

## Bupa at a glance

Our purpose is helping people live longer, healthier, happier lives and making a better world.

### We provide

#### Health insurance

A range of health insurance and funding products to 37.8m customers around the world.

#### Health provision

Personalised and accessible health provision to support over 22.7m customers' physical and mental health and wellbeing, delivered by world-class health professionals, facilities and technology.

#### Aged care

We provide care to our residents in the UK, Spain, Australia and New Zealand.

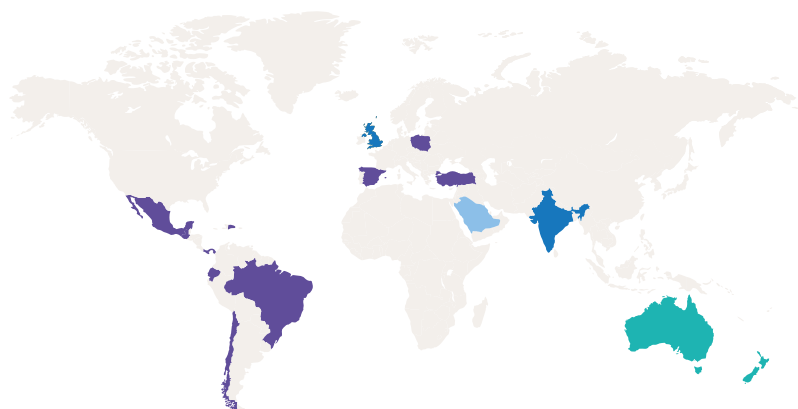
### Revenue %

Health insurance  
**73%**

Health provision  
**20%**

Aged care  
**7%**

### Where we are



### Market Units

#### Asia Pacific

For more information, see page 22

Revenue (£)

**6.3bn**

37%

Locations

Australia  
New Zealand  
Hong Kong

#### Europe and Latin America

For more information, see page 23

Revenue (£)

**5.4bn**

32%

Locations

Spain  
Poland  
Chile  
Türkiye  
Brazil  
Mexico  
Ecuador  
Dominican Republic  
Guatemala  
Panama  
Peru

#### Bupa Global, India and UK

For more information, see page 24

Revenue (£)

**5.2bn**

31%

Locations

United Kingdom  
Republic of Ireland  
India  
Worldwide

#### Associate Businesses

Locations

Saudi Arabia<sup>1</sup>

Total revenue (£)

**£16.9bn**

CER<sup>2</sup>: 16% Growth

Customers worldwide

**60.5m**

21% Growth

- Refers to Bupa Arabia and My Clinic. Revenues from associate businesses are excluded from reported figures. Customer numbers include 100% of our associates.
- Constant exchange rate (CER) financials are the retranslation of the prior year Actual Exchange Rates (AER) financials based on the current financial year's average rate.

## 2024 financial highlights

### Financial highlights

#### Revenue<sup>1,2</sup> (£bn)

# £16.9bn

**AER +12%**    **CER<sup>3</sup> +16%**  
2023: £15.1bn    2023: £14.6bn

2024	16.9
2023	15.1
2022	14.1

#### Statutory profit before taxation (£m)

# £972m

**AER +72%**  
2023: £564m

2024	972
2023	564
2022	(390)

#### Net cash generated from operating activities (£m)

# £1,268m

**AER +7%**  
2023: £1,182m

2024	1,268
2023	1,182
2022	966

#### Underlying profit (£m)

# £914m

**AER +53%**    **CER<sup>3</sup> +59%**  
2023: £599m    2023: £576m

2024	914
2023	599
2022	630

#### Solvency II capital coverage ratio<sup>4</sup> (%)

# 176%

2023: 175%

2024	176%
2023	175%
2022	181%

1. Revenue calculated based on the aggregation of 'insurance revenue' and 'total non-insurance revenue' as shown in the Consolidated Income Statement.
2. Revenues from associate businesses are excluded from reported figures. Economic post-tax profits include the associate contribution in line with our shareholding.
3. Constant exchange rate (CER) financials are the retranslation of the prior year Actual Exchange Rates (AER) financials based on the current financial year's average rate.
4. The 2024 Solvency II capital position, Solvency Capital Requirement (SCR) and coverage ratio are estimates and unaudited.

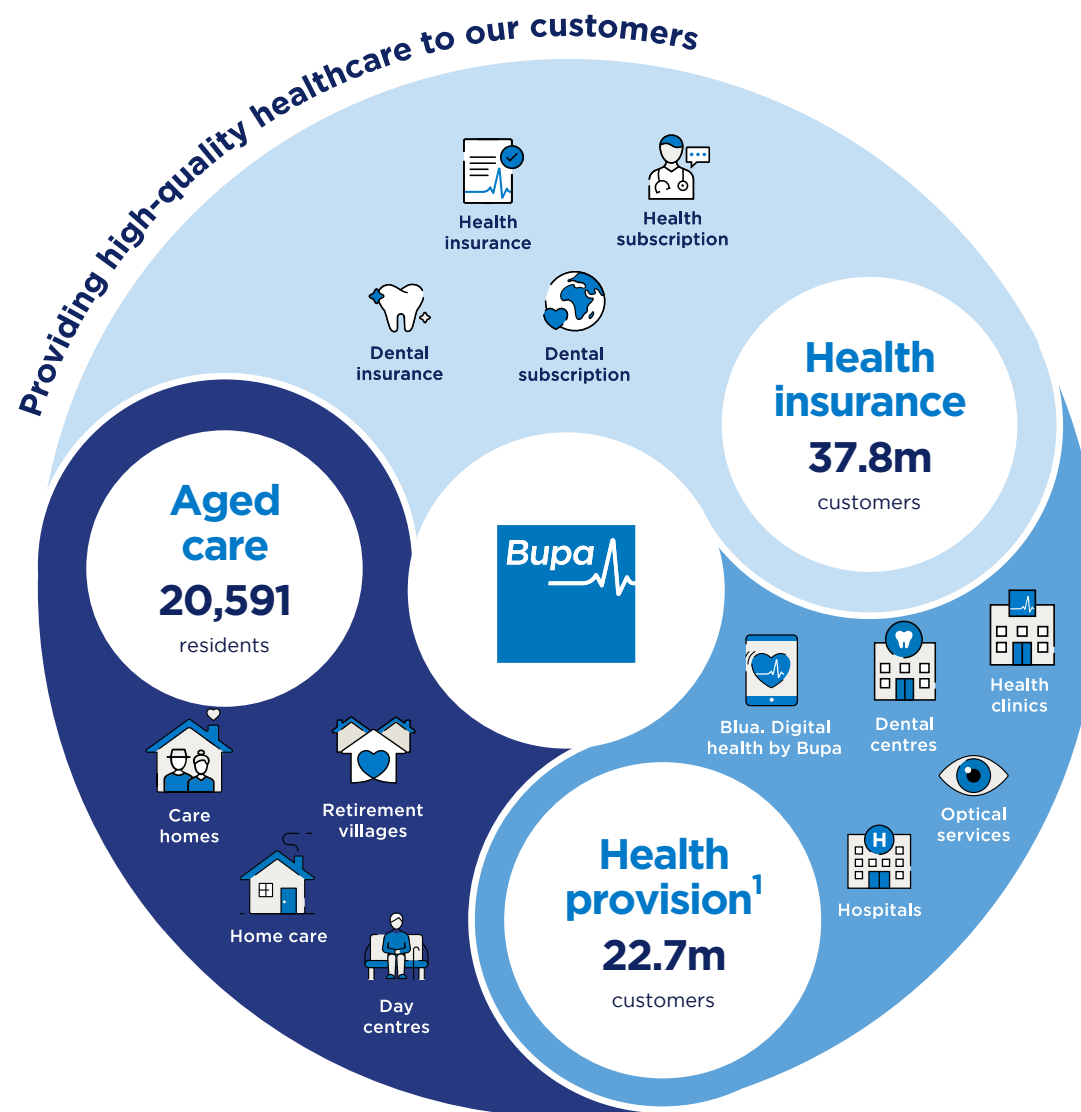
## Business model

We provide a range of health insurance, health provision and aged care products and services to our customers around the world.

Our 'Connected Care' model makes healthcare more convenient for our customers. We connect our health provision (both digital and in-person) with our health insurance products, to give customers a more seamless experience. This enables them to access care more easily, and get the support they need, all in one place.

With no shareholders, our customers are our focus. We reinvest profits from our business into our purpose by:

- Providing more and better healthcare for the benefit of current and future customers;
- Building a healthier future for people and planet – through delivering our sustainability strategy.



1. Some of our provision businesses (e.g., LUX MED in Poland) also offer health subscription products

## Chairman's statement

Bupa has delivered a strong set of financial results and our businesses are delivering on our strategy.

**Roger Davis**  
Chairman



On behalf of the Board, I present the 2024 Annual Report and Accounts to our stakeholders and highlight the key themes:

### 2024 Progress and performance

The Board has been very pleased with Bupa's strategic progress and financial performance in 2024. Bupa has delivered a strong set of financial results and our businesses are all delivering on our strategy. Iñaki Ereño's Group CEO review on [pages 6 to 7](#), and James Lenton's Group CFO review on [pages 17 to 19](#), cover this in detail.

During 2024, Niva Bupa became a subsidiary of the Group, following our acquisition of the controlling interest in January, and in November 2024 I was proud to attend its listing on the Indian Stock Exchanges following completion of its IPO. More detail on this can be found on [page 53](#).

### Our Customer Focus

Bupa continues to aspire to be the world's most customer-centric healthcare company and good progress has been made on our three customer-centric ambitions in 2024. In 2024 there was improvement across all three strategic ambitions and strong progress in all six strategic and enabling pillars. Through the Bupa Customer System, we seek feedback following customer care touchpoints in order to identify where we can do even better, and this mindset, supported by so many of our customers taking the time to do this, helps us to deliver this progress. Details of our customer centricity can be found on [pages 12 to 13](#).

### Our People and Culture

The Board values the huge contribution and commitment our people give to Bupa. Our high standards of service and quality of care could not be provided without them.

The Board was incredibly pleased to see that our employees feel the same way about Bupa through our global engagement scores from the biannual Pulse surveys. Our scores increased again in 2024, putting Bupa amongst the top 10% of most engaged companies worldwide in the Glint benchmark.

Bupa's continued focus on diversity and inclusion and health and wellbeing in the workforce was recognised in the engagement surveys, recording their highest scores to date. Employees felt they could be themselves at Bupa and that diverse perspectives were valued. They also felt well supported to look after their health and wellbeing. You can read more in People and Culture on [pages 28 to 32](#).

### Sustainability and ESG

The Board were pleased with the progress on delivering our sustainability strategy in 2024, working to reduce emissions and increase the use of renewable energy. Bupa also launched a 'Single-use Switch' initiative aimed at reducing waste to landfill or incinerators and reviewed its sustainable investment approach.

As in prior years, the annual Bupa Healthy Cities challenge took place in 2024 with the highest global participation so far and we ran another successful eco-Disruptive programme. We increased the number of partnerships with national Paralympic organisations in Paris ahead of the 2024 Paralympics.

You can read about all of these, and more, in 'Delivering Sustainability and ESG' on [pages 34 to 44](#).

### Our Strategy

2024 was the final year of our 3x6 Strategy and the Board was pleased with the progress Bupa has made since the strategy was launched, and the particularly strong performance this year. The Board took time to reflect on how Bupa's strategy should evolve, to continue building on this success going forwards. Details of progress on the 3x6 Strategy is covered on [pages 8 to 11](#), and an outline of the new Bupa strategy and how it was developed is covered on [pages 15 to 16 and 52](#).

### The Board

We continued to focus on ensuring the Board has the right skills and experience to oversee the strategy and that there is well-managed refreshment of the Board in line with our Board succession plans. During the year Simon Blair and Clare Bousfield joined the Board and Gunjan Bhow stepped down. Simon took over as Chair of the Board Risk Committee in 2024. A special committee of the Board was created to oversee the selection process for my successor, as Chair of the Board. We were delighted to announce that Don Robert CBE was selected and he joined the Board in February 2025 as Chair-elect, to take over as Board Chair when I retire in May 2025. It has been a great privilege to be the Chairman of Bupa for the last six years, and I am very proud of everything which Bupa and its people have achieved over that time.

### 2025 Focus

Looking to 2025, Bupa is focused on continuing our journey. It will continue under strong leadership to closely monitor execution of our strategy and the transformation of our business, to provide the best experience to our customers in the most sustainable way and keep delivering on our purpose.

**Roger Davis**  
Chairman

## Group CEO's review

We now serve over

# 60 million

customers globally

Over

# 7 million

customers are using  
Blua globally

**Iñaki Ereño**  
Group CEO



We have accomplished a lot this year in support of Bupa's purpose: helping people live longer, healthier, happier lives and making a better world. Everyone at Bupa should be proud of the progress we've made in 2024.

I'm incredibly proud of the dedication and hard work our Bupa colleagues have shown in caring for our customers and improving our performance. Their commitment to delivering outstanding care has made a real difference.

Our strategy is centred on digital transformation, enhancing the customer experience and making Bupa an even better place to work — all while growing our business and doing what we can to make the world a better place. We now serve over 60 million customers globally and almost 7.5 million people are using Blua, our digital health solution<sup>1</sup>.

In 2024, we made positive progress in three priority areas – our financial performance, our customer experience and our colleague engagement.

- We've driven strong **financial performance** with revenue and underlying profit continuing to increase which is enabling us to reinvest in line with our purpose.

- Listening to our customers and implementing improvements based on their feedback has enabled us to keep improving our **customers' experience**. As a result, the majority (92%) of our Business Units (BU) have improved their Net Promoter Score (NPS) this year with four BUs exceeding our world-class ambition of 80 NPS across the Group.
- In our second **colleague engagement** survey of the year, our score was 84 (up 2 from last year), a result that is regarded as world-class. More colleagues than ever took part, with over 70,000 employees completing the survey.

### Strategic progress

Since 2021, we have been focused on delivering our 3x6 Strategy - centred around three bold ambitions, supported by six strategic and enabling pillars. We are proud of the significant progress we have made, having delivered demonstrable results against each of our **three ambitions**.



Iñaki Ereño visiting Bite Médica hospital in Mexico

Performance in 2024, the final year of the 3x6 Strategy, was especially strong as we were able to build on the positive momentum generated over previous years.

- **40% customer care touchpoints owned by Bupa:** At the end of 2024, we owned 26% of our customer care touchpoints, having significantly expanded our digital health offerings (via Blua) and our physical provision network.
- **60% active digital customers:** We ended the year with 46% of our funding customers actively engaging with us through digital channels, having successfully increased customer awareness and adoption of Blua.
- **80 NPS:** By the end of the year, we achieved an average NPS score of 67, having focused on implementing customer experience improvements for the benefit of our customers.

1. Refers to Blua or an equivalent digital solution. Applicable to all references to Blua across the Annual Report & Accounts.

## Group CEO's review continued

Looking forward, there is more we can do to deliver on our three ambitions, and we are committed to accelerating our progress across these key priorities in 2025 and beyond.

In the final year of the strategy, we also made significant progress against our **six strategic and enabling pillars**, including:

■ **Customer:** Our ambition is to be the world's most customer-centric healthcare company, which means we are committed to listening to our customers and acting on their feedback. This year, we implemented over 10,500 improvements to enhance the experience of our customers, patients and residents. These improvements have led to tangible benefits for our customers, as shown by the growth in NPS across the majority (92%) of our BUs.

■ **Growth:** We continue to grow our business through strong organic customer growth. We have around 38m health insurance customers, reflecting a 27% increase from last year, and 23m provision customers, representing a 12% growth compared to 2023. In Australia, we've achieved nine consecutive quarters of maintaining or growing market share. In January 2024, we increased our investment to become the controlling shareholder in our Indian health insurance business, Niva Bupa. Subsequently, in November, Niva Bupa successfully listed a minority shareholding via an Initial Public Offering (IPO) and raised additional capital, marking an exciting step in the growth of the business.

\* A key driver of insurance growth has been Niva Bupa, our health insurance business in India.

■ **Transformation:** A key driver of our customer growth is Blua, our digital health solution, which is helping us attract and retain customers who prefer to access healthcare digitally. Currently, almost 7.5m customers are using Blua globally (up by

36% from 2023), benefiting from a network of more than 16,700 clinicians. In 2024, we delivered more than 6.5m digital consultations.

■ **Sustainability:** In 2024, our Healthy Cities programme took place across all Market Units. This initiative aims to improve the physical and mental health of 1 million people by 2025, while also contributing to the restoration and regeneration of local environments. Last year, there were 63,000 active participants in Healthy Cities, collectively taking 16 billion steps (a 68% increase in steps from 2023) and unlocking £3.5m in nature-related investments (a 75% increase from 2023).

■ **Agile culture:** Building an agile culture is central to our strategy, and customer feedback plays a key role in that. Through Bupa's Customer System, we've listened to more than 81,000 customer feedback videos and calls, generated 39,000 improvement ideas via our internal Customer Listening Programme and made over 10,500 improvements to the customer experience.

■ **Data:** Data is transforming how we support our customers, enabling smarter, faster and more personalised care. Over 16,000 Bupa employees are now using data from our platforms to inform decision-making (a 33% increase from 2023). In 2024, we also ran our B-Disruptive Hackathon, an internal initiative designed to upskill employees in technology and unlock their innovative ideas to provide a better experience for our customers. Over 750 employees from 16 countries took part, generating ideas for integrating Artificial Intelligence (AI) into Blua.

### Other highlights:

■ In October, we hosted our 2024 Bupa Healthcare Symposium, themed 'Unboxing Digital Health', with over 1,000 attendees from around the world, both in person and online. During the event, we unveiled Bupa's

industry-leading genome sequencing programme, My Genomic Health. This pilot programme offers more than 14,000 customers across the UK and Spain access to their genetic risk profiles for identifying preventable conditions, including certain types of cancer. This initiative is a key milestone in our journey to becoming a preventative healthcare partner for our customers.

■ In 2024, we became partners with three new Paralympic associations, having signed agreements with New Zealand, Hong Kong and Ecuador ahead of the 2024 Summer Paralympics in Paris, bringing our support of Paralympic associations to nine in total. These partnerships provide a valuable opportunity to create a positive social impact and strengthen our reputation. They have already led to initiatives like the Inclusive Games organised by the Sanitas Foundation, which took place in October and brought together para-athletes and able-bodied athletes to compete in 14 different sports.

■ In June, we became the official global healthcare partner of the All Blacks, Teams in Black, and the international healthcare partner of the Black Ferns. This four-year partnership will focus on exploring and promoting the connections between health and high performance across all teams.

### Outlook

While we have made significant progress, we know there is still more we can achieve. That's why we have launched a new '3x100 Strategy' for 2025-27 which is designed to be an evolution and acceleration of the current 3x6 Strategy.

We must stay focused on the work we've been doing over the past four years, while maintaining our relentless dedication to providing a world-class customer experience and continuing to build our data and digital capabilities.

And we want to do more: more to support healthcare systems by making high quality healthcare available to more people and using our global influence for good; more to support our people by creating even more ways for them to enjoy working at Bupa; and more to deliver healthcare sustainably, protecting our planet and supporting the communities we serve.

The macro-economic, political and regulatory outlook continues to be uncertain, but we remain confident for the future. We are well-placed to navigate challenges and take opportunities because of our underlying financial strength, resilience and diversified business model. Our purpose, ambition and values continue to guide everything we do and every decision we make. Our vision for the future is to do even more to help people live longer, healthier, happier lives and make a better world.

**Iñaki Ereño**  
Group CEO



**Iñaki Ereño and Mark Robinson, CEO, New Zealand Rugby**

## Delivering our 3x6 Strategy

### Our three ambitions

In 2021, we launched a transformative strategy (the '3x6 Strategy') to make Bupa the most customer-centric healthcare company in the world. The strategy was centred around three bold ambitions and six strategic and enabling pillars

Four years on, we are proud of the significant progress we have made, having delivered demonstrable results against each of our three ambitions. We now own a greater proportion of our customer care touchpoints, we leverage digital channels more effectively to better engage with our customers, and we are delivering market-leading customer experience.

Looking forward, there is more we can do to deliver on our three ambitions, and we are committed to accelerating our progress across these key priorities in 2025 and beyond.

#### Our three ambitions

**40%**

customer care  
touchpoints  
owned by Bupa

**60%**

active digital  
customers

**80**

Net Promoter  
Score




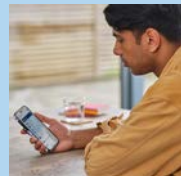




Performance in the final year (2024) of the 3x6 Strategy was especially strong, as we were able to build on the positive momentum generated over previous years.

An overview of tangible progress in 2024 against our three ambitions is set out on the following page.

## Delivering our 3x6 Strategy continued

### Our three ambitions

	Year-end position <sup>1</sup>	Overall progress in 2024	Additional commentary	Spotlight
 <b>40%</b> customer care touchpoints owned by Bupa  Our ambition was to take care of more of our customers' health needs and wants directly, by expanding our own offerings in health provision <sup>1</sup> .	<b>25.9%</b>  By the end of the year, we owned 25.9% of our customer care touchpoints, having significantly <b>expanded our digital health offerings (via Blua) and our physical provision network.</b>	<b>+3.7 ppts</b>  We increased the percentage of customer care touchpoints that we own in the majority (92%) of funding BUs.  <b>The average improvement was +3.7 ppts per BU.</b>	Expansion of our digital and physical footprint, and integrated care pathways have been critical to increasing the number of customer care touchpoint we own.	In <b>Hong Kong Health Insurance</b> we increased activity in Bupa-owned provision by attracting higher customer volumes in our diagnostic and imaging facilities, and by enhancing app features within Blua.  This resulted in an increase of <b>+6 ppts</b> since 2023. 
 <b>60%</b> active digital customers  Our ambition was to engage more with our customers through digital channels - enabling them to access what they need, from anywhere <sup>1</sup> .	<b>46.1%</b>  We ended the year with 46.1% of our funding customers actively engaging with us through digital channels, having <b>successfully increased customer awareness and adoption of Blua.</b>	<b>+5.8 ppts</b>  We grew our active digital customer base in every funding BU.  <b>The average improvement was +5.8 ppts per BU.</b>	The global roll-out of our new digital solution, Blua, and our targeted marketing and communication campaigns, have been significant drivers of digital adoption.	In <b>Care Plus (Brazil)</b> we grew our active digital customer base by increasing customer adoption of Blua (e.g., via marketing campaigns) and by improving user experience (e.g., through new app features).  This resulted in an increase of <b>+18 ppts</b> since 2023. 
 <b>80</b> Net Promoter Score  Our ambition was to improve NPS <sup>2</sup> across all businesses and to strive for world-class customer experience <sup>1</sup> .	<b>67 NPS</b>  By the end of the year, we achieved an average NPS score of 67, having delivered <b>over 10,500 customer experience improvements</b> to key parts of the customer journey.	<b>+5 NPS</b>  We improved NPS in the majority (92%) of BUs.  <b>The average improvement was +5 NPS points per BU.</b>	Embedding the 'Bupa Customer System' - listening to our customers, developing new ideas and implementing improvements across the customer journey, has been the key driver of improvement in NPS.	In <b>UK Care Services</b> we transformed the customer experience based on feedback from our residents. For example, by enhancing catering facilities and general activities.  This resulted in an increase of <b>+16 ppts</b> since 2023. 

