



Modern Slavery Statement

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 Act and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the “**Act**”).

It sets out the steps taken by Bupa, by the Relevant Entities or by Bupa Group (as they are defined below) during the year ending 31 December 2019 to prevent modern slavery and human trafficking in its business and supply chain.

- **Bupa:** the British United Provident Association Limited.
- **Relevant Entities:** the group companies listed in Annex 1, which fall within the scope of Section 54 of the Act.
- **Bupa Group:** refers to Bupa’s wholly owned and controlled companies. References to “**we**”, “**us**”, and “**our**” are to the Bupa Group. However, statements or representations made by, or using references such as, we, us, our or Bupa Group, do not necessarily refer each of the entities respectively but to the group as a global organisation.

Introduction

Slavery and trafficking are more than just a crime. They are crimes against people and responsible for untold misery and suffering.

The Bupa Group remains committed to combating the real and growing problem of modern slavery and trafficking. We recognise it can affect any industry and we take seriously our responsibility to be alert to the risks in our business and in our wider value chain. We expect our people, partners and suppliers to share our commitment to ensuring modern slavery does not exist in these areas.

Bupa has published three previous modern slavery statements (2016, 2017 and 2018). This statement provides an update on steps taken in 2019 to combat the risks of modern slavery and trafficking in our organisation or supply chains.

The scope of the Modern Slavery Act 2015 applies to companies in the UK with a turnover of at least £36m, but as an international organisation, we recognise slavery and trafficking is a global problem. This statement applies to the whole of the Bupa Group, however, progress made and the steps taken throughout the year may be different between the Relevant Entities and other entities within the Bupa Group.

This statement has been approved by the Bupa Board as well as by the boards of each of the Relevant Entities.

Our structure, business and supply chains

The Bupa Group's purpose is helping people live *longer, healthier, happier lives*.

Health insurance revenue accounts for over 70% of our global business, with 17.5m customers worldwide. We have a strong domestic health insurance presence in the UK, Australia, Spain, Saudi Arabia, Chile, Hong Kong, Turkey, India and Brazil. In most of these countries we offer health insurance for corporate businesses and small and medium-sized enterprises as well as for individuals. We also offer international private medical insurance through Bupa Global.

We directly provide healthcare to around 15.8m people through our clinics, hospitals and dental centres in Spain, Chile, Poland, the UK, Hong Kong and Australia. We also have one clinic in China and two (check) in Brazil. We have around 1,000 dental centres across the UK, Ireland, Australia, Spain, Chile, New Zealand, Poland, Brazil and Hong Kong. We care for around 22,000 residents in four aged care businesses in the UK, Australia, New Zealand and Spain.

Since Bupa's last modern slavery statement, we have simplified our organisation structure into three

Market Units (MUs) rather than four. The accountabilities of the Europe and Latin America MU and the UK MU have been increased, while the International Markets MU has been removed. The Australia and New Zealand MU is unchanged.

As the Bupa Group, our supply chains are both local and global, with a total annual spend in excess of £1.5bn on bought in goods and services with more than 20,000 suppliers.

Our approach to tackling the risk of modern slavery and human trafficking

Combating modern slavery and human trafficking is a reality all organisations face.

Ultimate oversight and responsibility for the steps the Bupa Group is taking and its approach to tackling modern slavery, as well as the publishing of this statement, sits with the Bupa Board.

Our progress and the preparation of this statement is reviewed by our Executive Risk Committee.

In 2019 a Modern Slavery Working Group was established at Group-level led by our Corporate and Social Responsibility (CRS) team. The Working Group is comprised of Legal, People, Procurement, Risk and CRS representatives and meets regularly to discuss the future direction of the Bupa Group's modern slavery agenda. It also provides guidance to the Bupa Australia Modern Slavery Working Group, which was established in 2019 in response to the Australian Modern Slavery Act (2018), and to other forums within the MUs.

In 2019, we established a Responsible Business Conduct (RBC) Workstream as part of our wider CRS agenda. Responsible Supply Chain Management, including combating Modern Slavery, is the key focus with a more proactive approach to ensuring Bupa Group conducts our business activities in a responsible way. The Modern Slavery Working Group is expected to provide regular progress updates to the RBC Workstream.

Our policies and contractual controls

Our Enterprise Policy suite defines the overarching principles for how the Bupa Group manages risk in key business areas. It also helps to ensure we meet business objectives and comply with legal and regulatory requirements in the jurisdictions in which we operate. Enterprise Policies are approved by Executive and Board committees to ensure they define the minimum expectations around how we do business. Enterprise Policies apply to the Bupa Group and all businesses are expected to comply with the principles and requirements of all applicable policies.

