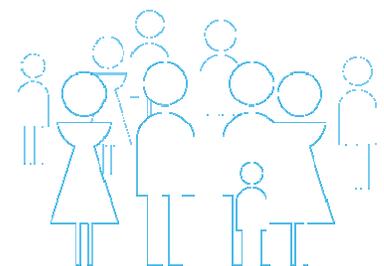




Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Bupa during the year ending 31 December 2016 to prevent modern slavery and human trafficking in its business and supply chain.

May 2017



Introduction

Bupa is committed to combating the real and growing problem of modern slavery and human trafficking.

We recognise that it can affect any sector or industry and we take seriously our responsibility to be alert to the risks, however small, in our business and in our wider supply chain.

We expect our people and our suppliers to share our commitment to ensuring modern slavery and human trafficking do not exist in our business or supply chains.

Although the scope of the Modern Slavery Act 2015 is limited to companies carrying on business in the UK, as a global organisation, we recognise the importance of these issues for all our stakeholders. This statement should be considered to constitute the slavery and human trafficking statement for Bupa and all our wholly owned or controlled companies within our worldwide group of companies.

Our business and our values

Bupa is an international healthcare group; we run care homes, health centres, dental centres and hospitals, offer personal and company health insurance and provide workplace health services, health assessments and chronic disease management services including health coaching.

At Bupa, everything we do is underpinned by our Code of Conduct, the [Bupa Code](#), which is designed to help all our people to make the right choices and to make clear what we expect of our people.

The Bupa Code calls out the values that we live by, including our

commitment to act ethically and to play by the rules, for example by ensuring we engage with suppliers and partners under the right contracts to protect Bupa, our customers and our people.

We employ over **86,000** people, principally in the UK, Australia, Spain, Hong Kong, Poland, New Zealand, Chile, Brazil, Thailand, China, Saudi Arabia, India and the US



Bupa spends in excess of **£1.5bn** annually with more than **20,000** suppliers located around the world
(excluding claims/provision)



We fund healthcare around the world through our network of recognised treatment providers



We also own the following facilities around the world:



17 hospitals



341 clinics



453 care homes



565 dental centres



62 retirement villages



37 optical outlets

Our People

Our People policy reflects our commitment to treating all employees in a fair, respectful and consistent manner in accordance with our seven Bupa values: passionate, caring, open, accountable, authentic, courageous and extraordinary.

With the help of our People teams around the world, we have carried out a thorough assessment of any risk of modern slavery and human trafficking occurring within Bupa itself. We evaluated our practices relating to recruitment, on-boarding of new employees and terms and conditions and assess the risk of modern slavery being present within Bupa to be very low.

Our supply chain

Our product supply chains are diverse and global, with more than 20,000 suppliers located around the world.

We regard our supply chain as comprising suppliers of goods and services directly to Bupa. Although technically not a supplier, we consider the hospitals and clinics we work with to be within scope when assessing our approach to modern slavery and human trafficking.

Bupa is committed to procuring goods and services in a manner which recognises the importance of human rights, and we require all suppliers to explicitly acknowledge that they will honour and observe and not exploit fundamental human entitlements before working with us.

Bupa expects all suppliers and subcontractors to ensure that all products and services supplied have been produced in compliance with all applicable laws and regulations through the entire supply chain, under a set of internationally acceptable environmental, social and ethical guidelines and standards.

Policies and contractual controls

Bupa has a long-standing commitment to ethical and

sustainable procurement. In addition to our sustainability policies, which set out our expectations on social, economic and environmental sustainability as well as health and safety, in 2016 we introduced a specific anti-slavery policy for all third party suppliers.

Our anti-slavery policy is supported internally by a detailed guidance note on the Modern Slavery Act which we've included in our Buyer Handbook for our procurement teams. This guidance note explains how members of these teams should assess the risk of modern slavery being present in a supplier and ways to address this.

We have conducted extensive reviews of how we work with our supply chain to ensure we deliver on our commitment to combating modern slavery.

As part of this, we've added clauses to our template supplier contracts requiring suppliers to agree to comply with our anti-slavery policy and to maintain certain records relating to their personnel and supplier practices that will allow us to assure ourselves that modern slavery or human trafficking are not present in their business or supply chains.