1. To maximise impact, the 40 Ambition is focused on Bupa's three largest insurance BUs (in Australia, the UK and Spain) and the year end position represents the true aggregate. The 60 Ambition is focused on Bupa's funding BUs and the year end percentage is based on a simple raw average. The 80 Ambition is relevant to all BUs and the year end score is based on a simple raw average.

2. NPS is derived from multiple transactional NPS Surveys.

## Delivering our 3x6 Strategy continued

### Our six strategic and enabling pillars

In addition to our ambitions, the 3x6 Strategy set out six strategic and enabling pillars. These have been the main areas of transformation focus across our global operations. An overview of progress against these pillars in 2024 is set out below.



#### Customers

Obsession with our customer's experience



Customer experience improvements

[www.bupa.com/ARA2024](http://www.bupa.com/ARA2024)

See page 12 for more detail, on Bupa's customer system

#### Experience improvements

# 10,500

Globally, we implemented 10,500 customer experience improvements across key parts of the customer journey (+31% vs.2023).

#### Business Units with improved NPS

# 92%

NPS improved in the majority (92%) of BUs, showing that these 10,500 improvements delivered tangible benefits for our customers.



#### Growth

Strong performance and governance



#### Customers

# 60.5m

We now have over 60.5m customers worldwide (+21% vs 2023).

#### Provision customers

# 22.7m

We have 22.7 million provision customers (+12% vs. 2023).

A key driver of insurance growth has been Niva Bupa, our health insurance business in India.

See page 24 for more detail on Niva Bupa.

#### Insurance customers<sup>1</sup>

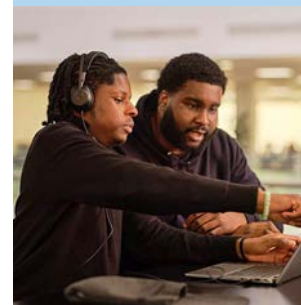
# 37.8m

We have 37.8m insurance customers (+27% vs. 2023).



#### Transformation

Continuous innovation and preparation for tomorrow



Find out more about Blua. Digital Health by Bupa

[www.bupa.com/blua](http://www.bupa.com/blua)

See page 14 for more detail on Blua

#### Blua customers

# 7.5m

We expanded our digital health offerings through Blua, enabling us to serve almost 7.5m Blua customers globally (+36% vs.2023).

#### Countries with Blua

# 180

Blua is now available in 180 countries, following the successful launch to Bupa Global customers in Q4 (+170 countries).

1. A key driver of insurance growth has been Niva Bupa, our health insurance business in India.

## Delivering our 3x6 Strategy continued

### Our six strategic and enabling pillars

Driving progress against these pillars has allowed us to be more customer-centric, to grow more rapidly, to deliver change in a more agile way and to be more data-driven in our decision-making. With these strong foundations in place, our business is well positioned to do more for more people as we enter our next strategic era (2025-27).



#### Sustainability

Making a positive impact on the world



##### Healthy people

**63,000**

In 2024, 63,000 people took a total of 16 billion steps during our global Healthy Cities challenge, designed to encourage our customers, people and communities to adopt healthy, long-term habits.

See page 42 for more detail on our Sustainability efforts.

##### Healthy planet

**£3.5m**

In return, we donated £3.5m funding to nature regeneration projects to enhance green spaces in urban areas, such as tree planning (+75% vs. 2023).



#### Agile culture

The best, most diverse people and a great place to work



##### Customer listening

**81,000**

This year we listened to 81,000 customer feedback videos and calls to better understand their needs and preferences (+33% vs. 2023).

See page 13 for more detail on the Bupa Customer System.

##### Improvement ideas

**39,000**

Based on this feedback, we generated 39,000 ideas for how we can improve the customer experience (+66% vs. 2023) and implemented 10,500 improvements (+31% vs. 2023).



#### Data

Enhanced data driven decision-making



##### Employees trained in data

**16,000**

We have been upskilling our people in data, with 16,000 employees globally using data platforms (+33% vs. 2023). This is driving better, data-driven decisions across Bupa.

See page 7 for more detail on our B-Disruptive Hackathon.

##### Employees involved in B-Disruptive

**750**

Our B-Disruptive Hackathon involved 750 employees across 16 countries working collaboratively to unlock innovative ideas to enhance Bupa with new AI technology.

# Spotlight: Customer centricity

Our ambition is to  
be the world's most  
customer-centric  
healthcare company.

At our core, we're focused on our customers. We put ourselves in their shoes to understand how they experience Bupa, so we can continually improve. We listen to thousands of customer interactions each month so we can come up with ideas to make our services even better.



Customer experience  
improvements

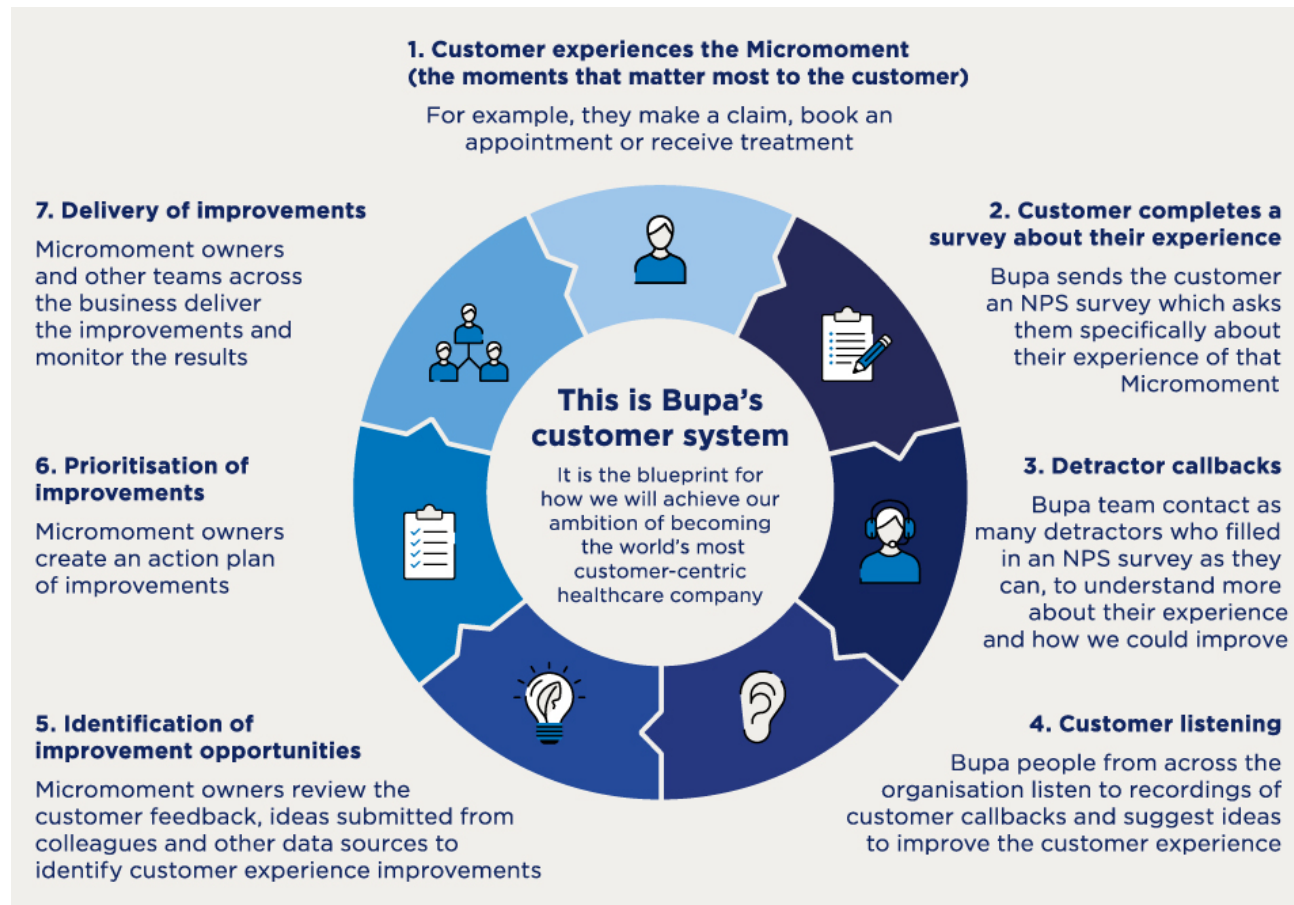
[www.bupa.com/ARA2024](https://www.bupa.com/ARA2024)



## Spotlight: Customer centricity continued

We have built a **Bupa-wide Customer System** to enable us to listen to what our customers are telling us and to respond quickly. We ask customers what they think of Bupa at **key moments in the customer journey**, which we call **Micromoments**. Each Micromoment has an 'owner' who is responsible for reviewing the customer feedback and implementing improvements.

Everyone at Bupa has a role to play in the Customer System, whether that's listening to our customers, suggesting ideas for changes or implementing customer experience improvements. This year, we have listened to over **81,000 customer feedback videos and calls**. Importantly, this has helped lead to the over **10,500 customer experience improvements** that were implemented this year.



### CUSTOMER CASE STUDY

## Here are some examples of the improvements we've made for customers:

- In our **Optical business in Australia**, we introduced a non-invasive assessment as part of a normal eye test, using AI to help identify early risk of heart disease. This is called a Microvascular Health Assessment (MHA) and it's free for all Bupa Health Insurance customers in Australia. This improvement is part of our ongoing commitment to providing holistic, preventative healthcare that is affordable and accessible.
- In **UK Health Clinics** we identified and addressed a significant pain-point for Bupa insurance customers: the need to obtain authorisation prior to having certain treatments. Now, clinicians at Bupa clinics can pre-authorise a number of treatments on the customer's behalf, significantly simplifying the process and saving time for the customer.
- In our care homes business in Spain, **Sanitas Mayores**, we improved the experience of our residents by partnering with Amazon to implement Alexa's voice-activated technology. Residents are now using Alexa to stay more informed, entertained and connected. For example, through simple voice commands, they can set reminders for activities, have video calls with their families, listen to music and the news.



# Spotlight: Blua

Blua offers Bupa customers convenient access to digital health services through the Bupa app.

Fast. Simple. Personal. Sustainable.  
This is healthcare designed for modern life.  
**This is Blua.**

## Highlights

Customers

**7.5m**

Available in

**180**

countries

Supported by

**16,700**

clinicians

## Blua Health Stories

From an early cancer diagnosis to ongoing menopause support, discover how customers are staying healthy, fit and well with Blua.



Watch our  
Blua customer  
stories

[www.bupa.com/blua](https://www.bupa.com/blua)

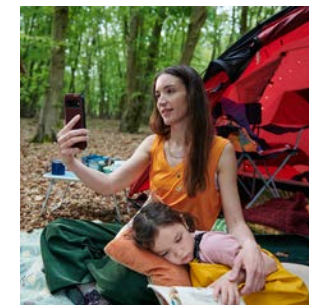
## Features

### Virtual Consultations

Enabling customers to connect with clinicians digitally in the comfort of their own homes.

#### Examples:

- **Primary care clinicians** available on Blua include GPs, Nurses, Advance Nurse Practitioners, Pharmacists, Physiotherapists and Mental Health Therapists
- **Secondary care clinicians** (e.g., Consultants) are also available on Blua in some countries

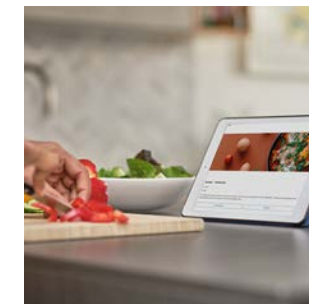


### Health Programmes

Personalised plans designed for prevention, getting well and staying well – beginning with online health content, but may also include virtual and in-person appointments.

#### Examples:

- **Lifestyle Support:** Weight Loss, Nutrition and Fitness
- **Chronic Disease:** Asthma, Cancer, Diabetes
- **Recovery Programmes:** MSK, Mental Health, Substance Addiction, Cardiac Rehab



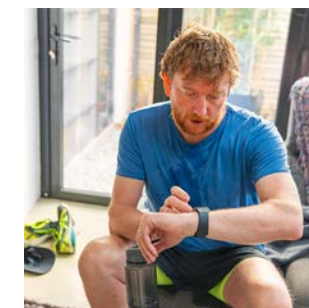
Note: Specific programmes on offer vary by country

### Remote Healthcare

Equipment, consumables or health monitoring which can be deployed at home or on-the-go, without the need to visit a hospital or clinic.

#### Examples:

- **Diagnostics:** Carrying out blood tests and skin checks
- **Virtual Wards:** Monitoring vital signs through wearables
- **Medication:** Delivering prescriptions and treatments (e.g., chemotherapy)



**blua.** Digital health  
by Bupa

## Looking forward: Our purpose, values and ambition



### Purpose:

Helping people live longer, healthier, happier lives and making a better world



### Values:

Brave, Caring, Responsible



### Ambition:

To be the world's most customer-centric healthcare company

Bupa's purpose, values and ambition are **long-term elements of our strategy** that have served us well over the last four years under the 3x6 Strategy.

Looking ahead to our **new strategic era (2025-27)**, these elements will **continue to guide our decisions and actions**:

- Our **purpose** is core to everything we do at Bupa, it captures why Bupa exists and the impact we want to have in the world
- Our **values** define our culture – empowering us to stand up for what's right for our customers, residents, patients and for each other
- Our **ambition** reflects our commitment to excellent customer experience, through great service and value, frictionless access and quality healthcare

To go further and faster in delivering **our purpose and ambition**, we are launching **Bupa's new strategy for 2025-27 – the '3x100 Strategy.'** It is designed to be an evolution of the 3x6 Strategy, and sets a **global framework** to guide and focus Bupa's Market Units (MUs) and Business Units (BUs) on the same key priorities.



# Our new strategy for 2025-27

# 3x100

## The 3x100 Strategy

### Three Ambition KPIs



**100**  
Net Promoter Score

Ensure we continue raising the bar for customer-centricity across Bupa



**100%**  
Complete Customer Dataset

Use clinical data to understand customer health needs and create more personalised care journeys



**100 million**  
Customers supported by Bupa

Innovate and grow our services to deliver high-quality healthcare to more people than ever before

### Three Supporting Pillars



**Customer:** 500 customer experience improvements per Business Unit per year



**Cloud:** Accelerated migration of systems to the Cloud



**Connected Care:** All Business Units delivering against Connected Care Strategies

## Group CFO's review

### Revenue

# £16.9bn

+16% at CER, 2023: £14.6bn

+12% at AER, 2023: £15.1bn

### Underlying Profit

# £914m

+59% at CER, 2023: £576m

+53% at AER, 2023: £599m

#### James Lenton

Group Chief Financial Officer



As Bupa grows and we maintain a strong focus on performance, it enables us to further reinvest in line with our purpose.

2024 has been another successful year for the Group as we see the results of our strategy in the financial performance of the Group. I am proud of how all our colleagues across the globe have contributed towards supporting the growth while maintaining a strong financial position.

#### Overview

Total customers of 60.5m (2023: 50.0m) as we continue to deliver strong growth.

Revenue<sup>1</sup> of £16.9bn, up 16% (2023: £14.6bn) at Constant Exchange Rates (CER). Excluding Niva Bupa, which has been consolidated from this year, and the return of COVID-19 claims savings to customers in Australia Health Insurance, Group revenues increased by 10%.

Underlying profit<sup>2</sup> before taxation of £914m, up 59% at CER (2023: £576m) driven by strong revenue growth, supported by higher investment returns.

Statutory profit before taxation of £972m, up 72% at Actual Exchange Rates (AER) (2023: £564m).

Solvency II capital coverage ratio remains strong at 176%<sup>3</sup> (2023: 175%).

Leverage (excluding IFRS 16 lease liabilities) of 16.0% (2023: 20.1%).

In January 2024, we increased our investment to become the controlling shareholder in Niva Bupa, a leading Indian health insurance company. Subsequently, in November, Niva Bupa successfully listed a minority shareholding via IPO and raised additional capital, marking an exciting next step in the growth of the business.

#### Revenue (CER)

Group revenue increased 16% to £16.9bn (2023: £14.6bn). Excluding Niva Bupa revenues (2024: £461m) consolidated from this year and the return of COVID-19 claims savings to customers in Australia Health Insurance (2024: £20m and 2023: £302m), revenues increased by 10%. The increase was driven by strong customer growth across insurance and provision whilst occupancy rates continued to increase in aged care. Pricing changes also drove higher revenues as we balanced the impacts of inflation, remaining competitive for customers and maintaining discipline in our underwriting of insurance risk.

Revenue in health insurance grew by 18%. Excluding Niva Bupa and the return of COVID-19 claims savings in Australia Health Insurance, insurance revenues grew 11% supported by customer growth of 7% period-on-period.

Our health provision businesses saw revenue growth of 10% driven by higher levels of activity across all Market Units as customers increased by 12%.

In aged care, revenue was up 10% as occupancy increased by 2ppts to 94%<sup>4</sup>, combined with a revised government funding model in Australia designed to improve levels of care for residents and address shortfalls within the sector.

1. Revenues from associate businesses are excluded from reported figures. Customer numbers include 100% of our associate figures. Economic post-tax profits include the associate contribution in line with our shareholding.
2. Underlying profit is a Non-GAAP financial measure. This means it is not comparable to other companies. A reconciliation to statutory profit before taxation can be found in the notes to the financial statements.
3. The FY 2024 Solvency II capital coverage ratio is an estimate and unaudited.
4. Closing occupancy

## Group CFO's review continued

### Underlying profit (CER)

Group underlying profit increased 59% to £914m (2023: £576m) driven by the strong increase in revenue and higher investment returns across all Market Units.

Health insurance underlying profit increased with growth in revenues and investment returns across all Market Units. In our Bupa Asia Pacific Market Unit, profits increased due to actions taken to return our Hong Kong Insurance business to profitability, whilst the headline profit increase saw significant fluctuation driven by the reduction in the final return of COVID-19 claims savings to customers in Australia Health Insurance (2024: £20m and 2023: £302m) partially offset by the claims savings arising from COVID-19 disruption in 2023 not arising in 2024<sup>1</sup>. In our Europe and Latin America Market Unit, profits increased due to volume growth and higher investment returns, partially offset by losses in Chile, following cancellation of the GES<sup>2</sup> price increase and other adverse governmental, regulatory and judicial measures in Chile. Despite higher revenues and investment returns, underlying profit in our Bupa Global, India and UK Market Unit reduced as Niva Bupa reported an increased loss due to acquisition cost strain and the absence of in-force profit earning through in the period having recognised it at fair value on acquisition.

Profits grew in health provision supported by strong revenue growth while aged care profits increased in the period driven by higher occupancy rates and margin improvement.

Investment into initiatives that improve our capability globally, including ESG, and higher staff costs resulted in central costs increasing to £299m (2023: £264m).

### Statutory profit

Statutory profit before taxation was £972m, up 72% AER (2023: £564m), as the higher underlying result was further increased by a positive variance in non-underlying items which totalled a £58m gain in 2024, compared with a £(35)m cost in 2023.

The key drivers of the movement in non-underlying items were the £309m gain on remeasuring the value of our existing stake in Niva Bupa to fair value, partially offset by a financial liability of £187m for the payment plan in Chile. For more information see Note 19: Provisions for liabilities and charges.

Losses on disposals of businesses and transaction costs on business combinations totalled £26m (2023: £1m) mainly relating to consolidation of dental and aged care portfolios in the UK and Australia.

Short-term fluctuations on investment returns resulted in a loss of £9m (2023: £31m gain). Overall, our return-seeking asset portfolio delivered a positive return in 2024, driven by higher interest income on bonds and floating rate securities, supported by a tightening in credit spreads. However, a higher movement in long-term yields led to negative short-term fluctuations compared to our expected return. This compares to 2023 where we saw actual returns higher than expected, driven by higher interest income on floating rate assets and tighter credit spreads, but with relatively stable longer-term yields. We also reported a gain on realised and unrealised foreign exchange in the period of £10m (2023: £2m gain).

Also included was a £(13)m (2023: £(32)m) amortisation charge on intangible assets in Bupa Villages and Aged Care Australia following the government announcement to deregulate bed licences from 1 July 2025. Other non-underlying items totalling a loss of £(33)m (2023: £(13)m) related to restructuring costs and fair value movements on the share purchase liability recognised as part of the transaction to increase our shareholding in Niva Bupa, which has since been derecognised following the successful IPO in November.

	2024 £m	2023 £m
Bupa Asia Pacific at CER	446	148
Europe and Latin America at CER	442	340
Bupa Global, India and UK at CER	228	269
Other businesses at CER	97	83
Central costs	(299)	(264)
<b>Consolidated underlying profit before taxation at CER</b>	<b>914</b>	576
Foreign exchange re-translation on 2023 results (CER/AER)	—	23
<b>Consolidated underlying profit before taxation at AER</b>	<b>914</b>	599
Impairment of intangible assets and goodwill arising on business combinations	(2)	(1)
Niva Bupa fair value gain on pre-existing shareholding	309	—
Chile payment plan payable	(187)	—
Short-term fluctuation on investment returns	(9)	31
Net loss on disposal of businesses and transaction costs on business combinations	(26)	(1)
Net property revaluation gains/(losses)	9	(21)
Realised and unrealised foreign exchange gains	10	2
Amortisation of bed licences	(13)	(32)
Other non-underlying items	(33)	(13)
<b>Total non-underlying items</b>	<b>58</b>	(35)
<b>Statutory profit before taxation at AER</b>	<b>972</b>	564

- Under IFRS 17 accounting rules we were unable to hold the deferred claims liability and premium increase deferral provisions in Australia Health Insurance related to the COVID-19 pandemic, that had previously been recognised under IFRS 4. The absence of these provisions has led to significant fluctuations in our reported profits as the cost of givebacks and rate deferrals (2024: £20m, 2023: £302m) do not directly align to the period in which the claim savings were realised.
- Garantías Explicitas en Salud price increase was originally approved by the Chilean regulator in October 2022, subsequently overruled by the Supreme Court and cancelled from 1 January 2024.

## Group CFO's review continued

### Insurance service result

Under IFRS 17, we are required to report an insurance service result which comprises: insurance revenue, less insurance service expenses. This result excludes financial income and expenses. For 2024 the Group insurance service result was £622m (2023: £445m)<sup>1</sup> driving a combined operating ratio (COR)<sup>1</sup> of 95% (2023: 96%). The increase in the insurance service result was driven by a significant increase in Australia Health Insurance profit, due to the reduction in the net cost of returning COVID-19 claims savings to customers. This was partially offset by a loss in Niva Bupa from acquisition cost strain and the absence of in-force profit earning through having recognised it at fair value on acquisition of a controlling shareholding.

### Taxation

The Group's taxation expense for the year of £212m, representing an effective tax rate of 22% (2023: 25%), was lower than the UK statutory corporation tax rate of 25%. This was mainly due to a deferred tax credit on the revaluation of the deferred tax liability relating to the UK pension surplus following a change in the tax rate applying to authorised payments from defined benefit pension schemes from 35% to 25% and the fair value accounting gain on acquisition of the additional stake in Niva Bupa, which is not subject to tax, offset by the non-recognition of deferred tax assets across the Group. Excluding the impact of these items, the effective tax rate would increase to 26%, which is in line with the UK statutory corporation tax rate.