As part of our core organisational design, the Bupa Group operates a “Three Lines of Defence” model to structure roles, responsibilities and accountabilities within the business for risk management activities. The model enables a culture of openness and accountability and aims to ensure all employees are clear about their roles and responsibilities in relation to risk management activities, reducing potential areas of conflict and promoting efficient and effective ways of working.

As reported in our previous statements, the Bupa Group has a number of policies and codes that are relevant to tackling modern slavery and trafficking with respect to its business and suppliers:

- Our **People Policy** sets out our aim to promote a workplace environment that is fair, open and respectful, and one that protects the rights and dignity of all employees. We operate people practices, contracts of employment and collective agreements that are lawful and aligned to the Bupa Code and values.
- The **Bupa Code** applies to all our people and requires that we treat everyone with respect and dignity and make sure we operate our business responsibly. It makes it clear that we follow the laws, regulations, policies and standards that affect us, wherever we are in the world, and that we enable and expect people to speak up.

Our **Speak Up Policy** sets out our commitment to ensuring people are free to question things and raise anything they are concerned about (including breaches of the Bupa Group Enterprise Policies). The Speak Up Enterprise Policy specifically calls out modern slavery and human trafficking as examples. We encourage people to speak up by raising matters with their manager or using the confidential Speak Up channel. There is a locally-tailored approach within Mus: our Speak Up phone line can take queries and concerns in 75 different languages. When we acquire new businesses, making Speak Up available is a key part of our integration strategy. In 2019, no calls were received through Speak Up that were categorised as relating to modern slavery.

- Our **Suppliers Policy** sets out the Bupa Board’s expectation that the Bupa Group has effective processes for the selection, contracting and management with our direct suppliers, allowing us to manage the risks posed by these suppliers throughout the supplier relationship lifecycle.
- Our **Human Rights Statement** outlines our commitment to protect, preserve and promote the human rights of our customers, our people and our partners around the world. It is guided by fundamental principles of human rights, such as those in the United Nations Universal Declaration of Human Rights.

- Our **Anti-Slavery Policy** for third party suppliers in our Bupa Global and UK (BGUK) market unit sets out the actions and behaviours we expect of suppliers in being aware of, addressing, and being open with us about, instances of modern slavery and human trafficking within their own business and supply chains.
- Our **Standard Terms and Conditions of Purchase** require suppliers in our BGUK market unit (and in turn their own supply chains) to comply with the Anti-Slavery Policy and to notify us immediately of any actual or suspected breach of it, or the Modern Slavery Act, so that we are able to determine an appropriate course of action.
- Our **Sustainable Supply Chain Statement** makes clear our expectation that suppliers, subcontractors and their respective supply chains comply with all domestic legislation, all applicable International Labour Organisation conventions and protocols, and the United Nations Universal Declaration of Human Rights. This commitment includes, but is not limited to, compliance with the Modern Slavery Act, not using child or forced labour and compliance with the rights and entitlements of indigenous peoples.

Identifying the risk of modern slavery across our business

We recognise that being in the healthcare industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector, in particular nursing, aged care provision, as well as in the manufacturing of healthcare equipment.

We are committed to monitoring such risks in our business and in our wider supply chain and to mitigating them.

In 2019 we engaged with external stakeholders, such as Non-Governmental Organisations and industry experts, to further our knowledge around best practice, benchmarking and insights, and in order to deepen our understanding and prioritise and manage risks.

Since early 2020, we have been supporting a UK-based non-profit organisation on a programme specifically designed to help victims of modern slavery into employment

Within Bupa Group

Since 2016, we have undertaken an annual assessment to understand how each MU manages the risk of modern slavery and human trafficking occurring within Bupa. The survey is based on UK

Home Office guidance and targets each MU's approach to recruitment, use of agency and temporary workers, on-boarding of new employees and terms and conditions of employment.

The responses are reviewed centrally by the Group People and Group Corporate Affairs functions. In 2019, the assessment identified that MUs have good practices in place.

In 2019, we also reviewed and strengthened our risk assessment process and developed a more sophisticated framework to identify key areas of focus in the UK, based on the level of inherent risk. The framework measures the potential exposure of each business activity to modern slavery and has enabled us to prioritise and focus efforts on those activities and processes, under our own control, that may carry potential modern slavery vulnerability.

The framework was initially focused on our own UK-based businesses (although those who interact with the UK business may be based in other countries). In the future, we plan on looking at ways of extending this new approach to other areas of our global operations.

