



# Greenhouse Gas Emissions Report

Scope 1, 2 and  
selected scope 3  
categories

Year ended 31 December 2024





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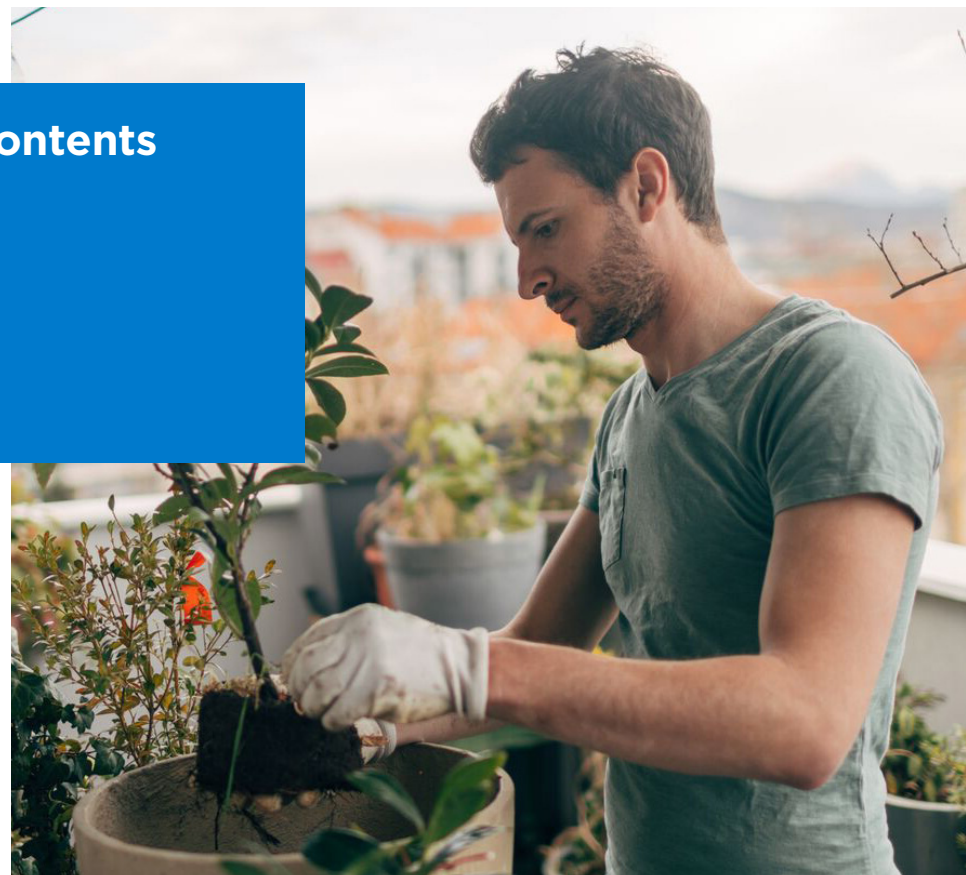
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## Group CEO statement

**Bupa has been looking after people's health for over 75 years. We now serve over 60 million customers globally and almost 7.5 million people using Blua, our digital health solution. Bupa's purpose is helping people live longer, healthier, happier lives and making a better world. This purpose is at the heart of everything we do and crucial to why we place such importance on reducing our impact on the environment, the delivery of more sustainable healthcare, and supporting the restoration of the health of our planet.**



**Iñaki Ereño, Group CEO**

In 2022, our science-based targets (SBTs) for all three Greenhouse Gas (GHG) emission scopes to keep global warming to no more than 1.5°C were validated by the Science Based Targets Initiative (SBTi).

Building on our strong progress to date, in 2024, we had another good year in decarbonising our own operations, reducing scope 1 and 2 (market-based) GHG emissions by 20% compared with 2023, and 58% compared with our 2019 baseline. This performance reflects our commitment to achieving our 2025 scope 1 and 2 (market-based) GHG emissions reduction target of 40% and our 2030 science-based reduction target of 46.2% compared with 2019. We anticipate upward pressure from business growth out to 2030, and to mitigate this, we continue to explore further cost-effective decarbonisation opportunities.

Our total selected scope 3 GHG emissions (categories 3 & 6)<sup>1</sup> increased 11% compared with 2023 reflecting higher business travel emissions as a result of the impact from the consolidation of Niva Bupa into the Group's GHG emissions footprint from January 2024 together with higher air travel across the Group. Compared with 2019, total selected scope 3 GHG emissions were broadly stable.

In 2024, we continued to make good progress in securing renewable energy for our global operations. In July 2024, we signed a virtual power purchase agreement (vPPA) in Poland, with R-Power, an

independent power producer and renewables developer. From 2025, this agreement will secure 100% renewable electricity for our business operations in Poland. In June 2025, the photovoltaic farms developed by R-Power commenced production.

We also remained focused on reducing our scope 3 GHG emissions. Across our business, we integrate sustainable practices into how we deliver healthcare, reducing GHG emissions associated with delivering quality care and reducing waste. As we pursue our ambitious growth plans, we continue to work across the business to reduce consumption, improve efficiency, innovate, and play our part in reducing the severity of the climate crisis in support of our net zero ambition, all whilst continuing to ensure that we deliver the best care for our customers.

Looking forward, we recognise there is more we can do. Building on the progress made since 2021, we have refreshed and uplifted our Better World sustainability strategy which we launched in the first quarter of this year. As part of this, we continue to pursue emission reductions in our direct operations and through partnerships in our supply chain, and advocate for the same across the healthcare sector.

The Board of Directors of The British United Provident Association Limited ("Bupa") has reviewed and approved the Group's Greenhouse Gas Emissions Report for the year-ended 31 December 2024.

1. Total selected scope 3 GHG emissions: (category 3) fuel- and energy-related activities, and (category 6) business travel.

## Bupa's sustainability strategy and climate targets

### Bupa's sustainability strategy

Bupa's purpose is more important than ever and our new '3x100 Strategy' sets out some big ambitions for us to shape the future of healthcare and help millions more people access it. We recognise that protecting people's health in a changing climate is a core part of that healthcare transformation. In early 2025, we launched our new Better World sustainability strategy which recognises the deep connection between human health and the health of the planet. Our refreshed and uplifted Better World commitments focus on how we can create healthier, more inclusive communities, across three pillars - people, communities and planet.

