



AVIVA

WHISTLEBLOWER POLICY

AVIVA LIFE INSURANCE COMPANY INDIA LIMITED

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1. Introduction

The Insurance Regulatory & Development Authority of India (IRDAI) vide its Corporate Governance Guidelines for Insurers in India (IRDA/F&A/GDL/CG/100/05/2016) requires Insurers in India to put in place a “whistle blower” policy defining mechanisms for employees to raise concerns internally about possible irregularities, governance weaknesses, financial reporting issues or other such matters.

These could include employee reporting in confidence directly to the Chairman of the Board or of a Committee of the Board or to the Statutory Auditor.

This Policy provides guidance on what should be reported, when and how one should speak up, the protection provided to anyone who speaks up and raises a genuine concern, and how concerns are dealt with.

2. Objective & scope

Objective - The objective of this policy is to;

- Encourage and enable everyone connected to Aviva India viz. employees, contractors, outsource providers and other third parties to raise concerns, grievances about any unacceptable practice or any event of misconduct, irregularities, governance weaknesses, financial reporting issues within the Company.
- The policy provides a framework to promote responsible and secure whistle blowing.
- Ensure that adequate mechanism is in place to address the complaints related to wrong-doing, misconduct, irregularities, governance weaknesses, financial reporting issues e.g. mis-selling, corrupt business practice, violation of provisions of applicable laws, leak of UPSI, etc.

Applicability - The policy is applicable to everyone connected to Aviva viz. employees, contractors, outsource providers and other third parties.

The policy applies to improper behaviour in the workplace (by Aviva employees or third parties) which is or may be a breach of Aviva India’s Business Ethics Code or appears illegal, criminal, or unethical, for example*, suspected:

- Acts of bribery and/or corruption.
- Actual or potential conflicts of interest.
- Inappropriate or disproportionate offering, solicitation or accepting of gifts, entertainment and hospitality when doing business with suppliers, business introducers or other third parties.
- Fraud.
- Accounting misstatement.

- Inaccurate, misleading or fraudulent reporting of key risks.
- Data privacy breaches (such as theft or deliberate/accidental loss).
- Money laundering.
- Price fixing, market abuse, or insider trading.
- Failure to comply with a legal or regulatory obligation (including commission of a criminal offence).
- Danger to the health and safety of employees.
- Actual or potential abuses of human rights (including modern slavery, forced labour, child labour and any form of discrimination in Aviva India's business or supply chain).
- Serious environmental concerns.
- Bullying and/or harassment and acts of unfair treatment and discrimination on grounds of race, gender, religion, sexual orientation and other protected characteristics.
- Behaviour that harms or is likely to harm Aviva India's reputation or financial well-being (e.g. inappropriate treatment of customers).

**This is not an exhaustive list, so in case of any doubts, either raise the concern or contact the Speak Up team in confidence for advice.*

Aviva India take all such concerns seriously and assures that the reporter of a concern will be heard, protected and supported. All senior managers and leaders are responsible for embedding a speak up culture across the Group.

Exclusions –

- The whistleblower must not investigate or try to prove if the concern is well-founded.
- Sexual harassment complaints are dealt separately vide established process in accordance to legal provisions in this regard.
- If the concern relates to a People Function (PF)/Human Resources (HR) type issue such as a complaint about something that affects any one personally (e.g., alleged bullying and/or harassment) or individual employment contract (HR process related grievances), Aviva India has procedures and processes in place to address the same through intervention of People function.

3. Review and approval of the policy

The policy will be reviewed by Board Audit Committee and approved by the Board of Directors annually or as and when required. Adherence to this policy and all resulting standards, procedures and guidelines is the responsibility of all directors and employees. Enforcement of this policy is the responsibility of the Board Audit Committee with the support of the Chief Compliance officer.


Any non-adherence to the policy shall be reported to the Chief Compliance Officer, and upon further non action to the Board Audit Committee for necessary action to be taken in this regard.

The Managing Director & CEO is authorized to make any amendments to this Policy at any time, where it is considered appropriate to do so subject to ratification of the said changes by the Board Audit Committee.

