

Bupa's Modern Slavery Act Statement¹

for the financial year ended
31 December 2022



¹This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

This statement applies to the Relevant Entities detailed on page 16.

This statement is also published on the UK online Modern Slavery Statement Registry.

Statement on modern slavery

Our business is founded upon and is centred around supporting the health and wellbeing of our people, our customers, our residents, and the communities in which we live and operate. We are a people-led business and we strive every day to fulfil our purpose: “helping people live longer, healthier, happier lives and making a better world”.

Being an ethical business is fundamental to “making a better world”. It is foundational to our wider environmental, social and governance (ESG) agenda. We are committed to identifying and addressing modern slavery risks across our organisation and supply chain in accordance with the Modern Slavery Act 2015 (“the Act”).

This statement for the financial year ended 31 December 2022 outlines the steps taken by our UK-based businesses falling within scope of the Act to identify and prevent any form of modern slavery occurring within our supply chain or own business.

This statement was approved by the Board of The British United Provident Association Limited on 9 May 2023 and was subsequently approved by the Boards of the Relevant Entities. A full list of the Relevant Entities covered by this statement is provided on [page 16](#).



Signed by Iñaki Ereño, Group Chief Executive Officer, 9 May 2023.





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Organisation structure and supply chains

About Bupa Group

We are an international healthcare company serving over 43 million customers worldwide. With no shareholders, we reinvest profits into providing increased and better healthcare for the benefit of current and future customers.

We directly employ around 82,000² people, principally in the UK, Australia, Spain, Chile, Poland, New Zealand, Hong Kong SAR, Türkiye, Brazil, Mexico, the US, Middle East and Ireland. We also have associate businesses in Saudi Arabia (Bupa

Arabia) and India (Niva Bupa) and an interest in MyClinic in Saudi Arabia. For more information, visit www.Bupa.com.

Bupa in the UK

In the UK, Bupa UK Insurance is a leading health insurer with 3.1m customers across private medical insurance, health trusts, dental and cash plan. Bupa Dental Care is a leading provider of private dentistry, providing dental services through 490 centres across the UK and the Republic of Ireland. Bupa Care Services cares for around 6,600 residents in 121 care

homes and 10 Richmond Villages. Bupa Health Services comprises 52 health clinics and Cromwell Hospital. Bupa Global serves over 460,000 international private medical insurance customers including individuals, small businesses and corporate customers.

Our workforce in the UK comprises 23,723 direct employees and 3,854 contingent workers. 38% work in our care homes, 25% are office based and 29% work within our dental clinics. The remainder work in our health clinics and Cromwell Hospital.

² Based on average number of employees during the year.



Bupa's supply chains

In the UK, Bupa relies on domestic and global supply chains to support our various businesses and associated activities. In 2022, the Relevant Entities in scope of this statement spent £872m with 8,034 direct suppliers, of which 92% are located within the UK and the remaining 8% are dispersed across 44 countries.

The top ten countries by highest procurement spend are detailed in Table 1. The listed countries account for 7,961 suppliers, equivalent to 99% of all direct suppliers to the Relevant Entities.

Our top 5 procurement spend categories are detailed in Table 2.

Table 1: Top 10 countries by procurement spend for the Relevant Entities

Country	Supplier count
United Kingdom	7,437
Ireland	268
Denmark	93
Hong Kong	51
United States of America	50
Netherlands	22
United Arab Emirates	12
Spain	11
Singapore	9
Cyprus	8
Remaining 1% of direct suppliers to the Relevant Entities are located across 35 countries	

Table 2: Top 5 procurement spend categories for the Relevant Entities

Category	Description
Property Services	Includes construction services, fire alarms, water and asbestos testing and other property maintenance services such as painting and decorating, heating and plumbing
Medical	All hospital equipment including ECG machines, mammography machines, MRI and mobile MRI, PPE equipment, gloves, physiotherapy services and primary healthcare partner contracts
Recruitment and Employee Services	Includes contingency worker/Managed Service Provider recruitment agencies, international nurse agencies, all areas of employee benefits and learning and development
Professional Services	Including call centres, language translation services and, tax and actuarial services
IS Business Systems	Information business services and software

Governance

Our Modern Slavery Working Group continued to meet regularly in 2022. The Working Group is comprised of representatives from functions including Procurement, People, Risk, Legal, Sustainability and Internal Communications and is responsible for planning and implementing our modern slavery programme for the year ahead as well as preparing the annual statement for review and approval by the Bupa Enterprise Risk Committee, the Board of the British United Provident Association Limited and the Boards of the Relevant Entities in the UK. The Working Group engages with Bupa Australia, which is also subject to domestic modern slavery legislation, to ensure alignment and share learnings.