Our sustainability strategy, together with our wider 3x100 strategic ambitions, aims to:

- expand access to affordable, preventative healthcare and support people to adapt and build resilience to climate-related health challenges;
- build healthier, more inclusive communities – for example, through our global Healthy Cities programme, which helps create urban environments that are better for both physical and mental wellbeing; and
- bring life back to our planet in the decades to come by investing in projects to restore and regenerate nature across our markets.

We remain committed to being a net zero business by 2040 through working across the healthcare sector, suppliers and partners to decarbonise patient care, reduce waste and increase reuse of materials. We also remain committed to reducing our GHG emissions in line with our SBTs to help drive transformational change in the next decade.

Further details on our broader sustainability strategy can be found on Bupa.com [here](#).

### Climate Targets

Our science-based target for scope 1 and 2 (market-based) GHG emissions, is that by the end of 2030 we will have reduced absolute emissions by 46.2% from our 2019 baseline. We also have an interim target to reduce our scope 1 and 2 (market-based) GHG emissions by 40% by the end of 2025.

In relation to scope 3, in this report, we disclose only:

- fuel-and energy-related (category 3) GHG emissions as these are directly associated with our energy consumption from scope 1 and 2; and
- business travel (category 6) GHG emissions as this data is readily available to allow for regular reporting and tracking.

We aim to disclose other more material scope 3 categories in due course.

More information about these, and Bupa's other decarbonisation targets, including our scope 3 SBTs is available [here](#).



# 2025

Reduce our greenhouse gas emissions across our global operations by at least

# 40%

(Scopes 1 and 2)



# 2030

Reduce our greenhouse gas emissions by at least

# 46.2%

**with the ambition to become a net zero business across our direct operations**

(Scopes 1 and 2)



### Reporting Criteria

Our Reporting Criteria (Issue 4), effective from the reporting period beginning 1 January 2024, can be found [here](#) and sets out the basis of preparation of our scope 1 and 2 and selected scope 3 (category 3: Fuel- and energy-related activities and category 6: Business travel) GHG emissions.

We categorise our GHG emissions as scope 1, 2 or 3 as referred to in the World Business Council for Sustainable Development (WBCSD) and World Resources Institute (WRI) GHG Protocol in carbon dioxide equivalent (CO<sub>2</sub>e). We have adopted 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.

### Scope 2 Dual-reporting approach

In accordance with the GHG Protocol's guidance on dual-reporting, Bupa reports scope 2 GHG emissions using both the location- and market-based approach.

- The location-based method reflects the GHG emissions associated with local, subnational<sup>2</sup>, or national electricity grids in which the reporting company operates. This helps demonstrate the average GHG intensity of the electricity grids where the operations occur, as well as the impacts of energy conservation within the organisation.
- The market-based method reflects the GHG emissions associated with the contractual choices of the reporting company on its energy supply<sup>3</sup>.

### Data Updates

Our 2024 Group and UK operations consumption and GHG emissions set out in this report have been updated following the publication of our 2024 Annual Report. This reflects, but is not limited to, an update to emission factors together with actual energy consumption where this is now available that was in part previously estimated.

The table on the following page sets out the changes to our GHG emissions footprint since the publication of the Group's 2024 Annual Report.

2. We use subnational (territory) grid emission factors for Australia to calculate electricity-related emissions.

3. Scope 2 (market-based) GHG emissions reflects the associated contractual choices of the reporting company on its energy supply. Contractual choices typically represent the recognition of renewable electricity consumption through the use of power purchase agreements and renewable energy certificates.

## Basis of preparation



## Greenhouse Gas Emissions Report

	Group			UK operations		
	2024 Annual Report	Change - Increase / (Decrease)	2024 GHG Emissions Report	2024 Annual Report	Change - Increase / (Decrease)	2024 GHG Emissions Report
GHG Emissions	tCO <sub>2</sub> e	tCO <sub>2</sub> e	tCO <sub>2</sub> e	tCO <sub>2</sub> e	tCO <sub>2</sub> e	tCO <sub>2</sub> e
<b>Scope 1</b>	38,783	410	39,193	14,621	36	14,657
<b>Scope 2</b>						
Market-based	12,206	154	12,360	787	15	802
Location-based	95,535	(210)	95,325	11,430	96	11,526
<b>Total scope 1 &amp; 2 (market-based)</b>	<b>50,989</b>	<b>564</b>	<b>51,553</b>	<b>15,408</b>	<b>51</b>	<b>15,459</b>
<b>Total scope 1 &amp; 2 (location-based)</b>	<b>134,318</b>	<b>200</b>	<b>134,518</b>	<b>26,051</b>	<b>132</b>	<b>26,183</b>
<b>Scope 3</b>						
Fuel- and energy-related activities (category 3)	27,048	(147)	26,901	6,153	39	6,192
Business travel (category 6)	20,368	175	20,543	5,800	(82)	5,718
<b>Total selected scope 3 (categories 3 &amp; 6)</b>	<b>47,416</b>	<b>28</b>	<b>47,444</b>	<b>11,953</b>	<b>(43)</b>	<b>11,910</b>
<b>Total reported market-based GHG emissions</b>	<b>98,405</b>	<b>592</b>	<b>98,997</b>	<b>27,361</b>	<b>8</b>	<b>27,369</b>
<b>Total reported location-based GHG emissions</b>	<b>181,734</b>	<b>228</b>	<b>181,962</b>	<b>38,004</b>	<b>89</b>	<b>38,093</b>

### External limited assurance

#### 2021 - 2024 GHG emissions

PricewaterhouseCoopers LLP (PwC) have performed limited assurance over the Group's scope 1 and 2 (location- and market-based), and total selected scope 3 (categories 3 and 6) GHG emissions from reporting year 2021 onwards. From 2022 onwards, PwC extended their limited assurance scope to cover UK operations.

The 2024 limited assurance statement is included at the end of this report.