### Cash flow

Net cash generated from operating activities increased by £86m year-on-year to £1,268m driven by the increase in profit (excluding net financial income) and the consolidation of Niva Bupa. This was partially offset by the timing of collections on NHS contracts and other timing differences. Net cash flow used in investing activities increased by £(829)m to £(983)m due to the acquisition of a controlling interest in Niva Bupa and as more of the cash generated from operating activities has been invested into financial assets versus 2023 contributing to the lower cash and cash equivalent balances being held at the year end. Cash used in financing activities has increased in the period by £(396)m to £(465)m, primarily due to the issuance of €500m of senior unsecured bonds in 2023.

### Funding

We manage our funding prudently to ensure a strong platform for continued growth. Bupa's policy is to maintain investment grade access to both the senior and subordinated bond markets. In October 2024, Fitch upgraded the Bupa Finance plc Issuer Default Rating to A from A- with Stable outlook and upgraded the related bond ratings. Moody's reaffirmed Bupa's ratings in July 2024.

We continue to hold a good level of Group liquidity. At 31 December 2024, our £900m Revolving Credit Facility (RCF) was undrawn (2023: undrawn). We completed the Niva Bupa acquisition in January and also repaid a £300m senior bond in April. These were funded through a combination of remaining cash available from the €500m senior bond issued in October 2023 and temporary drawings under the RCF. Coverage of financial covenants within the facility remains strong.

We focus on managing our leverage in line with our credit rating objectives. The reduction in leverage excluding IFRS 16 leases to 16.0% (2023: 20.1%) was largely driven by the repayment of the £300m senior bond in April from surplus cash. Strong repatriations in the second half of the year allowed the RCF, which was drawn by £150m at half year 2024, to be fully repaid by year end (2023: undrawn).

### Solvency

Our solvency coverage ratio of 176%<sup>2</sup> remains strong and is above our target working range of 140-170%.

The Group holds capital to cover its Solvency Capital Requirement (SCR), calculated on a Standard Formula basis, considering all our risks, including those related to non-insurance businesses. As at 31 December 2024, the estimated SCR of £3.1bn was £0.2bn higher and Own Funds of £5.4bn was £0.4bn higher when compared to 31 December 2023.

Our surplus capital was estimated to be £2.3bn, compared to £2.1bn at 31 December 2023, representing a solvency coverage ratio of 176% (2023: 175%). The net impact of the acquisition of Niva in January 2024 and the subsequent IPO in November 2024, led to a 5 percentage point reduction to the Group solvency coverage ratio. Capital expenditure and debt finance costs also reduced the Group solvency coverage ratio. Both of these reductions were offset by the generation of capital in the year through our strong underlying performance.

We perform an analysis of the relative sensitivity of our estimated solvency coverage ratio to changes in market conditions and underwriting performance. Each sensitivity is an independent stress of a single risk and before any management actions. The selected sensitivities do not represent our expectations for future market and business conditions. A movement in values of properties that we own continues to be the most sensitive item, with a 10% decrease having a 10 percentage point reduction to the solvency coverage ratio.

Our capital position is resilient in the face of the individual risks, illustrating the strength of our balance sheet.

Risk Sensitivities	Solvency II coverage ratio
Solvency coverage ratio	176%
Property values -10%	166%
Loss ratio worsening by 2%	168%
Sterling depreciates by 20%	170%
Group Specific Parameter (GSP) +0.2%	173%
Credit spreads +100bps (no credit transition)	175%
Interest rate +/-100bps	175%
Equity markets -20%	175%
Pension risk +10%	176%

We include a Group Specific Parameter (GSP) in respect of the insurance risk parameter in the Standard Formula, reflecting the groups loss experience.

- COR is calculated based on "Insurance service expense" plus "Net expense from reinsurance contracts held" divided by "Insurance revenue" as shown in the Consolidated Income Statement.
- The 2024 Solvency II capital coverage ratio is an estimate and unaudited.

**James Lenton**  
Group Chief Financial Officer

# Our Market Units

## In this section

- 22 Asia Pacific
- 23 Europe and Latin America
- 24 Bupa Global, India and UK



Bupa Chile, Santiago

## Our Market Units

### Asia Pacific

See page 22 for more detail.

Revenue (£)

**£6,277m**

AER +10% 2023: £5,726m  
CER +13% 2023: £5,541m

Underlying profit (£m)

**£446m**

AER +190% 2023: £154m  
CER +201% 2023: £148m

### Europe and Latin America

See page 23 for more detail.

Revenue (£)

**£5,427m**

AER +7% 2023: £5,083m  
CER +13% 2023: £4,807m

Underlying profit (£m)

**£442m**

AER +25% 2023: £355m  
CER +30% 2023: £340m

### Bupa Global, India and UK

See page 24 for more detail.

Revenue (£)

**£5,151m**

AER +22% 2023: £4,235m  
CER +22% 2023: £4,218m

Underlying profit (£m)

**£228m**

AER (15)% 2023: £269m  
CER (15)% 2023: £269m

### Associate Businesses

Revenue (£)

**£9m**

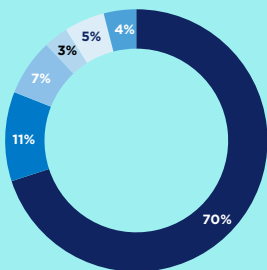
AER +13% 2023: £8m  
CER +13% 2023: £8m

Underlying profit (£m)

**£97m**

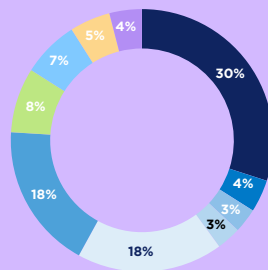
AER +14% 2023: £85m  
CER +17% 2023: £83m

Revenue by business (%)



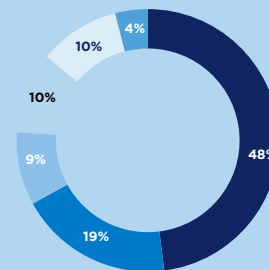
■ Australia Health Insurance  
■ Australia Health Services  
■ Bupa Villages and Aged Care Australia  
■ Bupa Villages and Aged Care New Zealand  
■ Hong Kong Insurance  
■ Hong Kong Health Services

Revenue by business (%)



■ Sanitas Seguros  
■ Sanitas Dental  
■ Sanitas Hospitales & New Services  
■ Sanitas Mayores  
■ Bupa Chile  
■ LUX MED, Poland  
■ Bupa Acibadem Sigorta, Türkiye  
■ Care Plus, Brazil  
■ Bupa Mexico  
■ Bupa Global Latin America

Revenue by business (%)



■ Bupa UK Insurance  
■ Bupa Global  
■ Niva Bupa  
■ Bupa Dental Care  
■ Bupa Care Services  
■ Bupa Health Services

Underlying profit was up 17% to £97m largely driven by revenue growth and higher investment returns in Bupa Arabia.

Customers

**3.7m**

Bupa Arabia

**0.5m**

My Clinic

## Our Market Units continued

# Asia Pacific

Customer growth driving financial performance across all Business Units

### Customers

**4.8m**

Health Insurance

**3.4m**

Healthcare Provision

**5,600**

Aged care, Australia

**3,000**

Aged care, New Zealand

**Nick Stone**  
CEO,  
Asia Pacific



In 2024, all Business Units improved their Net Promoter Score (NPS). We also implemented over 3000 customer experience improvements across our customer journey.

Revenues increased by 13% to £6.3bn. The 2023 comparative year was significantly impacted by the return of COVID-19 claims savings. Excluding this impact, revenue increased by 8% driven by customer growth in Australia Health Insurance, higher utilisation in health provision businesses and an increase in aged care occupancy, offsetting lower revenue in New Zealand Aged Care due to care home divestments.

Asia Pacific underlying profit increased year-on-year from growth in all Business Units. However, the most material driver of the year-on-year increase was a significant reduction in the cost of returning COVID-19 claims savings to Australia Health Insurance customers relative to 2023. The majority of the remaining profit growth was attributable to Health Services, Australia and New Zealand Aged Care, and Hong Kong.

In Australia Health Insurance, revenues increased by 6% (when excluding the impact of returning COVID-19 claims savings) driven by new members. On a reported basis, the Combined Operating Ratio (COR) improved to 93% (2023: 98%) due to a significant reduction in the cost of returning COVID-19 claims savings to customers relative to 2023.

Australia Health Insurance domestic market share was 25.54% at 31 December 2024, marking nine consecutive quarters of maintaining or growing market share<sup>1</sup>. Health Insurance has continued to deliver strong growth across all service propositions, including through our digital health platform, Blua. The digital customer offering and coverage continues to expand, including Chemist Delivery and Virtual GP consultations, with online doctor appointment eligibility being expanded in October to include additional products, increasing domestic coverage to 2.2m customers.

Australia Health Services delivered growth in both revenue and underlying profit. Revenue growth was primarily attributable to a sustained demand for temporary visa assessments within our Bupa Medical Visa Services business; customer growth in our Australia Defence Force contract; enhanced procedure mix and customer growth in Dental; and increased customers in Optical. As part of our Connected Care strategy, four additional healthcare centres opened, offering Bupa customers and the wider community access to GPs and a range of healthcare professionals.

In Australia Villages and Aged Care, revenue and underlying profit increased, driven by higher occupancy, closing at a six year high of 95% (2023: 91%), improved operational performance and changes in government funding to support enhanced resident care.

In New Zealand Villages and Aged Care, revenue decreased as a result of five site divestments, while underlying profit increased. In Care Homes, occupancy closed at 94% (2023: 91%), in part offsetting the impact of strategic care home divestments on revenue. Despite a subdued New Zealand property market, Village revenue grew, remaining strong from higher unit pricing on sales.

Hong Kong revenue grew driven by higher Health Services clinic utilisation and the opening of seven new clinics. The return to profitability within the Health Insurance business in 2024, was achieved through the effective implementation of a revised pricing and retention strategy.

**Nick Stone**  
CEO, Asia Pacific

1. Source: APRA industry data.

## Our Market Units continued

# Europe and Latin America

Strong growth across insurance and provision as we continue to grow our provision footprint in line with our connected care strategy

### Customers

**5.9m**

Health Insurance

**14.6m**

Healthcare Provision

**5,900**

Aged care

**Iñaki Peralta**  
CEO,  
Europe  
and Latin  
America



In 2024, the majority of our Business Units improved their NPS. We also implemented around 4,800 customer experience improvements across our customer journey.

Revenue in our Europe and Latin America Market Unit grew by 13% to £5.4bn as a result of strong customer growth and pricing. Underlying profit increased by 30% to £442m driven by the increase in customers and higher investment returns.

Sanitas Seguros, our health insurance business in Spain, delivered higher revenues due to organic customer growth and the impact of the acquisition of the Asefa health portfolio in June 2023. 2024 marked another important milestone for Sanitas Seguros, with the sale of more than 500,000 new policies in a year. Underlying profits increased driven by stable margins with a 90% COR (2023: 89%) combined with higher revenues and investment returns. We also continued to expand digital services and, in 2024, we reached an average of 77,000 video consultations per month (compared to an average of 68,000 per month in 2023).

Our dental business in Spain saw a strong increase in revenue and underlying profit, driven by higher customer volumes and improved margins. In the year, We also reached our highest ever NPS score of 75.

In our hospitals business in Spain, revenue reduced as our public private hospital partnership contract came to the end of its term while underlying profit increased. Excluding this contract, both revenue and underlying profit increased due to higher levels of activity. During 2024, Sanitas Hospitales opened 3 new centres, 1 medical centre in Madrid and 2 for advanced rehabilitation, in

Madrid and Barcelona. Work also continued on the construction of a new hospital in Madrid, in Valdebebas, which is expected to open in 2025. We also announced plans to open two new hospitals in Barcelona (Marina) and Madrid (Arganzuela).

Sanitas Mayores, our aged care division in Spain, continues to perform well. Occupancy remained high at 95% (2023: 96%) with the decrease resulting from the opening of a new care home in October, which will take time to reach capacity.

In Chile, insurance revenue decreased and the business reported an underlying loss following the cancellation of the GES price increase in the Isapre business and other losses associated with adverse government measures. As disclosed previously, Bupa's Isapre business in Chile has been negatively impacted by governmental, judicial and regulatory action, including regarding the method and implementation of statutory Risk Factor Tables (used to adjust the price of insurance contracts based on risk factors such as age), for more information see Note 19: Provisions for liabilities and charges ([page 190](#)). Chile provision profits remained stable in 2024.

In Poland, LUX MED revenue and underlying profit increased as result of strong customer growth in health provision and the development of the new InPMI product. In 2024, we acquired a new hospital in Krakow, with advanced orthopaedics provision with the potential to add additional capabilities, alongside opening 23 new centres, image diagnostic clinics, medical centres and mental health clinics. Throughout the period, we have maintained our support for Ukrainian refugees who have been forced to flee the war.

Bupa Türkiye has delivered substantial revenue and underlying profit growth, driven by pricing increases to keep pace with higher rates of inflation and increased investment returns in our health insurance business, Bupa Acıbadem Sigorta. The economy is classified as being a hyperinflationary environment, leading to the application of IAS 29. A net monetary loss of £16m (as of 31 December 2024) has been recorded outside of underlying profit for the period for Bupa Türkiye. In addition, we completed the acquisition of CompuGroup Medical Information systems, Inc., a healthcare software company and opened 3 new dental clinics as we look to expand our connected care footprint.

Care Plus in Brazil delivered very strong revenue and profit growth as result of higher healthcare customer numbers and higher investment returns. There was also a positive contribution from the dental and vaccination businesses acquired in 2023 as we expand into other lines of healthcare provision. After the reporting date, in February 2025, we completed the sale of a legacy portfolio of individual health business, resulting in a post tax profit of £14m.

Bupa Mexico delivered strong revenue and profit growth due to customer growth in the insurance business where we have launched new domestic and corporate products.

Bupa Global Latin America revenue and underlying profit increased due to improved margins and higher investment returns. In 2024, its business in Bolivia was sold for a consideration of £3m.

**Iñaki Peralta**  
CEO, Europe and Latin America

## Our Market Units continued

# Bupa Global, India and UK

Strong revenue and customer growth driven by UK Insurance whilst we completed the acquisition of a controlling stake in Niva Bupa

### Customers

**23.3m**

Health Insurance

**4.2m**

Healthcare Provision

**6,200**

Aged care

**Carlos Jaureguizar**  
CEO,  
Bupa Global, India  
and UK



In 2024, all Bupa Global, India and UK Business Units delivered improvements in NPS. There were also over 2,600 customer experience improvements implemented across our customer journey.

Revenue in our Bupa Global, India and UK Market Unit increased by 22% to £5.2bn. Excluding the consolidation of Niva Bupa, revenues increased by 11% driven by increased customer numbers in UK Insurance and Bupa Global, UK Dental and Health Services. Occupancy improved in UK Care Services and portfolio growth in Health Services also drove higher customer numbers. Underlying profit reduced as revenue growth was offset by the impact of fair value adjustments recognised following the increase in shareholding in Niva Bupa during the year. This resulted in an acquisition cost strain in the income statement from the absence of in-force profit being earned in the period. While in UK Insurance, profits reduced due to the timing impact of the return of premium provision release in the prior year, which offset the tail end of deferred COVID-19 claims, some of which arose in the first half of 2024.

UK Insurance delivered strong growth in revenue, adding over 485,000<sup>1</sup> net new customers across medical insurance, health trusts, dental insurance, subscriptions and cash plan in 2024. Underlying profit reduced, driven by the timing impact of the return of premium provision release and commission expense timing on strong gross written premium growth. The launch of Bupa Well+ health subscriptions to business and consumer customers has provided more people access to our digital health and wellbeing support, including GP, mental health and physio appointments. We also introduced a new dental allowance for all consumer health

insurance customers to be used for an appointment and treatment at Bupa Dental Care practices.

In Bupa Global, our IPMI business, revenue and underlying profit increased driven by growth in customer numbers, strong management of operating costs and higher investment returns. Our focus remains on responding to the distinct needs of our customers and people across global locations, while maximising the efficiency of our operating model, improving systems and providing more digital support for our customers.

The combined operating ratio for Bupa Insurance Limited, the UK based insurance entity that underwrites both domestic and international insurance was 96% (2023: 95%).

In January we increased our shareholding in Niva Bupa, a leading Indian health insurer, to reach more customers with their healthcare needs. Bupa is now the controlling shareholder of Niva Bupa and its results are fully consolidated from this year. Alongside this we have transferred Niva Bupa from Other businesses for segmental reporting into Bupa Global and UK, in line with the management reporting structure. In November 2024, Niva Bupa successfully completed an Initial Public Offering on the National Stock Exchange of India and the Bombay Stock Exchange, which will enable ongoing sustainable growth and provide continued investment to support future business ambitions. At Full Year 2024 Niva Bupa contributed £461m in revenues and a £51m underlying loss. The underlying loss was impacted by acquisition cost strain on new business and renewals which arose because of fair value adjustments following our increase in shareholding. Profit associated with the value of in-force business was

recognised at fair value on acquisition of a controlling shareholding, of which £55m would normally have earned through 2024.

UK Dental returned to profitability in 2024 as it continued to deliver on its turnaround strategy. Bupa Dental Care is striving to be the workplace of choice for dental professionals, supported by a market-leading health benefits proposition for frontline colleagues.

UK Care Services, our aged care business, delivered good growth in revenue. Underlying profit increased due to growing occupancy, strong cost management, which included reducing our reliance on agency staff, focusing on employee retention and lower energy costs. Closing occupancy was 91% (2023: 90%).

Health Services delivered growth in revenue and returned to profitability in 2024, driven by higher customer numbers in Clinics and Cromwell Hospital, new Bluea digital services and an expanded network of health centres. The portfolio has grown to 79 Bupa health centres through the acquisition of Blackberry Clinics, London Medical and The Dermatology Partnership. Through this expanded footprint and the launch of GP subscriptions, we continue to deliver our long-term strategy to provide more services directly to customers. Cromwell Hospital expansion continues with the addition of a new theatre which opened in June.

**Carlos Jaureguizar**  
CEO, Bupa Global, India and UK

1. Includes Health Trust customers which are excluded from the Group's total customer count.

## Chief Medical Officer's review

Our healthcare teams bring dedication and expertise to every moment of care, improving the health and wellbeing of customers around the world

Every day, Bupa teams strive to fulfil our purpose. Over 50,000 healthcare professionals deliver extraordinary care, drive innovation, and improve health outcomes.

In 2024, we launched a groundbreaking new initiative My Genomic Health, a pilot programme offering 14,000 customers whole genome sequencing. We are the first private healthcare provider in Spain and the UK, to offer whole genome sequencing with integrated follow-up care pathways, underpinning our commitment to improving customers' health.

Genomics, the study of genes in our DNA, their function and influence on the body, is transforming healthcare by enabling early detection and prevention. We offer access to genetic risk profiles across 36 conditions, as well as pharmacogenomic data - which provide insights into how a person's genes influence their response to medicines.

These insights enable us to identify individuals at high risk and support them with highly personalised health plans. Tailored drug recommendations further empower people in making informed decisions about their health. This marks a transformative moment in healthcare, shifting the focus from reactive care to proactive prevention.

Transformation is also evident in our expanding digital footprint, seamlessly connecting clinicians and patients. Over 7.5m customers in 180 countries access Blua, digital health by Bupa, and our unique ability to integrate digital and physical services means our customers can receive their care wherever is comfortable and convenient for them.

Mental health is essential to a healthy life yet, according to the World Health Organisation, one in eight people globally live with a mental disorder. At Bupa, we are committed to helping customers who need support, access mental health services where and when they need them. In Poland, we have six mental health clinics already open, with more planned both in Poland and elsewhere. Customers are able to move between in-person and remote care, with 51% of consultations in Poland having been delivered remotely. In Australia, cognitive behavioural therapy courses are delivered via THIS WAY UP, a clinically-proven digital health programme. Over the last 12 months, 8,000 customers have received treatment, with 73% of customers reporting an improvement in their symptoms.

**Dr Anne Lepetit**  
Chief Medical Officer,  
Bupa Group & BGIUK



### Mustafa's story

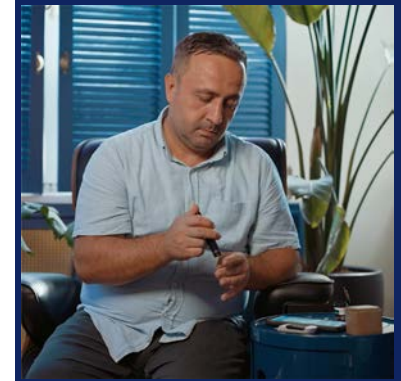
**In Türkiye, the Blua chronic disease tracking programme allows customers with Type 2 diabetes to digitally track their blood glucose levels and share with their doctor.**

One of our customers, Mustafa, has been using the digital service and Blua health information for two years. The programme supports him and his clinician in monitoring his condition at home, and work, sending alerts if the readings are high or low. Mustafa noted:

**"Thanks to the programme, my condition is better controlled, and I feel fitter, healthier and happier."**



Watch Mustafa's story here  
[www.bupa.com/blua](https://www.bupa.com/blua)



## Chief Medical Officer's review continued

Serving over

# 60 million

customers worldwide

# 50,000

dedicated healthcare professionals who deliver extraordinary care and drive innovation across our global network

We have increased our footprint worldwide, opening a new hospital, over 40 clinics, 15 dental centres, new laboratories, specialist diagnostic facilities and a vaccination centre.

The culture of clinical governance across our organisation is strong. With robust defined oversight of the quality and safety of our owned provision businesses, clinical governance controls over Third Party Providers (TPP), integrated risk management systems, and global forums, we empower our teams to uphold the highest standard of care, while delivering innovation and operational efficiency. At Full Year 2024, all BUs have been assessed as being inside risk appetite. Additionally, a review of clinical regulatory and accreditation maturity across all MUs will continue to ensure clinical governance remains robust as we move into 2025 and beyond.

We are supporting our clinicians by investing in technologies that allow them to focus more of their time on being with their patients. AI interpretation of MRI scans quickly delivers expert level diagnoses, which are reviewed and confirmed by the doctor, prior to communicating with their patient. This saves the doctor time and the patient receives their results faster.

In addition, we are putting AI directly into the hands of our customers, streamlining care and helping them to achieve better outcomes. The Bupa Sanitas symptom checker allows customers to evaluate their symptoms and receive recommendations on next steps. This technology has supported over 100,000 customers across Spain, directing them to appropriate care. If a consultation is needed, an integrated appointment system helps the customer navigate which specialist is most appropriate for them and arranges an appointment.

Looking further ahead, we will continue to support our people and harness new technologies, building a stronger, more resilient healthcare community. Together, we are shaping a future where health care is more personalised, more accessible and more effective than ever before.



Visiting Quality HealthCare Clinic, Hong Kong



Meeting members of Bupa LUXMED's ambulance crew at St Elizabeth Hospital, Warsaw

### Investing in our clinical workforce

We are committed to empowering our people and advancing education and innovation to help address global healthcare workforce challenges and build a stronger, more sustainable healthcare system for all.

