



Responsible Supply Chain Statement: Our expectations of suppliers

Working together for a better world

At Bupa, our purpose is to ‘help people live longer, healthier, happier lives and make a better world’. This isn’t just a statement - it’s the foundation of all we do.

In a rapidly changing world, fulfilling our purpose to help people and planet, and making a positive difference has never been more important. This is central to the way we do business, to our Sustainability strategy and to our wider environmental, social and governance (ESG) agenda.

We operate in accordance with the law, our [Bupa Code](#), and [Bupa Values](#) and have policies, processes and controls in place to ensure that our conduct reflects this.

This document sets out the minimum standards of business conduct that we expect from our direct suppliers and that need to be applied through their supply chains. Where relevant, it also sets out activity that we encourage our suppliers to work towards, including with regards to reducing their impact on the planet and contributing to communities.

Together, we can help make a better world.

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Acting in accordance with the law

Bupa expects suppliers to fully comply with all applicable laws and regulations, including but not limited to financial crime, data protection and competition legislation, and ensure their conduct does not cause Bupa to be in breach of applicable laws or regulations.



Respecting labour and human rights

Labour and Human Rights

Bupa expects suppliers to respect all internationally proclaimed human rights, as per the provisions of the United Nations Universal Declaration of Human Rights.

This includes, but is not limited to, specific provisions on:

- Prevention of modern slavery, forced labour, human trafficking and child labour;
- Freedom of association, wages, benefits and working hours; and
- Compliance with the rights and entitlements of indigenous people.

Suppliers must ensure the legal minimum wage is adhered to across the entire workforce and limit working hours according to national or local law.

Suppliers will not require workers, including migrant workers, to pay recruitment fees or other fees for their employment, either directly or through third parties.

Suppliers must report any breach of labour and human rights within their direct operations or supply chain to Bupa immediately. Reporting should include the nature of the breach and the remediation action plans.

Inclusion and Diversity

Bupa expects suppliers to ensure equality of opportunity for all. Suppliers should not tolerate discrimination or harassment in any form, including on the basis of protected characteristics (i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

Health, Wellbeing and Safety

Bupa expects suppliers to:

- Provide a safe and hygienic working environment that is compliant with general health and safety law, as well as industry-specific standards and codes. Necessary training should be provided to employees.
- Mitigate health and safety risks and establish suitable risk management assurance. Evidence of health and safety risk management systems should be available on request.

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Aligning with Bupa's sustainability targets

Bupa has committed to near-term science-based targets (Science Based Target initiative (SBTi) validated) and being a net zero business by 2040 led by a **Sustainability Strategy** that advocates working with our partners to deliver change at pace.

Bupa expects suppliers to:

- Comply with all applicable environmental regulatory requirements.
- Align and work with Bupa to support our ambitions to become a net zero business by 2040 across all emissions scopes (Scope 1-3).
- Use Bupa's ESG digital solutions to provide information on emissions, environmental credentials and management information related to any procured product or service (upon request), to support ESG-related reporting.
- Work towards setting their own net zero commitments including a target net zero year.
- Demonstrate an understanding of environmental and climate risk, impacts and responsibilities associated with the products and services they provide and have in place controls to address any areas of high risk.
- Provide a Carbon Reduction Plan or a Climate Transition Plan in line with climate science, their services and capabilities – SMEs are encouraged to use publicly available resources like the SME Climate Hub and CDP to demonstrate a high-level simple plan on request and can seek support and guidance from Bupa on execution/mitigating circumstances.
- Where possible, offer product and service options that offer reduced environmental impact.
- Learn more about Bupa's Sustainability approach at [Bupa.com](https://www.bupa.com) and our activities and programmes that seek to reduce environmental impact and mitigate environmental risks.