#### 2020 and 2019 GHG emissions

For years 2020 and 2019, The Carbon Trust performed limited assurance over the Group's scope 1 and 2 (location- and market-based), and selected scope 3 (category 3 - transmission and distribution (T&D) losses only, and category 6 - business travel) GHG emissions.

In accordance with our scope 1, 2 and selected scope 3 (categories 3 and 6) GHG emissions recalculation policy, 2020 and 2019 GHG emissions were

recalculated since we obtained limited assurance from The Carbon Trust, mainly to reflect a number of divestments made in our aged care businesses and acquisitions in our Polish provision business. Our 2020 and 2019 recalculated GHG emissions footprint was disclosed in our 2021 GHG emissions report and remains unchanged for this report.

### Annual Recalculation Assessment

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 (and other re-baseline/recalculation trigger events) on the Group's footprint is below the materiality thresholds set out in our GHG emissions recalculation policy<sup>4</sup>.

4. The recalculation assessment is based on:

(1) Group total scope 1 and 2 (market-based) GHG emissions; and

(2) Group total scope 1 and 2 (location-based), and selected scope 3 (categories 3 and 6) GHG emissions.

## 2024 Group overview

### Group energy consumption

In 2024, the Group's total energy consumption<sup>5</sup> was 468,560,920 kWh. Our energy consumption is mainly attributable to electricity and natural gas, contributing 56% and 31% respectively.

The Group's energy consumption is mainly attributable to our aged care businesses<sup>6</sup> contributing c.50%. In addition, our 25 hospitals that we operate across Spain, Poland, Chile, Mexico, and the UK account for c.20% of the Group's energy consumption.

### Group GHG emissions

#### Scope 1, 2 and total selected scope 3 GHG emissions

Our 2024 Group scope 1 and 2 (market-based) and selected scope 3 GHG emissions were 98,997 tCO<sub>2</sub>e.

#### Scope 1 and 2 (market-based) GHG emissions

Our total scope 1 and 2 (market-based) GHG emissions of 51,553 tCO<sub>2</sub>e are mainly attributable to our Europe and Latin America Market Unit (ELA), accounting for 51% of our total scope 1 and 2 GHG emissions. LUXMED, where we operate an extensive healthcare provision business including 16 hospitals, represents over 45% of ELA's total scope 1 and 2 (market-based) GHG emissions.

From a line of business perspective, our aged care and health provision<sup>7</sup> businesses contribute c.49% and c.48% respectively to our total scope 1 and 2 (market-based) GHG emissions.

### Scope 1 GHG emissions

These direct emissions occur from sources that are owned or controlled by the Group (e.g. gas boilers), and account for 39,193 tCO<sub>2</sub>e. Natural gas contributes 84% of the Group's total scope 1 energy consumption.

Our emissions from stationary and mobile<sup>8</sup> energy sources including, but not limited to natural gas and LPG, contributed 32,080 tCO<sub>2</sub>e or 82% of the Group's total scope 1 GHG emissions. Our process emissions reflect the release of anaesthetic gases from medical procedures and refrigerant losses, and accounted for 7,113 tCO<sub>2</sub>e, representing 18% of the Group's total scope 1 GHG emissions.

### Scope 2 GHG emissions

These indirect emissions occur from the generation of purchased electricity together with district heating and cooling consumed by the Group.

Electricity consumption accounts for 91% of total scope 2 energy consumption. District heating and cooling represents 9% of the Group's scope 2 energy consumption and is only used in LUXMED.

Our scope 2 (market-based) GHG emissions of 12,360 tCO<sub>2</sub>e reflects purchased electricity (56%) and district heating (43%). Cooling-related emissions represent 1% of the Group's scope 2 GHG emissions. Scope 2 (location-based) GHG emissions account for 95,325 tCO<sub>2</sub>e.

### Total selected scope 3 GHG emissions

These indirect emissions occur from fuel- and energy-related activities (category 3) and business travel (category 6)<sup>10</sup>, but whose source is not owned or controlled by the Group. These scope 3 emissions account for 47,444 tCO<sub>2</sub>e.

Our total selected scope 3 GHG emissions are mainly attributable to fuel- and energy-related activities contributing 26,901 tCO<sub>2</sub>e or 57% of our total categories 3 and 6 GHG emissions.

5. Total energy usage includes scope 1 and 2 consumption and consumption associated with car hire and private cars used for business purposes (scope 3, category 6).

6. We provide aged care services in the UK, Spain, Australia and New Zealand. Our aged care portfolio comprises care homes, retirement villages, day centres and homecare.

7. Our health provision business comprises health facilities and clinics, hospitals, dental centres and optical services globally.

8. Mobile energy sources includes combustion of fuels in both company-owned and lease-controlled vehicles.

9. District heating involves generating heat in a centralised location and then distributing it to residences, businesses and industry in a local area.

10. 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).



## 2024 Group performance

### Performance vs 2023

#### Scope 1 and 2 (market-based) GHG emissions

In 2024, the Group's scope 1 and 2 (market-based) GHG emissions of 51,553 tCO<sub>2</sub>e decreased by 13,164 tCO<sub>2</sub>e or 20%, compared with 2023 (2023: 64,717 tCO<sub>2</sub>e).

Scope 1 emissions were down 6,299 tCO<sub>2</sub>e or 14% compared with 2023. Refrigerant losses were lower by 3,426 tCO<sub>2</sub>e mainly as a result of the replacement of air conditioning equipment in Bupa Chile and our aged care business in Australia. In addition, we reduced energy-related emissions by 2,367 tCO<sub>2</sub>e. This is mainly as a result of lower natural gas consumption partly reflecting the benefit of electrification of kitchen and laundry facilities in a number of our UK care homes and retirement villages, the installation of new air handling units at the Cromwell hospital in the UK and energy efficiency initiatives in Sanitas Mayores, our aged care business in Spain. The divestment of a number of care homes as well as our Spanish public private hospital partnership contract that came to the end of its term in 2024 also contributed to the reduction. We decreased anaesthetic gas emissions year-on-year by 506 tCO<sub>2</sub>e which includes the benefit from the implementation of a new anaesthetic gas distribution system and a reduction in the use of nitrous oxide in Bupa Chile.

