

Helping people live  
**longer, healthier,  
happier lives and  
making a better world**

**Bupa**



**Bupa Australia Group  
Modern Slavery  
Statement  
FY21**



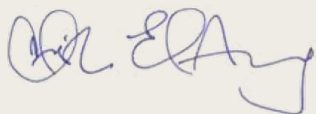
# Statement on modern slavery

In 2021, we refreshed Bupa's purpose to be: "helping people live longer, healthier, happier lives *and making a better world.*" By adding "and making a better world", we recognise our role in the health of our planet. Ensuring we conduct our business in an ethical, responsible way is fundamental to delivering our purpose.

Our business was founded upon, and is centred today around, supporting the health and wellbeing of our people, our customers, our residents, and the communities in which we live and operate. We are a people-led business, and we strive for our purpose and our values to guide our decision-making and help us make a positive difference in our communities and environment.

Bupa is committed to identifying and addressing modern slavery risks across our organisation and suppliers in accordance with the Modern Slavery Act 2018 (Commonwealth) (The **Act**).

This is Bupa ANZ's Modern Slavery Statement in response to the Act, which reflects on the actions we have taken to identify and address modern slavery risks in our Australian operations and supply chain over 2021, and outlines opportunities where we can improve in the future.



**Hisham El-Ansary**  
Chief Executive Officer

This statement has been approved by the Board of Directors for Bupa ANZ Healthcare Holdings Pty Ltd ACN 126 737 308 and Bupa ANZ Insurance Pty Ltd ACN 098 309 025 on 21 June 2022 and Hisham El-Ansary is authorised to sign this statement as the CEO of those entities.

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# Criteria **1**

## Reporting entity

This is a joint modern slavery statement made by Bupa ANZ Healthcare Holdings Pty Ltd ACN 126 737 308 and Bupa ANZ Insurance Pty Ltd ACN 098 309 025 (collectively referred to as **Bupa ANZ**), being members of the Bupa Group of Companies under the immediate parent company Bupa Investments Overseas Ltd.

For this reporting period, we have focussed on the modern slavery risks in our Australian operations and supply chain. This statement covers the reporting period starting from 1 January to 31 December 2021.

### Definitions

<b>Bupa Parent</b>	The British United Provident Association Limited.
<b>Bupa ANZ</b>	Refers to the Australian operations of <b>Bupa ANZ Healthcare Holdings Pty Ltd and Bupa ANZ Insurance Pty Ltd</b> , which are the subjects of this statement. References to “we”, “us” and “our” are to Bupa ANZ.
<b>Bupa Group<sup>1</sup></b>	Refers to Bupa Parent’s wholly owned and controlled companies.

<sup>1</sup> References to Bupa Group do not necessarily refer to each of the entities respectively but to the group as a global organisation. Bupa Parent and certain other Bupa Group companies are reporting entities under the UK Modern Slavery Act 2015.

## Criteria **2**

# Reporting entity's structure, operations, and supply chains

## Our structure

Bupa's purpose is helping people live longer, healthier, happier lives and making a better world.

Bupa is an international healthcare company serving over 38 million customers worldwide. With no shareholders, Bupa reinvests profits into providing more and better healthcare for the benefit of current and future customers. Globally, Bupa Group directly employs 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.

### Bupa in Australia

Bupa entered the Australian market in 2002 and today employs more than 22,000 people across Australia and New Zealand.

In Australia, the Bupa ANZ Board of Directors is committed to maintaining high standards of service and effective governance across all Australian affiliated entities, including:

<b>Bupa Aged Care Australia Pty Ltd</b>	<b>ACN 082 931 575</b>
<b>Bupa HI Pty Ltd</b>	<b>ACN 000 057 590</b>
<b>Bupa Health Services Pty Ltd</b>	<b>ACN 003 098 655</b>
<b>Bupa Innovations (ANZ) Pty Ltd</b>	<b>ACN 614 905 967</b>
<b>Bupa Wellness Pty Limited</b>	<b>ACN 145 612 951</b>
<b>Bupa Dental Corporation Limited</b>	<b>ACN 161 650 979</b>
<b>Bupa Medical Services Pty Limited</b>	<b>ACN 168 581 548</b>
<b>Bupa Optical Pty Ltd</b>	<b>ACN 126 819 154</b>
<b>Benefit Pocket Pty Ltd</b>	<b>ACN 615 942 311</b>