In partnership with Spain's Universidad Europea, we have established two Bachelor's degree courses, one in Nursing, and the other in Occupational Therapy, as well as a Master's degree in Physiotherapy. Delivered with the support of Bupa clinicians, these degree programmes have already attracted 75 students in their first year.

In addition, the first cohort of Assistant Nurses have graduated from the Sanitas Campus in Madrid. Enrolment has increased ten times across nursing and care home assistants, as well as in dental care and diagnostic imaging. With a second campus opening in Barcelona in 2025, we are strengthening our commitment to healthcare education and workforce development.

# Bupa Healthcare Symposium

The 2024 Bupa Healthcare Symposium brought together leaders from across the global health community. This year the theme was digital health, with an agenda structured around the three pillars of Blua – virtual consultations, remote care and health programmes.

We were proud to have Michael Johnson, 12-time Olympic and World Champion opening the Symposium, sharing his personal health story as a stroke survivor and how new digital technologies supported his recovery.

Panel sessions explored the future of digital health and how it is evolving to support patients and healthcare providers alike. Daniel Kraft MD, shared his visionary outlook on healthcare innovation and our high-tech exhibition showcased cutting-edge advancements in diagnostics, delivery and patient engagement.



# Our people and culture

We are committed to building the best, most diverse workforce and a great, inclusive place to work for our people.

A place where all our people feel supported and valued, and they can grow and develop. Where everyone feels inspired to perform at their best and provide our customers with the best possible experience.



## Our people and culture continued

“This score puts us within the 10% most engaged companies and is seen as ‘world-class engagement’ by our survey partner, Glint, who work with some of the biggest companies across the world.”

– Iñaki Ereño, Group CEO, on our global engagement score

### 2024 global engagement result

# 84

In 2024, we again achieved a ‘world-class’ engagement score, this year being our highest ever.



Iñaki Ereño, Group CEO, talking to Yolanda Erburu Arbizu, Chief Sustainability and Corporate Affairs Officer for Europe and Latin America

### Employee Experience

Enhancing employee engagement, embracing diversity and inclusion, and investing in the health and wellbeing of our people creates a great place to work. It also contributes to our ambition to become the world's most customer-centric healthcare company.

#### Engagement

We measure employee engagement twice a year through our global People Pulse survey for all employees and, in 2024, we continued to see improvements. Our people continue to tell us how much they love working here and, over the past year, our employee engagement results continued to rise.

In November, we saw the highest ever participation rate since we launched our current approach to employee listening six years ago, with over 70,000 employees completing the survey. We also saw the highest ever global engagement score of 84. That score was up two points on 2023 and exceeds the high performing (top 10%) external benchmark, measured by our engagement partner, Glint, by four points.

We're incredibly proud of that continued improvement and remain committed to listening and acting on our people's feedback so we can continually improve their experience of working at Bupa.

We continued to actively engage our people with our strategy through a series of creative global campaigns across the year. These included marking the Year of Bluea, our digital health solution, by encouraging colleagues to share their 'Picture of Health' in the run-up to the Paris Paralympic Games. We also celebrated the end of Bupa's 3x6 Strategy with films, quizzes, infographics and sharing inspiring people stories from around the globe.

In 2024, 78% of our people used Workvivo, our global internal communications and employee engagement platform, creating 56,000 posts, 121,000 comments and over 640,000 likes.

#### Viva

We want our people to feel healthier and happier because they work at Bupa, which is why we launched Viva, our global employee health and wellbeing programme, in 2023. As of 2024, all Bupa employees worldwide have access to medical benefits, health insurance and wellbeing offerings through Viva. Our November 2024 People Pulse survey showed that our people feel more supported to look after their health and wellbeing than ever before. Our highest ever score of 83 for Wellbeing, was two points above the external benchmark.

We continued to expand our Personal Energy programme, helping leaders and their teams manage wellbeing practices and behaviours at work and at home. The programme is now available globally, Group-wide, translated into 13 different languages. It is accessible in care homes, call centres, clinical locations, retail stores, for back-office teams and corporate clients. Nine out of ten participants sharing that attending a Personal Energy session helped them feel more connected to their team.

### Health and Safety

During 2024, our priority has been exploring how we support our people's psychological health and safety, and the root causes that affect that. This included looking at any unintended consequences from the shift to hybrid working.

Two of our key measures when looking at health and safety are through lost time injury and burnout and both of these measures improved during 2024. Over the past 12 months, we've also been recognised externally across our markets. We achieved six awards in the UK from the Royal Society for the Prevention of Accidents, the Suicide Prevention Australia's LiFE award for 'Best Practice in Workplace' for our Suicide Prevention Strategy and accreditation as a Top Wellbeing Company in Spain.



## Our people and culture continued

# 300

Olympic and Paralympic athletes from 9 countries competing together in 14 inclusive sports.



In October, Sanitas hosted the 2nd Inclusive Games in Madrid which brought together over 300 international athletes with and without disabilities and showcased the importance of inclusive sports for all.

### Inclusion & Diversity

We are committed to providing an environment that enables our people to bring their true selves to work and is inherently more inclusive. Our Group-wide inclusion framework supports the Group-wide inclusion priorities our Chief Executive Committee committed to for 2023 and 2024.

#### Inclusive Culture

Our **Be You at Bupa** campaign continues to have a tangible impact on how our people are feeling, achieving the highest levels of engagement on our internal social channels this year.

Our People Pulse survey also reflected that our employees continue to report feeling valued and free to challenge the status quo. This surpasses the top 10% global benchmark and indicates that people feel able to be their true selves at work with an increase in "Diverse perspectives are valued at Bupa" of two points in 2024.

Understanding our workforce diversity remains an important focus. During 2024, we increased the quality of our diversity data, completing a Bupa-wide data privacy exercise and setting the foundation for further development in 2025.

### Inclusive Culture

A culture where everyone feels a sense of belonging and our people feel able to bring their true selves to work and be their very best.

### Inclusive Leadership

All of our markets have continued to develop inclusive behaviours within leadership teams, which is reflected in the continued positive trend across our pulse inclusion index scores. There has been a focus on improving gender balance in leadership teams and developing future leaders. This work will continue, along with supporting the growth of under-represented groups, including people with disabilities.

Having undertaken an extensive review to understand any barriers to progression for female leaders, this year we delivered our first 'General Manager - Insight to Action' programme. This programme provides talent assessment, coaching and career development to support more women to move into senior General Manager roles across the business.

Our Dora Livock global female leadership network also continues to provide a supportive space for senior women to connect and to strengthen the pipeline of future women leaders. This year, the network has nearly doubled to over 300 global members, with executive sponsors across each Market Unit as well as from our Chief Executive Committee.

### Inclusive Leadership

Our leaders visibly role model inclusive leadership, building diverse teams and creating safe environments where our people can develop and grow.

We voluntarily report data to a number of important initiatives, including the FTSE Women Leaders Review and the HM Treasury Women in Finance Charter. This year, our progress has been recognised with our inclusion in the 2024 Financial Times Diversity Leaders rankings.

### Inclusive Practices

In a year when the global spotlight shone on the Paralympic Games in Paris, our focus was firmly on continuing to drive action on disability inclusion and accessibility across Bupa.

Following accessibility reviews in each of our three Market Units, we set up working groups to target the areas where we could have the most impact. These included workplace adjustments; recruitment and onboarding; and training and awareness.

The launch of the Be You at Bupa accessibility commitments in July reinforced our work to remove barriers and create inclusive and accessible experiences for our employees and our customers.

### Inclusive Practices

Our policies and practices are fair, remove bias and allow us to attract, retain and promote to increase diversity, reflecting the customers and communities we serve.

## Our people and culture continued

The overwhelmingly positive response to our people's stories, shared through the global launch campaign, demonstrated the importance of the subject to our people around the world.

Building on the strength of the existing disability advocacy groups within our Market Units, we held our first Bupa-wide employee advocacy forum, to ensure that the experiences of our people with disabilities are central to our plans and progress.



Colleagues in London joined a 'Breaking Barriers' panel discussion to share their experience of living with a disability.

### Leadership and Workforce

As we navigate an increasingly complex and dynamic global landscape, the need for future-ready skills and capabilities has never been more critical. Our commitment to building a resilient and adaptable workforce underpins our strategic vision, ensuring we remain at the forefront of innovation and excellence.

Through targeted initiatives and comprehensive development programmes, we are equipping our people with the tools they need to thrive in their roles and drive our organisation towards sustained success. By fostering a culture of continuous learning and professional growth, we are not only enhancing individual careers but also strengthening our competitive edge.

### Leadership Development

We continue to build leadership capability globally by empowering our leaders to create an environment where all of our people can thrive, innovate and contribute to our collective success.

Bupa Advance, our global senior leadership development programme, is designed to build the mindset and capabilities we need to deliver our strategy, and to create a collaborative leadership community. During 2024, a further 25 leaders representing 11 countries completed the programme.

In our APAC Market Unit, 186 leaders completed the newly launched 'Lead at the Heart' programme, which focuses on leading great customer experiences, self-development and supporting people through change.

The programme was recognised with a Platinum Award in Leadership Development at LearnX 2024: an award for outstanding leadership training which drives and supports talent and development. It has been nominated as a finalist in the Australian HR Institute's Best Leadership Development Strategy award.

In BGIUK, we launched 'Evolve', to accelerate the development of leaders with growth potential. The first 68 leaders have started the programme, which focuses on leading with purpose, impact, agility and inclusion.

### Global Mobility

Creating opportunities for career mobility across Bupa is essential for our business success, driving collaboration and global problem solving, and our people's personal growth, as the demand for global talent in healthcare increases.

Through our 'Move On' mobility programme launched in our ELA Market Unit in 2024, 16 employees gained international experience undertaking three-to-six-month projects in different countries, gaining invaluable development opportunities with a global perspective.

We initiated an Aged Care Study Tour for aged care managers, from Australia and the UK, to collaborate and explore ways to improve our dementia care offering – an experience designed to accelerate their personal growth, build global networks and enhance the care we give to our customers around the world.

### Future Skills and Future Capabilities

At Bupa, we recognise the importance of preparing our people to deliver for our customers and transform for the future, by equipping them with the necessary skills and capabilities to meet emerging challenges and opportunities.

Our commitment to future skills development is evident in our comprehensive approach to continuous learning and innovative training programmes. Our strategic approach to workforce development includes a focus on early careers, clinical and future skills.

### Future Skills

For the fourth year, we ran our global B-Disruptive programme, which is open to everyone at Bupa. Following training on generative artificial intelligence, 750 people participated in the challenge, designing potential AI-driven solutions within Bupa to predict and prevent illness.

There were two winning teams: one providing AI-enhanced hormone health insights and the other creating an AI-powered assistant to help customers follow their healthcare consultation advice.

## Our people and culture continued

### Early Careers

Bupa is committed to investing in our internal talent and recruiting externally to find brilliant people to join our apprenticeship and graduate schemes.

This year, we were placed 25th in the UK's Top 100 Apprenticeship Employers, moving up six places from 2023.

In Sanitas, our annual Talent Young People programme continued. We hired 10 people this year, working in different departments in Functions, People, Finance and IT. Each gaining skills in their respective department while also learning soft skills, English and Data/IT tools to enhance their development.

Within our Legal function, we launched an in-house solicitor apprenticeship programme, designed to develop our internal legal capabilities, increase access to the legal profession and assist with social mobility.



Iñaki Ereño, Group CEO, welcoming our new intake of Group and BGIUK graduates

### Clinical Workforce

Following the successful launch of Sanitas Campus FP in 2023 (our clinical vocational training initiative in ELA), we have increased our intake from 35 students in 2023 to over 350 students enrolling in the 2024/25 cohort. We have also introduced new certifications, including learning for diagnostic radiographers and care home assistants.

We continue to invest in our future clinical workforce and have already started to replicate this initiative through building new facilities in Barcelona and in Staines-upon-Thames, near London.



The 2024 winning eco-Disruptive team, Moodmon

### eco-Disruptive

In 2024, we ran the fourth edition of eco-Disruptive where learners work with the start-up community to solve challenges linked to our sustainability agenda. This year's focus was Healthy Societies, and the challenge areas included inclusive health, supporting disability, and illness prevention. 125 of our people participated with an impressive 1,079 start-ups, gaining invaluable skills and challenging themselves and the way we work to deliver better outcomes for our colleagues, customers and wider society.

The teams developed 18 Minimum Viable Products (MVPs) and our winning start-up, Moodmon, have developed a medical application that uses an AI algorithm. It analyses behavioural markers such as speech, activity and sleep quality parameters to evaluate a patient's mental state. They will receive a prize of £200,000 to further fund product development, as well as the opportunity to present at Plug and Play's Summit in Silicon Valley, whose mission is to drive innovation by connecting entrepreneurs, corporations, and investors worldwide.

#### Inclusive Health

Creating solutions for **people with limited access or support** for their healthcare needs.

#### Supporting Disability

Creating solutions that consider the challenges of **those living with a disability**.

#### Illness Prevention

Creating solutions aimed at **preventing illness** and reducing the need for **unnecessary medical interventions**.

### Executive Leadership Development

We supported 24 of our executive level leaders to gain insight from a variety of external perspectives and innovation during 2024, including the Singularity Executive Programme.

In addition to a customised event hosted by Singularity for our top executives, five senior leaders had the opportunity to spend an immersive week in Silicon Valley, developing a deeper understanding of the technologies shaping the future and inspiring radical new ways of thinking.

### eco-Disruptive

# 125

125 participants took place in our 2024 eco-Disruptive programme



2024 eco-Disruptive participants

# Partnering with New Zealand Rugby

In June, we became the official global healthcare partner of the All Blacks, Teams in Black, and the international healthcare partner of the Black Ferns. This four-year partnership aligns with our mission of helping people live longer, healthier, and happier lives, emphasising the connection between health and high performance across all the teams.

"It's fantastic to partner with such a prestigious and successful institution as New Zealand Rugby. These are legendary teams that epitomise health and high performance. We are excited to be working in partnership, championing healthy lifestyles worldwide and supporting these athletes who are leading the way."

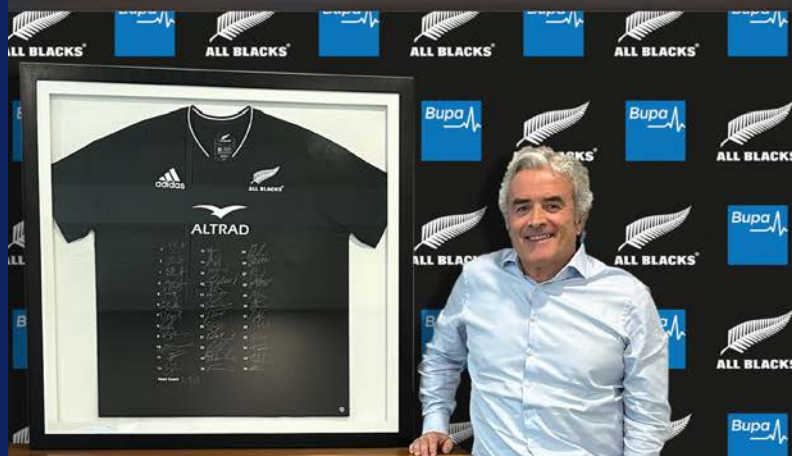
Iñaki Ereño, Group CEO



More about our partnership with the All Blacks

□ [www.bupa.com/allblacks](http://www.bupa.com/allblacks)

Bupa Annual Report 2024



# Delivering Sustainability and ESG

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Download our sustainability report

[www.bupa.com/ARA2024](http://www.bupa.com/ARA2024)



Mr Motivator and our Bupa colleagues celebrating Healthy Cities

## Sustainability and ESG

Our sustainability strategy focuses on building a healthy future for both people and the planet.

Sustainability, and environmental, social impact and governance matters (ESG), are embedded in Bupa's purpose and reflected in our 3x6 Strategy, as they will continue to be in the 3x100 Strategy going forward. A review and refreshment of the sustainability strategy has been undertaken to align with the 3x100 Strategy and support delivery of the strategy in a sustainable way.

Our sustainability strategy focuses the business on how people and the planet are connected, and how Bupa can make healthcare more sustainable.

Bupa remains committed to becoming Net Zero<sup>1</sup> and achieving our Science-Based Targets (SBT). We continue to work towards reducing our environmental impact and improving healthcare. We will do this by focusing on areas where we can make the biggest difference for people and the planet.

Our sustainability strategy supports behaviours and actions across a broad range of ESG matters, such as inclusion and diversity, how we care for our people and how we contribute to communities, and how we respond to the risks of modern slavery and ensuring strong governance and business ethics.

For more information, see [People and Culture](#) on pages 28 to 32.



**We deliver our sustainability activity through three missions.**

### Mission 2040

Our mission to build a healthier future for people and planet



#### Mission Zero

Reducing the environmental impact of healthcare.

For more information, see pages 37 to 39



#### Mission Accelerate

Accelerating innovative solutions to the biggest health-related sustainability challenges.

For more information, see pages 40 to 41






#### Mission Regenerate

Helping restore the health of our planet.

For more information, see page 42

# Sustainability and ESG continued

Our Pillars and Ambition	Objective	Targets	Key progress in 2024
<b>Mission Zero</b> Reducing the environmental impact of healthcare. 	<p>To provide healthcare solutions for a healthy future for people and the planet by 2040. We are focused on:</p> <ul style="list-style-type: none"> <li>■ decarbonising our own operations, supply chain, investments and healthcare provision</li> <li>■ digitalising our products and services</li> <li>■ delivering sustainable healthcare.</li> </ul>	<ol style="list-style-type: none"> <li>1. Reduce our scope 1 and 2 (market-based) greenhouse gas (GHG) emissions across our global operations by at least <b>40% by end 2025 from 2019 baseline</b>.</li> <li>2. Reduce scope 1 and 2 (market-based) GHG emissions across our global operations by at least <b>46.2% by end 2030 from 2019 baseline</b> (our approved science based target)</li> <li>3. Reduce scope 3 emissions<sup>1</sup> by at least <b>63% by 2034 from 2019 baseline</b> (our approved science-based target)</li> <li>4. Align our portfolio of corporate bonds, loans and listed equities to 1.5C by 2040</li> <li>5. Become a net zero business for scope 1 and 2 by 2030 and across all scopes by 2040.</li> </ol>	<ul style="list-style-type: none"> <li>■ Reached and exceeded our interim 2025 scope 1 and 2 emission reduction target.</li> <li>■ 2024 performance is exceeding our targeted 2030 SBT emissions reduction.</li> </ul>
<b>Mission Accelerate</b> Accelerating innovative solutions to the biggest health-related sustainability challenges. 	<ul style="list-style-type: none"> <li>■ To innovate and bring influence, research and advocacy, working with others, to deliver net zero, patient-centric health systems in a sustainable way.</li> </ul>	<p>By 2025, we will have engaged 500 start-ups and other key innovation partners to deliver at least one scalable sustainable healthcare solution per year and share these insights with our partners.</p>	<p>We engaged over 1,000 start-ups in each of the four years of our eco-Disruptive programme, including 2024, and continue to work with innovators and partners to scale sustainable healthcare solutions.</p>
<b>Mission Regenerate</b> Helping restore the health of our planet. 	<ul style="list-style-type: none"> <li>■ Provide opportunities for people to enhance their physical and mental health through community-based programmes that restore and regenerate the health of the planet. Developing and participating in partnerships that bring clinical expertise to drive human health benefits through conserving, restoring and regenerating nature.</li> </ul>	<p>By 2025, we will support 1 million people each year to improve their physical and mental health by expanding initiatives like our Healthy Cities programme that help restore and regenerate nature.</p>	<p>In 2024, we supported over 500,000 people towards our target and plan to achieve our target of 1 million people during 2025.</p>

1. Scope 3 emission categories included in target scope include: purchased goods and services, insurance-related emissions, business travel, downstream transportation and distribution.

## Sustainability and ESG continued

# Mission Zero

We're committed to being a net zero business by 2040,

with our efforts underpinned by near-term targets validated by the Science Based Targets initiative (SBTi).



### Transforming to a net zero business

We are in the process of developing a climate transition plan for our business based on the recommendations and guidance provided by the Transition Plan Taskforce (TPT) Disclosure Framework.

### Reducing our direct emissions

We continue to make good progress in decarbonising our scope 1 and 2 GHG emissions achieving a reduction of 58% from our 2019 baseline. This reduction currently exceeds our 2025 interim target of a 40% reduction, as well as our 2030 science-based target of 46.2%. During 2024, we maintained our commitment to securing renewable electricity, moving from 91% in 2023 to 94% in 2024, and remaining at 100% in our APAC Market Unit. In 2024, Spain, Türkiye and Mexico continued to secure 100% renewable energy.

For further information on our 2024 carbon performance see pages 38 and 39.

### Reducing our indirect emissions Responsible Investment

Our sustainability strategy and climate targets are reflected in our approach to responsible investment. During 2024, we updated our Sustainable Investing Framework. This aligns our approach to sustainable investing with our growing emphasis on sustainability at Bupa. The aim of the new framework is to continue management of ESG risk by incorporating sustainability factors in investment decisions, while improving the positive impact of our portfolios on society and the environment. We will prioritise impact investments focused on climate, health and nature, creating quantifiable positive outcomes while balancing the need to maintain diversification and optimise return on capital. We will publish our progress against our targets in due course.

For more information, see our Responsible Investment Statement [www.bupa.com/financials/responsible-investment](http://www.bupa.com/financials/responsible-investment)

### Sustainable Procurement

During 2024, we continued to expand our sustainable procurement programme, increasing the number of suppliers that we are targeting for change, and expanding our efforts to reduce the climate emissions from the supply chain across our Market Units. One of our global initiatives is to work with our top technology suppliers (by spend) to ensure that they also share our net zero ambitions. After exceeding our 60% target in 2023, we increased our target to an ambitious 75% of technology spend globally with suppliers aligned to our sustainability goals. At the end of 2024, we reached 73%, an increase of 7% in 12 months. We also have targets for our top global suppliers to increase the percentage of our top 100 suppliers (globally, by spend) aligned with our SBTs and net zero ambition.

Our targets help us work with suppliers who are aligned with our climate goals. In 2025, we will focus on deeper engagement with both suppliers and internal business owners to help everyone understand the importance of climate action.

### Sustainable Healthcare

Our sustainable healthcare approach focuses on practical solutions to reduce the environmental impact of healthcare and supporting others to do the same.

In 2024, we launched the 'Single-use Switch' initiative to replace single-use items across our provision businesses with more sustainable alternatives, aiming to save millions of items from landfills or incinerators.

We also released three sustainable healthcare educational films aimed at healthcare professionals, highlighting the relationship between people and planet health and showcasing actionable solutions to reduce healthcare's environmental impact.

