



Bupa's Approach to Tax

2025



Foreword

Bupa is an international healthcare company serving over 60 million customers worldwide. Established in 1947, Bupa's purpose is helping people live longer, healthier, happier lives and making a better world. With no shareholders, we reinvest profits into providing more and better healthcare for the benefit of current and future customers.



James Lenton, Group Chief Financial Officer

Since 2021, we have been focused on delivering our 3x6 Strategy and are proud of the significant progress we have made, having delivered demonstrable results against each of our three ambitions. Please see our [Annual Report and Accounts](#) for more details.

Looking forward, we know there is more we can achieve which is why we have launched a new 3x100 Strategy for 2025-27. 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.

Bupa's purpose, values and ambition are long-term elements of our strategy that have served us well under the 3x6 Strategy and 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 – Brave, Caring and Responsible – define our culture, empowering us to stand up for what's right for our customers, residents, patients and for each other.
- Our ambition to be the world's most customer-centric healthcare company reflects our commitment to excellent customer experience, through great service and value, frictionless access and quality healthcare.

In addition, the [Bupa Code](#) gives us a simple decision-making framework to help us do the right thing by our stakeholders. We take seriously the need to maintain high standards of business conduct and act as a good corporate citizen.

Bupa's Approach to Tax is a key component of our business ethics and conduct and wider Environmental, Social and Governance agenda. Paying the right amount of tax ensures that Bupa contributes to the communities in which we operate and helps us fulfil our purpose. We are focused on building a healthier future for both people and the planet and we are increasingly aware of how our actions, including with whom and how we conduct business, impact our environment and communities.

We conduct our tax affairs in a fair and transparent manner, acting responsibly and with integrity, in line with our values. We achieve this by engaging with tax authorities openly and do not use contrived or artificial tax structures that are intended for tax avoidance or have limited commercial substance. We are 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.

Our six tax principles help inform our decision-making and help manage our tax risks by upholding our commitment to transparency, fairness and robust governance. This document outlines how we set our standards and act responsibly, holding ourselves accountable. It also seeks to provide transparency on our tax affairs by detailing our total tax contribution worldwide, which was £1.9 billion in 2024.

Our approach to tax

Our approach to tax is based on six principles that help inform our decision making and uphold our commitment to transparency, fairness and robust governance. These principles are in line with Bupa's values and the Bupa Code.

We only enter into commercial transactions and the tax positions we adopt are in accordance with applicable laws and practices. The Bupa Board is accountable for ensuring that our approach to tax is consistent with our principle of sustainable growth, within the Group's overall strategic framework.



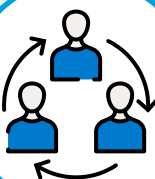
We price international related-party transactions on an arm's length basis in accordance with OECD principles and local tax regulations, ensuring Bupa's transfer pricing reflects the commercial and economic substance of the transaction.

In circumstances where tax legislation is unclear or subject to interpretation, we obtain independent external advice. We also engage tax advisors where specialist expertise is required on complex transactions, compliance obligations and to provide insight into industry practice.



We approach our tax affairs in a manner that makes appropriate use of government endorsed claims, elections, deductions, and exemptions available in accordance with the tax legislation, as per the intent of the legislation.

We seek to establish constructive relationships and work positively with fiscal authorities – HMRC in the UK and other tax authorities overseas. This is based on transparency and mutual respect, and we work with tax authorities to minimise the extent of disputes. Where there are differences of opinion, we endeavour to work collaboratively and seek clarity to resolve these differences in a satisfactory manner.



We do not use contrived or artificial tax structures that are intended for tax avoidance or have limited commercial substance.

Our approach to tax risk management

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

Embedding a strong risk management culture is a priority across Bupa, supported by robust risk management and controls. This culture helps us to foresee and respond to changing environments and evolving regulation, enabling us to mitigate potential risks that could affect our customers and our business.