# Our operations

In Australia, Bupa ANZ provides a broad range of health and care services, including aged care and retirement villages, dental and optical care, health insurance, distribution of certain general insurance products, medical assessment services, integrated healthcare to serving defence force personnel and community wellbeing initiatives.

Our health insurance business provides quality, affordable health insurance covering more than three and a half million Australians through our digital and online services, 65 retail stores and our customer call centre.

During the reporting period, our villages and aged care business operated around 60<sup>1</sup> homes and villages across Australia, providing residential aged care, respite, and specialised dementia care services. We are a leading aged care provider, with one of the largest networks of residential aged care homes in Australia. Our dedicated teams are passionate about supporting the needs of our residents and ensuring we have a positive impact on their wellbeing.

We operate 221 dental clinics across Australia, including more than 145 Bupa Members First clinics, where our professionals provide a full range of dental services including routine check-ups, professional cleaning and oral hygiene advice to our customers.

We also operate 47 optical stores across the country with the purpose of delivering quality eye care advice and information for our Bupa members and retail customers, alongside an extensive range of quality frames and lenses.

Bupa Health Services Pty Ltd is responsible for the provision of migration medical services to visa applicants in Australia for the Department of Home Affairs. It also provides an integrated health care system to the Australian Defence Force (ADF). This system provides end-to-end health care to approximately 85,000 ADF personnel, delivering services both on-base and through a network of off-base providers. We also provide medical and advisory services, to the Department of Veterans' Affairs for the benefit of veterans and their families.

In 2021, Bupa ANZ launched two new digital customer offerings – Blua and Benefit Pocket.

Blua brings new digital services to customers' mobiles and other digital devices, via telehealth and virtual consults.

Benefit Pocket is a curated health and wellbeing app and is free to download and join for all Australians, regardless of whether they are a Bupa member. Offers from 30+ partners are available on the app, with the number growing as new partners join the platform.

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<sup>1</sup> In 2021, Bupa sold some of its homes as part of planned portfolio optimisation initiatives.



Currently Bupa Asia Pacific (APAC) services 6.5m customers across five business units, enabled by more than 22k people

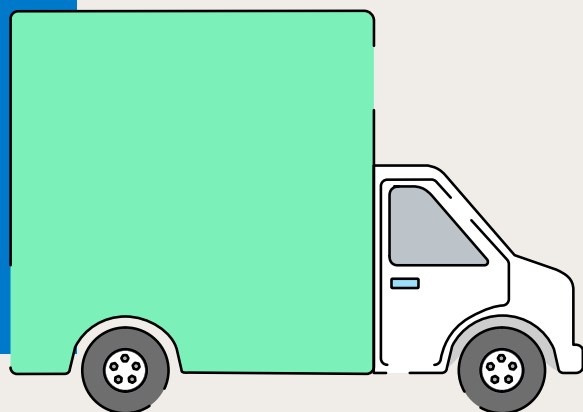
	Health Insurance (HI)	Bupa Dental	Bupa Optical & Hearing (BOH)	Bupa Medical Visa Services (BMVS)	Australian Defence Force (ADF)	Bupa Villages and Care Australia (BVAC AU)	Bupa Villages and Aged Care NZ (BVAC NZ)	Bupa Health Insurance HK (HKI)	HK Health Services (HKHS)		
<b>Customers</b>	2m Members 3.9m Lives	596k Customers	216k Customers	329k Assessments	237k Offsite appointments	5,327 Occupied beds at Dec	64 Occupied village units at Dec	3,320 Total occupied beds at Dec	1,777 Occupied village units at Dec	468k <sup>1</sup> Customers	893k Customers
<b>Sites</b>	65 Retail stores	221 Sites	47 Sites	6 Sites	0 Sites	59 Care homes	1 Retirement village	49 Care homes	37 Retirement villages	0 Centres	89 Centres