Scope 2 (market-based) emissions were lower year-on-year by 6,865 tCO<sub>2</sub>e or 36%. This is as a result of switching additional sites onto renewable electricity in Poland and Chile.

#### Total selected scope 3 GHG emissions

Our total selected scope 3 GHG emissions of 47,444 tCO<sub>2</sub>e increased by 4,890 tCO<sub>2</sub>e or 11% compared with 2023. Business travel (category 6) emissions were higher by 4,758 tCO<sub>2</sub>e compared with the prior year as a result of the consolidation of Niva Bupa into the Group's footprint from January 2024 together with higher air travel across the Group. Our fuel- and energy-related activities (category 3) emissions increased marginally year-on-year by 132 tCO<sub>2</sub>e.

### Performance vs 2019 Baseline

#### Scope 1 and 2 (market-based) GHG emissions

Our scope 1 and 2 (market-based) GHG emissions were down 69,952 tCO<sub>2</sub>e or 58% compared with 2019, our baseline year. This performance reflects our focus on decarbonising our own operations to achieve our interim GHG emissions reduction target of 40% by the end of 2025. We anticipate upward pressure from business growth as we progress our big ambitions as part of our 3x100 strategy, and to mitigate this, we continue to explore further cost-effective decarbonisation opportunities.

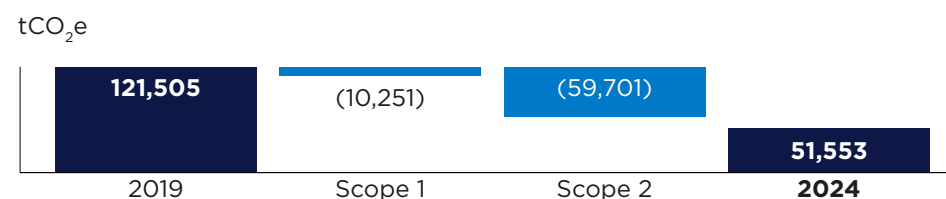
Scope 1 emissions were down 10,251 tCO<sub>2</sub>e or 21% compared with 2019. Energy-related emissions were down 9,480 tCO<sub>2</sub>e mainly due to lower natural gas consumption as a result of a number of decarbonisation initiatives across the Group including the implementation of building management systems, 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. In addition, energy-related emissions were lower reflecting a number of care home divestments as well as our Spanish public private hospital partnership contract that came to the end of its term in 2024. Anaesthetic and refrigerant loss emissions were down 771 tCO<sub>2</sub>e compared with 2019.

Scope 2 (market-based) emissions have reduced 59,701 tCO<sub>2</sub>e or 83% compared with 2019 through increasing the proportion of electricity sourced from renewables mainly in Australia, New Zealand, Hong Kong, Chile and Poland.

#### Total selected scope 3 GHG emissions

Our total selected scope 3 GHG emissions of 47,444 tCO<sub>2</sub>e were broadly stable to 2019. Business travel emissions increased 2,114 tCO<sub>2</sub>e or 11% reflecting the consolidation of Niva Bupa. When excluding Niva Bupa, business travel emissions remained marginally below 2019 levels. Fuel- and energy-related emissions of 26,901 tCO<sub>2</sub>e were down 2,038 tCO<sub>2</sub>e or 7% compared with 2019 mainly due to a reduction in emission factors relating to the transmission and distribution of electricity.

#### 2019 to 2024 scope 1 and 2 (market-based) GHG emissions walk





### Intensity metric performance vs 2023

#### Energy intensity metrics

The Group's energy intensity (kWh per customer) improved by 42% compared with 2023 mainly reflecting year-on-year customer growth together with a reduction in the Group's energy usage of 2% (12,013,156 kWh). The Group's energy usage decreased compared with the prior year driven by lower natural gas consumption. Customers grew year-on-year across our insurance business with a key driver being the consolidation of Niva Bupa from January 2024. Provision customers increased 12% compared with 2023, whilst occupancy rates continued to increase in aged care.

#### Scope 1 and 2 (market-based) GHG emissions intensity metrics

We saw a year-on-year improvement across our three scope 1 and 2 (market-based) GHG emission intensity metrics. This performance is driven by the 20% reduction in the Group's scope 1 and 2 (market-based) GHG emissions, together with increased revenues, higher number of customers and an increase in the average number of employees compared with 2023.

#### tCO<sub>2</sub>e per £m revenue

2024: 3.05, (29%) improvement vs 2023

Group revenue increased 12% (at actual exchange rates) compared with the prior year driven by customer growth together with pricing changes. In addition, revenue grew as a result of the consolidation of Niva Bupa from 1 January 2024<sup>11</sup> and the return of COVID-19 claims savings to customers in Australia Health insurance<sup>12</sup>.

#### tCO<sub>2</sub>e per 000's customers

2024: 0.92, (52%) improvement vs 2023

Customers increased year-on-year for the aforementioned reasons.

#### tCO<sub>2</sub>e per average employee

2024: 0.51, (31%) improvement vs 2023

Average number of employees increased by 15% compared with 2023 mainly due to the consolidation of Niva Bupa<sup>13</sup>.



11. At full year 2024, Niva Bupa contributed £461m in revenues.

12. The 2023 comparative year was significantly impacted by the return of COVID-19 claims savings.

13. 2024 includes 8,326 employees in Niva Bupa.

### Renewable electricity<sup>14</sup>

The proportion of the Group's renewable electricity consumption in 2024 was 94%, an increase of 3 percentage points on 2023 (2023: 91%). The proportion of renewable electricity increased compared with 2023 mainly due to LUXMED, where we secured guarantees of origin under the vPPA agreement that we signed in July 2024. In 2024, LUXMED operated on 87% renewables, an increase of 51 percentage points compared with 2019.

We have made significant progress in the use of renewable electricity, increasing the proportion of renewable electricity consumption across the Group by 40 percentage points compared with 2019 (2019: 54%). This has been achieved by entering into energy supplier contracts, power purchase agreements, and by purchasing renewable energy certificates.

