Bupa’s Modern Slavery Act statement
for the financial year ending
31 December 2020

This 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 named on page 10.
Introduction

As a business we support the goals of the UK’s Modern Slavery Act and we have a zero tolerance approach to forced labour of any kind.

Bupa is committed to being a responsible and sustainable business. As a global healthcare company, we recognise that businesses can play an important role in protecting human rights and have a responsibility to respect and promote them within their sphere of influence.

Modern slavery in all its forms, including human trafficking, forced labour and servitude, are crimes against people and responsible for untold misery and suffering. Bupa remains committed to combating the real and growing problem of modern slavery. 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 any area of our business.

About Bupa

We are an international healthcare company serving over 31 million customers worldwide.

With no shareholders, our customers are our focus. We reinvest profits into providing more and better healthcare for the benefit of current and future customers.

Health insurance accounts for 17.9m customers and contributes 72% of our revenue. In health provision, we operate clinics, dental centres and hospitals in some markets serving another 13.6m customers. We also care for around 20,000 residents in our aged care businesses in the UK, Australia, New Zealand and Spain.

We directly employ around 84,000 people, principally in the UK, Australia, Spain, Chile, Poland, New Zealand, Hong Kong SAR, Turkey, Brazil, Mexico, the US, Middle East and Ireland. We also have associate businesses in Saudi Arabia and India.

This document outlines the action taken by those Bupa entities¹ required to make a transparency statement pursuant to the Modern Slavery Act to help ensure that we, working together with our partners and suppliers, can meet that commitment.

¹ Relevant Entities and other defined terms used in this document are shown on page 10.
Modern slavery risk within Bupa’s ESG agenda

Through 2020, we maintained a focus on environment, social impact and governance (ESG) considerations in how we responded to the pandemic and more broadly.

The management of our ESG agenda is embedded into our wider governance to ensure we manage it in an integrated way.

A Group Board Sustainability Committee was established in April 2021 to assist the Board and its other Committees in ensuring the integrated management of ESG matters.

During 2020 we strengthened our approach to the fundamentals of Responsible Business Conduct, increasing governance and reporting in this area. We are developing plans for a new level of ambition on Environment and Climate Action.

Environment & Climate Action Programme
Oversees the development and delivery of our decarbonisation and sustainable resource usage agenda

Responsible Business Conduct & Reporting
Ensures governance, horizon-scanning and consistency of external reporting of material themes at an Enterprise level

Sustainability & Corporate Affairs Executive Team
Focuses on the delivery of ESG activation in businesses, and leads advocacy and social contribution

Responsible Business Conduct
Bupa has a role to play in the economies and societies in which we operate which includes a responsibility to ensure we conduct our business activities appropriately.

We are committed to operating in a fair and transparent manner and in accordance with the law, including combating the real and growing problem of modern slavery.

Our commitment is underpinned through our Bupa Code, our Bupa Values and our robust risk management framework which seek to create both the right culture and appropriate governance to hold ourselves to account.
Our practices and policies

Bupa’s Enterprise Policy suite defines the overarching principles for how the Group manages risk in key business areas; meets business objectives; and complies with legal and regulatory requirements. 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, including the Relevant Entities, and all businesses are expected to comply with the principles and requirements of all applicable policies.

More information about Bupa’s risk management activities can be found in the 2020 Annual Report and Accounts.

The Bupa Group has a number of policies and codes that are relevant to tackling modern slavery with respect to its business and suppliers:

- **The People Policy** sets out Bupa’s aim to promote a workplace environment that is fair, open and respectful, and one that protects the rights and dignity of all employees. The Bupa Group operates 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 of Bupa’s people and requires that everyone is treated with respect and dignity. It makes it clear that Bupa people follow all applicable laws, regulations, policies, and standards, and that people are enabled and expected to speak up.

- **The Speak Up Policy** sets out the Group’s 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. The Speak Up phone line can take queries and concerns in 150 different languages and is available across the Bupa Group. The Speak Up phone line can be used by suppliers or indeed any individual wishing to raise a concern relating to Bupa. In 2020, no calls were received through Speak Up that were categorised as relating to modern slavery.

- **The Suppliers Policy** sets out the Bupa Board’s expectation that the Bupa Group has effective processes for the selection of, contracting with and management of direct suppliers, allowing the Group to manage the risks posed by these suppliers throughout the supplier relationship lifecycle.
We undertake an annual self-assessment of our People practices to monitor and improve our approach to managing the risk of modern slavery and human trafficking occurring in our own operations.

The survey targets our approach to recruitment, use of agency and temporary workers, on-boarding of new employees and terms and conditions of employment.

In 2020, the assessment confirmed that we have good practices in place. The design of recruitment processes and the controls in place for pre-employment screening help minimise the risk of modern slavery occurring within our business. These processes and controls include checks on individuals’ right to work in the UK, prior employment screening and ensuring that contracts with agencies use Bupa’s standard terms and conditions.

Drawing on action in 2019 to strengthen our risk assessment processes, we identified areas of potential modern slavery risk exposure in each business area. In response, we issued targeted communications to raise awareness in our Care Services business.

