



Bupa Australia Modern Slavery Statement 2022



Bupa Australia

Modern Slavery Statement 2022



Statement on Modern Slavery

Bupa's purpose is to help people live longer, healthier, happier lives and make a better world. This purpose underpins everything we do, guiding our decision making, business operations and stakeholder relationships, including our commitment to uphold human rights in our business and its supply chain.

To deliver health and care to our 4.5 million health insurance and 2.7 million health provision customers, our Australian workforce of over 16,000 people is supported by thousands of suppliers from across Australia and New Zealand, as well as a smaller number from overseas. We know that it is vital we remain vigilant to modern slavery risks within our supply chain, as well as within our direct operations, and are committed to working alongside the Australian government, the healthcare sector and the wider community to mitigate and address these risks.

In accordance with Australia's *Modern Slavery Act 2018* (Cth), this statement reports on Bupa Australia's approach to identifying and addressing modern slavery risks across our operations and supply chain in 2022. It outlines the way our business is structured, how we interact with suppliers, and summarises the work we have undertaken over the course of the 2022 reporting period to assess and manage modern slavery risks.

Bupa's global ambition is to become the world's most customer-centric healthcare company. As we strive to take a leading role in improving the way healthcare is delivered for the benefit of current and future customers, we acknowledge that to do so involves protecting the rights, freedoms and health of everyone who contributes to that ambition.

Nick Stone
Bupa APAC | Acting 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 2 May 2023 and Nick Stone is authorised to sign this statement as the CEO of those entities.

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Reporting entities

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')

This modern slavery statement responds to the Australian *Modern Slavery Act 2018* (Cth). Bupa has focused on modern slavery risks in our operations and supply chain relevant to our Australian businesses. This statement covers the reporting period between 1 January 2022 and 31 December 2022.

Definitions

Bupa

Refers to Bupa ANZ Healthcare Holdings Pty Ltd and Bupa ANZ Insurance Pty Ltd, which are the subjects of this statement. References to “we”, “us” and “our” are to Bupa.

Bupa Group

Refers to the British United Provident Association Limited's wholly owned and controlled companies. References to Bupa Group do not necessarily refer to each of the entities respectively but to the group as a global organisation. Certain other Bupa Group companies are reporting entities under other modern slavery legislation in international jurisdictions.



Reporting entities structure, operations and supply chains

Bupa Group's structure

Bupa Group is an international healthcare company serving around 43 million customers worldwide. With no shareholders, Bupa Group reinvests profits into providing increased and better healthcare for the benefit of current and future customers.

Bupa Group directly employs around 82,000 people, principally in the UK, Australia, Spain, Chile, Poland, New Zealand, Hong Kong SAR, Türkiye, Brazil, Mexico, the US, Middle East and Ireland. Bupa Group also has associate businesses in Saudi Arabia (Bupa Arabia) and India (Niva Bupa) and an interest in MyClinic in Saudi Arabia. For more information, visit www.Bupa.com.

Bupa in Australia

Bupa entered the Australian market in 2002. As of 31 December 2022, our workforce in Australia comprised 14,206 direct employees and 2,016 contingent workers serving over 4.5 million health insurance customers, 2.7 million health provision customers and around 5,100 residents. Bupa Australia defines contingent workers as those who are not an employee of and are not paid directly by Bupa Australia. Contingent workers are normally engaged and paid through an external agency or professional services firm.

Bupa controls a range of Australian affiliated entities¹ under the leadership of the Bupa ANZ Board of Directors. The Board is responsible for maintaining high standards of service and effective governance across our entire operations.

¹ Some of these entities include:

Bupa Aged Care Australia Pty Ltd ACN 082 931 575

Bupa HI Pty Ltd ACN 000 057 590

Bupa Health Services Pty Ltd ACN 003 098 655

Bupa Innovations (ANZ) Pty Ltd ACN 614 905 967

Bupa Wellness Pty Limited ACN 145 612 951

Bupa Dental Corporation Limited ACN 161 650 979

Bupa Medical Services Pty Limited ACN 168 581 548

Bupa Optical Pty Ltd ACN 126 819 154

Benefit Pocket Pty Ltd ACN 615 942 311

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Our operations in Australia

In Australia, Bupa provides a broad range of health and care services, including aged care and a retirement village, dental and optical care, health insurance, distribution of certain general insurance products, medical assessment services, integrated healthcare to serving Australian Defence Force (ADF) personnel and community wellbeing initiatives.

