standards:

- No form of modern slavery or forced labour, including human trafficking, involuntary prison labour, indentured labour, bonded labour or otherwise
- Children under the age of fifteen 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.



Diversity, equity, and inclusion (DE&I):

Aviva is committed to being a diverse and inclusive organisation. We want our commitment to DE&I to be reflected in our people practices, customers, communities, and our supply chain.

It is important that we, and the Third Parties we engage with, should promote equal opportunities for everyone in employment - free from prejudice and discrimination (*direct and **indirect) on the grounds of gender, gender reassignment, sexual orientation, disability (including both visible and invisible conditions), pregnancy and maternity, marital status, creed, colour, race, ethnic origin, nationality, social-economic backgrounds, religion and belief, age, union status or political opinion. All Third Parties must meet the requirements of any applicable discrimination legislation.

Community:

We should actively support local communities where we have an interest to do so; such initiatives may include supporting local charities, community groups or initiatives with the intent of making life better for those in the community.

Health safety and wellbeing:

We recognise that the quality of products and services, consistency of production, and workers morale, are enhanced by a safe and healthy working environment. In addition, we have a legal requirement to ensure that Third Parties working on behalf of Aviva are competent to undertake the tasks for which they are employed and comply with all relevant health, safety, and welfare legislation.

We are committed to both the safety and health of employees, and others who may be affected by their operation, and to maintaining a safe work environment ensuring that all workers are qualified and are supplied with the correct equipment to carry out their roles safely.

We must continuously support the wellbeing of our employees, through providing support for physical, mental, and financial wellbeing.

Financial crime:

We should adopt a zero-tolerance approach towards acts of financial crime being undertaken in our business dealings with each other and all other areas of our business operations. To achieve this, both parties must comply with all applicable financial crime laws and regulations including, but not limited to, bribery and corruption, facilitation of tax evasion, fraud, market abuse, money laundering and financial sanctions.

Gifts and entertainment:

We take care not to seek influence, or to be compromised by, the offering or accepting of gifts and entertainment when doing business.



Whistleblowing:

At Aviva we encourage those we do business with to have a culture which encourages people to raise legitimate concerns of alleged wrongdoing where they suspect them. This should be through a formal whistleblowing process or similar. More importantly we expect organisations to make clear that those who raise genuinely held concerns will not be penalised or disadvantaged in any way. Those who have concerns in connection with any alleged wrong doing within Aviva can raise their concerns using the **Aviva Speak Up service**. You can also access our **Third Party Speak Up (whistleblowing) policy**.

Working together:

Throughout all our interactions we should always:

- treat each other with respect and consideration in all aspects of our operations
- be open in our feedback to each other to facilitate a successful working relationship, discussing when things are going well and when they are not
- ensure communications between us are clear, unambiguous, timely and not acting in a way that may put our integrity into question
- act honestly, fairly, with integrity and care in all aspects of our business together
- behave in a socially responsible manner pursuant to the countries in which we operate
- feel able to actively engage each other if we believe efficiencies, value add activities or innovation could be achieved through continuous improvement in all our dealings together

Procurement:

Third Parties should, when conducting their own procurement activities, seek similar behavioural commitments as above from its own supply chain, in addition to any legally binding commitments within a formal contract.

Challenging:

If either party feels that an employee has not supported this Third Party Business Code of Behaviour then a complaint should be lodged with the appropriate Aviva Relationship Manager, where it will be investigated.



*Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. For example, refusing to employ a person because they are pregnant or dismissing a person because of their religious beliefs.

**Indirect discrimination occurs when a policy, rule or requirement applies to everyone but particularly disadvantages a certain group with a protected characteristic. For example, if a rule is put in place that an employee must have at least 10 years' service before being eligible to apply for promotion, this means that employees under the age of 26 cannot be promoted. This would be unlawful unless it can be shown that there was a good reason for the 10 years' service being required.