4. Reporting Mechanism

Whistle Blower can make Protected Disclosure as soon as possible and shall communicate the complaints to any of the below mentioned avenue:

- Line manager/ Leadership team
- People Function
- Chairman of the Board or a Committee of the Board or to the Statutory Auditor
- Speak-Up* team member
- The Speak Up E-mail ID - speakup@aviva.com (Anonymous as well, should one choose)
- EthicsPoint reporting system - EthicsPoint allows reporting concerns confidentially and anonymously should an employee so wish. EthicsPoint provides a free 24- hour service which operates seven days a week offering the facility to raise a report via a confidential hotline in the local language or by submitting a report online. It also allows reports to be submitted via mobile devices by scanning a QR code:

Website:	<p>avivaspeakup.ethicspoint.com</p> <p>Hotline numbers can be found on the site and reports can be submitted online. Please note that the EthicsPoint hotline numbers are local free phone numbers.</p>
QR Code	

** “Speak Up” is Aviva’s reporting facility that includes a confidential and secure whistleblowing service “EthicsPoint” to enable raising concerns. It includes both internal and external channels for reporting concerns.*

5. Resolution of Whistleblower concern

Below is an outline of what the Speak Up team does when someone raises a concern:

- When a concern is received, the Speak Up team will contact the person raising the concern (directly where contact details are provided and it is appropriate to do so, or via the feedback section on the

EthicsPoint system that allows for anonymity), to acknowledge receipt, and to ensure that it has all available information and advise of next steps;

- All concerns received are passed through an assessment and triage process to determine next steps, including investigation as appropriate;
- The Speak Up team will make a decision, in consultation with relevant stakeholders as appropriate (e.g. the People Function, Legal, Corporate Security etc.), as to which function will progress the matter: Group Investigations, People Function, or another team as appropriate;
- Where the Speak Up team determines that it is a matter for Group Investigations, an investigator will investigate the concern(s) and keep the whistleblower informed, as per Aviva India's legal and confidentiality obligations, and
- The Speak Up team will keep full and accurate records of all disclosures and actions taken. At the end of an investigation or review of the concern(s), where contact details are known, the Speak Up team will contact the whistleblower to advise that the matter has been closed.

6. Protection & Confidentiality

Aviva India shall not tolerate retaliation against anyone who speaks up and raises a concern in good faith. If the reporter believe he/ she has been unfavourably treated as a consequence of raising a concern, it should be reported to the Speak Up team or the Aviva India Legal Head, who will independently review the circumstances. The Speak Up team and Legal Head will keep what the whistleblower tell them confidential throughout and beyond any investigation process, subject to Aviva India's legal obligations.

A Whistle Blower may make a Protected Disclosure without fear of retaliation or intimidation. Aviva prohibits its Employees from engaging in retaliation or intimidation that is directed against a Whistle Blower. Employees who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action.

One should be aware that there may be times when the Speak Up team is unable to resolve a concern without revealing the identity, for example where the personal evidence of Whistleblower is required. However, the Speak Up team will make every effort to obtain the agreement of Whistleblower prior to any such disclosure, subject to Aviva India's legal obligations.

If a concern is reported anonymously, it can be much more difficult for Aviva India to investigate the matter, protect the position of Whistleblower, or to provide him/ her with feedback on the outcome. However, Aviva India would rather want the concern raised anonymously than not at all.

7. Duty to Whistle blow

The appointed actuary and the statutory/internal auditors have the duty to 'whistle blow', i.e., to report in a timely manner to the IRDAI if they are aware that the insurance company has failed to take appropriate steps to rectify a matter which has a material adverse effect on its financial condition. This would enable the IRDAI to take prompt action before policyholders' interests are undermined.

8. Responsibilities

The Board Audit Committee shall supervise the development and implementation of this Policy and periodically review the Policy to consider whether amendments are necessary, and, if so, it shall communicate any such amendments to all employees as soon as possible. It shall also receive reports concerning the investigation and resolution of Protected Disclosures made pursuant to the Policy on a quarterly basis or as per the guidelines given by the Board Audit Committee.

The Chief Compliance Officer shall brief the Board Audit Committee on quarterly basis on number of complaints, key complaints and action taken summary.

9. Record keeping

All documents shall be preserved for a period as specified in the applicable regulations and as per Board approved Record Maintenance and Document Retention Policy.

10. Communication of the policy

The policy shall be communicated to all the Employees of the Company and other persons dealing with the Company, through email, circular, or display on the Notice Board/ display on the Intranet/Internet.