Our health insurance business provides quality and affordable health insurance covering 4.5 million Australians through our digital and online services, 60 retail stores and our customer call centre. We issue health insurance policies to international visitors to Australia and international students, which represented around 350,000 customers at the end of December 2022. As part of Bupa's suite of general insurance products, we also offer car, pet, home, landlords and travel insurance.

During the reporting period, our Bupa Villages and Aged Care business operated 59 aged care homes and 1 retirement village, 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 operated 180 dental clinics across Australia, including 54 Bupa Members First and 91 Bupa Members First Platinum clinics, where our professional team provides a full range of dental services including routine check-ups, cleaning and oral hygiene advice to our customers.

We also operated 47 hearing and optical stores that deliver quality eye care advice and information for 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 and provides an integrated health care system to the ADF. This system provides end-to-end health care to around 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.

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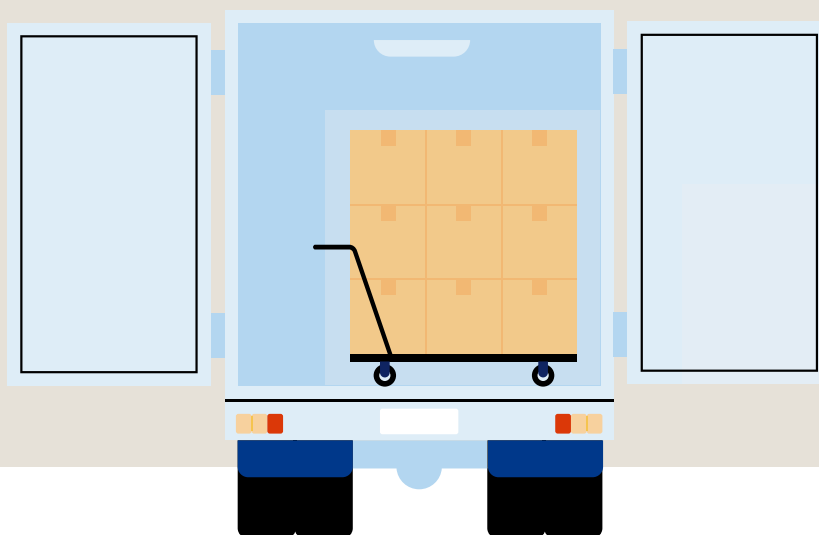
Our supply chain

In Australia, Bupa relies on domestic and some international supply chains to support our operations. In 2022, more than 97% of Bupa's procurement spend went to direct suppliers located in Australia and New Zealand.