Modern Slavery risks within our supply chain

Areas of potential risk for Bupa

The construction, agriculture and manufacturing sectors are those most frequently associated with risks of slavery and human trafficking. However, Bupa is conscious that risks can also arise in certain industries connected to the healthcare sector – in particular nursing, home nursing and personal care provision, as well as the

manufacturing of healthcare equipment.

How we deal with these risks

Our external supplier policy clearly outlines the selection process for all suppliers whom we deal with directly. This is supported by the due diligence we carry out on all new suppliers where we ask for information about their employment practices, working conditions and their own supply chains.

Under our anti-slavery policy, suppliers commit to:

- Adopting their own approach to modern slavery which implements and enforces **effective systems and controls** to tackle modern slavery.
- **Complying with any requests Bupa may have for information** enabling us to assess the supplier's modern slavery risk.
- **Answering promptly and acting openly and with integrity** in respect of any information requests Bupa may have for the supplier.
- **Taking action** to address any deficiencies in their organisation.
- **Entering into Bupa's standard contractual provisions** relating to modern slavery.
- **Raising any concerns they have about modern slavery and human trafficking within Bupa.** Our Speak Up channel is available to suppliers who want to raise their concerns confidentially.

As part of our recent heightened focus on modern slavery, we have also carried out a risk-based assessment across our supplier base

to identify suppliers which may be at a higher risk of having modern slavery and human trafficking present within their business and/or supply chains. The risk assessment is based on geographical information such as where the service is being supplied or the entity the goods are supplied from, the nature of the supply and our annual spend with that supplier. This framework will apply to all new suppliers and the risk weighting attached to each supplier reviewed at regular intervals.

If, following this assessment, a supplier is deemed to be high risk, we have introduced the following further measures:

1. enhanced due diligence (during on-boarding and throughout our engagement with this supplier) to ascertain where and how modern slavery and human trafficking may be present in that supplier's business or supply chains;
2. enhanced contractual requirements, including audit rights; and
3. any further engagement or mitigating actions we consider necessary to address any deficiencies.

Based on the findings of this risk assessment, we carried out additional due diligence on a number of suppliers. The responses we received indicated that these suppliers were not aware of any modern slavery or human trafficking within their business or supply chains. As we continue to progress our approach to modern slavery, we will consider other appropriate means to assure ourselves of this, including through on-site audits.

Modern Slavery training

We have provided training to our Senior Management, Procurement and People teams around the world to increase awareness of what human trafficking and modern slavery is and the various responsibilities these teams have for ensuring it doesn't exist within Bupa or our supply chains.

Assessing our effectiveness in preventing Modern Slavery

In order to assess the effectiveness of the measures taken by Bupa we will be reviewing the following key performance indicators:

1. the number of high risk category suppliers identified through our due diligence
2. the number of suppliers responding with positive responses to our due diligence questions and confirming that they have had no incidents of modern slavery (both as a real number and as a percentage of those suppliers requested to provide such confirmation)
3. the number of Bupa employees trained on modern slavery and human trafficking
4. the number of audits Bupa has undertaken on suppliers for reasons of modern slavery

5. the number of investigations undertaken into reports of Modern Slavery and remedial actions taken in response

Further steps to prevent Modern Slavery in our supply chains

Our approach to tackling slavery and human trafficking will evolve and strengthen over time. We continue to take this issue seriously and we'll continue to review our approach each year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2016. The boards of the Bupa entities listed in Annex 1, as well as The British United Provident Association board, have approved this statement.

Signed



Evelyn Bourke
Group Chief Executive Officer
May 2017



Annex 1

Bupa entities within scope for this statement:

Bupa Care Homes (AKW) Limited
Bupa Care Homes (ANS) Limited
Bupa Care Homes (BNH) Limited
Bupa Care Homes (CFCHomes) Limited
Bupa Care Homes (CFHCare) Limited
Bupa Care Homes (GL) Limited
Bupa Finance plc
Bupa Insurance Limited
Bupa Insurance Services Limited
Bupa Investments Overseas Limited
Bupa Occupational Health Limited
Medical Services International Limited
Richmond Care Villages Holdings Limited
Richmond Villages Operations Limited