Bupa's policies

Our suite of internal Enterprise Policies defines our minimum requirements and expectations to ensure compliance with all applicable laws and regulations as well as effective risk management. They are located on our internal communications platform, Workvivo, and their principles are communicated to our people through employee inductions, online learning and briefings via our internal communications channels. Every Enterprise Policy is subject to regular review as part of a rolling review cycle to ensure they continue to comply with legal and regulatory requirements and align with our strategy. More information about Bupa's risk management activities can be found in our [2022 Annual Report and Accounts](#).

Enterprise-wide policies relevant to modern slavery

- **The Bupa Code** – The high standards of ethical behaviour we expect from our people are outlined in The [Bupa Code](#). Alongside our values, the Code acts as a moral compass for everyone that works at Bupa. It gives us a simple decision-making framework to help us do the right thing by our people, customers, residents and patients. It also displays our commitment to being a responsible business.
- **Enterprise People Policy** – This sets out requirements to mitigate Bupa's people risks, including ensuring lawful practices and employment contracts, and defines key principles including "protection of people". Through our People Policy we promote a workplace environment that is fair, respectful and protective of the rights of all employees.
- **Enterprise Speak Up Policy** – Speak Up is our whistleblowing service and can be used by anyone who has a concern either about Bupa, our suppliers or our partners – this can include individuals and organisations. 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 and supported. Every report is subject to appropriate

action. Alongside our Enterprise Speak Up Policy, the accompanying Speak Up Information and Process Standard explicitly lists modern slavery as a concern that can be raised through Speak Up. More information on Bupa Speak Up is available [here](#).

- **Enterprise Suppliers Policy** – This ensures we have effective processes for the selection, contracting and management of all our suppliers and addresses the risks of inappropriate contracting and supplier failure. It mandates specific requirements including segmentation assessments that take account of modern slavery risks.
- **Enterprise Financial Crime Risk Policy** – We recognise the intrinsic link between modern slavery and financial crime, with modern slavery thriving through corruption and generating proceeds of crime which are laundered through the financial system. Our Enterprise Financial Crime Risk Policy sets out our obligations regarding financial crime risk management, specifically bribery and corruption, money laundering and terrorist financing, fraud, sanctions and failure to prevent the facilitation of tax evasion. More information on our approach to preventing financial crime is available [here](#).

Policies for our UK businesses relevant to modern slavery

In addition to our Enterprise-wide policies, we also have policies that are designed specifically for our UK businesses:

- **Background Screening Policy** – Applies to all UK employees and non-employed workers such as agency workers, contractors and self-employed individuals. It documents our approach to background screening, both pre- and during employment, including mandatory identity verification and right to work checks.
- **Protecting Our People Policy** – Seeks to make everyone aware of their responsibilities to prevent and protect one another from harm, hate or abuse. Modern slavery is expressly referenced and Bupa's approach to tackling modern slavery is detailed. It also signposts help available to our people if they are a victim of, or suspect someone else is a victim of, modern slavery.
- **Contingent Worker Policy** – Details the principles we must apply to ensure the fair, consistent and lawful engagement of contingent workers, including contractors and clinical agency workers, in our UK entities.

Relevant standards for suppliers

- **Responsible Supply Chain Statement** – Sets out our commitments as well as the minimum standards of business conduct we expect from our direct suppliers and those within their supply chains, including complying with all applicable laws and regulations, conducting themselves to the highest ethical standards, abiding by all Bupa policies and respecting all internationally proclaimed human rights, including the prevention of modern slavery, forced labour, human trafficking and child labour. Our Responsible Supply Chain Statement is available [here](#).
- **Bupa Policies Suppliers Handbook** – A reference guide for Bupa's suppliers to ensure a high level understanding of Bupa policies and their key principles. A section is dedicated to the Modern Slavery Act 2015 and useful external resources are signposted for suppliers to learn more. The Bupa Policies Suppliers Handbook is available [here](#).



New in 2022:

- We reviewed and updated The Bupa Code, rolling the refreshed version out across our businesses and integrating it into local policies and codes, training, people processes, including inductions, performance and reward, and internal communications.
- The Enterprise Financial Crime Risk Policy requirements were updated to include the implementation of proportionate control frameworks relating to financial crimes including bribery and money laundering, which are known to be intrinsically linked to modern slavery.
- The Responsible Supply Chain Statement was updated to align with our new Sustainability Strategy.

Due diligence processes

We have various processes and controls in place to identify modern slavery risk in our workforce and supply chain.

Our operations

Within our workforce, we conduct a series of checks as part of our people screening and onboarding processes, including identity verification, seeking confirmation that individuals have the right to work in the UK, criminal record checks and, where appropriate, adverse financial screening checks. Our Employment Compliance team reviews, and takes the necessary steps to resolve, any adverse findings arising from pre-employment screening checks.