For more information, see Our Approaches: [www.bupa.com/impact/sustainability/sustainable-healthcare](http://www.bupa.com/impact/sustainability/sustainable-healthcare)

### Emissions reduction

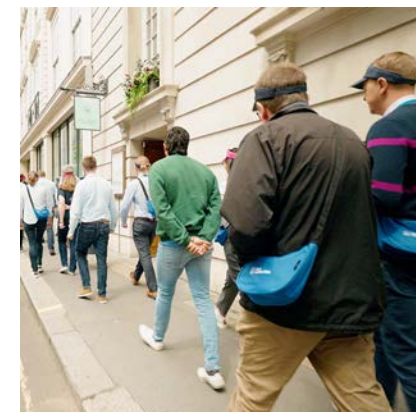
# 58%

from our 2019 baseline

### Sustainable Procurement

# 73%

of global technology spend with suppliers aligned to our sustainability goals, up from 63% in 2023



## Sustainability and ESG continued

# Mission Zero

continued



Iñaki Ereño, Group CEO, and Nick Stone, APAC CEO, supporting Healthy Cities

### 2024 Group and UK operations GHG emissions footprint

In accordance with the Streamlined Energy and Carbon Reporting (SECR) requirements for a large unquoted UK company, we report our UK-based energy usage and GHG emissions. We publish the Group's 2024 energy consumption and GHG emissions compared with full year 2023, and 2019, our base year, to show progress against our interim scope 1 and 2 GHG emissions reduction target of 40% by 2025. We will publish our detailed full year 2024 GHG emissions report<sup>1</sup> later in 2025 on [bupa.com](https://bupa.com) following external limited assurance<sup>2</sup>.

We adopt the operational control approach, meaning we account for 100% of emissions from business locations over which we have control. Under this approach, control is considered where we have the authority to introduce and implement operational policies. In accordance with the GHG Protocol's guidance on dual reporting, we report scope 2 GHG emissions using both the location- and market-based approach.

In 2024, we increased our shareholding in Niva Bupa, our Indian health insurance business, becoming the controlling shareholder. As a result, our 2024 GHG emissions footprint includes the energy usage and associated GHG emissions from Niva Bupa. In accordance with the Group's GHG emissions recalculation policy, our full year 2023 and 2019 baseline has not been restated as the impact of the Niva Bupa transaction on the Group's footprint is below the materiality thresholds set out in our GHG emissions recalculation policy.

Our GHG emissions reporting criteria can be found at [bupa.com/sustainability/sustainability-documents](https://bupa.com/sustainability/sustainability-documents) and sets out the basis of preparation<sup>1</sup>.

### Market-based GHG emissions performance

#### Group

In 2024, we continued to achieve a reduction in our scope 1 and 2 (market-based) GHG emissions in line with our 2030 SBT. Scope 1 and 2 (market-based) GHG emissions of 50,989 tCO<sub>2</sub>e decreased by 13,728 tCO<sub>2</sub>e or 21% compared with last year (2023: 64,717 tCO<sub>2</sub>e).

Scope 1 emissions were lower by 6,709 tCO<sub>2</sub>e or 15% compared with 2023. This is mainly due to lower refrigerant losses in Chile and Australia as well as lower natural gas consumption reflecting a number of decarbonisation initiatives. We also reduced anaesthetic gas emissions through the reduction in the use of nitrous oxide together with the implementation of a new anaesthetic distribution system in Chile.

Scope 2 (market-based) emissions were lower year on year by 7,019 tCO<sub>2</sub>e or 37% due to switching additional sites onto renewable electricity in Poland and Chile. This has resulted in the increased proportion of renewable electricity consumption compared with last year by 3 percentage points to 94% (2023: 91%).

Total selected scope 3 emissions (category 3 and 6) increased by 4,862 tCO<sub>2</sub>e or 11% this year to 47,416 tCO<sub>2</sub>e (2023: 42,554 tCO<sub>2</sub>e) mainly as a result of increased business travel predominantly due to the consolidation of Niva Bupa into the Group's 2024 footprint.

### UK operations

Our 2024 scope 1 and 2 (market-based) GHG emissions were lower by 1,516 tCO<sub>2</sub>e or 9% to 15,408 tCO<sub>2</sub>e (2023: 16,924 tCO<sub>2</sub>e).

Scope 1 emissions decreased by 1,807 tCO<sub>2</sub>e or 11% mainly reflecting lower gas consumption, primarily due to the electrification of kitchen and laundry facilities across the majority of our UK care homes and retirement villages and the replacement of air handling units at the Cromwell Hospital.

Scope 2 (market-based) emissions increased by 291 tCO<sub>2</sub>e to 787 tCO<sub>2</sub>e (2023: 496 tCO<sub>2</sub>e) mainly reflecting the acquisition of Blackberry clinics in January 2024. As a result, the proportion of renewable electricity consumption in the UK decreased by 2 percentage points to 96% (2023: 98%).

Total selected scope 3 emissions decreased by 324 tCO<sub>2</sub>e to 11,953 tCO<sub>2</sub>e (2023: 12,277 tCO<sub>2</sub>e). Business travel emissions are marginally lower by 83 tCO<sub>2</sub>e or 1% compared with 2023 and remained lower than 2019 by 18%.

### Additional GHG emissions reduction and energy management activities

We continued to work on decarbonisation initiatives associated with procurement and third-party healthcare providers. These efforts, alongside Bupa's programme for sustainable digital transformation, are intended to reduce emissions associated with patient claims and travel.

1. Covers scope 1, 2 and selected scope 3 (category 3 – fuel- and energy-related activities, and category 6 – business travel).

2. Our full year 2024 GHG emissions report will reflect our most up-to-date GHG emissions position, including actual fourth quarter activity data which, in part, has been estimated in this report, predominantly based on previous consumption trends.

# Sustainability and ESG continued

## Mission Zero

continued

	Unit	2024		2023		2019		Increase/(Decrease)			
		Group	UK	Group	UK	Group	UK	% change vs. 2023		% change vs. 2019	
		Group	UK	Group	UK	Group	UK	Group	UK	Group	UK
Total energy usage <sup>1</sup>	kWh	468,333,299	136,144,885	480,574,076	145,122,725	508,743,037	163,830,698	(3)%	(6)%	(8)%	(17)%
<b>GHG emissions<sup>2</sup></b>											
<b>Scope 1</b>	tCO <sub>2</sub> e	38,783	14,621	45,492 <sup>3</sup>	16,428 <sup>3</sup>	49,444 <sup>4</sup>	20,408	(15)%	(11)%	(22)%	(28)%
<b>Scope 2</b>											
Market-based	tCO <sub>2</sub> e	12,206	787	19,225 <sup>3</sup>	496 <sup>3</sup>	72,061 <sup>4</sup>	1,200	(37)%	59 %	(83)%	(34)%
Location-based	tCO <sub>2</sub> e	95,535	11,430	96,028 <sup>3</sup>	11,453 <sup>3</sup>	108,541 <sup>4</sup>	14,938	(1)%	— %	(12)%	(23)%
<b>Total scope 1 and 2 (market-based)</b>	<b>tCO<sub>2</sub>e</b>	<b>50,989</b>	<b>15,408</b>	<b>64,717 <sup>3</sup></b>	<b>16,924 <sup>3</sup></b>	<b>121,505 <sup>4</sup></b>	<b>21,608</b>	<b>(21)%</b>	<b>(9)%</b>	<b>(58)%</b>	<b>(29)%</b>
<b>Total scope 1 and 2 (location-based)</b>	<b>tCO<sub>2</sub>e</b>	<b>134,318</b>	<b>26,051</b>	<b>141,520 <sup>3</sup></b>	<b>27,881 <sup>3</sup></b>	<b>157,985 <sup>4</sup></b>	<b>35,346</b>	<b>(5)%</b>	<b>(7)%</b>	<b>(15)%</b>	<b>(26)%</b>
<b>Scope 3</b>											
Fuel- and energy-related activities (category 3)	tCO <sub>2</sub> e	27,048	6,153	26,769	6,394	28,939	5,897	1 %	(4)%	(7)%	4 %
Business travel (category 6)	tCO <sub>2</sub> e	20,368	5,800	15,785	5,883	18,429	7,114	29 %	(1)%	11 %	(18)%
<b>Total selected scope 3 (category 3 and 6)</b>	<b>tCO<sub>2</sub>e</b>	<b>47,416</b>	<b>11,953</b>	<b>42,554 <sup>3</sup></b>	<b>12,277 <sup>3</sup></b>	<b>47,368 <sup>4</sup></b>	<b>13,011</b>	<b>11 %</b>	<b>(3)%</b>	<b>— %</b>	<b>(8)%</b>
<b>Total reported market-based emissions</b>	<b>tCO<sub>2</sub>e</b>	<b>98,405</b>	<b>27,361</b>	<b>107,271 <sup>3</sup></b>	<b>29,201 <sup>3</sup></b>	<b>168,873 <sup>4</sup></b>	<b>34,619</b>	<b>(8)%</b>	<b>(6)%</b>	<b>(42)%</b>	<b>(21)%</b>
<b>Total reported location-based emissions</b>	<b>tCO<sub>2</sub>e</b>	<b>181,734</b>	<b>38,004</b>	<b>184,074 <sup>3</sup></b>	<b>40,158 <sup>3</sup></b>	<b>205,353 <sup>4</sup></b>	<b>48,357</b>	<b>(1)%</b>	<b>(5)%</b>	<b>(12)%</b>	<b>(21)%</b>
% of renewable electricity <sup>5</sup>	%	94%	96%	91%	98%	54%	94%	3 ppt	(2 ppt)	40 ppt	2 ppt
Energy intensity	kWh per customer	8.34	17.50	14.34	20.50	18.90	26.83	(42)%	(15)%	(56)%	(35)%
<b>Market-based scope 1 and 2 GHG emissions intensity metrics<sup>6</sup></b>											
	tCO <sub>2</sub> e / £m revenue	3.01	3.29	4.28	4.00	9.87	6.50	(30)%	(18)%	(70)%	(49)%
	tCO <sub>2</sub> e / 000's customers	0.91	1.98	1.93	2.39	4.51	3.54	(53)%	(17)%	(80)%	(44)%
	tCO <sub>2</sub> e / average employees	0.51	0.63	0.74	0.68	1.56	0.95	(31)%	(7)%	(67)%	(34)%
<b>Location-based scope 1 and 2 GHG emissions intensity metrics<sup>6</sup></b>											
	tCO <sub>2</sub> e / £m revenue	7.94	5.55	9.36	6.58	12.83	10.64	(15)%	(16)%	(38)%	(48)%
	tCO <sub>2</sub> e / 000's customers	2.39	3.35	4.22	3.94	5.87	5.79	(43)%	(15)%	(59)%	(42)%
	tCO <sub>2</sub> e / average employees	1.34	1.07	1.62	1.12	2.03	1.55	(17)%	(4)%	(34)%	(31)%

1. Total energy usage includes scope 1 and 2 consumption and car hire and private cars used for business purposes (scope 3, category 6). Conversion factors issued by the UK Government's Department for Energy Security and Net Zero Business (DESNZ) are applied to convert distance travelled data to kWh. Actual consumption is captured from a variety of sources including meter readings, supplier reports and supplier invoices where actual or estimated consumption is provided. Where actual data is not available, consumption is estimated based on, but not limited to, previous consumption trends.
2. Scope 1 (direct) emissions are from the combustion of fuels as part of stationary sources e.g. natural gas and liquefied petroleum gas, and from combustion of fuels in company-owned and leased controlled mobile combustion sources, e.g. company vehicles. Release of anaesthetic gases from medical procedures and refrigerant losses are also included. Scope 2 (indirect) emission sources are from purchased electricity and district heating and cooling. Our reported selected scope 3 (indirect) emissions are from i) category 3: well-to-tank and transmission and distribution (T&D) losses associated with scope 1 and scope 2 energy consumption and ii) category 6: business travel which includes air and train travel, taxis, car hire and employee vehicles (business mileage only). Other scope 3 'value chain' categories will be published in due course. A number of emission factor sets are used in the calculation of GHG emissions including DESNZ, International Energy Agency (IEA) and the Australian Clean Energy Regulator (CER).
3. Independent limited assurance provided by PricewaterhouseCoopers LLP for 2023 Group and UK Operations scope 1, 2 and total selected scope 3 (category 3 and 6).
4. Independent limited assurance provided by The Carbon Trust for 2019 Group scope 1, 2 and selected scope 3 (category 3 - T&D losses only and category 6). 2019 data has been updated following external assurance mainly to reflect a number of divestments and acquisitions.
5. % of renewable electricity covers purchased and self-generated electricity consumption (scope 2).
6. As reported in the Group's annual report - Group revenue (2024: financial statements: Note 2), total average employees (financial statements: Note 2.3.1) and customer numbers (excluding our associate businesses). UK operations reflects BGIUK revenue and customer numbers excluding Niva Bupa. UK Operations average employees includes BGIUK (excluding Niva Bupa) and Group Functions.

## Sustainability and ESG continued

# Mission Accelerate

## Collaborating and innovating in our industry and beyond

Engagement in partnerships with various networks and coalitions to help keep abreast of developments, and to drive systemic, sustainable change in healthcare.

### Advocacy and Coalitions

Bupa works closely with others: collaborating and advocating for change through coalitions, forums, and associations. During 2024, our activities included:

#### Sustainable Markets Initiative (SMI) Health Systems Task Force.

We joined the SMI in 2023, a public-private partnership of global health leaders taking joint, scalable action to accelerate the delivery of net zero health systems – to improve individual, societal and planetary health. We continue to work with them on initiatives including supply chain decarbonisation, patient care pathways decarbonisation, and consumer health and wellbeing. Through the SMI, we also supported the launch of the European Network for Climate and Health Education. This network, chaired by the University of Glasgow and supported by the World Health Organization, is working with 25 leading universities to equip over 10,000 medical students with the skills to address the health impacts of climate change.

**Norman Foster Foundation.** With cities housing over half the global population, urban action is key to supporting people's health in changing climate. That is why we have commenced work as health partner for the Norman Foster Institute for Sustainable Cities programme, delivering health-related course content, lectures, and workshops for the inaugural year of the programme. This initiative aims to equip the next generation of future city leaders, architects, planners, and engineers with the skills to create greener, healthier, and climate-resilient cities.

**Healthcare without Harm.** We announced a new phase in our partnership with global NGO, Health Care Without Harm, as part of its efforts to work with others in shaping the delivery of healthcare to benefit people and planet health.

By partnering with Health Care Without Harm, we aim to scale local, on-the-ground action that will tackle emissions and reduce the environmental impact of healthcare, including a focus on single-use items, patient travel, hospital emissions and anaesthetic gases.

For more information, see: [www.bupa.com/news-and-press/news-and-stories/2024/bupa-partners-with-health-care-without-harm](http://www.bupa.com/news-and-press/news-and-stories/2024/bupa-partners-with-health-care-without-harm)

**Report Launches.** Launch of second edition of Healthy and Climate-Resilient Cities white paper, together with the Norman Foster Foundation and C40 Cities we launched a new report, detailing what is needed to help the next generation of city leaders and urban designers develop a new model for cities, that puts health at the centre of design to better support people in a changing climate.

Launch of Healthy Cities documentary: We launched our new documentary, Health Stories which explores the complex connections between climate, health and urban living. Featuring insights from prominent urbanists, academics and thought-leaders, this film showcases the power of collaboration, and highlights how Bupa is working with partners around the world to help make cities healthier. It aims to inspire everyone, not just experts, to join a movement for change.

[www.bupa.com/impact/sustainability/healthy-cities](http://www.bupa.com/impact/sustainability/healthy-cities)

### eco-Disruptive programme – rewarding innovation

eco-Disruptive has been running annually since 2021, enabling hundreds of our people from across the globe to work together to deepen understanding on challenge areas and to collaborate with people outside of Bupa. eco-Disruptive is focused on finding innovative solutions to the sustainability challenges facing people and the planet by bringing together the energy and agility of start-ups with the experience and capabilities of Bupa. The 2024 theme was centred on solutions to help create healthier societies, considering three key areas:

1. Inclusive health
2. Supporting disability
3. Illness prevention

In 2024, 125 of our employees submitted entries to the programme and a combined 1,079 start-ups were engaged, taking our total of engaged start-ups to over 4,000 since we began the programme. The 2024 winner, MoodMon, uses AI to analyse behavioural markers such as speech, activity and sleep data to assess a patient's mental state and then notifies physicians or caregivers of any signs of deterioration.



Bupa co-hosted events at NY Climate Week with key partners on preventative health interventions in cities and the role of health insurers in addressing climate-driven health risks

## Sustainability and ESG continued

# Mission Accelerate

continued



Children from Green Flag-awarded Moorside Primary School near Manchester, tend to their plants as part of their Eco-Schools biodiversity partnership with the Bupa Foundation

### Responding to Climate Risk and opportunities

Climate change, and the risks associated with it, are a crucial factor in our medium and long-term planning which is why we are developing our Transition Plan with both risk and opportunity at its heart. We believe Bupa's commitment to being a net zero business by 2040 is the right thing to do for our customers, partners and the environment. It is also good for our business in the long run.

Our climate risks, opportunities and impacts can be found in our Climate-related Financial Disclosure.

### ESG Reporting Landscape

Bupa undertake regular horizon scanning of the ESG reporting landscape to ensure we are tracking any changes to existing reporting requirements, future and emerging legislation and monitoring shifts in voluntary reporting trends and market expectations. Parts of our global business are already impacted by the EU's Corporate Sustainability Reporting Directive (CSRD) reporting requirements, in particular, Sanitas in Spain, Bupa Global in Ireland and LUX MED in Poland. During 2024, we focused on readiness for meeting our CSRD obligations within our Market Units and at Group Level. In our APAC Market Unit we are preparing to meet local reporting standards aligned to International Sustainability Standards Board (ISSB) requirements. We are also monitoring emerging ISSB-related reporting requirements in other parts of our business, including Türkiye, Chile and the UK. In 2024, we submitted a voluntary CDP (formerly the Carbon Disclosure Project) response, which is available at [www.cdp.net](http://www.cdp.net).

### Governance – Oversight of sustainability and ESG

The Board sets the sustainability strategy for the Group and closely monitors progress through its Board Sustainability Committee. Details of how the Board has considered sustainability is set out in the Section 172(1) and Engagement Statement and throughout the Governance section.

The Group Chief Sustainability and People Officer chairs the Sustainability Steering Committee (SSC), which oversees Bupa's global sustainability agenda and reports to the Chief Executive Committee (CEC) as necessary. The Group CFO, Chief Medical Officer, Group Chief Risk Officer, Group Chief Brand Officer, sustainability leads and core representatives from Bupa's Market Units are also members of the SSC. The SSC is accountable to the CEC for driving Bupa's sustainability strategy delivery. Additional information on sustainability and ESG governance can be found in the Taskforce on Climate-related Financial Disclosures (TCFD) on [page 48](#).

### Climate Opportunities

We believe that there are opportunities for Bupa associated with climate change. These relate to how shifting consumer preferences for low carbon products and services, that keep people healthy, will align with our digital service offerings which present lower carbon serving opportunities. We expect to publish further detail of these opportunities alongside our Transition Plan in due course.

For more information, see Our Sustainability Governance structure: [www.bupa.com/company/about-us/governance/sustainability-governance](http://www.bupa.com/company/about-us/governance/sustainability-governance)

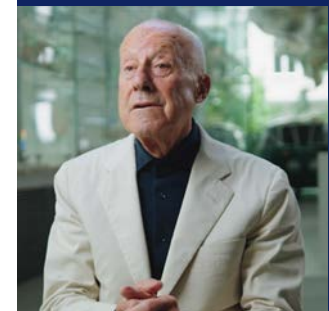
#### MISSION ACCELERATE CASE STUDY

## Norman Foster Foundation

The Norman Foster Institute Programme on Sustainable Cities blends hands-on experience with academic insights from the Norman Foster Foundation's global network of experts.

Bupa, as the exclusive health partner of the programme, brings a clinical voice to the curriculum, helping to educate scholars on the health impacts of climate change on urban populations and highlighting interventions that can mitigate health issues. The course provides skills that can be used to address wide-ranging issues in cities, such as leadership, communication, mapping and urban sciences.

Lord Norman Foster in our Healthy Cities documentary



## Sustainability and ESG continued

# Mission Regenerate

## Healthy Cities

Over the past nine years, Bupa's Healthy Cities initiative has catalysed a global movement, encouraging people to adopt sustainable and healthy lifestyles, while investing in regenerating urban environments for people to thrive.

In 2024, the programme supported over 500,000 participants, unlocking £3.5m in projects to support urban health and climate resilience in 68 cities. Our nature regeneration efforts focused on deprived urban areas across cities where Bupa has a presence, and peri-urban areas where nature is declining.

Tackling the interconnected challenges of health, climate, and urbanisation requires innovative, cross-sector partnerships, so our regeneration projects are implemented in close collaboration with city leaders and organizations including WWF, the UNEP, Landcare Australia and Trees for Cities.

### Nature and sequestration

Our current net zero by 2040 commitment focuses on reducing scope 1, 2 and 3 emissions in line with our near-term Science-Based Targets with remaining emissions re-absorbed and durably stored via carbon dioxide removal measures. The refreshed sustainability strategy, that will be announced during 2025, brings together our nature and net zero goals by supporting Bupa to address our remaining emissions via nature-based solutions.



Learn more about  
Healthy Cities

[www.bupa.com/healthycities](http://www.bupa.com/healthycities)



**70+** nature regeneration projects undertaken across our Market Units during 2024, including wetlands restoration, reforestation of land devastated by wildfires, volunteer-based tree planting, coastal regeneration and providing a total of 295 community grants.

Through Healthy Cities, we aim to support people's health in a changing climate, and help people make the link between their health and the environment.

Our goal is to support **1 million** people by the end of 2025.