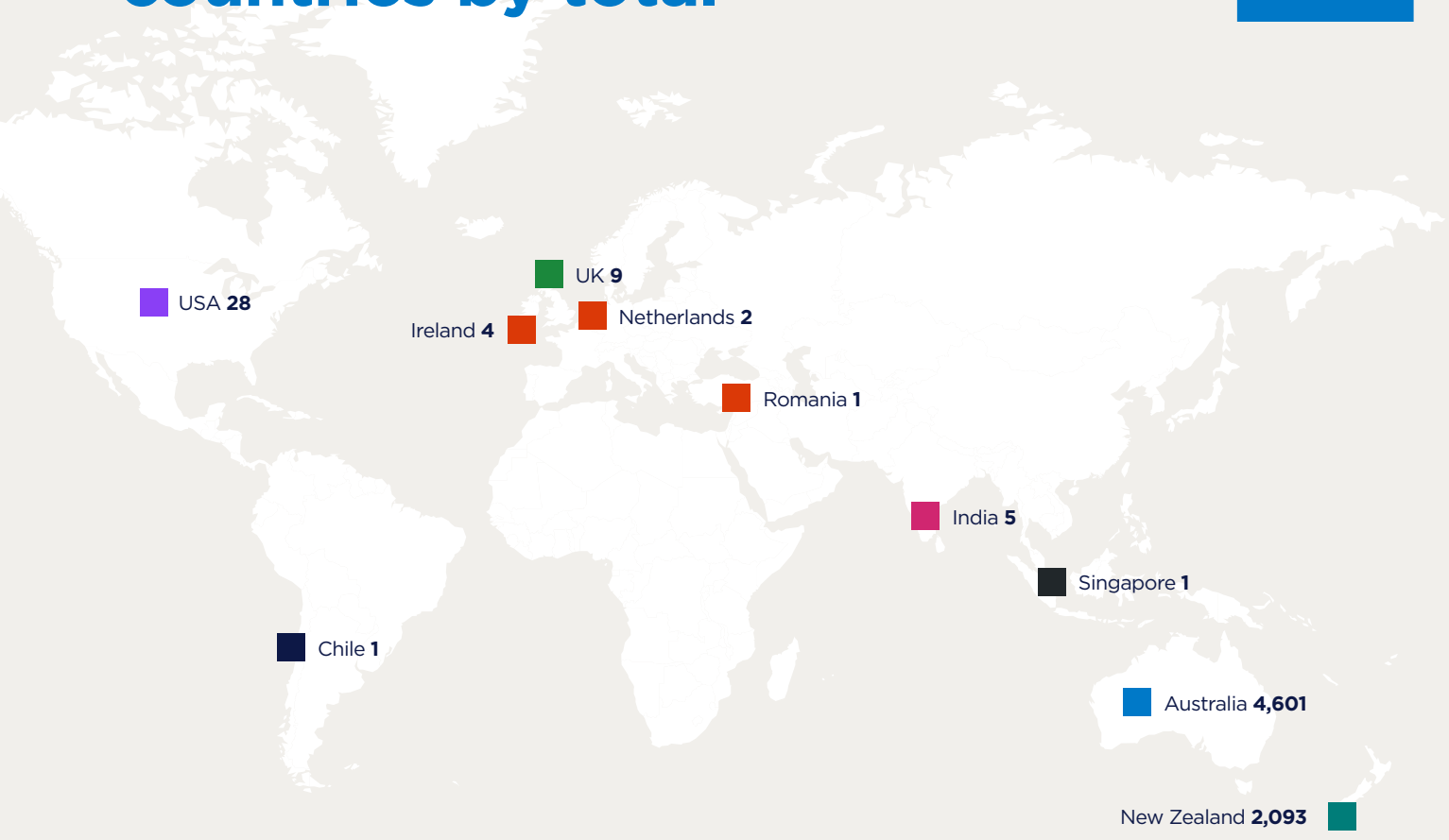
Across the 2022 reporting period, we identified 6,757 suppliers from 20 countries, representing a spend of over \$1.1 billion, that are providing goods and services to our operations.

Bupa's highest-spend supplier categories

Category Group	Number of suppliers	Percentage of spend
Medical	1371	35.5%
Facilities Management	3052	25.0%
Technology	451	14.4%
People Services	832	9.6%
Marketing & Travel	510	6.7%
Professional Services	382	5.9%
Food & Beverage	63	2.9%



Top ten Bupa supplier countries by total



Country	Number of suppliers	Percentage of spend
Australia	4,601	83.5%
New Zealand	2,093	14.4%
United States	28	<1%
United Kingdom	9	9.6%
India	5	1.5%
Ireland	4	<1%
Netherlands	2	<1%
Romania	1	<1%
Singapore	1	<1%
Chile	1	<1%



Risk of modern slavery practices in our operations and supply chains

Operations

No instances of modern slavery were reported via Speak Up or our risk management systems relating to our operations in 2022. More information about Speak Up can be found on page 12.

Bupa uses contingent workers, which may include migrants, as part of our normal operations, particularly in our aged care business. A high contingent workforce may represent a higher risk of modern slavery where Bupa does not have a direct line of sight into the operations of agencies and other people-related suppliers on which we rely. These suppliers, as with all suppliers to Bupa, are required to comply with the Bupa ANZ Supplier Code of Conduct, other relevant Bupa policies and all relevant laws that prohibit modern slavery practices including bonded labour, forfeiture of identity documents and financial crime. More information on the Bupa ANZ Supplier Code of Conduct can be found on page 13.

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New in 2022:

- ★ We used digital tools to conduct an in-depth analysis of 110 high-spend suppliers' modern slavery risk

Supply Chain

Bupa expects all suppliers to understand and adhere to the Bupa ANZ Supplier Code of Conduct (**Code**), which sets out 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 Guiding Principles on Business and Human Rights. We continue to track supplier performance on modern slavery using our risk assessment systems which include considerations of modern slavery risk informed by these laws, conventions, protocols and our Code.

To add to our existing risk assessments, in 2022, Bupa embarked on a broad Environment, Social and Governance (ESG) assessment for a selection of 110 high-spend suppliers. This assessment piloted digital platforms that measure the degree to which suppliers are meeting their modern slavery obligations as per the Code as well as other key metrics.