Key highlights include:

- In February 2022, we implemented a 5-year power purchase agreement to secure renewable electricity to our care homes and offices in Australia. From January 2023, our APAC Market Unit covering Australia, New Zealand and Hong Kong secured 100% renewable electricity;
- In July 2024, we signed a 10-year vPPA agreement with R-Power in Poland that will enable LUXMED to operate on 100% renewables from 2025; and
- From January 2024, Niva Bupa secured 100% renewable electricity through purchasing of international renewable electricity certificates.

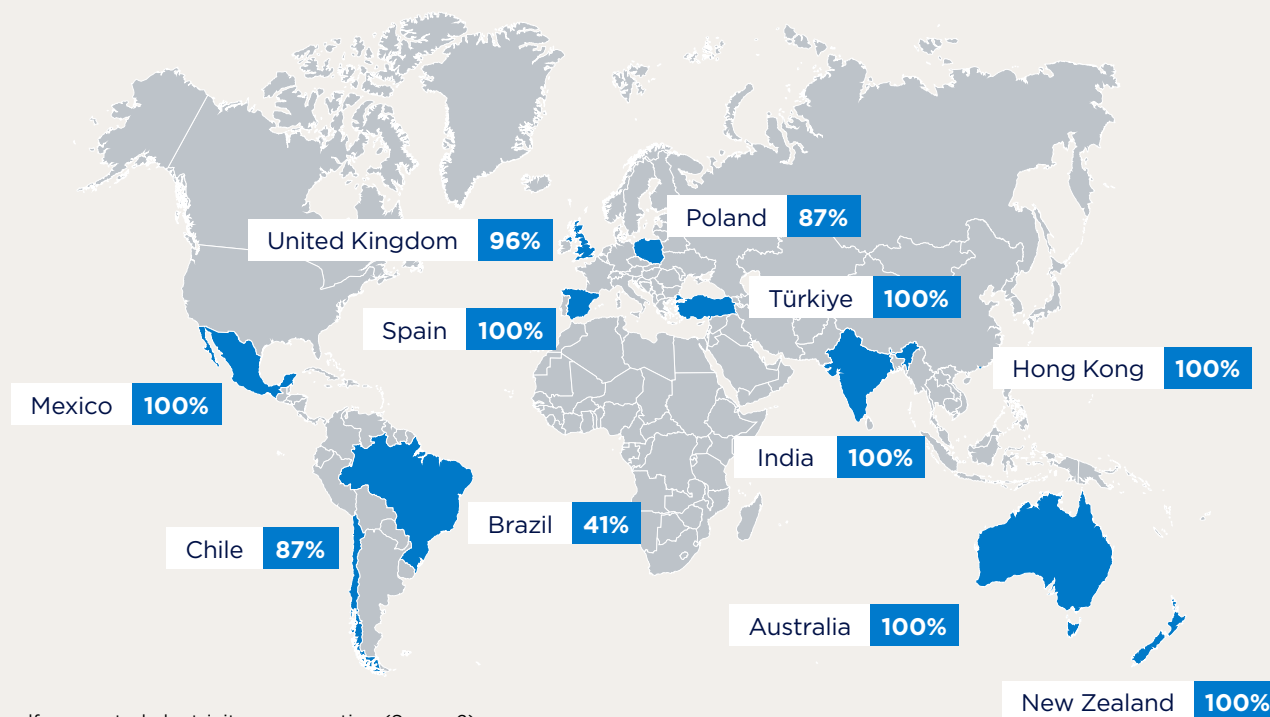
We also continued to increase the use of renewables in other markets, most notably in Chile, where we secured 87% of 2024 electricity consumption from green-certified sources.

### Renewable electricity

# 94%

2023:  
+3 percentage points (91%)

2019:  
+40 percentage points (54%)



14. Proportion of renewable electricity consumption includes purchased- and self-generated electricity consumption (Scope 2).



## Greenhouse Gas Emissions Report

Group performance					Increase/(Decrease)	
	Unit	2024	2023	2019	% change vs. 2023	% change vs. 2019
<b>Total energy usage</b> <sup>15</sup>	kWh	<b>468,560,920</b>	<b>480,574,076</b>	<b>508,743,037</b>	<b>(2%)</b>	<b>(8%)</b>
<b>GHG Emissions</b>						
<b>Scope 1</b> <sup>16,17,18</sup>	tCO <sub>2</sub> e	<b>39,193</b>	<b>45,492</b>	<b>49,444</b>	<b>(14%)</b>	<b>(21%)</b>
<b>Scope 2</b>						
Market-based <sup>16,17,18</sup>	tCO <sub>2</sub> e	12,360	19,225	72,061	(36%)	(83%)
Location-based <sup>16,17,18</sup>	tCO <sub>2</sub> e	95,325	96,028	108,541	(1%)	(12%)
<b>Total scope 1 &amp; 2 (market-based)</b> <sup>16,17,18</sup>	<b>tCO<sub>2</sub>e</b>	<b>51,553</b>	<b>64,717</b>	<b>121,505</b>	<b>(20%)</b>	<b>(58%)</b>
<b>Total scope 1 &amp; 2 (location-based)</b> <sup>16,17,18</sup>	<b>tCO<sub>2</sub>e</b>	<b>134,518</b>	<b>141,520</b>	<b>157,985</b>	<b>(5%)</b>	<b>(15%)</b>
<b>Scope 3</b>						
Fuel- and energy-related activities (category 3)	tCO <sub>2</sub> e	26,901	26,769	28,939	0%	(7%)
Business travel (category 6)	tCO <sub>2</sub> e	20,543	15,785	18,429	30%	11%
<b>Total selected scope 3 (categories 3 &amp; 6)</b> <sup>16,17,18</sup>	<b>tCO<sub>2</sub>e</b>	<b>47,444</b>	<b>42,554</b>	<b>47,368</b>	<b>11%</b>	<b>0%</b>
<b>Total reported market-based GHG emissions</b> <sup>16,17,18</sup>	<b>tCO<sub>2</sub>e</b>	<b>98,997</b>	<b>107,271</b>	<b>168,873</b>	<b>(8%)</b>	<b>(41%)</b>
<b>Total reported location-based GHG emissions</b> <sup>16,17,18</sup>	<b>tCO<sub>2</sub>e</b>	<b>181,962</b>	<b>184,074</b>	<b>205,353</b>	<b>(1%)</b>	<b>(11%)</b>
% of renewable electricity <sup>19</sup>	%	94%	91%	54%	3 ppt	40 ppt
Energy intensity	kWh per customer	8.35	14.34	18.90	(42%)	(56%)
<b>Scope 1 &amp; 2 (market-based) GHG emissions intensity metrics</b> <sup>20</sup>						
	tCO <sub>2</sub> e / £m revenue	3.05	4.28	9.87	(29%)	(69%)
	tCO <sub>2</sub> e / 000's customers	0.92	1.93	4.51	(52%)	(80%)
	tCO <sub>2</sub> e / average employees	0.51	0.74	1.56	(31%)	(67%)
<b>Scope 1 &amp; 2 (location-based) GHG emissions intensity metrics</b> <sup>20</sup>						
	tCO <sub>2</sub> e / £m revenue	7.95	9.36	12.83	(15%)	(38%)
	tCO <sub>2</sub> e / 000's customers	2.40	4.22	5.87	(43%)	(59%)
	tCO <sub>2</sub> e / average employees	1.34	1.62	2.03	(17%)	(34%)