## Sustainability and ESG continued

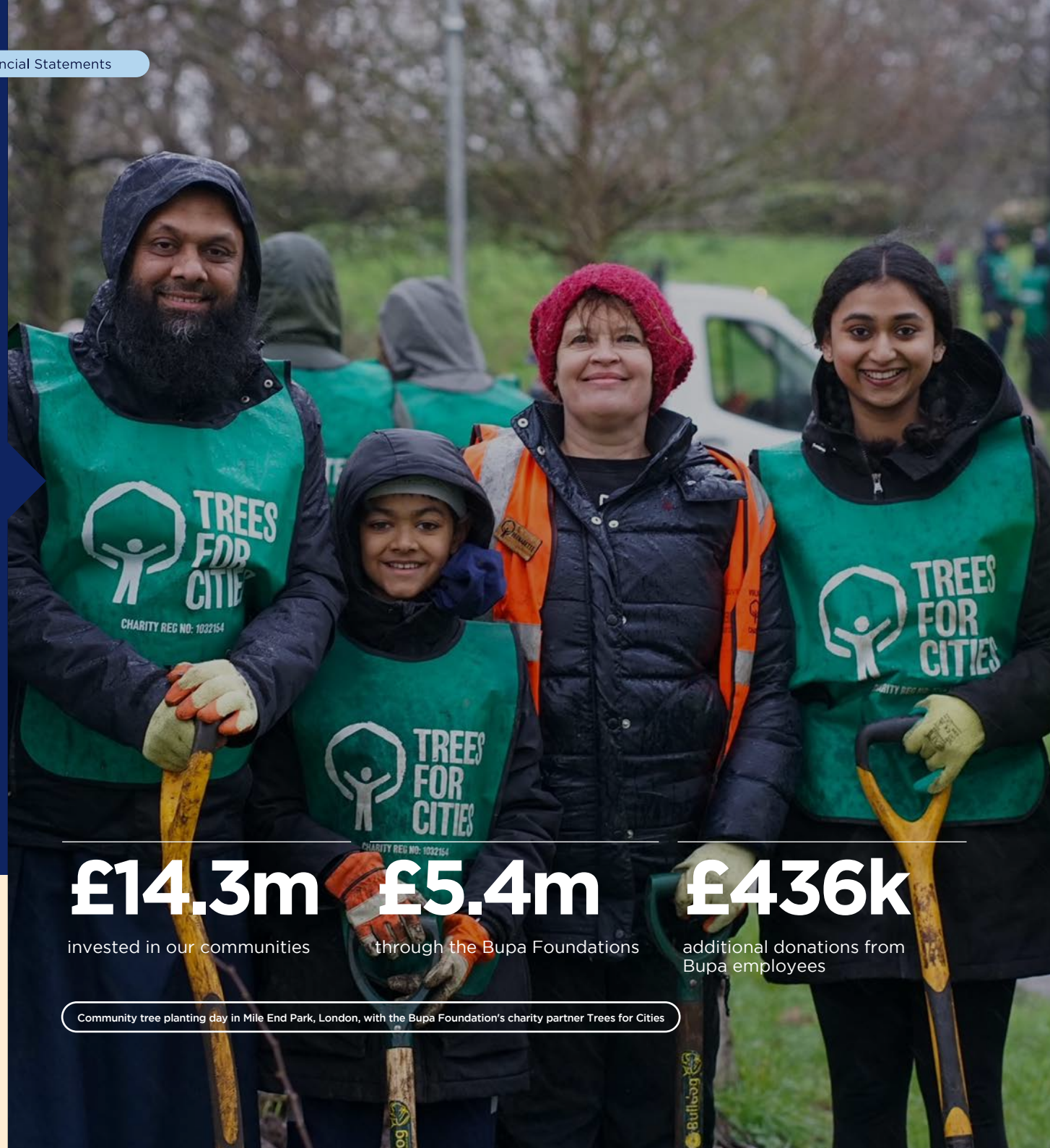
# Bupa's contribution to communities

During the year we invested £14.3m in our communities, with over £5.4m of this through the Bupa Foundations. We also enabled a further £436,000 in donations from Bupa employees.

Community investment has been measured using the Business for Societal Impact framework which includes financial donations to charities, funding to the Bupa Foundations in Australia, Spain and the UK, as well as volunteering hours and in-kind support.

Market Units lead local community activity alongside taking part in our global Healthy Cities challenges (see more on p42), as well as support for promoting parasport, disability, and inclusion through National Paralympics Committees in Australia, Chile, Ecuador, Great Britain, Hong Kong, Mexico, New Zealand, Poland and Spain.

See page 45 for more detail



# £14.3m

invested in our communities

# £5.4m

through the Bupa Foundations

# £436k

additional donations from  
Bupa employees

Community tree planting day in Mile End Park, London, with the Bupa Foundation's charity partner Trees for Cities

## Contribution to communities continued

### Highlights from around the world

#### BGIUK

## 9,000 hrs

Bupa employees used their paid volunteering days to give back to communities, volunteering more than 9,000 hours to support projects including tree planting, foodbanks and homeless charities.

## £1.8m donated

The **Bupa Foundation, BGIUK** donated £1.8m to support communities. This included educating thousands of pupils on sustainability through its national partnership with 'EcoSchools'; funding a solar-powered mobile dental unit for 'Dentaid, the Dental Charity', to provide free dental treatment to vulnerable people; and launching a new partnership with 'The Eden Project' to support their Nature Connections programme which provides horticultural therapy for people experiencing health-related problems.



Bupa volunteers helping The Felix Project rescue surplus food and deliver it to those in need across London.

Over £100,000 in employee fundraising was match-funded and 'My Community Grants' supported local schools, sports clubs and youth programmes nominated by employees.

#### ELA

In a Market Unit deeply affected by geographical and geopolitical crisis during 2024, we have invested £1m to support the health of people affected by natural disasters or refugee displacement. In Poland, this meant ongoing support for Ukrainian refugees, for a third consecutive year, while Sanitas Dental's professionals continued to offer complex surgeries to people in refugee reception centres in Spain. Bupa Türkiye helped to regenerate areas affected by the previous year's earthquake while local teams supported those affected by 2024 floods in Brazil, Poland and Spain as well as wildfires in Chile.

## 8,500 students

**BGLA's** collaboration with **ANIA** saw the evolution of its 'Seeds of Change' (Huellas de Cambio) project extend to schools in Ecuador, Peru and the Dominican Republic. Alongside the delivery of 'One Health' workshops, in Chilean and Spanish schools a total of over 8,500 students were reached.



In 2024, the **Sanitas Foundation** invested £1.9m in three key areas of work:

- **Inclusive Sport:** Promoting health and inclusion through sport. Our focus on disability took on a whole new international dimension in 2024, when the Foundation staged the celebration of the world's second Inclusive Games, with 300 Olympic and Paralympic athletes competing in Madrid.
- **Supporting Excellence through Medical & Nursing awards:** the longest award of its kind in Spain that recognises the best in class among final year Residents.
- **Solidarity in action:** Over 100 Sanitas doctors and dentists volunteered pro bono in collaborations with UNICEF, Red Cross, the Spanish Commission for Refugee Aid and the Down Syndrome Association of Spain. Together they supported more than 28,000 people in 2024 across Spain, Peru and Cameroon.

#### APAC

## £4.6m

invested in our communities, an uplift of £1.9m from £2.7m in 2023.

## £1.2m

invested for nature regeneration and biodiversity programmes, in collaboration with partners across Australia, New Zealand, and Hong Kong.

**In Hong Kong,** we continued our partnership with The Green Earth and supported the Run Our City Streetathon, which attracted 16,500 participants for Hong Kong's first city-centred full marathon for charity.

The Bupa Foundation invested £1.7m across Australia and New Zealand in partnerships and initiatives aligned with our focus areas of 'Healthy Minds', fostering mentally healthy and resilient communities, and 'Healthy People, Healthy Planet', addressing the link between human health and environmental sustainability. We supported over 150,000 young people to access free mental health support through our partnerships with Kids Helpline,

The Black Dog Institute, and the Australian Kookaburra Kids Foundation. Our commitment to First Nations health was demonstrated through a new flagship partnership with the National Aboriginal Community Controlled Health Organisation (NACCHO) to establish a diabetes care training program for Aboriginal healthcare workers, a First Nations optical range that raised £58,000 for myopia management, and £57,000 in Dr Evelyn Scott Scholarships to support interns improving First Nations health outcomes. Additionally, the Bupa Foundation's Community Grants Programme awarded £270,000 to 54 community organisations across Australia and New Zealand.

# Partnering with the Paralympics

In 2024, we were partners with nine Paralympic associations, having signed agreements with New Zealand, Hong Kong and Ecuador ahead of the Summer Paralympics in Paris.

Paralympians show what it means to keep pushing forward, inspiring not just those with disabilities but everyone. Through each national partnership, we help to keep the Paralympic teams and their families healthy and strong so that they can perform at their best and continue to inspire.



## Playing our part in preventing modern slavery

### Preventing modern slavery

At Bupa, we recognise our responsibility to help protect, preserve, and promote human rights and are guided by fundamental principles of human rights, such as those in the United Nations Universal Declaration of Human Rights.

For more information, see our Human Rights Statement: [www.bupa.com/important-notices/human-rights-statement](http://www.bupa.com/important-notices/human-rights-statement)

In accordance with section 54 of the UK Modern Slavery Act 2015 and the Australian Commonwealth Modern Slavery Act 2018, we publish annually statements setting out the steps taken to prevent modern slavery and human trafficking in our operations and supply chain. We have a suite of enterprise-wide policies that define our minimum requirements and expectations to ensure compliance with all applicable laws and regulations as well as effective risk management. These include enterprise policies on People, Suppliers and Speak Up. The Bupa Code gives us a simple decision-making framework to help us do the right thing by our people, customers, residents and patients. Our Responsible Supply Chain statement specifically references our expectations that suppliers respect all internationally proclaimed human rights, including the prevention of modern slavery, forced labour, human trafficking and child labour.

For more information about the Bupa Code and Responsible Supply Chain statement, see Business Ethics and Conduct on page 47

Across the Group, our whistleblowing service, Speak Up, makes it easy to report any concerns in confidence and can be used by anyone who has a concern about Bupa, our suppliers or our partners. In 2024, no reports were received through Speak Up relating to modern slavery.

We track closely modern slavery related risks and external developments relevant to our operations and/or supply chain. Through this external monitoring, we identified escalating cases of modern slavery among migrant workers in the UK care sector. We responded proactively, developing and implementing an international inclusion programme to support international visa sponsored workers and their managers in our UK care homes and retirement villages. We also stepped-up our training and awareness raising on the issue, including launching dedicated modern slavery online learning modules. In our procurement processes, we enhanced the modern slavery questions we ask at due diligence and during supplier audits and launched guidance for suppliers, to help educate them about modern slavery risk and inform them about our expectations.

Our Australian business uses a supplier assessment framework (SAF) tool administered through APAC's Third Party Management Framework, launched in April 2024, which is designed to identify and help mitigate modern slavery risks associated with the appointment of new (or the continuation of existing) suppliers.

The SAF draws on internationally recognised datasets, with risk indicators including geographic location, sector and procurement category and triggers escalation, due diligence and monitoring for high and medium risk rated suppliers.

To support the development and progression of our anti-slavery agenda, we continued to work with the UK modern slavery charity, Unseen. We ran internal communications campaigns to coincide with Anti-Slavery Day and delivered targeted training. In Australia, we hosted a webinar with Anti-Slavery Australia and rolled out an online modern slavery training module for our people, launched at the end of 2023, which is focused on capacity building and practical ways to understand and address modern slavery risk in their business area (including training to support the adoption of the SAF). This module is now required learning for all senior leaders.

For more information on our latest UK modern slavery statement: [www.bupa.com/important-notices/modern-slavery-statement](http://www.bupa.com/important-notices/modern-slavery-statement)

For more information on our latest Australian modern slavery statement: [www.bupa.com.au/about-us/modern-slavery-statement](http://www.bupa.com.au/about-us/modern-slavery-statement)

# Business Ethics and Conduct

## Business Ethics and Conduct

Our Enterprise-wide People Policy makes clear that the Bupa Code is our global standard for employee conduct and that all our businesses have a formal approach to identify and address conduct issues. The Bupa Code is the moral compass that embodies our culture and values, to guide everyone that works at Bupa and empower them to stand up for what's right for our customers, residents, patients, and for each other. It is integrated in the business through local policies, mandatory training, and people processes, including inductions, performance and reward. The Bupa Code is underpinned by our performance management, risk management and systems, governance and controls, and audit processes. Mandatory training is required to be undertaken by all our people and contractors, and covers ethics issues such as Anti-Bribery and Corruption, Information Security, Health and Safety and Risk Management.

For more information, see our Bupa Code: [www.bupa.com/important-notice/bupa-code](http://www.bupa.com/important-notice/bupa-code)

## Preventing financial crime

We take active steps to ensure that our business, people, and customers are not victims of financial crime, and strive to limit the impact of fraud, whether committed against Bupa, our customers, or the wider communities we serve. The Bupa Code is directly relevant to financial crime risk management, making clear that bribery is prohibited, and our people are required to act in compliance with all applicable laws and regulations.

Bupa's Enterprise Policy on Financial Crime Risk is applicable across the Group and articulates our approach and standards to preventing breaches of economic sanctions, bribery and corruption, fraud, money laundering and tax evasion offences - including all applicable corporate offences, such as the UK's new failure to prevent fraud offence, coming into effect in Q3 2025.

This Policy is supplemented by key controls including regular risk assessments, risk-based third-party due diligence and training initiatives, with oversight and guidance provided by subject matter experts. Ongoing horizon risk scanning ensures Bupa responds appropriately to financial crime risks emerging through legislative changes and geopolitical developments. The Bupa Enterprise Risk Committee oversees the management of all risk types across Bupa, including financial crime risk and other risks relating to business ethics.

For more information, see our Prevention of financial crime statement: [www.bupa.com/impact/responsible-business/business-ethics/prevention-of-financial-crime](http://www.bupa.com/impact/responsible-business/business-ethics/prevention-of-financial-crime)

## Speak Up

Speak Up is Bupa's whistleblowing service and can be used by anyone who has a concern either about Bupa or individuals/organisations providing goods or services to Bupa. It ensures people can raise genuine concerns about wrongdoing, misconduct, or risk of harm, in confidence and anonymously, if preferred. We take concerns seriously and the people who raise them can be confident that they'll be heard, protected from retaliation, and supported.

For more information on Bupa Speak Up: [www.bupa.com/important-notice/bupa-speak-up](http://www.bupa.com/important-notice/bupa-speak-up)

## Responsible supply chain

We conduct ESG due diligence when onboarding our suppliers and during the procurement life cycle in accordance with our framework and governance. We expect our suppliers to abide by Bupa policies, fully comply with all applicable laws and regulations and conduct themselves in line with the highest ethical standards. Our Responsible Supply Chain Statement outlines the minimum standards we expect from our suppliers across a range of ESG areas.

For more information, see our Responsible Supply Chain Statement: [www.bupa.com/impact/responsible-business/business-ethics/responsible-supply-chain-statement](http://www.bupa.com/impact/responsible-business/business-ethics/responsible-supply-chain-statement)

## Approach to tax

Bupa is committed to complying with tax laws responsibly, ensuring that tax is paid in the jurisdictions in which the Group operates based upon applicable laws and practices.

For more information, see Bupa's Approach to tax statement: [www.bupa.com/impact/responsible-business/business-ethics/bupas-approach-to-tax](http://www.bupa.com/impact/responsible-business/business-ethics/bupas-approach-to-tax)

## Protecting data and using it responsibly

Our customers and people are at the centre of everything we do at Bupa. Maintaining their trust by ensuring personal data is handled responsibly and securely not only sets the foundation for Bupa's digital ambitions, it is the right thing to do. Information security, technology and privacy risks continue to be high on the agenda of the Bupa Board Risk Committee and Bupa is committed to protecting data, using it responsibly and ensuring compliance with law and regulation. In 2024, we launched Bupa's Responsible AI Principles - transparent, accountable, fair, and safe - which guide our decision making on our journey to using AI tools for great customer outcomes.

Cybersecurity threats are growing globally, and threat actors use ever more sophisticated means of targeting organisations and individuals. In 2024, we continued to further enhance our cybersecurity threat response globally, strengthening capabilities across key control areas from vulnerability management to zero trust and security testing. We continued to build our security culture and develop a group-wide cybersecurity strategy and target operating model to ensure our collective defences continue to be effective.

We enhanced our ability to respond in a crisis, by exercising our response plans through regular crisis management team exercises at Market Unit and Group level, penetration testing of critical systems, red team testing and automated breach and attack simulations. In parallel, each of our Market Units continue to enhance key controls to meet global standards for effectiveness, from Multi-Factor Authentication and Privileged Access Management. The effectiveness of our controls were subject to second line oversight and audited by Internal Audit during the year.

# Taskforce on Climate-related Financial Disclosures

## Compliance with Non-Financial and Sustainability Information Statement

The following table sets out where the Company's disclosures in relation to the recommendations of the Taskforce on Climate-related Disclosures (TCFD), which are now incorporated into regulation in the FCA's Listing Rules and the Companies Act 2006, can be found in this Annual Report and Accounts.

TCFD recommendation <sup>1</sup>	Details on our progress in 2024 including references to where more information can be found.
<b>Governance</b>	
Describe the Board's oversight of climate-related risks and opportunities (a)	Board engagement and consideration of communities and the environment and its suppliers – Section 172(1) and Engagement Statement on <a href="#">pages 49 to 55</a> .  Board activities during 2024 on <a href="#">page 75</a> and for considerations by the Board Audit Committee see <a href="#">page 81</a> , Board Risk Committee see <a href="#">page 86</a> and Board Sustainability Committee see <a href="#">pages 88 to 89</a> .
Describe management's role in assessing and managing climate related risks and opportunities (a)	See Risk Management (right column) and the Risk Report, <a href="#">pages 56 to 62</a> .
<b>Strategy</b>	
Describe the climate related risks and opportunities the organisation has identified over the short, medium, and long term (d)	Climate change, due to its pervasive and cross-cutting nature, has the potential to affect our existing principal risks (e.g. Property, Insurance).  We have identified which of our principal risks may be impacted by climate change over the short, medium, and long term. In line with the TCFD recommendations, we present the relevant risk drivers across two different types of risk: <ul style="list-style-type: none"> <li>■ <b>Transition</b> (i.e. risks resulting from the transition to a lower carbon economy); and</li> <li>■ <b>Physical</b> (i.e. risks resulting from short-term changes in weather patterns and long-term changes in climate).</li> </ul> See Risk Report, <a href="#">pages 56 to 62 for disclosures</a> .
Describe the impact of climate risks and opportunities on the organisation's business, strategy, and planning (e)	As a healthcare company, we are aware of the inextricable link between the health of the planet, climate change, human health, and healthcare. Bupa's sustainability strategy provides a framework for its business to focus investment, and accelerate action, where the business can have the greatest impact.  See the Sustainability and ESG report on pages 34 to 48 for these disclosures and Bupa's sustainability strategy at <a href="http://www.bupa.com/sustainability/sustainability-strategy">www.bupa.com/sustainability/sustainability-strategy</a> .

### TCFD recommendation<sup>1</sup>

Details on our progress in 2024 including references to where more information can be found.

Describe the resilience of the organisation's strategy taking into consideration different climate-related scenarios, including a 2°C or lower scenario (f)	In 2024 we continued to develop our approach to scenario analysis. A number of Business Units selected a climate-related narrative to guide their annual local scenario and stress testing. The future health impact of climate change was assessed in several markets, including the potential impacts on insurance claims, as well as potential impacts for provision businesses. For more information on our scenario analysis work, see <a href="#">page 62</a> .
<b>Risk management</b>	
Describe the organisation's processes for identifying and assessing climate-related risks (b)	We have identified which of our principal risks may be affected by climate change and defined our approach to mitigating these risks. See Risk Report, <a href="#">pages 56 to 62</a> .
Describe the organisation's processes for managing climate related risks (b)	See Risk Report, <a href="#">pages 56 to 62</a> .
Describe how processes for identifying, assessing, and managing climate related risks are integrated into the organisation's overall risk management (c)	We have integrated climate risk management into our existing Group-wide Risk Management Framework (RMF) which sets out how we identify, assess, manage, and report on risks. The Group Risk Function is responsible for the oversight of identification and management of financial, and other, risks from climate change throughout the Group. For more information see Risk Report, <a href="#">pages 56 to 62</a> .
<b>Metrics and targets</b>	
Disclose the metrics used by the organisation to assess climate-related risk and opportunities in line with its strategy and risk management process (h)	We use a range of metrics to measure and track our progress against key climate targets. These include year-on-year location and market-based scope 1 and 2 absolute carbon reduction, business travel emissions, customer-based, revenue-based, and average employee-based carbon intensity metrics, and the temperature alignment and carbon intensity of our investment portfolio.  We are developing a property Climate Change Risk Register. Once this work is complete, we will be able to better define any climate-related metrics and aggregated risk exposure to weather-related catastrophes of our property.
Disclose scope 1, scope 2 and, if appropriate, scope 3 greenhouse gas emissions and the related risks (h)	We disclose our 2024 scope 1, 2 and scope 3 category 3 (along with category 6 – business travel) GHG emissions for the Group and UK operations on <a href="#">pages 38 to 39</a> . The Group's scope 1 and 2 and selected scope 3 GHG emissions will be subject to external limited assurance later in 2024. We aim to disclose our other scope 3 value chain GHG emissions in due course on <a href="http://bupa.com">bupa.com</a> .
Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets (g)	Bupa's ambition to be net zero by 2040 is underpinned by 1.5°C aligned science-based targets across all three emission scopes, including a separate 1.5°C temperature alignment target for our investments. These targets have been validated by the Science Based Targets initiative (SBTi).

1. Reference is included to CA414CB (2A) with regard to our Non-Financial and Sustainability Information Statement.

# Section 172(1) and Engagement statement

The following provides the Directors' statements, required by the Companies Act 2006 (the Act), to report on how they have performed their duties in relation to Section 172(1) of the Act and engaged with employees, suppliers, customers, and others. It draws upon information contained earlier in the Strategic Report, which has been signposted and not repeated.

## Section 172(1)

During the year, the work of the Board supported Bupa's purpose to help people live longer, healthier, happier lives and make a better world by promoting Bupa's long-term success and sustainability. The Directors are guided in the performance of their broader Section 172 duties and decision-making by Bupa's values and strong governance arrangements, detailed in the Governance section starting on [page 64](#). The Board requested and received regular reports from executive management on the matters set out in Section 172(1) and had regard to business performance, people, strategy, and sustainability when making decisions on financial, operational, and strategic matters, and allocation of resources. They considered the views of Association Members (who perform the governance and certain of the oversight activities usually performed by shareholders) on relevant issues and were focused on maintaining the Group's reputation and high standards of business conduct, given the social context Bupa operates in, its global presence, and how they underpin Bupa's culture and business model detailed earlier in this Strategic Report.

## Stakeholders and engagement

The Board considers the Company's stakeholder groups, aligned with Section 172(1), to be customers, people, suppliers and partners, communities and environment, regulators, its Association Members and, with its oversight role for the Group, Bupa Finance plc's bondholders. As the Company is a private UK company limited by guarantee, it has Association Members instead of shareholders.

It has engaged directly and indirectly with each of these groups during the year to ensure that the Directors are informed on the interests and views of all its stakeholders, particularly given that the stakeholder groups have different perspectives which may not align with each other. This holistic view enables the Directors to navigate differences and make complex decisions that deliver, on balance, the best outcome for Bupa's long-term sustainability and success. The Board also encourages all levels of the business to engage with relevant Bupa stakeholders in order to broaden their awareness and understanding of the impact that their business decisions could, and do, have.

The relevance and importance of each stakeholder group and how the Directors have engaged, or been informed, during 2024 as a Board, Board committees, individual Directors, or via management, is set out below.