The ESG assessment sent questionnaires to 110 of Bupa's high-spend suppliers. Against a target response rate of 50%, 45% was achieved in 2022 which represented a spend of around \$300 million, or 38% of Bupa's total supplier expenditure.

A further 60 non-responsive suppliers were assessed for modern slavery risks through secondary research by reviewing publicly available modern slavery statements and human rights policies on supplier websites.

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Bupa received the following data from our supplier ESG assessments related to modern slavery risk:

Table 1: Bupa's direct suppliers by modern slavery risk category:

Risk level	Number of assessed suppliers	Percentage of assessed suppliers
Low Risk	23	20.9%
Medium Risk	86	78.2%
High Risk	1	0.9%

Risk category descriptions:

- **Low Risk:** No source materials/services from high-risk countries/sectors and compliant response to questionnaire
- **Medium Risk:** Some source materials/services from high-risk countries/sectors, or non-compliant/no response to questionnaire
- **High Risk:** Response to questionnaire indicated insufficient controls to mitigate modern slavery, for example: no current policies or submitted modern slavery statements.

The ESG assessment data was reported back to Bupa's ESG Committee in December 2022. The assessment categorised one supplier into our New Zealand operations as high-risk, the supplier having engaged with the assessment but not indicating sufficient controls in place across their business to mitigate modern slavery risk.

In the time since this was identified, the services provided by the supplier were put to market as part of Bupa's program to streamline procurement operations. Should the supplier introduce sufficient modern slavery risk controls, they will become eligible for future tender responses.

We understand that insufficient modern slavery risk controls do not necessarily mean suppliers are linked to modern slavery. Our goal, in the first instance, is to engage with high-risk suppliers to understand their position and identify opportunities to offer support. In 2023, we will build on this approach to develop a high-risk supplier engagement policy that outlines steps Bupa will take when they are identified in our supply chain.



Our approach to modern slavery risk

New in 2022:

- ★ We updated the Bupa ANZ Supplier Code of Conduct to include a specific clause related to modern slavery, requiring suppliers to meet our human rights expectations
- ★ We piloted programs and tools to build on our awareness of modern slavery risk and determine a way forward for ongoing third-party assessments of our suppliers
- ★ We joined a healthcare sector community of interest to share and receive insights on best-practice and to foster collaboration on modern slavery risk management with peers
- ★ We approached business and not-for-profit leaders in managing modern slavery risk to learn more about how we can improve our approach

People

Workforce due diligence

To monitor modern slavery risks across Bupa's workforce, including migrant and contingent workers, we complete several 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, where appropriate, adverse financial screening checks. We also complete quality assurance on our screening and onboarding processes.

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People

Whistleblower program

Speak Up is our whistleblowing service and can be used by anyone who has a concern about Bupa, our suppliers or our partners – this can include individuals and organisations. Speak Up ensures people can raise genuine concerns about wrongdoing, misconduct or risk of harm in confidence and anonymously, if preferred. We take concerns seriously and the people who raise them can be confident that they'll be heard, protected and supported. Every report is subject to appropriate action. Alongside our Enterprise Speak Up Policy, the accompanying Speak Up Information and Process Standard explicitly lists modern slavery as a concern that can be raised through Speak Up.

The Speak Up phone line can take queries and concerns in 75 different languages and is available across the Bupa Group 24 hours a day, 7 days a week.

All Bupa employees, both at onboarding and throughout their employment, receive training in how Speak Up can and should be used to raise grievances or concerns.

Training and awareness

Bupa has provided initial modern slavery awareness training to its Procurement and ESG functions as a first step to integrating modern slavery awareness across our broader businesses. Training will be expanded in 2023 to reach a larger group of Bupa people with content that is meaningful and relevant to their work.

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Policies

Bupa ANZ Supplier Code of Conduct

Bupa requires all suppliers to comply with the Bupa ANZ Supplier Code of Conduct (**Code**).

The Bupa ANZ Supplier Code of Conduct clearly and explicitly sets out 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.