1. Customer numbers includes ~14k health and wellness customers

## Our supply chain

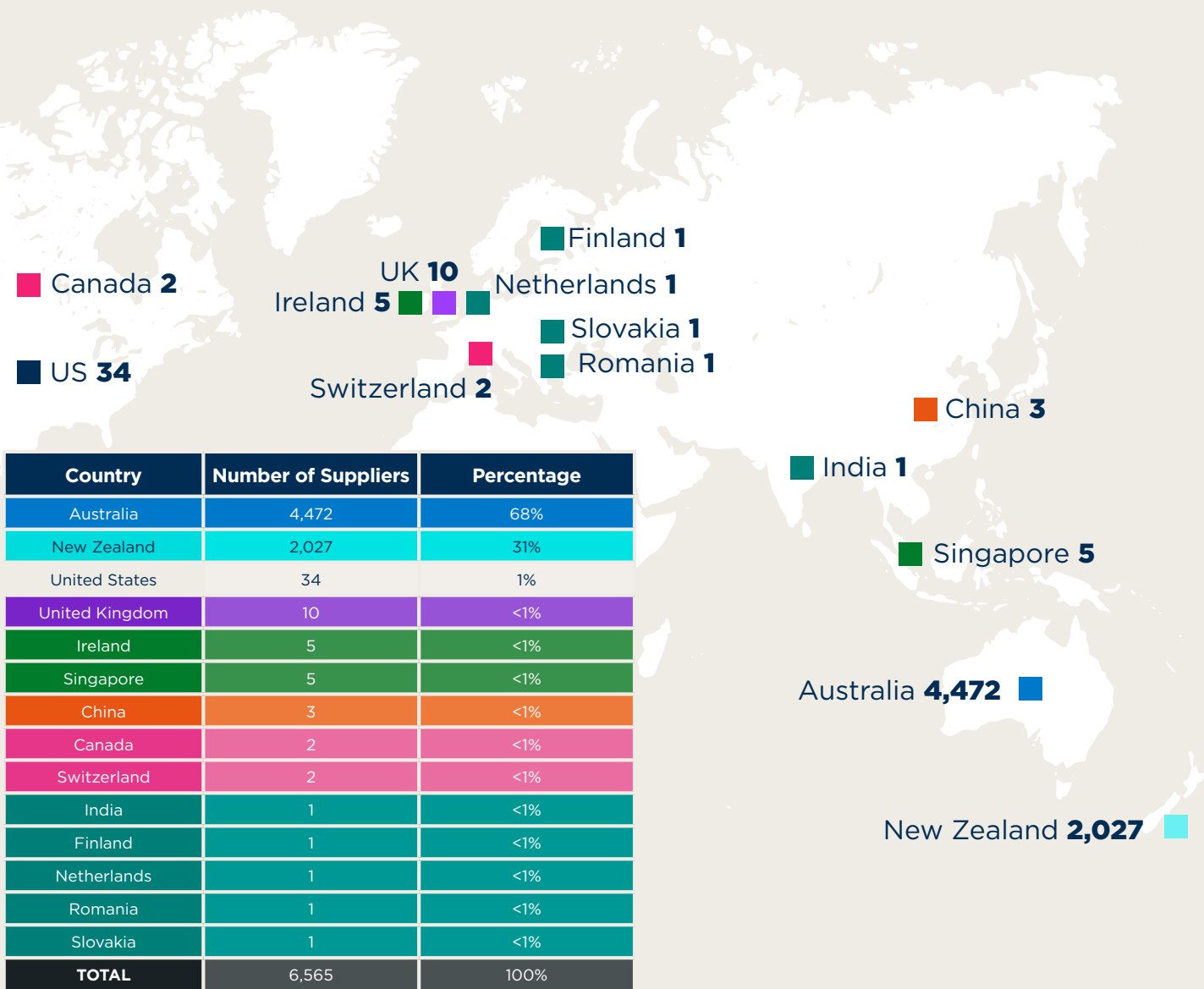
More than 99% of Bupa ANZ’s direct suppliers are located within Australia and New Zealand. However, Bupa ANZ also relies on a global supply chain to support its various businesses across Australia.