In 2022, we updated our Employment Compliance team guide and risk matrix, to make clear that the presence of one or several adverse screening indicators can provide an alert that there is an increased risk of modern slavery requiring further investigation.

Because modern slavery is often not just a social crime but a financial crime too, in 2022, we considered how we may be able to use insights from our payroll system to develop an additional control to mitigate the risk of modern slavery in our workforce. In particular, we considered the risk that if several workers have their wages paid into the same bank account, those workers may not be receiving what they are due. We therefore piloted a new payroll check to identify any instances in which three or more employees shared the same bank account details and lived at the same address. No cases were identified; however, we will continue to perform this control on an annual basis.



New in 2022

- We updated the guidance used by our Employment Compliance team to support their reviews of adverse findings arising from pre-employment screening checks, incorporating modern slavery risk considerations.
- We piloted a new payroll check to identify any instances in which three or more employees shared the same bank account details and lived at the same address.

Our supply chain

To mitigate supply chain risk, any prospective suppliers managed by our Procurement function are subject to a segmentation process that determines their level of risk and associated due diligence requirements. They are required to complete due diligence questions covering specific modern slavery points. These questions seek to affirm that suppliers have whistleblowing policies in place and require their own suppliers to have similar processes and identify whether any modern slavery concerns have been raised. Responses are reviewed by appropriate teams and are investigated and resolved before the supplier is onboarded.

Following formal onboarding, due diligence checks are repeated at regular intervals in accordance with the supplier's risk tiering. An annual assurance review of this activity is conducted to identify and resolve any gaps. We also use a third party risk database to proactively identify and monitor risk, including modern slavery risk, within our supply chain.

We recognise there are many challenges that we, in common with other large organisations, face in full transparency across each tier of our supply chain. At present, only direct suppliers are in scope for these due diligence processes. In 2022, we began scoping project methodology for a "deep dive" into our workwear supply chain, to commence in 2023. The aim of this deep dive is to develop our understanding of the risks, controls and gaps beyond our direct suppliers to inform our modern slavery programme and share learnings with other supply chain categories for Bupa.

Speak Up

We continue to monitor our whistleblowing mechanism, Speak Up, to identify any potential or actual incidents of modern slavery reported internally or by our suppliers and partners. In 2022, no reports were received through Speak Up relating to modern slavery.





Assessing and managing risk

Our operations

As a part of our risk management approach, we continually monitor external developments relevant to modern slavery. This monitoring identified that the wider risk environment in the UK for modern slavery worsened in 2022, impacted by the Ukraine war and subsequent refugee emergency and the ongoing 'Cost of Living' crisis, thus increasing the number of people who are financially vulnerable and susceptible to exploitation. In 2023, to ensure we continue to effectively mitigate modern slavery risk within our business, we intend to update our risk assessment across our UK operations.

Our supply chain

As part of our supplier segmentation process (see '[Due diligence processes](#)'), we assess modern slavery risk for each of our direct suppliers managed by our Procurement function, taking account of their geographical location, with reference to the Global Slavery Index, and sector. From our 2022 spend, we identified 53 suppliers as high risk, representing 0.7% of direct suppliers to the Relevant Entities. These 53 suppliers span various categories, from IT hardware/software and IT resourcing/consultancy to workwear and medical supplies.



New in 2022

- We deployed enhanced scripting and guidance in relation to modern slavery in our auditing activities.

On an annual basis we issue a modern slavery questionnaire to those suppliers considered to be at high risk of modern slavery who have not been assessed in the past 12 months. In 2022, the modern slavery questionnaire was issued to 42 of the 53 identified high risk suppliers; the remaining 11 high risk suppliers had either already been subject to a form of additional due diligence or were awaiting set up on the Procurement platform that we use to issue the questionnaire. The questionnaire encompasses a series of questions that probe and seek to verify that their practices to identify and prevent modern slavery are aligned with our expectations.

In addition, modern slavery risk is considered in our wider annual audit programme. In 2022, we deployed revised audit scripting and guidance relating to modern slavery and in 2023, all audits will include modern slavery questions.

Audit and modern slavery questionnaire responses are reviewed and subject to further investigations as deemed appropriate, such as requests for supporting materials or specific evidence. These are requested where greater clarity on the supplier's modern slavery policies is required. Should any concerns be identified in the course of audits, we would engage with the supplier in question to assess and fully understand any issues. Depending on the nature of the issue, we would engage collaboratively with the supplier on a remediation plan. Only after we have engaged with the supplier and they are unwilling to make appropriate remediation, would contract termination be considered.