The Bupa ANZ Supplier Code of Conduct includes a specific clause related to modern slavery, requiring that suppliers always act consistently with relevant modern slavery legislation and proactively identify, address and, where appropriate, report on modern slavery risk (including all forms of human trafficking, forced labour and debt bondage) in their business operations and supply chains. In previous years, the Bupa ANZ Supplier Code of Conduct imposed a general duty on suppliers to follow all applicable laws in relation to their operations. By including a specific requirement related to modern slavery in 2022, Bupa demonstrated both our acknowledgment that this is a growing issue in a wide range of sectors with which we may engage and that addressing the issue is a focus for our business.

According to the Bupa ANZ Supplier Code of Conduct, suppliers must not require workers to surrender any government-issued identification, including their passport or work permit, or any other personal documents as a condition of employment. Further, workers must not be required to pay employers' or agents' recruitment costs or any other fee for their employment.

Suppliers must also familiarise themselves with the United Nations Guiding Principles on Business and Human Rights and raise awareness of these Principles internally to ensure compliance with their responsibilities in protecting human rights.

The Bupa ANZ Supplier Code of Conduct also imposes conditions on suppliers with respect to areas that often give rise to modern slavery practices, including non-discrimination, freedom of association, wages and benefits, working hours, child and underage labour and financial crime. It is reviewed and updated as required annually.

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Policies

Other relevant policies

In addition to the Bupa ANZ Supplier Code of Conduct and Enterprise Speak Up Policy, Bupa people and suppliers are bound by other policies and codes that are relevant to tackling modern slavery in our operations and supply chains, including:

The Bupa Code: The high standards of ethical behaviour we expect from our people are outlined in the Bupa Code. Alongside our values, the Bupa Code acts as a moral compass for everyone that works at Bupa. It gives us a simple decision-making framework to help us do the right thing by our people, customers, residents and patients. It also displays our commitment to being a responsible business.

People Policy: Sets out requirements to mitigate Bupa's people risks, including ensuring lawful practices and employment contracts, and defines key principles including "protection of people". Through our People Policy we promote a workplace environment that is fair, respectful and protective of the rights of all employees.

Enterprise Suppliers Policy: Ensures we have effective processes for the selection, contracting and management of all our suppliers and addresses the risks of inappropriate contracting and supplier failure. It mandates specific requirements including segmentation assessments that take account of modern slavery risks.

Enterprise Financial Crime Risk Policy: We recognise the intrinsic link between modern slavery and financial crime, with modern slavery thriving through corruption and generating proceeds of crime which are laundered through the financial system. Our Enterprise Financial Crime Risk Policy sets out our obligations regarding financial crime risk management, specifically bribery and corruption, money laundering and terrorist financing, fraud, sanctions and failure to prevent the facilitation of tax evasion.

Brand and Reputation Management Policy: Sets out the actions Bupa people must take to protect our brand and reputation, including escalating all potential and live issues to Corporate Affairs & Sustainability immediately. These actions help to create a risk-aware culture across Bupa Australia and an alternative frame through which our people can identify inappropriate business practices occurring across our operations.

These policies and codes are regularly reviewed and, where appropriate, updated by the relevant function in consultation with People and executive leadership.

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Technology

In 2022, Bupa piloted a range of digital tools to gain a view of technology that provides insights on supplier performance and market intelligence on ESG metrics. These pilots will inform decisions about ongoing assessment and management of ESG risks including modern slavery.

One digital tool, managed by a leading technology and accounting consultancy, facilitated the 2022 ESG assessment involving questionnaires delivered to key suppliers as well as supplementary desktop research for non-responsive suppliers. Through this process, we gained important insights into our key suppliers' ESG indicators across Modern Slavery, Net Zero ambitions, risk management systems and diversity & inclusion. The assessment established moment-in-time data for cross-functional reviews of supplier performance on modern slavery risk, a tool for comparison against alternative suppliers and areas for action to increase the degree of alignment between our suppliers and Bupa's ESG strategies.

Bupa also maintained its subscription to a smart technology platform that enables us to review and track our suppliers' ESG credentials, including their adherence to modern slavery risk reporting requirements. We can use this platform to conduct high-level and up-to-date reviews of supplier performance as needed, for example, when vetting potential new suppliers.

Collaboration

In 2022, a modern slavery specialist was invited to discuss existing and emerging trends in labour and human rights issues around the world as well as corporate best practice in responding to them with our ESG team. We also continued to work with corporates leading in modern slavery risk mitigation to assess our sustainable procurement readiness, including our approach to modern slavery risk assessment, an analysis of high-level procurement spend data and our approach to stakeholder engagement.