For the FY21 period we have identified over 6000 direct suppliers (excluding hospital and healthcare providers) from across 31 countries that are providing goods and services to our Australian operations.



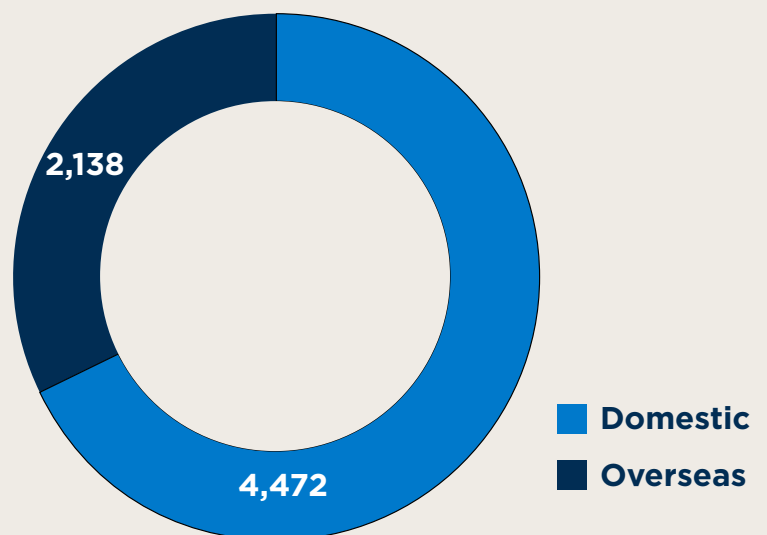
# Ten largest countries for procurement spend by Bupa ANZ's supplier origin

(representing more than 99% of Bupa ANZ's suppliers)



## Origin of suppliers

Location of Bupa ANZ's direct suppliers





Bupa ANZ has worked to identify the risk of modern slavery practices in our supply chain, based on the geographical locations of the suppliers and specific industry risk factors.

To better understand the opportunities Bupa has to support improved practices with key suppliers to our Australian businesses, we conduct an annual review of spend across different procurement categories. We also undertake risk assessments of our suppliers. To date, this has occurred on a bi-annual basis with Bupa engaging consultants to undertake such work in 2020, and with our next supplier risk assessment due to be completed by the end of 2022.

In 2021 our top five highest procurement spend categories were:

1. Professional services. Primarily medical services, but also includes services that range from strategic advice to administration including advisory, consulting, legal, recruiting, and real estate services.
2. Medical. Includes services such as dental services and supplies, diagnostic imaging, ophthalmic, pathology, medical consumables, orthopaedics, radiology, anaesthesia, among others.
3. Property services. Includes services such as rent and rates, parking and managing agents' services.
4. Business Systems. Includes software, hardware for business systems, onshore professional services, and consultancy services.
5. Construction. Includes building contractors, refurbishment services, architects, and consultancy.

### **Hospitals and healthcare providers in Bupa ANZ's Supply Chain**

Given the nature of our private health insurance business in Australia we have a significant number of contracts in place with private hospitals and other healthcare providers. Hospitals and other healthcare providers do not provide services directly to Bupa ANZ, rather they provide services to Bupa HI Pty Ltd health insurance business members, and Bupa HI Pty Ltd pays benefits on behalf of its members directly to hospitals or the healthcare providers.

We are aware of modern slavery risks associated with the healthcare industry, particularly in respect of the manufacture of healthcare equipment and supplies.

This year we considered the approaches of our major healthcare providers to better understand their workforce, their modern slavery commitments, and supply chain risk management, including opportunities to learn from each other.

