



Introduction

Bupa's purpose – helping people live longer, healthier, happier lives – is at the core of our approach to addressing Environmental, Social and Governance (ESG) issues. We recognise our responsibility to society, and we are committed to acting in the best interest of our customers, employees, communities and the environment. 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.

We value the relationships we hold with our suppliers and seek to work with those that share our commitment to:

1. Acting in accordance with the law
2. Protecting and empowering people
3. Reducing environmental impact and managing climate risk
4. Conducting business activities in a responsible way
5. Contributing to society

This Responsible Supply Chain Statement sets the minimum standards of business conduct that Bupa expects from our direct suppliers and that need to be applied in turn, through the supply chain.

In return, Bupa commits to:

- Treating suppliers fairly
- Paying suppliers on time, as per contracted terms
- Selecting suppliers without prejudice
- Working with our suppliers to support improvements in their social, environmental and ethical practices
- Maintaining a supply chain that reflects and aligns to our own standards of responsible business conduct

1. Compliance with the law

Bupa expects suppliers to fully comply with all laws and regulations applicable to them.

2. Protecting and empowering people

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 and the International Labour Organisation (ILO) core labour standards. This includes, but is not limited to, specific provisions on:

- Prevention of modern slavery, forced labour, human trafficking and child labour;
- Compliance with the rights and entitlements of indigenous peoples.

Suppliers must report non-compliance within their direct operations or supply chain to Bupa immediately.

Inclusion and Diversity

Bupa expects suppliers to ensure equality of opportunity for all. Suppliers should not tolerate discrimination or harassment, 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 management systems should be available on request.

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

3. Reducing environmental impact and managing climate risk

As a minimum, Bupa expects suppliers to:

- Comply with all applicable environmental regulatory requirements.
- Demonstrate understanding of environmental risks, impacts and responsibilities associated with the products and services they provide.
- Provide information to Bupa about the environmental credentials of a procured product or service on request.
- Where possible, offer product and service options that offer reduced environmental impact.

Bupa encourages suppliers to:

- Have policies or programmes that seek to reduce environmental impact and mitigate environmental risks;
- Measure, monitor, and endeavor to make continuous improvements in environmental performance. This includes, but is not limited to, carbon emission accounting in accordance with the Greenhouse Gas Protocol.
- Minimise the use of energy, water and raw materials. Where possible, use renewable or sustainably sourced energy and materials.
- Make practical efforts to eliminate or reduce levels of generated waste and reuse and recycle waste materials wherever possible.
- Consider the environmental credentials and performance of suppliers within their own supply chain and require them to operate to a minimum set of standards.

4. Conducting our business activities in a responsible way

Bupa expects suppliers:

- Not to offer any form of gift or hospitality for the purposes of influencing business decisions.
- To conduct themselves to the highest ethical standards.
- To avoid conflicts of interest that may adversely affect their business relationship with us. Any conflicts of interest must be declared with us as soon as possible.
- To take appropriate measures to prevent themselves from being used as a channel for financial crime and protect against fraud, money laundering or any other kinds of financial crime.
- To have processes in place to ensure all levels of the supply chain are paid promptly, in line with individual agreements.
- To have processes in place for handling all information including personal data, and sensitive personal data (special categories) within their organisation and across their supply chain.
- To ensure appropriate visibility and management is in place to consider potential disruptions to the supply chain, with adequate business continuity measures to be deployed as required. This should be evidenced by a policy, plan and risk model that can be deployed within adequate, agreed time periods and tested at least annually.
- To have processes in place to allow the confidential reporting of concerns or make use of [Bupa Speak Up](#) which allows for confidential (and anonymous, if preferred) reporting by any party

5. Contributing to society

- Bupa encourages suppliers to support and contribute to the social and economic wellbeing of the communities in which they operate.

Date of last review	January 2021	Date for next review	January 2023
Owner	Peter Lock, Procurement & Commercial Director, Bupa UK		

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