15. Total energy usage includes scope 1 and 2 consumption and consumption associated with car hire and private cars used for business purposes (scope 3, category 6).

16. The 2024 data were subject to external independent limited assurance by PricewaterhouseCoopers LLP (PwC). For the results of the assurance, see PwC's assurance report on page 14 to 17 of this report and Bupa's Reporting Criteria 2024 at [www.bupa.com/sustainability/sustainability-documents](http://www.bupa.com/sustainability/sustainability-documents).

17. The 2023 data were subject to external independent limited assurance by PricewaterhouseCoopers LLP (PwC). For the results of the assurance, see PwC's assurance report on page 13 to 16 of the Greenhouse Gas Emissions Report 2023 and Bupa's Reporting Criteria 2023 at [www.bupa.com/sustainability/sustainability-documents](http://www.bupa.com/sustainability/sustainability-documents).

18. 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) GHG emissions. Data has been updated since we obtained external assurance mainly to reflect a number of divestments and acquisitions.

19. % of renewable electricity covers purchased and self-generated electricity consumption (scope 2).

20. As reported in the Group's annual report: Group revenue (2024: financial statements: Note 2), customer numbers (excluding our associate businesses) and total average employees (financial statements: Note 2.3.1).

## 2024 UK operations performance

Our Streamlined Energy and Carbon Reporting (SECR) GHG emissions disclosure for our UK operations was estimated at the time of the Group's 2024 Annual Report, and this report reflects our final position.

### UK operations energy consumption

In 2024, total energy consumption<sup>21</sup> in the UK was 136,809,126 kWh, down 6% compared with 2023, with over 70% of our energy consumption consumed across our 116 care homes and 10 retirement villages<sup>22</sup>.

### UK operations GHG emissions

In 2024, our UK operations scope 1 and 2 (market-based) and total selected scope 3 GHG emissions were 27,369 tCO<sub>2</sub>e.

### Performance vs 2023

#### Scope 1 and 2 (market-based) GHG emissions

In 2024, UK operations scope 1 and 2 (market-based) GHG emissions of 15,459 tCO<sub>2</sub>e decreased by 1,465 tCO<sub>2</sub>e or 9%, compared with 2023 (2023: 16,924 tCO<sub>2</sub>e).

Scope 1 emissions of 14,657 tCO<sub>2</sub>e decreased by 1,771 tCO<sub>2</sub>e or 11% compared with 2023 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 with works completing in December 2024, and the replacement of air handling units at the Cromwell hospital in June 2023.

Scope 2 (market-based) emissions of 802 tCO<sub>2</sub>e increased year-on-year by 306 tCO<sub>2</sub>e or 62% 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 GHG emissions

Our total selected scope 3 GHG emissions decreased by 367 tCO<sub>2</sub>e or 3% to 11,910 tCO<sub>2</sub>e (2023: 12,277 tCO<sub>2</sub>e). Fuel- and energy-related emissions of 6,192 tCO<sub>2</sub>e were down 202 tCO<sub>2</sub>e or 3% while business travel emissions were marginally lower by 165 tCO<sub>2</sub>e or 3% compared with 2023 at 5,718 tCO<sub>2</sub>e.



21. Total energy usage includes scope 1 and 2 consumption and consumption associated with car hire and private cars used for business purposes (scope 3, category 6).

22. Number of care homes and retirement villages as at 31 December 2024.



## Greenhouse Gas Emissions Report

UK operations performance					Increase/(Decrease)	
	Unit	2024	2023	2019	% change vs. 2023	% change vs. 2019
<b>Total energy usage</b> <sup>23</sup>	kWh	136,809,126	145,122,725	163,830,698	(6%)	(16%)
<b>GHG Emissions</b>						
<b>Scope 1</b> <sup>24,25</sup>	tCO <sub>2</sub> e	14,657	16,428	20,408	(11%)	(28%)
<b>Scope 2</b>						
Market-based <sup>24,25</sup>	tCO <sub>2</sub> e	802	496	1,200	62%	(33%)
Location-based <sup>24,25</sup>	tCO <sub>2</sub> e	11,526	11,453	14,938	1%	(23%)
<b>Total scope 1 &amp; 2 (market-based)</b> <sup>24,25</sup>	tCO <sub>2</sub> e	15,459	16,924	21,608	(9%)	(28%)
<b>Total scope 1 &amp; 2 (location-based)</b> <sup>24,25</sup>	tCO <sub>2</sub> e	26,183	27,881	35,346	(6%)	(26%)
<b>Scope 3</b>						
Fuel- and energy-related activities (category 3)	tCO <sub>2</sub> e	6,192	6,394	5,897	(3%)	5%
Business travel (category 6)	tCO <sub>2</sub> e	5,718	5,883	7,114	(3%)	(20%)
<b>Total selected scope 3 (categories 3 &amp; 6)</b> <sup>24,25</sup>	tCO <sub>2</sub> e	11,910	12,277	13,011	(3%)	(8%)
<b>Total reported market-based GHG emissions</b> <sup>24,25</sup>	tCO <sub>2</sub> e	27,369	29,201	34,619	(6%)	(21%)
<b>Total reported location-based GHG emissions</b> <sup>24,25</sup>	tCO <sub>2</sub> e	38,093	40,158	48,357	(5%)	(21%)
% of renewable electricity <sup>26</sup>	%	96%	98%	94%	(2 ppt)	2 ppt
Energy intensity	kWh per customer	17.59	20.50	26.83	(14%)	(34%)
<b>Scope 1 &amp; 2 (market-based) GHG emissions intensity metrics</b> <sup>27</sup>						
	tCO <sub>2</sub> e / £m revenue	3.30	4.00	6.50	(18%)	(49%)
	tCO <sub>2</sub> e / 000's customers	1.99	2.39	3.54	(17%)	(44%)
	tCO <sub>2</sub> e / average employees	0.63	0.68	0.95	(7%)	(34%)
<b>Scope 1 &amp; 2 (location-based) GHG emissions intensity metrics</b> <sup>27</sup>						
	tCO <sub>2</sub> e / £m revenue	5.58	6.58	10.64	(15%)	(48%)
	tCO <sub>2</sub> e / 000's customers	3.37	3.94	5.79	(14%)	(42%)
	tCO <sub>2</sub> e / average employees	1.08	1.12	1.55	(4%)	(30%)