## Criteria **3**

# Risk of modern slavery practices in the operations and supply chains

**Our approach includes monitoring our portfolio through ongoing business reviews and supplier relationship management, annual reviews, industry engagement forums and external issues scanning.**

### Operations risk

The 2020 assessment of modern slavery practices in our operations did not identify any instances of modern slavery. In prior years, our aged care operations, like many in this sector, have used a higher amount of contingent workers, including professional nurses and casual workers, however workforce and border restrictions arising from the COVID-19 pandemic greatly restricted the use of such workers in 2021.

In order to help identify and address modern slavery risks associated with contingent and migrant workers, Bupa ANZ completes a number of checks as part of our people screening and onboarding processes. These include identity verification, determining whether individuals have a right to work in Australia, criminal record checks and, in appropriate cases, adverse financial screening checks. Together, these checks can help identify modern slavery risk before people join our business. In addition, Bupa ANZ completes quality assurance on our screening and onboarding processes.

As part of our continued response to modern slavery risks, we are investigating how we best collaborate with our business partners to discuss and support their anti-modern slavery strategies, and to identify opportunities to work together to help eliminate such risks throughout the visa and recruitment processes.

Furthermore, we are committed to raising awareness and strengthening our modern slavery risk management processes with our people, suppliers, and partners. As part of these efforts, we will be undertaking a dedicated communications campaign on modern slavery in 2022.

### Supply chain risk

We continue to track supplier performance on modern slavery against our comprehensive risk assessment process. In 2020 this highlighted that 0.1% of our suppliers were considered high-risk at that time.

Our risk assessment levels are informed by the Global Slavery Index and reports of modern slavery activity based on geographical region and industry sector.

**Table 1: Bupa ANZ's direct suppliers categorised by risk score**

Risk Category	Number of Suppliers
Low Risk	(0.58%)
Medium Risk	(99.41%)
High Risk	(0.01%)

There have been no instances of identified or reported modern slavery relating to Bupa ANZ's procurement of goods and services in the reporting period. Notwithstanding this, we remain vigilant to identifying, monitoring, and managing modern slavery risks both now and in the future.

**Table 2: Bupa ANZ’s supplier categories of interest in modern slavery response**

Industry Sector	Relevance to Bupa ANZ
<b>Cleaning Services</b>	Bupa contracts professional cleaners to maintain our hygiene standards across our corporate offices, aged care homes, dental clinics, and retail store fronts.
<b>Construction</b>	Bupa contracts construction services to conduct property fit out arrangements for our retail and corporate premises.
<b>Electronics</b>	Bupa procures an extensive range of electronic equipment across our corporate, aged care and health services operations.
<b>Medical Equipment</b>	Bupa procures a broad range of specialist equipment in our healthcare and age care businesses, including medical, dental, and optical testing and diagnostic equipment.
<b>Personal Protective Equipment (PPE)</b>	Bupa procures PPE including masks, gloves, and googles to protect employees and lower the chances of infection.

Bupa ANZ requires all suppliers to comply with its Supplier Code of Conduct which makes clear our expectation that suppliers, subcontractors, and their respective supply chains comply with all domestic legislation, all applicable International Labour Organisation (ILO) conventions and protocols, and the United Nations Universal Declaration of Human Rights.

Further, in 2021 we became a subscriber to Givvable; a smart technology platform which enables Bupa ANZ to review and track our supplier’s sustainability credentials and attributes.

The platform covers over 500 local and global credentials, such as certifications, accreditations, ratings, and initiatives, which are mapped to environmental, social and governance (ESG) themes (including modern slavery) drawn from leading sustainability frameworks and industry standards.

The use of Givvable is part of our approach for better understanding our suppliers ESG credentials. Using this platform, in-house teams can identify and engage suppliers who have an existing Modern Slavery (or equivalent) statement or Human Rights policy and can demonstrate values that align with Bupa’s approach.

Bupa ANZ has also worked with a specialist consultant to assess our sustainable procurement readiness. The review included an analysis of high-level procurement spend data, stakeholder engagement and benchmarking against leading sustainable procurement practice with Modern Slavery being a key driver of this work.