The Bupa Board is accountable for Bupa's System of Governance with responsibility for setting Bupa's risk appetite and overseeing the risk management framework. We manage our risks using a 'three lines' model. Bupa's management of tax risk is aligned with this approach and is set out in our internal Enterprise Tax Policy, which is applicable across the Group, and defines our minimum requirements and expectations to ensure compliance with all applicable laws and regulations as well as effective risk management.

The Director of Tax and Sustainable Finance, Chief Financial Officer, and the Chief Risk Officer are accountable for ensuring that these policies and procedures are embedded throughout the Group to ensure tax risk is appropriately managed.

Bupa divides tax risk into two categories and has controls in place for managing these separate risks.



Tax compliance risk

Tax risk explained

The risk of a financial, regulatory or reputational impact due to errors, omissions, or process failings in the usual course of managing Bupa's tax affairs.

How Bupa manages this

We minimise tax compliance risk through the use of preventative and detective controls. We act on any errors identified to ensure they are corrected and improve our processes to mitigate the risk of repeat occurrences.



Tax judgement risk

Tax risk explained

The risk of a financial, regulatory, or reputational impact arising out of a tax authority challenge or negative public perception to a position taken by Bupa.

How Bupa manages this

We only enter into commercial transactions and the tax positions we adopt are in accordance with applicable laws and practices.

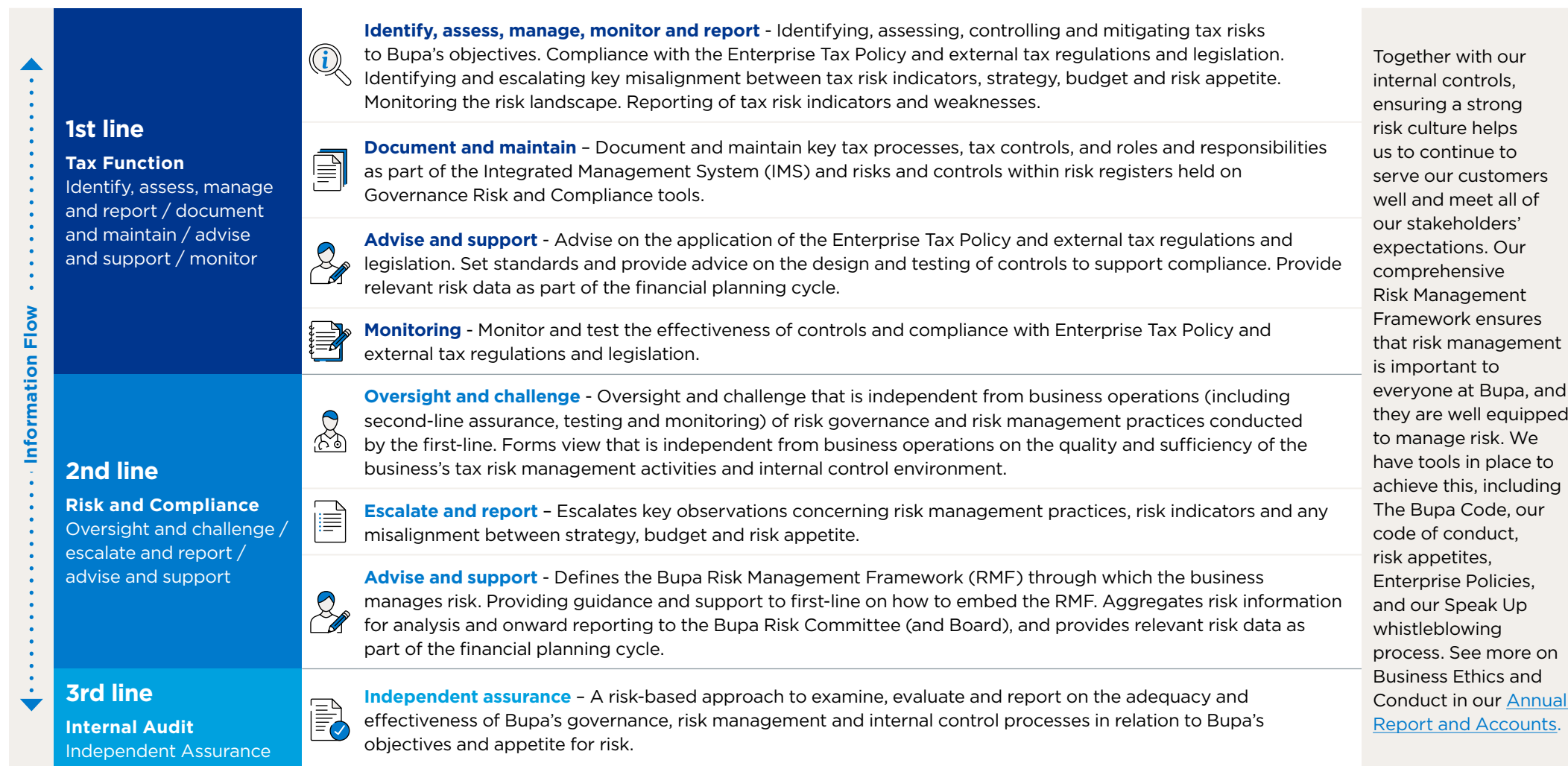
Risk is an inevitable part of operating a business. Some risks are avoidable while others are inherent in our business model, so we have an effective internal control and risk management system to mitigate these risks.