Stakeholder	Stakeholder engagement and consideration	Further detail
<b>Our customers</b> Customers are fundamental to Bupa, so we need to understand as much as we can about them and their needs and interests to provide the best customer service and experience.	<ul style="list-style-type: none"> <li>■ The Board was kept informed on the progress and performance of initiatives to achieve the 3x6 Strategy Ambitions, all of which are customer-focused, via reports regularly provided to Board meetings. This was beneficial when developing the new 3x100 Strategy effective from 2025.</li> <li>■ The Board received detailed reports on the emblematic projects related to the strategy which are designed to drive customer experience improvements.</li> <li>■ In developing Bupa's new 3x100 Strategy, the Board considered the changing needs and expectations of our actual and potential customers, driven by technology and the demand for more integrated, personalised care.</li> <li>■ The Board received in depth business updates from the three Market Units during the year, which covered customer matters in each Market Unit.</li> </ul>	<p><b>Group CEO Review, pages 6 to 7.</b></p> <p><b>Spotlight: Customer centricity, pages 12 to 13.</b></p>

## Section 172(1) and Engagement statement continued

Stakeholder	Stakeholder engagement and consideration	Further detail
<b>Our People</b> Our people are central to supporting our customers, living our values and the long-term success and sustainability of Bupa. So it is fundamental we listen to our people and consider their interests to ensure we attract and retain the best people and they feel Bupa is a great place to work, are engaged and empowered to deliver great outcomes for our customers, and they lead healthier and happier lives.	<ul style="list-style-type: none"> <li>■ The Group Chief Sustainability and People Officer provides regular reports to the Board, covering our people strategy, addressing people-related risks, retaining and developing talent, supporting leadership, and broader training and development. This included updates on the investments being made in the future clinical workforce described on <a href="#">page 32</a>.</li> <li>■ The Board reviewed the Global People Framework and considered the global priorities for our people.</li> <li>■ It also received and considered a report on the utilisation of Speak Up, Bupa's whistleblowing service across the Group (detailed on <a href="#">page 47</a>).</li> <li>■ The Board reviewed the results and analysis of the responses to the biannual People Pulse employee engagement surveys.</li> <li>■ It also received updates on senior talent and succession from each of the Market Units, as well as on inclusion and wellbeing, and health and safety matters.</li> <li>■ The three Non-Executive Directors (NEDs), appointed as designated workforce engagement NEDs for Bupa's three largest markets (UK, Spain and Australia), participated in a series of site visits, listening groups, town halls and smaller team meetings and reported the outcomes back to the full Board.</li> <li>■ Several NEDs engaged with our people on visits to our healthcare facilities and offices in the UK, Australia, Poland and Türkiye.</li> </ul>	<b>Our People and culture, pages 29 to 32.</b>
<b>Association Members</b> As a company limited by guarantee, Bupa appoints Association Members to conduct the governance and certain of the oversight activities that are usually performed by shareholders. It is important that Bupa engages with them regularly from an external governance and challenge perspective.	<ul style="list-style-type: none"> <li>■ The Board arranged half year and full year results briefing calls with Association Members, which were followed by a question-and-answer session. Regular updates were also provided on the progress of the 3x6 Strategy.</li> <li>■ All Association Members were invited to the Healthcare Symposium on unboxing digital health, as described on <a href="#">page 27</a>, to gain deeper insight into Bupa, its business initiatives and digital health technology.</li> <li>■ Association Members engaged with the Chairman, Senior Independent Director, Group CEO and Group CFO at informal lunch meetings.</li> <li>■ The Group CEO, Chairman, Senior Independent Director, and Group Company Secretary made themselves available to Association Members throughout the year.</li> <li>■ The Nomination and Governance Committee regularly reviewed the register of Association Members to ensure the membership remains sufficiently engaged and diverse and recruited additional members during the year.</li> </ul>	<b>Corporate Governance Report, page 69.</b>
<b>Our Suppliers and partners</b> Bupa's suppliers and partners support our business needs and help the Group to deliver high-quality service to our customers, from information systems to equipping our healthcare settings. So it is important that we have strong working relationships and operate ethically.	<ul style="list-style-type: none"> <li>■ Bupa sets minimum standards of business conduct expected of our suppliers and our commitments to them, which can be found in Bupa's Responsible Supply Chain Statement (available at <a href="http://www.bupa.com/important-notice/responsible-supply-chain-statement">www.bupa.com/important-notice/responsible-supply-chain-statement</a>). Bupa also maintains a Human Rights Statement (available at <a href="http://www.bupa.com/important-notice/human-rights-statement">www.bupa.com/important-notice/human-rights-statement</a>).</li> <li>■ The Board received and considered matters related to modern slavery and the supply chain and approved the Modern Slavery Statement, which can be found on <a href="http://www.bupa.com/important-notice/modern-slavery-statement">www.bupa.com/important-notice/modern-slavery-statement</a>.</li> <li>■ The Board reviewed the Group Suppliers Enterprise Risk Policy that governs the selection, contracting and management of all Bupa's suppliers and partners, and considered supplier relations and risk management during the year.</li> <li>■ The Board is kept informed of the progress of negotiations and corporate activities with significant suppliers, including hospital groups, and other strategic partners.</li> <li>■ The Board Risk Committee was regularly briefed during the year on the enhancements to Bupa's operational resilience capabilities and controls related to key third-party risk management.</li> </ul>	<b>Playing our part in preventing modern slavery, page 46.</b>  <b>Business Ethics and Conduct, page 47.</b>

## Section 172(1) and Engagement statement continued

Stakeholder	Stakeholder engagement and consideration	Further detail
<b>Our communities and environment</b> Bupa operates within a societal context and believes the health of the community and environment we live in has a significant impact on people living longer, healthier, happier lives. We set our 3x6 and Sustainability Strategies from our understanding of how we can make a positive contribution and impact and operate sustainably.	<ul style="list-style-type: none"> <li>■ The Board reviewed progress on the sustainability strategy and approved the Sustainability Enterprise Risk Policy.</li> <li>■ The Chair of the Board's Sustainability Committee provided updates to Board meetings on its activities which included monitoring performance and progress on the Sustainability Strategy and supporting initiatives and activities during the year, collaboration with our partners such as the Norman Foster Foundation, and disclosure and reporting matters.</li> <li>■ The Board was informed by the Chief Risk Officer and via the Board Risk Committee Chair on climate and ESG risks and mitigations.</li> <li>■ The Board received updates on progress in reducing Scope 1, 2 and 3 emissions from management and from the Chair of the Board Sustainability Committee, whose committee considered these matters in more depth.</li> <li>■ Following recommendations from the Board Audit Committee and consideration by the Board Sustainability Committee, the Board also considered and approved the 2023 GHG Emissions Report, which was published in August 2024.</li> </ul>	<b>Sustainability and ESG Report, pages 35 to 44.</b>  <b>Including, Bupa's Contribution to our communities, pages 43 and 44.</b>
<b>Regulators and governments</b> Bupa's business activities are highly regulated and subject to financial services regulatory regimes in our insurance businesses and care quality regulators in our provision and aged care businesses. Depending on where we operate, our regulators can be independent bodies or national or local governments. Their role is to ensure we have the resources, understanding, and capabilities, to protect our customers and other stakeholders, so it is important we understand their expectations and have strong working relationships with them.	<ul style="list-style-type: none"> <li>■ The Board received updates on the programme of regular interactions with the Financial Conduct Authority (FCA) and the Group's lead insurance regulator, the Prudential Regulation Authority (PRA), and engaged with them on key Board decisions.</li> <li>■ The Chairman, chairs of the Board's standing committees, the Group CEO, Group CFO, and certain other senior executives, had regular meetings with the PRA during the year.</li> <li>■ The Board and its standing committees received routine updates on issues, activities, and interactions with other regulators from Market Unit and Business Unit management teams and subsidiary board directors.</li> <li>■ The PRA attended a Board meeting and presented its annual Periodic Summary Meeting (PSM) Letter, which was considered by the Board.</li> <li>■ The Board engaged with the FCA and PRA on Board changes and succession plans.</li> <li>■ The Board considered regulatory risk to our operations regularly throughout the year, informed by the Board's Risk Committee, and reviewed and approved the Group's Regulatory Compliance and Conduct Risk Policy to ensure high standards of compliance with regulatory requirements in all the markets Bupa operates in.</li> </ul>	
<b>Bondholders</b> Bupa has a series of publicly traded debt securities issued by its subsidiary, Bupa Finance plc. As the ultimate parent company of the Group, Bupa considers the bondholders to be a key stakeholder and seeks to engage with them regarding their investment and support and understand their views.	<ul style="list-style-type: none"> <li>■ Bondholders were invited to attend briefing calls on the full-year and half-year results of the Company and Bupa Finance plc and had the opportunity to question management on performance and strategy.</li> <li>■ Roadshows were held for current and prospective bondholders during the year.</li> <li>■ Significant matters related to the debt securities were reviewed by certain Directors before being communicated externally via regulatory announcements, press releases, and published on our website, <a href="http://www.bupa.com/news">www.bupa.com/news</a>.</li> <li>■ During the year, the Board was briefed by the Group CFO on the outcome of bondholder engagements and their views on the Group's financial performance and strength, and our sustainability and wider ESG activities.</li> </ul>	

## Section 172(1) and Engagement statement continued

### Key strategic decisions and their impact on stakeholders

Throughout 2024, consideration of Bupa's ambition and purpose, values and culture, and stakeholders featured in some way in all Board papers and discussions. The Directors applied their knowledge and experience, and insights from stakeholder engagement during discussions and were cognisant of the possibilities, impact, and consequences for relevant

stakeholders. The table below sets out some key strategic Board deliberations and decisions during the year, aligned with matters highlighted in the Strategic Report, to illustrate how they had regard to Bupa's stakeholders. Where further information on the matter can be found, this is indicated.

Decision	Considerations, actions and decisions	Further information
<b>Development of 3x100 Strategy</b> <b>Stakeholders impacted</b> Our customers, people, suppliers and partners, communities and environment, regulators and governments, Association Members and Bondholders	<ul style="list-style-type: none"> <li>■ With the 3x6 Strategy in its final year, the Board spent considerable time in 2024 reflecting on the current strategy and looking forward to the next stage of Bupa's development. Together with the CEC, it oversaw the development of, and the objectives for, Bupa's strategy for the next three-year period, the 3x100 Strategy, to start from 2025. The strategy was developed in an iterative process with senior management, reflecting inputs from the Strategic Development Forum (the 75 most senior executives across the Group).</li> <li>■ Through the development of the 3x100 Strategy, the Board was mindful of the importance and impact to the Company's stakeholders, and the different interests and perspectives of each were considered:               <ul style="list-style-type: none"> <li>▪ <i>Customers</i> - The Board continues to believe Bupa should aspire to be the world's most customer-centric company and therefore the new strategy should be built around its customers. The Board, informed by management, customer feedback, and external subject matter experts, oversaw the development of the new strategy to ensure it captured and addressed the current and future needs of current and future customers and helped people 'live longer, healthier, happier lives'. It considered the strategic components and aspirations to understand how each could be delivered and would benefit Bupa's customers.</li> <li>▪ <i>People</i> - Central to the new strategy and ongoing success of Bupa is its people. The Board continued to consider the roles of its people in the new strategy and services to be delivered. In particular, what new skills and opportunities this might present and how people would be supported, developed and retained, cognisant that Bupa's people are also customers via their participation in healthcare benefits and offerings. Ensuring Bupa's new strategy would resonate with and be well understood by Bupa's people would also strengthen Bupa's culture and values</li> <li>▪ <i>Suppliers and partners</i> - The role of, and relationship with, suppliers and partners, and engaging those with the same values and high standards of conduct, was considered key to elements of the strategy and to the growth of the business. The Board considered what support from partners and suppliers would be needed under the new strategy and how this could develop over time.</li> <li>▪ <i>Association Members and Bondholders</i> - The Board considered expectations for governing and delivering the strategy and managing the business sustainably and profitably, aligned with its culture and values and mindful of its societal responsibility. It was cognisant of the members' and bondholders' interests in ensuring that Bupa's strategy balances the ambition to generate value with preservation of financial stability, and that profits are appropriately reinvested to deliver Bupa's purpose.</li> <li>▪ <i>Communities and environment</i> - The Board remained mindful of Bupa's social impact and its focus on sustainability. When considering the strategy and how this would serve stakeholder interests and be conducted sustainably, the Board had regard to how management would align the business model and new strategy with Bupa's sustainability agenda and aspirations. The Board decided to separate out the future sustainability strategy to sit alongside and be complementary to the new strategy, and the new sustainability strategy will be launched later this year.</li> <li>▪ <i>Regulators and governments</i> - Through development of the strategy, the Board considered the expectations of its UK and local regulators, and regulatory requirements and developments relevant to healthcare insurance, clinical services, and global organisations of its size. Alignment with these in the new strategy was important as these set the parameters for what and how the business can operate, and that Bupa retains its financial strength and perform its obligations to required standards.</li> </ul> </li> <li>■ These considerations informed the Board's views on the strategic components proposed for the new 3x100 Strategy, to build on the progress and success of the 3x6 Strategy and embrace new developments and innovation, in order to ensure Bupa's long-term sustainability and success.</li> <li>■ The Board being satisfied that all relevant stakeholders had been considered when designing the 3x100 Strategy, it approved the new 3x100 Strategy to come into effect in 2025.</li> </ul>	<p><b>Delivering our 3x6 Strategy, pages 6 to 11.</b></p> <p><b>Our New Strategy for 2025-27, pages 15 to 16.</b></p> <p><b>Chairman's Introduction to Governance, page 64.</b></p> <p><b>Key Activities in 2024, page 76.</b></p>

## Section 172(1) and Engagement statement continued

Decision	Considerations, actions and decisions	Further information
<p><b>The integration of Niva Bupa and the listing of its equity shares on Indian stock exchanges in November 2024</b></p> <p><b>Stakeholders impacted</b></p> <p>Our customers, people, regulators (UK and India), Association Members and Bondholders</p>	<ul style="list-style-type: none"> <li>■ Following the acquisition of the controlling interest in Niva Bupa in January 2024, reported in the last Section 172(1) and engagement statement, the Board and relevant Board committees received updates on Niva Bupa throughout the year. The Group CEO and CFO reported to the Board on its performance and integration into the Group, including the establishment of the expanded BGIUK Market Unit, the Audit Committee considered the acquisition accounting, its inclusion in the Group's financial and non-financial reporting and external assurance, and the Risk Committee considered its risk profile. Niva Bupa's strategy was also considered as part of the Board's annual deep dive into the BGIUK Market Unit.</li> <li>■ Bupa committed to an IPO of Niva Bupa as part of the agreement to acquire control reached in 2023. The work to prepare for an IPO commenced in April, and the Board was kept apprised of the IPO process, the macro-economic environment and market conditions, and considered the relevant stakeholders that would be impacted, to determine whether, and when, to proceed.             <ul style="list-style-type: none"> <li>▪ <i>Customers</i> – The new capital raised in the IPO would be reinvested in the business for the benefit of customers through services and initiatives.</li> <li>▪ <i>People</i> – Niva Bupa employees had an existing share option scheme in place allowing the senior management team to participate in the ownership of Niva Bupa to share in its success and act as a retention tool. The current and future employees participating in the share option scheme would benefit from the IPO, and there was also the potential to broaden the opportunity to own shares in Niva Bupa to the wider workforce. The new capital raised would provide new career opportunities as Niva Bupa grows and evolves, which should help to attract and retain talent.</li> <li>▪ <i>Regulators</i> – Undertaking an IPO on Indian stock exchanges aligns with local regulatory requirements and expectations, and facilitates more local and foreign investors holding shares in the company, whilst complying with the Indian restrictions on the maximum permitted level of foreign ownership.</li> <li>▪ <i>Association Members and Bondholders</i> – The IPO of Niva Bupa maintains Bupa's controlling interest, thereby enabling Niva Bupa to benefit from the skills and experience of the rest of the Group, whilst strengthening Niva Bupa's capital flexibility and financial stability, enabling greater future investment in the business and accelerating its growth and value generation.</li> </ul> </li> <li>■ With the market environment and conditions considered favourable, and having considered the benefits to, and interests of, the stakeholders and the Company, the Board endorsed proceeding with the IPO in November 2024. The Niva Bupa board approved and executed the IPO and the shares opened to trading on the Indian Stock Exchanges on 14 November 2024.</li> </ul>	<p><a href="#">Group CEO's Review, page 7.</a></p> <p><a href="#">Group CFO's Review, page 17.</a></p> <p><a href="#">Note 23 to the Financial Statements, page 195.</a></p>

## Section 172(1) and Engagement statement continued

Decision	Considerations, actions and decisions	Further information
<p><b>Payment and adjustment plan for Isapre Cruz Blanca SA, Chile following legal and regulatory changes in Chile</b></p> <p><b>Stakeholders impacted</b></p> <p>Our customers, people, communities, regulators and government (UK and Chile), Association Members and Bondholders</p>	<ul style="list-style-type: none"> <li>■ As a result of the judicial and regulatory action related to the method and implementation of the statutory risk factor tables affecting Bupa's subsidiary, Isapre Cruz Blanca SA, the Board continued to closely monitor the environment in Chile with regard to potential impacts for the business. It received regular updates from the Group CFO and from management of the ELA Market Unit in their reporting to the Board meetings in 2024.</li> <li>■ When legislation giving clarity over the quantum and steps required for implementation of the retrospective liability relating to the risk factor table came into force in May 2024, the Board considered the application of the retrospective liability and the period allowed for making payment to eligible customers. It discussed matters related to the process for submitting a payment plan and premium increase proposal for regulatory approval, and the longer-term impact for the business model of these matters. The Board created a sub-committee of the Board to review the key developments and management's proposed payments and adjustment plan, before its submission to the Chilean regulator (SIS).</li> <li>■ The Board sub-committee considered the proposed plan for submission to the SIS, taking account of the financial modelling and profit projections for the Isapre, the timeline for making the payment to eligible customers, and the ability to increase premiums to ensure the future sustainability of the Isapre. In doing so, it had regard to the following impacts on the following stakeholders:             <ul style="list-style-type: none"> <li>▪ <i>Customers</i> – The impact on current and future customers of the payment and pricing proposals and the future sustainability of the Isapre. It considered the appropriate level of the premium increases, the potential impact on lapse rates and on the longer-term future of the sector, and how competitors might respond.</li> <li>▪ <i>People</i> – In considering the projections and viability of the current and future business model and strategy as a result of these changes, consideration was given to the continued level of employment and roles and career opportunities.</li> <li>▪ <i>Communities</i> – How the Isapre sector, the Chilean public health system and local communities would be impacted in the short and longer term was considered.</li> <li>▪ <i>Regulatory and government</i> – The interests of the SIS and the Chilean government to ensure the stability and continuation of the Isapre sector and the need for it to complement the public healthcare system was taken into account.</li> <li>▪ <i>Association Members and Bondholders</i> – The interests of these stakeholders in the short and medium term, and the financial and reputational aspects of the proposals were considered. There was also regard paid to the key risks of the payments and adjustment plan, such as an impact on the loss ratio, and on liquidity and capital including whether any Group funding would potentially be required to support the Isapre.</li> </ul> </li> <li>■ The Directors, having reviewed and scrutinised management's proposed payments and adjustment plan, endorsed the submission of the plan to SIS by Isapre Cruz Blanca. The SIS subsequently approved the plan. This resolved the uncertainty for the Group outlook which was referred to in the Group's longer-term viability statement in the 2023 Annual Report and Accounts.</li> </ul>	<p><b>Our Market Units, Europe and Latin America, page 23.</b></p> <p><b>Group CFO's Review, page 18.</b></p> <p><b>Note 19 to the Financial Statements, pages 189 to 190.</b></p>

## Section 172(1) and Engagement statement continued

Decision	Considerations, actions and decisions	Further information
<p><b>Expansion of 'Connected Care' model</b></p> <p><b>Stakeholders impacted</b></p> <p>Customers, people, suppliers and partners, communities and the environment, Association Members and Bondholders</p>	<ul style="list-style-type: none"> <li>■ As part of its delivery of the 3x6 Strategy during 2024, the Board continued to focus on the development and growth of the Connected Care model intended to transform our service delivery models and grow our provision business in the key areas of customer health propositions, integrated digital experience and tools, and our physical health centres. This included Market Unit Updates on the roll-out of the model and the Board considering certain specific transactions because of their size.</li> <li>■ During the year, there were a number of transactions that the Board had visibility of which were below the threshold that required Board approval. The key decisions here relate to those where the value of the proposals were above the threshold set for the Market Units under delegated authority. For these proposals, the Market Units sought permission from the Board to expand the Connected Care model through acquiring a network of 13 medical centres and 3 urgent care centres in three states in Australia, and redeveloping a building in Madrid as a hospital to serve the local demographic and provide specialist services.</li> <li>■ For each proposal, the Board considered the business case and alignment with Market Unit strategy and plans, the impact and interests of relevant stakeholders, potential risks, and the financial and infrastructure considerations. <ul style="list-style-type: none"> <li>■ <i>Customers</i> – The expansion of Connected Care through organic and select inorganic growth is part of both the 3x6 Strategy and the new 3x100 Strategy, and accelerates the expansion of an integrated customer health propositions and experience. Specifically in relation to the new Madrid hospital, the hospital is located in a district with limited private healthcare infrastructure.</li> <li>■ <i>People</i> – Expansion of Connected Care and acquisitions of more Bupa-owned facilities would provide increased direct employment (with associated benefits) and career and development opportunities for existing and prospective employees, and help to make Bupa the employer of choice.</li> <li>■ <i>Suppliers and partners</i> – The impact on non-employed GPs and the integration of the business model and range of services would provide increased opportunities for suppliers and partners, both locally and for those able to support a network, and would provide mutual benefits from cost and operational efficiency.</li> <li>■ <i>Communities and the environment</i> – The Board satisfied itself of the benefits to the local communities via having more locations to access Bupa services, as well as providing opportunities to create local employment and other positive impacts. For sustainability, having Bupa-owned facilities creates more control over energy supply and consumption and how the facilities are developed for their intended use.</li> <li>■ <i>Association members and Bondholders</i> – Increasing the level of Bupa-owned facilities reduces costs and improves operational efficiency, and provides greater long-term sustainability and stability for the business model. The Board is cognisant of property risks and the potential impact on liquidity and capital, but this risk is well understood and mitigated.</li> </ul> </li> <li>■ After careful appraisal and scrutiny at its meetings, and via specifically created sub-committees, the Board supported management proceeding with its proposals for the Market Unit acquisitions in line with the parameters specified in their papers to the Board.</li> </ul>	<p><b>Our Market Units, pages 21 to 24.</b></p>

## Risk Review

### Bupa's strong risk management culture and system support delivery of our strategy and business performance.

Risk is an inevitable part of operating a business. Some risks are avoidable while others are inherent in our business model so Bupa must have an effective internal control and risk management system to mitigate these risks.

Bupa's culture and values enables its people to respond to the fast-changing environments and markets it operates in and the evolving regulations that apply to our business. This helps Bupa identify potential risks that could affect its customers and business, in order to mitigate them and adapt if necessary. Together with Bupa's system of risk management and internal controls, its strong risk culture is the foundation of Bupa's business model to serve its customers well, deliver its strategy and meet all of its stakeholders' expectations.

#### Risk Governance

Bupa's governance framework is set out in the Governance section on [page 68](#), at the start of the Corporate Governance Report. The Bupa Board ultimately sets the system of risk management and internal control for the Group, and delegates oversight duties to its Board Risk Committee. The Board Risk Committee receives reports from management and in particular the Group Chief Risk Officer, Chief Medical Officer, the Group Legal Officer and subsidiary board risk committees. The Group's business and the Group Chief Risk Officer are supported by the Group-wide Risk Function and an executive forum, the Bupa Enterprise Risk Committee, which comprises members of the Bupa executive management team. This forum monitors and oversees risk in the businesses and functions across the Group, ensuring the system of risk management and internal controls is fit for purpose and operating effectively, for example, routinely reviewing policies and processes and undertaking assurance. If it feels changes are necessary, it makes recommendations to the Board Risk Committee, and ultimately the Board. More details on this governance and the Risk Function are set out on [pages 69 and 73](#).