Our Standard Terms and Conditions of Purchase require suppliers to comply with Bupa's policies relating to modern slavery and to notify us immediately of any actual or suspected breach of these or the Modern Slavery Act 2015 in order for us to determine an appropriate course of action.

Training and awareness

Developing targeted training and raising awareness across our UK based workforce of modern slavery, how to recognise it and what to do should our people have concerns, were key areas of activity in 2022.

We focused our training activity on our UK based Procurement function and Employment Compliance team, which is responsible for undertaking pre-employment screening for our people.

For our UK Procurement function, we developed and delivered modern slavery training covering the potential indicators of modern slavery and risk factors, Procurement's approach to risk management and identification, the processes that must be followed, the responsibility of all Procurement personnel to remain vigilant to signs of modern slavery in our supply chain and how to seek further information. Eighty people, representing 96% of our UK Procurement function, completed the training, which we now plan to provide annually to maintain knowledge and capture new starters.

For our Employment Compliance team, training was focused on ensuring understanding of the updated guidance (see '[Due diligence processes](#)') that supports reviews of adverse screening results, making clear that the presence of one or several adverse screening indicators can provide an alert that there is an increased risk of modern slavery requiring further investigation.

In addition, we updated our mandatory risk management training for UK based people managers, signposting our Protecting Our People Policy, which explicitly covers modern slavery (see '[Bupa's Policies](#)').

We also continued to provide Safeguarding training, which includes modern slavery content, on a business line, risk assessed basis.



To raise awareness of modern slavery and relevant company policies, procedures and controls, we launched an internal communications campaign across all our UK businesses to coincide with Anti-Slavery Day on 18th October 2022. The campaign included articles and videos on our intranet, presentations to people managers and leaders, as well as articles in e-bulletins and newsletters. We issued a survey to our people seeking feedback, which we will use to inform and enhance our internal communications campaign in 2023.

In 2022, we also completed the rollout of our new internal communications platform, Workvivo, across all Bupa operations in the UK. This platform encourages and facilitates our people to have a voice, share their perspectives and concerns and engage with communications content. Workvivo was the most popular channel for our modern slavery awareness raising campaign, being the platform through which most of our people saw or heard about the campaign, according to our survey.

We will continue to develop our modern slavery training and awareness programme in 2023.



New in 2022

- We developed and delivered modern slavery training to 96% of our UK Procurement function.
- We provided training to the Employment Compliance team relating to the guidance that supports reviews of adverse screening results.
- We updated our mandatory risk management training for UK-based people managers, signposting to the Protecting Our People Policy which includes modern slavery guidance.
- We launched an internal communications campaign to coincide with Anti-Slavery Day.



Measuring effectiveness

Throughout 2022, we took active steps to develop internal tools and measurements to assess our modern slavery controls and initiatives. Our initial focus has been on looking at data from our controls to identify potential or actual cases of modern slavery in our business and supply chain and using insights from this data to inform our future modern slavery programme. We recognise that we have more work to do in this area in 2023, including to provide year-on-year performance data to report on progress over time.

Priorities for 2023

- Refresh our modern slavery risk assessment to enhance our understanding of risk areas within our UK businesses and inform future action planning.
- Review and refine our existing approach to supplier due diligence, which in turn will positively impact our modern slavery due diligence processes.
- Continue to deepen our understanding of our supply chain beyond direct tier 1 suppliers, including completing a deep dive risk assessment of our workwear supply chain.
- Build on work delivered in 2022 to develop measures to gauge the effectiveness of our processes, policies and controls.
- Explore opportunities to collaborate with appropriate non-governmental organisations (NGOs), charities and business groups.
- Continue to monitor modern slavery legislative developments and prepare for anticipated amendments to the UK Modern Slavery Act 2015.

Defined terms

In this statement:

Bupa means The British United Provident Association Limited

Relevant Entities means the companies which fall within scope of section 54 of the Modern Slavery Act 2015 and which are named below

Bupa Group and **Group** refer to Bupa and its wholly owned and controlled companies

We, us and our are references to the Relevant Entities

Relevant Entities required to make a statement pursuant to section 54 of the Modern Slavery Act 2015:

- Bupa Care Homes (ANS) Limited
- Bupa Care Homes (BNH) Limited
- Bupa Care Homes (CFC Homes) Limited
- Bupa Finance plc
- Bupa Insurance Limited
- Bupa Insurance Services Limited
- Bupa Investments Overseas Limited
- Bupa Occupational Health Limited
- Medical Services International Limited
- Oasis Dental Care (Central) Limited
- Oasis Dental Care Limited
- Richmond Villages Operations Limited
- The British United Provident Association Limited
- Xeon Smiles UK Limited