Direct suppliers

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, we are only able to carry out meaningful due diligence on those who supply goods and services directly to Bupa.

In 2019, we improved our due diligence processes in the UK-geography by establishing a 'subject matter expert' (SME) to review and give a recommendation on supplier response, while also continuing with:

1. Our existing modern slavery due diligence risk assessment that identifies high risk suppliers that serve the UK geography. This process occurs annually. (See below).
2. The current standard UK due diligence process, which includes a modern slavery assessment.

High-risk suppliers are identified based on the country in which the supplier is located (in the case of goods) and where the supply is delivered (in the case of services), as well as the sectors in which they operate. Our assessment of risk in each country is based on the risk categorisation set out in the Global Slavery Index published by the Walk Free Foundation. We have designated countries into high, medium and low risk based on the underlying data that inputs into the Index. There is no publicly recognised index for sector risk. We have therefore compiled our own list with input from external advisers, taking into consideration factors such as the likelihood that workers receive low pay or are

required to do jobs most people would seek to avoid. If a supplier is based, or delivers services, in a high-risk country, and within a sector we determine to be medium or high risk, then we consider them to be at high risk for modern slavery and human trafficking.

Suppliers considered to be high risk were subject to enhanced due diligence to help us understand more about their internal controls and engagement with their supply chains. This due diligence is in the form of a detailed questionnaire, evaluated by our Procurement team in consultation with our Legal, Risk and CRS teams. The questions focus on whether the suppliers have whistle-blowing policies in place, whether they required similar policies of their own suppliers, and whether any concerns that could be considered connected to modern slavery and/or human trafficking were reported using these arrangements.

Assessing our effectiveness in preventing Modern Slavery

In 2018, we defined the following KPIs, and our progress in 2019 is detailed below:

KPI	Performance
Establish a Working Group	Established a Working Group at Group-level and in Australia with representatives from CRS, Legal, People, Procurement and Risk teams.
Review risk assessment process, developing a more sophisticated approach, enabling prioritisation areas where we can have the most significant impact.	The assessment concluded that areas of focus in 2020 should include: Non-UK based outsourced services; the provision of UK clinical services and the provision of UK care services.
Improve Training	Launched an updated mandatory training module targeted to the UK health provision business.
Take preparatory steps for the introduction of anti-modern slavery reporting in Australia.	Defined a roadmap for delivery of our first statement in 2021. Leveraged industry experience and efficiencies by collaborating with other private health insurance companies.
Number of investigations undertaken into reports of modern slavery and remedial actions taken	In 2019, we did not receive any reports of modern slavery within our business or our tier one suppliers. We have therefore not carried out any investigations.

Modern slavery training

Training continues to focus on targeted areas. In 2019, we updated 'Safeguarding levels 1 and 2' to include modern slavery learning outcomes and this has been deployed to 2,500 targeted employees in UK Provision roles.

Our priorities for the year ahead

- Use our risk assessment to define the next level of ambition. This includes refining and developing our approach in UK clinics and UK care homes in areas including:
 - Increasing awareness of modern slavery risks; and
 - Enhancing employment practises that relate to modern slavery if and where required.
- To investigate non-UK based outsourced services, understanding their employee recruitment process and satisfy that what we expect through contracts is being delivered.
- In line with the Australian Modern Slavery Act 2018, Bupa Australia will publish its first statement relevant to the Australian entities.
- We will collaborate with our Australian colleagues to share learnings and experiences.

We understand that modern slavery risk is not static, and will continue to evolve our approach, including updating our KPIs.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2019. The boards of the Relevant Entities listed in Annex 1 as well as the Bupa board have approved this statement.

Signed

A handwritten signature in black ink, appearing to read 'E. Bourke'.

Evelyn Bourke
Group Chief Executive Officer
27 April 2020

Annex 1

Bupa entities required to make a transparency statement under section 54 (1) of the Modern Slavery Act 2015

- BUPA Care Homes (ANS) Limited
- BUPA Care Homes (BNH) Limited
- BUPA Care Homes (CFCHomes) Limited
- BUPA Occupational Health Ltd
- Richmond Villages Operations Limited
- Medical Services International Limited
- Oasis Dental Care (Central) Limited
- Oasis Dental Care Limited
- Xeon Smiles UK Limited
- Bupa Finance Plc
- Bupa Insurance Limited (BINS)
- Bupa Insurance Services Limited (BISL)
- Bupa Investments Overseas Limited (BIOL)