Priority actions identified and incorporated into our 2022 program of work to address modern slavery include, but are not limited to:

- The development and roll out of an assessment framework to identify and address MS risks in our supply chain.
- Investigating third-party supplier risk management solutions that will enhance our ability to identify, monitor, and address modern slavery risk in our extended supply chain.
- The provision of Modern Slavery awareness training to employees and specialised modules for the executives, customer facing and contingent workers
- Increased levels of supplier engagement and the exploration of partnership opportunities with healthcare and hospital providers

## Criteria 4

# Our approach to modern slavery risk

In response to the Act, in 2021 Bupa ANZ has undertaken activity to scope and develop our strategy in a manner that is appropriate for our business and will continue to strengthen our efforts in this respect.

Our current framework includes reporting mechanisms to monitor, detect and respond to unethical and criminal conduct.

Our [Speak Up policy](#) sets out our commitment to ensuring our people can confidently report concerns about matters relating to Bupa ANZ that aren't, or don't seem, right (including modern slavery concerns and breach of relevant Bupa policies). Such concerns may be reported anonymously if that is the reporter's preference. All concerns raised via Speak Up are taken seriously and addressed appropriately by our in-house representatives, who may in turn involve external parties where appropriate. The Speak Up website and hotline are managed by a specialist external partner, can take queries and concerns in multiple languages and is available 24 hours a day, 7 days a week.

In addition to our Supplier Code of Conduct (refer Criteria 3) and Speak Up policy, Bupa ANZ and Bupa Group also have a number of policies and codes that are relevant to tackling modern slavery in relation to the business's operations and suppliers:

- **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.
- **Bupa Code** applies to all of our 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; and
- **A 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.

Throughout 2021, we provided specific training and information sessions to our Procurement and Sustainability teams, to increase awareness and support our people in identifying potential cases of modern slavery within our business. We will be extending this training to a wider audience of internal stakeholders in 2022.

Bupa ANZ runs mandatory training for employees on the Bupa Code and our Speak Up arrangements.

Our approach to modern slavery is overseen by Bupa ANZ's ESG Committee. This Committee includes five members of our Executive Leadership team and senior leaders from across our Business Units.

This high-level governance body will continue to identify opportunities for us to monitor and advance progress on our modern slavery response.

## Criteria **5**

# Assessing effectiveness

Bupa ANZ will continue to update and review existing policies to acknowledge and respond to modern slavery risks; these reviews will include a series of performance metrics to track implementation and will be monitored by both the policy owner and the ESG Committee.

We will build on this over time by closer engagement with our higher-risk suppliers on their modern slavery risk management and controls and, where appropriate, consider unique modern slavery related performance targets for key suppliers.

We are not aware of any instances of modern slavery in our operations or supply chain and no items relating to Modern Slavery were reported via Speak Up in 2021.

We also hope that a decline in restrictions related to the COVID-19 pandemic will allow for easier engagement with key suppliers and our people on issues related to modern slavery in 2022 and beyond.



## Criteria 6

# Consultation process

To promote a coordinated response across the Bupa ANZ business, our ESG Committee provides senior level oversight and accountability for our ongoing response to modern slavery, including ongoing monitoring of our enterprise-wide implementation. This includes sharing lessons learned about due diligence and supplier engagement and embedding continuous learning across the business. The Committee includes representatives from Corporate Affairs, Legal, Finance, People, Procurement, Risk, and all major Business Units.

To build internal awareness and capability, we have also conducted information sessions where specialist consultants have presented to key internal stakeholders such as Procurement, Risk and Sustainability on Modern Slavery and Ethical Supply chain practices. Topics covered included human rights, fair working conditions and integration of ESG principles into supply chain and procurement processes.

Bupa ANZ has worked closely with Bupa Group regarding their response to the UK Modern Slavery Act 2015 (UK). Bupa ANZ will maintain this dialogue, continuing to share learnings to help address modern slavery.