Bupa's global tax team has the appropriate skills and experience to implement our tax control framework. Teams consist of individuals with a balance of both technical and business specific knowledge. This global tax expertise ensures that domestic and cross border tax issues are managed appropriately and that we are able to comply with our worldwide tax obligations.

Tax teams are involved when strategic business decisions are being considered and external advice is obtained where appropriate. In addition, ongoing horizon risk scanning activities ensure Bupa responds appropriately to tax risks emerging through legislative changes and developments.

Bupa's three lines model and tax

The Board is ultimately responsible for the system of governance, setting policies and the risk management framework.

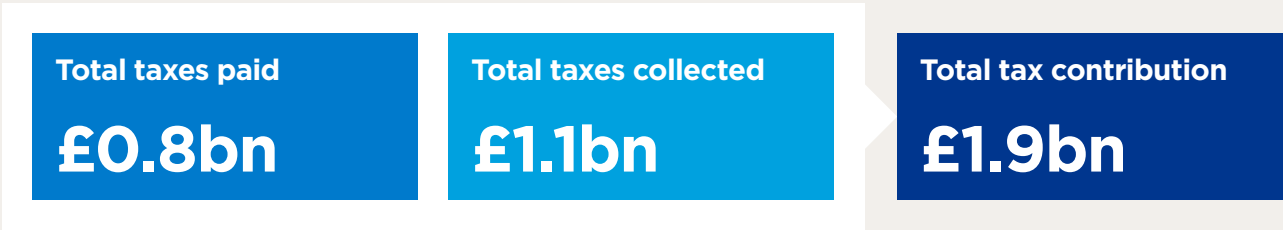


Our tax contribution

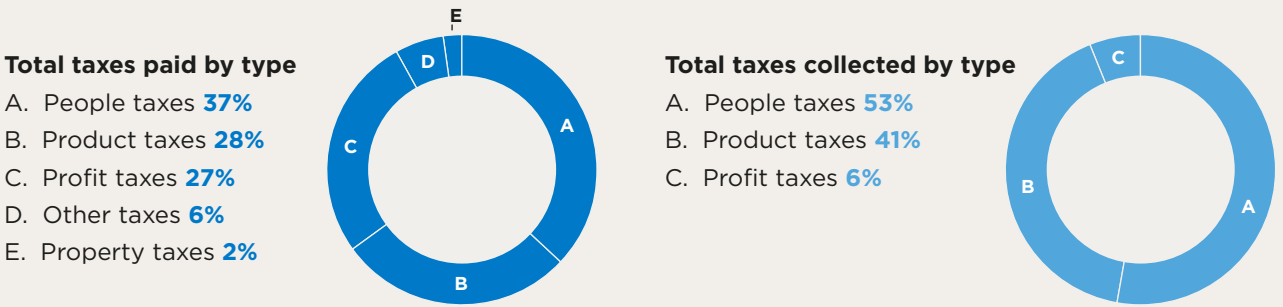
Sustainability and wider ESG issues are important areas of focus for our Board. These issues play a key role in Bupa’s purpose, values, and strategy. Our approach to responsible business is a foundation of our Sustainability Strategy and focuses on several areas, including our approach to tax.