Bupa encourages suppliers to:

- Measure, monitor, and endeavour to make continuous improvements in environmental performance. This includes, but is not limited to, carbon emission accounting in accordance with the Greenhouse Gas Protocol (including material scope 3 categories) and setting near-term 1.5 degree aligned Science-Based targets across all 3 emission scopes.
- Formally commit to setting Science Based Targets and have targets validated by the SBTi, or sign up to another Bupa approved partnership as stated in our supplementary supplier guidance (e.g. Race to Zero).
- Provide an annual Scope 1, 2 and 3 carbon emission report covering at a minimum the most material scope 3 emission categories (at least 66% of suppliers' total scope 3 emissions), preferably independently assured.
- Identify and measure any activities that have resulted in carbon reductions and focus on duplication or expansion.
- Disclose maturity scores via the Carbon Disclosure Project annually.
- Minimise the use of energy, water and raw materials.
- Use renewable electricity or sustainably sourced energy and materials.
- Make practical efforts to eliminate or reduce levels of generated waste and reuse and recycle waste materials in a way that aligns with local regulation.
- Consider the environmental risks, credentials and performance of suppliers within their own supply chain and require them to operate to a minimum set of standards, exceeding them wherever possible.
- Reduce reliance on offsetting in favour of direct decarbonisation activities.



Responsible Business Conduct

Bupa expects suppliers to:

Financial crime

- Implement appropriate measures to prevent fraud, bribery (including facilitation payments, kickbacks and the offering of gifts or entertainment to improperly influence behaviour and business decisions) and other kinds of financial crime.
- Comply with all relevant sanctions regimes, including but not limited to those applicable in the UK, EU, US and UN.
- Have robust policies to manage conflict of interests and the appropriate handling of gifts/entertainment, and a process to notify Bupa of relevant conflicts.

Data

- Have processes and controls in place for secure and appropriate handling of all information, including personal data, within their organisation and across their supply chain.

Operational resilience

- Understand their operational resilience and consider potential supply chain disruption, with adequate, regularly tested business continuity measures to be deployed as required.
- Cooperate with necessary joint Bupa/supplier activities designed to ensure service integrity.

Business ethics

- Conduct themselves to the highest ethical standards.
- Ensure all levels of the supply chain are paid promptly, in line with individual agreements.
- Have processes in place to allow the confidential reporting of concerns, or make relevant staff aware of [Bupa Speak Up](#) which allows for confidential (and anonymous, if preferred) reporting by any party.
- Ensure recruitment, screening, and training practices meet legal, regulatory, and industry standards, with all Bupa-related staff appropriately vetted, qualified, and fit for their roles.
- Maintain and communicate policies and relevant standards across areas such as disciplinary, legal and regulatory compliance, ethics, conflicts of interest, complaints, inclusion, screening, performance, whistleblowing, wellbeing, customer care, security, compliance, professional standards, IP, and business continuity.

Bupa brand

- Comply with Bupa guidelines with regards to the use of Bupa's brand, trademarks or media channels.
- All public statements, including social media posts or use of Bupa branding, must not harm Bupa's reputation and require prior approval from Bupa's external relations team.

Contributing to Communities

In line with its purpose, Bupa is committed to making a positive impact in the communities where it operates.

Bupa is happy to share further information on what it does and where there may be scope to collaborate to help make a better world.

Bupa encourages suppliers to:

- Support and contribute to the local communities in the areas they operate, to help improve social and economic wellbeing.
- Either set up social value programmes or actively take part in existing programmes, to contribute time, resources or donate to benefit society.



Your compliance with this statement

We expect all our suppliers to meet or exceed the requirements outlined in sections 1-4 of this statement. If you are not currently compliant with the expectations, or if you're unable to commit to compliance, you must let us know. We will review the areas where there are gaps and may agree to work with you on defining a plan to resolve any issues. However, if the issue is serious enough or cannot be resolved in a reasonable time frame, we reserve the right to review the terms of any contract or supply arrangement (existing or potential). Actions resulting from this review could include, in accordance with any applicable contractual right, termination.

We reserve the right to review your policies, procedures or any other documentation related to this statement. In some higher risk instances, we may undertake an audit to validate your adherence to our standards and applicable policies. The provisions in this statement are in addition to and not in lieu of any legal agreement or contract.

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's there to ensure people can raise genuine concerns about wrongdoing, misconduct or risk of harm in confidence and anonymously.

We take concerns seriously and the people who raise them can be confident that they'll be heard, protected and supported.

Suppliers without a confidential whistleblowing channel must inform relevant staff about Bupa's Speak Up service for raising concerns.

Visit
bupa.com/speakup
or scan the QR code