23. Total energy usage includes scope 1 and 2 consumption and car hire and private cars used for business purposes (scope 3, category 6).

24. The 2024 data were subject to external independent limited assurance by PricewaterhouseCoopers LLP (PwC). For the results of the assurance, see PwC's assurance report on page 14 to 17 of this report and Bupa's Reporting Criteria 2024 at [www.bupa.com/sustainability/sustainability-documents](http://www.bupa.com/sustainability/sustainability-documents).

25. The 2023 data were subject to external independent limited assurance by PricewaterhouseCoopers LLP (PwC). For the results of the assurance, see PwC's assurance report on page 13 to 16 of the Greenhouse Gas Emissions Report 2023 and Bupa's Reporting Criteria 2023 at [www.bupa.com/sustainability/sustainability-documents](http://www.bupa.com/sustainability/sustainability-documents).

26. % of renewable electricity covers purchased and self-generated electricity consumption (scope 2 only).

27. As reported in the Group's annual report - UK operations reflects BGIUK revenue (2024: financial statements: Note 2) and customer numbers excluding Niva Bupa. Average employees includes BGIUK (excluding Niva Bupa) and Group Functions (2024: financial statements: Note 2.3.1).

# Full year 2024 PwC limited assurance statement



## Independent Limited Assurance Report to the Directors of The British United Provident Association Limited (“Bupa”) on global and UK greenhouse gas (“GHG”) emissions

### Our limited assurance conclusion

Based on the procedures we have performed, as described under the “Summary of work performed” and the “Areas of Assurance Focus” sections below, and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Subject Matter Information in Bupa’s 2024 GHG Emissions Report for the year ended 31 December 2024 (the “Report”) and summarised below (together, the “Subject Matter Information”), has not been prepared, in all material respects, in accordance with Bupa’s Greenhouse Gas Emissions Reporting Criteria July 2025 Issue 4 (the “Reporting Criteria”).

### What we were engaged to assure

The Subject Matter Information needs to be read and understood together with the Reporting Criteria which Bupa’s Directors are solely responsible for selecting and applying. The Subject Matter Information and the Reporting Criteria are as set out in the table below:

Subject Matter Information	Reported Group Emission (tonnes CO <sub>2</sub> e)	Materiality <sup>28</sup> (tonnes CO <sub>2</sub> e)	Reporting Criteria
<b>Group</b>			Bupa Greenhouse Gas Emissions Reporting Criteria July 2025 issue 4 as available at <a href="http://www.bupa.com/sustainability/sustainability-documents">www.bupa.com/sustainability/sustainability-documents</a> <sup>29</sup>
<b>GHG Emissions</b>			
<b>Scope 1</b>	39,193	1,960	
<b>Scope 2</b>			
Market-based	12,360	618	
Location-based	95,325	4,766	
<b>Total scope 1 &amp; 2 (market-based)</b>	51,553		
<b>Total scope 1 &amp; 2 (location-based)</b>	134,518		
<b>Total selected Scope 3 (category 3 and 6)</b>	47,444	2,372	
<b>Total reported market-based GHG emissions</b>	98,997		
<b>Total reported location-based GHG emissions</b>	181,962		

28. The basis of materiality is set out in the “materiality section” on page 16.

29. The maintenance and integrity of Bupa’s website is the responsibility of the Directors; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Subject Matter Information or Reporting Criteria when presented on Bupa’s website.



# Full year 2024 PwC limited assurance statement

Subject Matter Information	Reported Group Emission (tonnes CO <sub>2</sub> e)	Materiality <sup>28</sup> (tonnes CO <sub>2</sub> e)	Reporting Criteria
<b>UK Operations</b>			Bupa Greenhouse Gas Emissions Reporting Criteria July 2025 issue 4 as available at <a href="http://www.bupa.com/sustainability/sustainability-documents">www.bupa.com/sustainability/sustainability-documents</a> <sup>29</sup>
<b>GHG Emissions</b>			
<b>Scope 1</b>	14,657	733	
<b>Scope 2</b>			
Market-based	802	40	
Location-based	11,526	576	
<b>Total scope 1 &amp; 2 (market-based)</b>	15,459		
<b>Total scope 1 &amp; 2 (location-based)</b>	26,183		
<b>Total selected Scope 3 (category 3 and 6)</b>	11,910	596	
<b>Total reported market-based GHG emissions</b>	27,369		
<b>Total reported location-based GHG emissions</b>	38,093		

The scope of our work did not extend to information in respect of earlier periods or to any other information included in, or linked from, the Report.

## Our work

### Professional standards applied

We performed a limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' and, in respect of the greenhouse gas (GHG) emissions, in accordance with International Standard on Assurance Engagements 3410 'Assurance Engagements on Greenhouse Gas Statements', issued by the International Auditing and Assurance Standards Board.

## Our independence and quality control

We have complied with the Institute of Chartered Accountants in England and Wales Code of Ethics, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code).