We pay taxes both directly to tax authorities in countries in which we operate and collect taxes on behalf of those authorities from customers and employees. Together this equates to our total tax contribution. Taxes paid include taxes such as corporation taxes and consumption taxes on purchases, withholding taxes, property and stamp taxes. Taxes collected include those in relation to the employment of our people, consumption taxes on sales to customers, and insurance premium taxes. On a global basis, our total tax contribution in 2024 was £1.9 billion. The following represents the taxes we have paid or collected on behalf of others in the financial year ended 31 December 2024.

Total tax contribution data



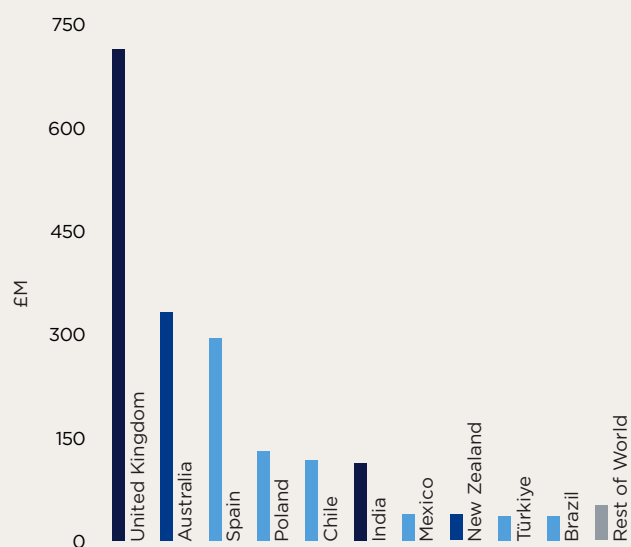
What taxes we contribute



Profit taxes are taxes paid on our business profits based on applicable tax legislation.
People taxes are taxes paid by Bupa on behalf of and as a result of its employees including income tax, social security and payroll taxes.
Product taxes are taxes paid on the products we offer within the market including consumption taxes such as VAT and Insurance Premium Tax.
Property taxes are taxes paid based on property held by Bupa such as business rates and duties.
Other taxes are taxes paid globally that do not fall within the aforementioned categories.
Associate businesses are not included in the total tax contribution data.

Bupa's footprint

Total tax contribution by jurisdiction⁵



We are an international healthcare company serving over 60 million customers worldwide. Health insurance accounts for 73% of our total revenue with 37.8m insurance customers worldwide. We operate clinics, dental centres and hospitals in some markets and we run aged care businesses in the UK, Australia, New Zealand, and Spain. Having been established in the UK over 75 years

		Bupa Asia Pacific			Europe and Latin America							Bupa Global, India and UK			Other
		Australia	New Zealand	Hong-Kong SAR	Spain ¹	Poland	Türkiye	Chile	Brazil	Bupa Global Latin America	Mexico	UK ²	India	Bupa Global ³	Saudi Arabia ⁴
Funding	Health insurance	■		■	■	■	■	■	■	■	■	■	■	■	■
	Health subscription			■	■	■		■				■			
	Dental insurance	■		■	■	■		■	■			■			
	Dental subscription			■								■			
Health provision	Clinics	■		■	■	■		■		■		■			■
	Hospitals				■	■		■			■	■			
	Dental centres	■		■	■	■	■	■	■			■			
	Optical and audiology	■				■		■							
Aged care provision	Care homes	■	■		■							■			
	Retirement villages	■	■									■			

ago, we now have businesses around the world: principally in Australia, the UK, Spain, Poland, Chile, Hong Kong SAR, India, Türkiye, Brazil, Mexico and New Zealand. We also have associate businesses in Saudi Arabia. We have a small number of subsidiaries in low tax rate jurisdictions. This is due to the fact we provide services to customers in the local market or region, or it is necessary for local

regulatory and compliance reasons. Bupa derives no artificial or contrived tax benefits through owning these subsidiaries.