#### Bupa's system of risk management

Bupa operates within a three-lines approach to risk management: first-line accountability is the Market Units and functions; second-line is Risk assurance; and the third-line is Internal Audit assurance (see [pages 73 and 74](#) for more detail on each of these). At an operational level the system of risk management comprises the Bupa Risk Management Framework. This sets out the principles behind the robust and continuous risk management system in our first-line. It ensures that Bupa has:

- reporting systems to identify current and emerging risks to the businesses and strategy and the potential consequences.
- clear and established risk appetites within which it should operate.
- taken appropriate and effective steps to mitigate and manage identified risks.
- risk management information to help inform risk-based decisions across the business.
- set clear ownership of, and accountability for, risk.

The Risk Management Framework is underpinned by its risk taxonomy, risk appetite statements, Enterprise Policies and Standards, well-established reporting systems, and an annual internal control and risk management assessment (ICRMA). These, together with the Risk Management Framework, are all reviewed by the Board Risk Committee, and approved by the Board, annually.

*Bupa's reporting systems* ensure that major risks to the businesses are identified, escalated, managed and mitigated. Detailed reviews and in-depth analyses on particular risks are undertaken where required, and Bupa has a stress and scenario testing programme for key risks. These risk management processes include explicit consideration of how future risks to Bupa's strategy might emerge or evolve and what actions should be taken now to mitigate these risks or to benefit from the opportunities they provide. This includes:

- consideration of how technology may evolve
- the future of health and healthcare and the impact of emerging and increasingly prevalent medical conditions
- Bupa's appetite for risk
- how society may evolve including the impacts of ageing populations and geopolitical and economic considerations.

## Risk Review continued

*Bupa's risk appetite statements* set out the degree of risk it is prepared to accept to deliver Bupa's strategy. The core risk appetite statements are focused on:

- the treatment of customers and employees
- management of our financial strength
- operational risk, including information security; privacy and clinical risks.

*Bupa's Enterprise Policies and Standards* define how Bupa should conduct business in a way consistent with its culture, values and purpose and which appropriately mitigates risk. The policies are reviewed annually and cover all key areas of risk for our health insurance, provision and aged care businesses. These are implemented by the Market Units and in Group functions and are overseen by relevant Group functions to ensure compliance with the requirements in each Market and Business Unit. Each policy has a designated owner with defined roles and responsibilities at both Enterprise and local levels.

*The ICRMA* tests how effectively Bupa's Risk Management Framework operates in practice. It assesses how well internal control and risk management practices and policy compliance are embedded across Bupa. This is a self-assessment conducted by the first-line, and then reviewed and challenged by the second- and third-lines. The results are presented to a joint meeting of the Board Audit and Risk Committee each year. The conclusions of this years review are set out in the Report of the Directors on [page 114](#).

### Risk Culture

This comprehensive risk management programme and Bupa's culture and values set the expectations for risk management and reinforces its importance. It sets appropriate risk behaviours that are well understood by everyone working at, or for, Bupa including its people, suppliers and partners. The importance of risk management is reinforced by its inclusion in executive remuneration and performance considerations, with defined outcomes set for all Market Units. Appropriate risk behaviours are encouraged and rewarded, inappropriate risk behaviours are challenged with appropriate consequences, and risk events are communicated quickly without fear of blame.

The tools that underpin Bupa's culture and its strong risk management include the Bupa Code, Bupa's Speak Up service, and mandatory training. These are all covered in detail in Business Ethics and Conduct on [page 47](#).

### Risk Management in 2024

During 2024, Bupa has continued to raise its standards and expectations in order to ensure the right outcomes for our customers, markets and business. Its businesses have continued to be exposed to a wide range of political, regulatory, legal, operational and economic risks. These varied by business type and jurisdiction, given the health insurance, provision and aged care activities have different risk profiles including clinical risks.

Bupa managed its risks, including emerging and strategic risks, by analysing the factors behind the risk relative to each business and to Bupa's balance sheet and liquidity, and assessed how they interact.

It continued to strengthen its risk management approach and capability within its businesses to remain aligned with the business model and strategy set out earlier in the Strategic Report, to support performance and address relevant risks that have evolved globally.

Risk management governance and activities during 2024 included reviews of Bupa's:

- strategic and emerging risk profiles, particularly in relation to potential challenges in the geopolitical environment, for example stress testing of liquidity.
- climate change risk profile, risks associated with the Bupa sustainability strategy.
- investment risk appetite.
- progress on embedding Bupa's integrated management system for key processes (IMS).
- risks associated with the judicial and regulatory changes impacting Isapre Cruz Blanca SA in Chile.
- people risks relating to resilience as well as strategic risks associated with workforce availability.
- progress on improvements to information security to respond to the increased and evolving threats in the external environment, and to privacy controls through data retention reviews.
- enhancement and strengthening of operational resilience capability and controls.
- Group Recovery and Resolution Plans.
- scheduled reviews and refreshment of Enterprise Risk policies.
- annual stress and scenario testing programme, primarily focused for 2024 on adverse economic conditions triggered by increased geopolitical uncertainty and global tensions and conflicts.
- the Group's Own Risk and Solvency Assessment (ORSA) for 2024.
- the annual ICRMA for 2024.

## Risk Review continued

### Principal risks

Bupa maintains significant economic capital as a means of mitigating certain inherent risks. This reflects the nature of our operations and the level of risk associated with them. There are other significant risks to Bupa that cannot be effectively mitigated through holding capital alone. Many of these are operational risks and although we do hold significant capital for operational risks, this is not the only or most effective mitigant for these risks.

Bupa's Market Unit executive risk committees regularly review residual risks and the mitigating actions taken to reduce them. The committees inform the BERC about key areas of specific concern. This provides management with a view of the priority areas to focus its resources.

The following table sets out the principal risks to the Group. The defined principal risks are those risks that could result in events or circumstances that might threaten Bupa's business model, future performance, solvency or liquidity, or result in significant value erosion.

Risk	Description	Comment and outlook	Mitigating actions
<b>Risks related to managing the financial strength of the Group</b>			
<b>Property valuation risk</b>	<p>The risk of the volatility in values or the devaluation of properties held for own use (including owned care provision properties), or for investment purposes, resulting in adverse impacts.</p> <p>This includes capital associated with leased properties.</p>	<ul style="list-style-type: none"> <li>■ We generally own rather than rent property. This could leave us exposed to falls in property values.</li> <li>■ Care home valuations are based on their trading potential based on discounted cash flow techniques.</li> <li>■ The properties are subject to external valuations at least triennially and management valuations in intervening years.</li> </ul>	<ul style="list-style-type: none"> <li>■ By maintaining a geographic spread of businesses across a number of countries, we are able to diversify exposure to national or regional property markets and trading conditions.</li> <li>■ The properties are primarily owned by companies that are not regulated insurance entities and therefore any reduction in value does not materially impact the solvency position of regulated insurance entities.</li> </ul>
<b>Insurance risk</b>	<p>Risks relating to our insurance businesses. Risk of inadequate pricing and/or underwriting of insurance policies, of claims experience being materially adversely different expectations and that provisions made for claims prove to be insufficient in light of later events and claims experience.</p>	<ul style="list-style-type: none"> <li>■ Health insurance is short-tailed, with lower outstanding claims as a percentage of revenue than most general insurers.</li> <li>■ Insurance risk exposure will grow in step with planned growth in premium income of the insurance businesses.</li> <li>■ Medical inflation continues to impact the costs of treatments and the overall affordability of healthcare.</li> </ul>	<ul style="list-style-type: none"> <li>■ The relatively short-tailed nature of Bupa's products allows us to respond to market changes quickly, although this can be limited by government-set pricing controls in some markets.</li> <li>■ There is a relatively low exposure to reserving risk compared to underwriting and pricing risk due to the very short-term nature of our claims development patterns.</li> <li>■ We have robust control mechanisms in place, including holding an appropriate risk margin, to mitigate against the risk of higher-than-expected claims costs.</li> <li>■ The geographical diversity of Bupa offers further mitigation against insurance risk.</li> </ul>
<b>Liquidity risk</b>	<p>The risk that we hold insufficient financial resources to enable us to meet our obligations as they fall due or to take advantage of potential opportunities, or of being able to secure such resources only at excessive cost, resulting in adverse impacts</p>	<ul style="list-style-type: none"> <li>■ Liquidity risk is addressed not through capital but by holding liquid assets and maintaining appropriate controls.</li> <li>■ Policyholder liabilities are predominantly backed by liquid assets held locally in our insurance businesses.</li> </ul>	<ul style="list-style-type: none"> <li>■ This is mitigated by the Treasury Function actively managing borrowings, for which the amount and timing of outflows are known, and by maintaining a portion of the bank facility undrawn.</li> <li>■ We continue to monitor the markets to ensure that we appropriately fund the Group and any obligations including pension liabilities.</li> <li>■ Our stress-testing programme considers the liquidity impacts of potential adverse scenarios.</li> </ul>

## Risk Review continued

Risk	Description	Comment and outlook	Mitigating actions
<b>Operational risks</b>			
<b>Operational (including conduct risk and clinical risk)</b>	Risk of loss arising from inadequate or failed internal processes, or from personnel, systems or external events. This includes conduct risk (the risk that our behaviours, actions or controls result in detriment or unfair outcomes for our customers), and clinical risk (the risk of injury, loss or harm to customers in receipt of healthcare). Information security risk is specifically addressed below.	<ul style="list-style-type: none"> <li>■ We are committed to managing operational risks effectively. This includes continued close attention to management of regulatory risk and proactive engagement with regulators.</li> </ul>	<ul style="list-style-type: none"> <li>■ Maintaining internal control processes and governance frameworks, approving risk policies and assessing compliance help to mitigate this risk.</li> <li>■ We have specific dedicated internal governance committees focusing on specific areas of risk. These are sub-committees of the BERC.</li> <li>■ We have a range of activities underway to develop our operational resilience capabilities.</li> </ul>
<b>Cyber and Information security</b>	The risk of significant financial and reputational impacts due to a failure to appropriately secure information (including personal information).	<ul style="list-style-type: none"> <li>■ Information security remains a critical challenge for all businesses, particularly those in the healthcare sector.</li> <li>■ The threats to our businesses evolve constantly and therefore our responses need to continue to do so as well.</li> <li>■ This risk will remain elevated given the challenging macroeconomic and geopolitical environment and several incidents targeting the healthcare sector.</li> <li>■ Management of this risk is a key focus of management and the risk governance structure.</li> </ul>	<ul style="list-style-type: none"> <li>■ We are continuing to invest in a range of activities and actions to enhance security as we further digitalise customer experiences.</li> <li>■ All staff are required to complete appropriate mandatory training.</li> <li>■ We have well-established and tested data breach incident response plans in place across the Group.</li> </ul>
<b>Strategic risks</b>			
<b>Government, legal and regulatory change and compliance risk</b>	The risk of failure to anticipate or influence changes in governmental and regulatory environment which may impact our customers and the viability or profitability of our business.	<ul style="list-style-type: none"> <li>■ Our health insurance, provision and aged care businesses are subject to government and regulatory policy, including insurance conduct rules, minimum wage requirements, prudential requirements, changes to tax regimes and the interpretation of existing tax practices, pricing controls in some of our health insurance businesses and clinical care requirements for our provision and aged care businesses.</li> <li>■ Bupa's businesses operate within a wider health ecosystem and generally complement the national health services. Changes in funding and other health policies can have a resultant impact on our businesses.</li> </ul>	<ul style="list-style-type: none"> <li>■ All our markets have defined key activities to make sure we can continue to monitor and assess the strategic implications on our businesses of any future changes in policy or regulation, and advocate for appropriate change in these areas.</li> </ul>
<b>Geopolitical uncertainty</b>	The risks associated with geopolitical uncertainty and increasing nationalistic policies globally including in many of the markets the Group operates in.	<ul style="list-style-type: none"> <li>■ This has been an emerging and increasing trend for some time and likely to continue for the foreseeable future.</li> <li>■ We have seen elections in multiple markets across the Group this year, including in the UK and will see further elections next year. This can increase uncertainty and may result in changes to government funding decisions which impact our businesses.</li> </ul>	<ul style="list-style-type: none"> <li>■ We continue to focus on heightening our supplier monitoring, management and communications to help minimise disruption.</li> <li>■ We actively monitor the geopolitical landscape and consider the implications of potential changes such as the possibility of trade tariffs being introduced.</li> </ul>

## Risk Review continued

Risk	Description	Comment and outlook	Mitigating actions
<b>Data ownership, use and governance</b>	The risks associated with the ownership, use and governance of data which could impact on the delivery of the Group Strategy. This includes the risks associated with data privacy and of failing to use the data we do have to deliver the strategy.	<ul style="list-style-type: none"> <li>Data is fundamental to the delivery of the Group strategy and will continue to remain a key area of focus for some time.</li> </ul>	<ul style="list-style-type: none"> <li>We have a range of initiatives and programmes in place across the Group focused on the ownership, use and governance of data.</li> <li>This included introducing Bupa's Responsible AI Principles which guide our decision making for using AI tools.</li> <li>We have also reviewed and enhanced our data retention practices.</li> </ul>
<b>Strategic workforce risks</b>	The strategic risks associated with a lack of available workforce, particularly clinical staff.	<ul style="list-style-type: none"> <li>In many markets this has been an enduring risk for some time but has been exacerbated by cost-of-living challenges.</li> <li>An inability to recruit and retain the required skills may impact our ability to deliver services to our customers and delivery of the strategy.</li> </ul>	<ul style="list-style-type: none"> <li>Workforce availability remains a key area of focus for senior management with a range of activities under way in each market to address challenges. For more information, see People and Culture on pages 29 to 32.</li> </ul>
<b>Operational resilience including supply chain disruption and third-party reliance</b>	The risks associated with failure to ensure our businesses remain resilient to operational and supply chain challenges including those presented by third-party suppliers. This includes the risks associated with complying with the associated regulatory requirements.	<ul style="list-style-type: none"> <li>Operational resilience capabilities are key to being able to maintain operations in the face of many challenges including third-party and supply chain risks, workforce fatigue, information security and other operational risks and the challenges presented by business growth.</li> <li>As we grow, these challenges will continue to become more pronounced, particularly where we increase our reliance on third parties.</li> </ul>	<ul style="list-style-type: none"> <li>We continue to focus on heightening our supplier monitoring, management and communications to help minimise future disruption.</li> <li>Our businesses have well-established and tested disaster recovery plans.</li> <li>We have a range of activities underway to develop our operational resilience capabilities and to ensure we comply with relevant regulation.</li> </ul>

### Other risk themes monitored

In addition to the principal risks set out above, a range of other risks related to the delivery of our strategy are monitored. These are assessed to determine the potential impact the risks may have on Bupa's individual businesses and the Group and the appropriate actions to take to mitigate these risks and monitor them.

### Strategic and Emerging risks

Strategic and Emerging Risks that may affect Bupa are monitored through extensive reviews of relevant external reference material and internal consultation with subject matter experts. Through this process the themes set out below were identified. These themes are highly interlinked and how they evolve will affect, and be affected by, each other. They will also develop and evolve over different time frames, with some impacts already being experienced to some degree, but overall, the challenges these themes present will continue to increase the further out they are assessed.

- Customer and societal demands/expectations will inexorably increase;
- Geopolitical and economic uncertainty and deglobalisation focus will continue to rise;
- Workforce expectations are changing, alongside evolving requirements from the workforce and workforce availability challenges will persist;

- Global standards of regulation will continue to increase;
- Overall medical treatment and technologies will continue to advance rapidly and often at great cost;
- Advances in technology will be a critical underpin and influence (with a particular focus on Artificial Intelligence);
- Trust in healthcare, and particularly AI, systems and data, will be a key factor in the adoption of new technologies; and
- Climate change and how the world response to this threat will have a significant and rapidly growing strategic impact.

### Financial risks associated with climate change

Climate risk management is integrated into our existing Group-wide Risk Management Framework ('RMF'), which sets out how risks are identified, assessed, managed and reported on. Bupa will continue to ensure that climate-related risks are considered appropriately throughout our governance arrangements, including the policy framework and management committees' responsibilities. It will continue to reflect on changes in regulatory expectations while embedding climate risk management through the RMF.

## Risk Review continued

As a result, the financial risks from climate change do not appear separately in Bupa's principal risks above, as they are already captured within these risks. The table below does show how different risks are potentially impacted by different key climate risk drivers.

Risk drivers	Relevant risks and potential impact	Mitigating actions
<b>Transition: Policy and legal</b>	<p><b>Government, legal and regulatory change risk</b></p> <p>We must continue to prepare for, and then comply with, emerging regulations (primarily driven through our insurance business but becoming increasingly relevant for all businesses globally). As such, there is a risk of fines, penalties, and litigation in the event of regulatory non-compliance, which could also result in reputational damage.</p> <p>We are also exposed to potential non-regulatory litigation risk, including the risk of class actions.</p> <p>Short, medium and long term.</p>	<ul style="list-style-type: none"> <li>■ Our horizon scanning process continues to identify relevant legislative and regulatory changes across a broad spectrum of topics, including consideration of ESG-related (including climate change) developments.</li> </ul>
<b>Transition: Reputation</b>	<p><b>Brand and Reputation Management</b></p> <p>Stakeholder expectations on all ESG-related areas, including climate change, are increasing. As such, there is a risk of reputational damage and loss of trust in our brand – across the Group – occurring as a result of not taking appropriate action to meet those expectations, not meeting commitments, or by greenwashing.</p> <p>Short, medium and long term.</p>	<ul style="list-style-type: none"> <li>■ The sustainability strategy focuses on building a healthier future for people and planet. There are governance structures in place to oversee the delivery of the sustainability strategy.</li> <li>■ Bupa engages in industry coalitions and partnerships to accelerate the delivery of net zero, patient-centric health systems through collaboration and innovation.</li> <li>■ Communication policies and procedures, and disclosure governance in place to reduce likelihood of publishing misleading sustainability claims.</li> </ul>
<b>Transition: Market</b>	<p><b>Property valuation risk</b></p> <p>Changes in severity, frequency, and variability in weather patterns may result in decreases in property valuations. This could be caused by reduced demand for services in areas more prone to climate change, additional operating costs and capital expenditure required to adapt properties to either meet or anticipate increasing market demands and future regulation in response to changes in weather-related events and decarbonisation agenda, and/or by the availability and affordability of insurance.</p> <p>Medium and long term.</p> <p><b>Market risk</b></p> <p>Our investment portfolio is exposed to potential adverse valuation impacts driven by both transition and physical risk exposures in the companies in which we invest.</p> <p>Medium and long term.</p>	<ul style="list-style-type: none"> <li>■ We continue to perform a range of climate-related stress testing to explore possible impacts to property valuations (which are not currently believed to be material to our business).</li> <li>■ Geographical spread of properties helps to diversify exposure.</li> <li>■ Merger and Acquisition decision-making process also incorporates climate risk (physical) as a factor to consider.</li> <li>■ We concluded a facilities-related global scope 1 and 2 decarbonisation modelling project which provided insights to enable the planning of our decarbonisation efforts in order to meet our 2030 Science-based Target and Net Zero ambition. These insights are now being adopted within business planning.</li> <li>■ Decarbonisation underway at appropriate selected sites.</li> <li>■ We place exposure limits on the sectors and countries most at risk from climate change. Our primary target for our investment portfolio, which has been validated by the Science Based Targets Initiatives (SBTi), is to achieve Temperature Alignment of 1.5°C by 2040. We are taking action to reduce the GHG emissions of our investments, while helping to finance the transition to a low-carbon economy.</li> </ul>

## Risk Review continued

Risk drivers	Relevant risks and potential impact	Mitigating actions
<b>Physical: Acute and chronic</b>	<p><b>Operational resilience including supply chain disruption and third-party reliance</b></p> <p>Climate change may increasingly cause operational disruption (directly or indirectly through, for example, third parties and supply chain), which could compromise Bupa's ability to deliver products and services safely to customers, patients, and residents; the health and safety of Bupa's people could also be impacted.</p> <p>Short, medium and long term.</p> <p><b>Insurance</b></p> <p>Shifts in global temperatures and weather patterns will affect the acute and chronic healthcare needs of our customers and may lead to increased insurance claims via changes to frequency or disease severity requiring shifts in the treatments required. This impact could be more pronounced in markets with multi-year policy contracts in place. Separately, decarbonization and other sustainability-related efforts by third-party healthcare providers used by Bupa to service insurance claims may also contribute to higher claims inflation.</p> <p>Medium and long term</p>	<ul style="list-style-type: none"> <li>■ The Operational Resilience Framework considers broader customer disruption and the same principles apply to extreme weather events.</li> <li>■ Business Continuity Plans are produced and updated in accordance with the Enterprise Operational Resilience Policy and associated Standards.</li> <li>■ Guidance documents are in place for managing the potential impact of heatwaves and flooding across our aged care facilities.</li> <li>■ Governance forums and communication channels are in place to enable the timely reporting and escalation of any climate change related risks or incidents.</li> <li>■ We know that people will be more unwell in a world that experiences greater weather variability due to climate change. The short-tailed nature of most of our insurance products allows us to respond through pricing, although this can be limited by pricing controls in some markets. The affordability impacts from price increases would need to be carefully considered. Overall, the impact is likely to vary by type of product and coverage (comprehensive; complementary/supplementary) and based on the interactions between private medical insurance and the public health system.</li> <li>■ Bupa is currently deepening its understanding of the potential long-term impacts of climate change on customers' health and claims in some markets, and based on the assessment will consider how best to respond and adapt its insurance product offerings accordingly (e.g. product benefits, financial incentives, target market).</li> </ul>

1. Short term (1-3 years). Medium term (3-5 years). Long term (5+ years).

Financial risks from climate change have been incorporated into Bupa's wider stress-testing programme. The results of the scenario analysis carried out to-date suggested that the strategy is resilient to the financial risks of climate change. Bupa will continue to evolve and mature its climate scenario analysis along with its disclosure approach, and scan for developments and improvements in scenario methodology and data.

The following sets out some of the key highlights from tests performed in 2024:

The latest Stress and Scenario Testing programme helped Bupa better understand localised climate change risks as well as a range of potential impacts which could be driven by climate change (although not exclusively) over the planning period. Scenarios assessed included: impacts of increased inflation on insurance claims and expenses across all businesses (possibly a potential outcome of an energy price shock and/or carbon pricing); impacts of strategic workforce risks (including workforce shortages, increased attrition, and higher staff costs), supply chain disruption risk, and regulatory changes.

In 2024, a number of Business Units selected a climate-related narrative to guide their annual local scenario and stress testing. The future health impact of climate change was assessed in several markets, including the potential impacts on insurance claims, as well as potential impacts for provision businesses (hospitals and clinics mostly) should these be able to respond to the changing population health needs given physical risks from climate change. Beyond extreme weather events, the impacts of air pollution and water shortages were also considered though to a lesser extent. This work compliments results from scenario analysis performed in prior years, including a 'Late Action': a -2C global warming by 2100; a disorderly transition scenario; and 'No Additional Action', a 4C global warming by 2100 scenario with high physical risk. The results of these remain relevant.

Bupa will continue to focus on building and assessing its specific climate scenarios in 2025.