We developed plans to undertake assurance reviews designed to focus on our People processes and hiring practices across the Bupa Dental and Care Services businesses. Although timing was impacted by the pandemic, we were able to undertake the review of our Dental business in late 2020 which found that the inherent risk of contravening the Modern Slavery Act is low for that business.
The Bupa Group’s supply chains are both local and global, with a total annual spend in goods and services of £2.2bn with more than 23,000 suppliers. In 2020, the spend for the Relevant Entities was £800m with c.8,000 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.

Our due diligence processes are set up to issue any prospective suppliers with a modern slavery risk assessment questionnaire. We undertake a retrospective review of this activity annually to ascertain any gaps and to ensure that these are resolved.

This is 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 require similar policies of their own suppliers, and whether any concerns that could be considered connected to modern slavery and/or human trafficking are reported using these arrangements.

In addition, we conduct an annual modern slavery check on those suppliers who we consider to be high risk and for whom we do not hold a recent supplier risk assessment (completed within the last 12 months).

We assess these suppliers using a risk matrix considering modern slavery risk that takes account of the supplier’s location (in the case of goods) and the location in which the supply is delivered (in the case of services) and also the sector in which the supplier operates.

For 2020, we identified 54 suppliers to the Relevant Entities as potentially high risk and who are being assessed through this process.
The COVID-19 pandemic has heightened our awareness of the risk of modern slavery through increased demand on the manufacturers and suppliers of goods and services that support the health and wellbeing of our customers, employees, and communities.

Throughout the pandemic, we remained vigilant to potential COVID-19-related risks relevant to our stance on modern slavery, in line with UK government guidelines published in April 2020. No additional modern slavery risks were identified during 2020.

Across our operations, we did not compromise existing standards of due diligence as a result of COVID-19. In our operations, we ensured that hiring and recruitment due diligence processes remained intact for the entities that introduced fast-tracked screening to recruit frontline workers.

In our supply chain, we used existing suppliers to obtain personal protection equipment (PPE) where possible. These existing suppliers would have already been subject to our modern slavery due diligence processes.

As the full extent of the social and economic consequences of COVID-19 are still to be fully understood, we remain committed to monitoring and mitigating modern slavery risks in our operations and supply chain. For more information on our full response to COVID-19, please see our 2020 Annual Report and Accounts.
Action we took in 2020

Increased awareness of modern slavery risks and employment practices relating to them across our UK aged care businesses, which use agency and other temporary staff on a regular basis, through targeted communications to care services staff in Q4 2020, and we undertook an assurance review of people processes in our dental clinics business.

Conducted an assessment of one of our primary outsourced services suppliers based outside of the UK to better understand its employee recruitment processes and ensure our contractual requirements were being met. We looked at its training materials and processes to ensure modern slavery risk was well understood within the organisation.

Implemented our Responsible Supply Chain statement, which sets the minimum standards of business conduct Bupa expects from its direct suppliers and which need to be applied through our supply chain, including standards relating to the prevention of modern slavery.

Collaborated and shared best practice with our ANZ Market Unit in preparation for publication of a modern slavery statement for in-scope Australian businesses in 2021.

Bupa Speak Up

Bupa Speak Up
Speak Up is our confidential channel which employees, partners and suppliers can use to report concerns about things relating to Bupa that aren’t, or don’t seem, right, including concerns relating to modern slavery.

You don’t have to be a Bupa employee to report an issue which relates to Bupa. After a concern is reported, a Speak Up Officer will contact the reporter via the Speak Up website to discuss the concern raised.

Each Speak Up Officer is someone who works for Bupa and their contact details can be found on the Speak Up website.
Our priorities for the year ahead

In 2021, we will focus on the following priorities:

- Monitoring the continued impact of COVID-19 on our operations and heightened risk of modern slavery within the supply chain.
- Extending our supplier due diligence processes beyond our direct supplier base and operations, to include pre-contractual and post-contractual monitoring and supplier engagement.
- Strengthen our governance processes in light of the regulatory developments concerning the UK’s modern slavery legislation.
- Ensure that modern slavery risk continues to be an area of heightened risk awareness within the Responsible Business Conduct pillar of our ESG agenda.
- Focus on aligning modern slavery risk assessment and operational risk mitigation best practices between our UK and Australia businesses, where appropriate.

Regulatory developments

We have followed relevant regulatory developments to inform our approach to mitigating modern slavery risk, including the UK Home Office guidance for businesses concerning modern slavery risks during the COVID-19 pandemic published in April 2020.

In September 2020, the UK Government published its response to its 2019 consultation on strengthening the UK Modern Slavery Act. The changes proposed include making certain matters to be addressed in a modern slavery statement mandatory, rather than voluntary as presently the case.

In February 2021, the Home Office launched a new registry service that allows reporting organisations to voluntarily add their modern slavery statements to the registry.
The board of The British United Provident Association Limited, as well as the boards of the other Relevant Entities listed below, have approved this statement.

The Group CEO has signed the statement on behalf of The British United Provident Association Limited.

Signed

Iñaki Ereño
Group Chief Executive Officer
23 May 2021

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
• References to **we**, **us** and **our** are to the Relevant Entities

Relevant Entities required to make a statement pursuant to section 54(1) 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