For a full list of legal entities please refer to our published [Annual Report and Accounts](#).

1. In Spain we also have day care centres.

2. We also operate dental clinics in the Republic of Ireland managed through Bupa Global, India and UK.

3. Global international insurance available in most countries. Includes 49% stake in Highway to Health (GeoBlue) in the US.

4. Bupa Arabia is an associate business.

5. Total tax contribution data is for the financial year ended 31 December 2024.

6. Rest of the world consists of taxes paid and collected in all other jurisdictions in which Bupa operates including but not limited to the US and Middle East, but does not include our associate businesses in Saudi Arabia.

Our commitment to tax transparency

Being an ethical business is fundamental to 'making a better world' as set out in our purpose. Business ethics means operating in a responsible, fair and transparent manner, in accordance with the law and regulations, and creating the right culture and governance to hold ourselves to account.

Responding to the tax regulatory landscape

The tax regulatory landscape continues to evolve at pace with external disclosure requirements extending in scope and complexity. At Bupa, we are constantly horizon scanning to ensure we are prepared to meet our obligations across the different geographies in which we operate.

Two significant tax reporting requirements that will impact Bupa, and that we are focused on preparing for are the Pillar Two OECD Model rules, which seek to establish a 15% global minimum tax rate for multinational enterprises, and Public Country by Country Reporting

(CbCR), which is being introduced in many of the jurisdictions in which we operate. We have several initiatives under way across the Bupa Group to assess our readiness to report against these requirements and will continue that work during 2025.

We believe that open consultation with governments and tax authorities results in more informed and sustainable legislation. We therefore respond to tax consultations via industry bodies to explain the impact of proposals on our industry, our business, our customers, and our people.

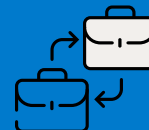
Global minimum tax regime

The Group operates in the UK where new tax legislation to implement a global minimum top-up tax was enacted in July 2023 and became effective from 1 January 2024. This new legislation seeks to establish a 15% global minimum tax rate for multinational enterprises. In accordance with International Accounting Standards 12, the Group has applied a mandatory temporary relief from deferred tax accounting for the impacts of the top-up tax, and instead accounts for it as a current tax when it is incurred. The current tax charge with respect to the top-up tax for the period was £nil. The Group is continuing to monitor the development of Pillar Two rules and guidance from tax authorities.



Transfer pricing

We apply the arm's length principles of transfer pricing to payments between Group companies, ensuring the prices applied in intragroup transactions are representative of the prices that would have been applied in comparable transactions between two independent parties. This practice is in line with our Group transfer pricing standard, and the OECD Transfer Pricing Guidelines which is the agreed international standard and have been adopted consistently across the majority of the countries we operate in.



Financial crime

We take active steps to ensure that our business, people and customers are not victims of financial crime. We do not tolerate our business being misused for bribery and corruption, sanction violations, laundering of criminal proceeds, and the evasion of tax. We work hard to minimise the impact of fraudulent activity on our customers, our communities, our people, and others who rely on us.



Further information

For information about Bupa's operations and financial performance or Bupa's approach to Responsible Business Conduct please refer to www.bupa.com

This document has been published by The British United Provident Association Limited and complies with its duty under Paragraph 16(2) Schedule 19 of the UK Finance Act 2016 to publish a group tax strategy for the year ended 31 December 2025. This document is approved annually by the Bupa Risk Committee and was last approved on 22 July 2025.