We apply International Standard on Quality Management (UK) 1 and accordingly maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

28. The basis of materiality is set out in the "materiality section" on page 16.

29. The maintenance and integrity of Bupa's website is the responsibility of the Directors; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Subject Matter Information or Reporting Criteria when presented on Bupa's website.

# Full year 2024 PwC limited assurance statement

Summary of work performed

We performed a limited assurance engagement. Because the level of assurance obtained in a limited assurance engagement can vary, we give more detail about the procedures performed, so that the intended users of the Subject Matter Information can understand the nature, timing and extent of procedures we performed as context for our conclusion. These procedures performed vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

In performing our assurance procedures, which were based on our professional judgement, we performed the following:

- evaluated the suitability in the circumstances of Bupa’s use of the Reporting Criteria as the basis for preparing the Subject Matter Information including the associated reporting boundaries;
- through inquiries, obtained an understanding of Bupa’s control environment, processes and systems relevant to the preparation of the Subject Matter Information. Our procedures did not include evaluating the suitability of design, obtaining evidence about their implementation or testing operating effectiveness of particular control activities;
- evaluated whether Bupa’s methods for developing estimates are appropriate and had been consistently applied, noting that our procedures did not involve testing the data on which the estimates are based or separately developing our own estimates against which to evaluate Bupa’s estimates;
- compared year on year movements and obtained explanations from management for significant differences we identified;
- performed limited substantive testing on a selective basis of the Subject Matter Information, which is aggregated from information submitted by Bupa’s business units. We tested 15 business units which were selected based on their inherent risk, materiality and unexpected fluctuations in the Subject Matter Information since the prior period. Testing involved, on a sample basis, agreeing arithmetical accuracy of calculations, and agreeing data points to or from source information to check that the underlying subject matter had been appropriately evaluated or measured, recorded, collated and reported; and
- evaluated the disclosures in, and overall presentation of, the Subject Matter Information.

Materiality

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Subject Matter Information is likely to arise. We set certain quantitative thresholds for materiality. These, together with qualitative considerations, helped us to determine the nature, timing and extent of our procedures in support of our conclusion. We believe that it is important that the intended users have the information they need to understand the concept and the level of materiality to place our conclusion in context. Based on our professional judgement, we determined materiality for the Subject Matter Information as follows:

Overall materiality	<p>Materiality may differ depending upon the nature of the Subject Matter Information. We apply professional judgement to consider the most appropriate materiality benchmark for each aspect of the Subject Matter Information, having considered how the intended users may use the information.</p> <p>The benchmark approach for the Subject Matter Information is set out in the “Subject Matter Information” table above in the “What we were engaged to assure” section of this report. A benchmark materiality of 5% has been applied to the absolute number.</p>
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We also agreed to report to the Directors misstatements (“reportable misstatements”) identified during our work at a level below overall materiality, as well as misstatements below that lower level that in our view warranted reporting for qualitative reasons. The Directors are responsible for deciding whether adjustments should be made to the Subject Matter Information in respect of those items.

Areas of Assurance Focus

The Areas of Assurance Focus are those areas of our work that, in our professional judgement, require additional procedures. In the case of limited assurance, that means our procedures may be towards the upper end of those that might be expected for limited assurance. These areas were identified as part of our risk assessment and result of the assurance procedures performed, and include those areas of significant risk, areas that involved significant judgement or other areas where significant assurance effort was needed. This approach provides transparency about where we deemed it necessary to perform extra work. However, this does not imply - for limited assurance - the same level of assurance as would have been obtained under a reasonable assurance engagement.

We have determined that there are no areas of assurance focus to communicate in our report.

# Full year 2024 PwC limited assurance statement

## Challenges of non-financial information

The absence of a significant body of established practice upon which to draw to evaluate and measure non-financial information allows for different, but acceptable, evaluation and measurement techniques that can affect comparability between entities, and over time.

Non-financial information is subject to more inherent limitations than financial information, given the characteristics of the underlying subject matter and the methods used for measuring or evaluating it. The precision of different measurement techniques may also vary.

## Reporting on Other Information

The other information comprises all of the information in the Report other than the Subject Matter Information and our assurance report. The Directors are responsible for the other information. As explained above, our conclusion does not extend to the other information and, accordingly, we do not express any form of assurance thereon. In connection with our assurance of the Subject Matter Information, our responsibility is to read the other information. In doing so, we consider whether the other information is materially inconsistent with the Subject Matter Information or our knowledge obtained during the assurance engagement, or otherwise appears to contain a material misstatement of fact. If we identify an apparent material inconsistency or material misstatement of fact, we are required to perform procedures to conclude whether there is a material misstatement of the Subject Matter Information or a material misstatement of the other information, and to take appropriate actions in the circumstances.

## Responsibilities of the Directors

The Directors of Bupa are responsible for:

- determining appropriate reporting topics and selecting or establishing suitable criteria for measuring or evaluating the underlying subject matter;
- ensuring that those criteria are relevant and appropriate to Bupa and the intended users of the Report;
- the preparation of the Subject Matter Information in accordance with the Reporting Criteria including designing, implementing and maintaining systems, processes and internal controls over the evaluation or measurement of the underlying subject matter to result in Subject Matter Information that is free from material misstatement, whether due to fraud or error;
- documenting and retaining underlying data and records to support the Subject Matter Information;
- producing the Report that provides a balanced reflection of Bupa performance in this area and discloses, with supporting rationale, matters relevant to the intended users of the Report; and
- producing a statement of Directors' responsibility.

## Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Subject Matter Information is free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to the Directors of Bupa.

## Use of our report

Our report, including our conclusion, has been prepared solely for the Directors of Bupa in accordance with the agreement between us dated 20 March 2025 (the "agreement"). To the fullest extent permitted by law, we do not accept or assume responsibility or liability to anyone other than the Board of Directors and Bupa for our work or our report except where terms are expressly agreed between us in writing.

**PricewaterhouseCoopers LLP**  
**Chartered Accountants**  
**London**  
**6 August 2025**



## Further information

To know more about Bupa's operations and financial performance or Bupa's approach to Sustainability please refer to [www.bupa.com](https://www.bupa.com)