Bupa, alongside Australian peers, is a member of a healthcare sector community of interest focused on the topic of modern slavery. Members of this group share and receive insights into processes and controls to prevent modern slavery, with the view to improving the overall sector response. We also collaborate independently with business and not-for-profit advocacy groups to determine the effectiveness of our approach and identify opportunities to improve where we can. This approach builds on Bupa's desktop benchmarking process to identify areas for improvement and enables the exploration of collaborative opportunities with like-minded organisations.

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Hospitals and healthcare providers delivering services to Bupa members

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 service Bupa members, and do not provide goods and services direct to Bupa itself. Bupa pays benefits on behalf of its members directly to these hospitals and healthcare providers.

Bupa acknowledges the modern slavery risks associated with the healthcare industry, particularly in the manufacture of healthcare equipment and supplies. In 2023, Bupa will explore opportunities with hospital and healthcare providers to consider shared opportunities for modern slavery mitigation.



Assessing effectiveness

New in 2022:

- ★ Bupa's response to modern slavery risk was discussed as an agenda item at every executive-level ESG Committee meeting held in 2022

In 2022, Bupa held five meetings of its ESG Committee, comprising senior leaders from across functional and business units including at the executive level, to ensure we meet our legal obligations and ethical ambitions in relation to human rights as well as to discuss our sustainability agenda. Modern slavery was discussed at all meetings of the ESG Committee in 2022 and will be included as a standing item at all ESG Committee meetings in 2023.

Bupa continues to update and review its policies to address and respond to modern slavery risks. These reviews can support the development and testing of metrics to track the effectiveness of our policies, processes and controls and will be monitored by both the policy owners and ESG Committee.

As of 2022, we are not aware of any instances of modern slavery in our operations or supply chain, and no reports of instances or concerns relating to modern slavery were received by the Speak Up program or through our risk management systems.

Consultation process

To promote a coordinated response across our business, Bupa's ESG Committee provides senior-level oversight and accountability for our approach to modern slavery risks, including monitoring of our enterprise-wide implementation. The ESG Committee is chaired by the Chief Sustainability & Corporate Affairs Officer and includes representatives from Corporate Affairs, Legal, Finance, Procurement, Risk and all our operating businesses. The Committee's terms of reference cover a broad field of ESG matters, including Bupa's contribution to, impact on, and role in society as well as external reporting such as modern slavery statements and emerging sustainability issues.

In addition to the ESG Committee, Bupa has convened a Modern Slavery Working Group specifically to develop strategies that address modern slavery risks and coordinate our response to the *Modern Slavery Act 2018* (Cth). Chaired by the Director of ESG and Sustainability, who is also member of the ESG Committee, the Modern Slavery Working Group ensures coordination between the Committee and Working Group on our overall approach to modern slavery.

2022 Modern Slavery Working Group Membership by role and function/business unit

Role	Function/Business Unit
Director ESG & Sustainability	Corporate Affairs & Sustainability (Chair)
Head of Sustainability APAC	Corporate Affairs & Sustainability
Director Procurement Property & Operations	Procurement
Head of Procurement	Procurement
Procurement Manager	Procurement
Legal Director	Legal
Senior Corporate Counsel - Regulatory	Legal
Legal Advisor	Legal
Head of Risk - Provisioning and Sustainability	Risk
Head of Policy - Risk and Education	People
People Policy & Risk Specialist	People
Analyst - Environmental Reporting	Finance
Head of People	Business Services
Head of People	Bupa Villages & Aged Care Australia

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Bupa Australia has worked closely with Bupa Group to develop this modern slavery statement. Bupa Group, headed in the UK, is subject to the *Modern Slavery Act 2015* (UK). We will maintain this dialogue and continue to share resources, lessons and insights that help address modern slavery and, ultimately, to fulfill our shared purpose of helping people live longer, healthier, happier lives and making a better world.

Priorities for 2023:

- Enhance and expand modern slavery awareness training
- Finalise the scope and methodology for a deep dive risk assessment for our highest-spend suppliers to deepen our understanding of Bupa's supply chain
- Develop a supplier engagement policy that guides our approach to engaging with high-risk suppliers
- Continue Bupa's cross-functional approach through internal collaboration at Working Group and Committee meetings to improve modern slavery risk management in our business
- Continue Bupa's membership of a healthcare community of practice as well as independent collaboration with relevant peers and not-for-profit advocacy groups to improve modern slavery risk management in our sector