

# BUPA'S THIRD PARTY SUPPLIER ANTI-SLAVERY POLICY

Bupa is committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own organisation and our global supply chain.

We expect you to work with us to ensure that modern slavery and human trafficking do not exist within our businesses and supply chains.

## What is Modern Slavery?

Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## Where can I find out more?

### UK Government

<https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

### Chartered Institute of Purchasing and Supply (CIPS)

<http://www.cips.org/en/Supply-Management/Analysis/2016/February/Think-your-supply-chain-is-free-of-slavery-Think-again/>

## Who has responsibility for this Policy within Bupa?

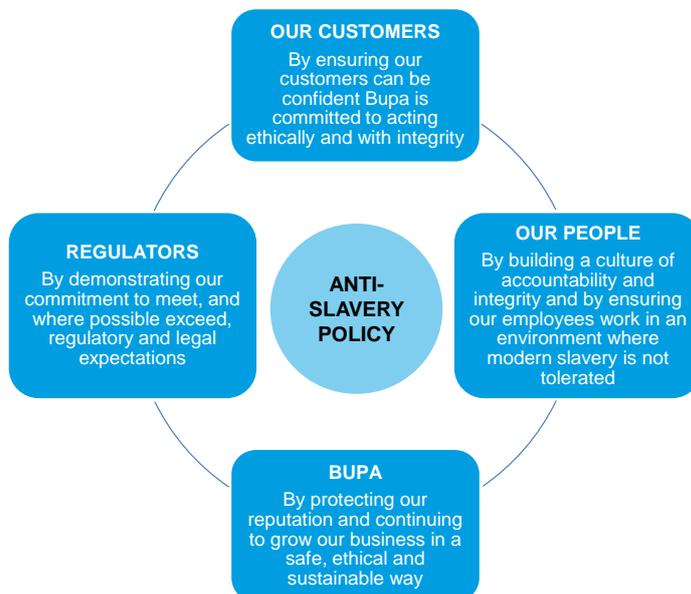
Bupa's board of directors has overall responsibility for ensuring this Policy complies with our legal obligations.

The Board has appointed a senior executive with primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

## Does this Policy apply to me?

If you are supplier of goods or services to Bupa then this Policy will apply to you. This Policy also applies to all hospitals/clinics within Bupa's global provider network, all direct third party administrators and re-insurance partners (each a "Third Party Supplier").

## Why is this Policy important?



## WORKING TOGETHER TO COMBAT MODERN SLAVERY AND HUMAN TRAFFICKING

### Bupa Commits to:

- Taking a robust approach to modern slavery and adopting a proportionate and risk-based response to the UK Modern Slavery Act 2015 (the “Act”).
- Prior to entering into any business relationship (or in the event something changes), assessing the risk of modern slavery and human trafficking occurring within a Third Party Supplier.
- Being transparent with respect to the steps it is taking and publishing a modern slavery and human trafficking statement in accordance with the requirements of the Act within 6 months of the end of each financial year.
- Encouraging openness and supporting anyone who raises genuine concerns under this Policy.
- Reviewing this policy from time to time and notifying Third Party Suppliers of any changes.

### You Commit to:

- Adopting your own approach to modern slavery which implements and enforces effective systems and controls to tackle modern slavery.
- Complying with any requests we may have for information enabling us to assess your modern slavery risk.
- Answering promptly and acting openly and with integrity in respect of any information requests we may have for you.
- Taking action to address any deficiencies in your organisation.
- Entering into Bupa’s standard contractual provisions relating to modern slavery.
- Raising any concerns you have via the appropriate channels mentioned below.

### How do I report incidents of Modern Slavery?

#### *Incidents affecting you*

If you believe or suspect you have breached this policy please raise this immediately through your usual Bupa contact at the earliest possible stage. If you feel they have not adequately addressed your concerns, please send your concerns in writing to the Corporate Controller at [ModernSlavery@Bupa.com](mailto:ModernSlavery@Bupa.com).

#### *Incidents affecting Bupa*

If you believe or suspect modern slavery may be occurring with Bupa, please raise this immediately through your usual Bupa contact at the earliest possible stage. If you feel they have not adequately addressed your concerns, please send your concerns and in writing to the Corporate Controller at [ModernSlavery@Bupa.com](mailto:ModernSlavery@Bupa.com). If you do not feel comfortable raising your concerns through these channels, you can raise this anonymously via our Speak Up channel at [www.bupa.com/speakup](http://www.bupa.com/speakup). Speak Up is a secure and confidential channel which you can use to report concerns about modern slavery in any part of our business or supply chains. Here you can share your concern either online or via our telephone hotline. We can receive concerns 24/7 and our call handlers can take reports in 75 different languages. By clicking on the 'Follow Up' section of the Speak Up site, you can see responses from our Speak Up team and you'll be able to write back to us in a confidential way.

#### *Our commitment to you*

Any concerns which you raise will be taken seriously, investigated and responded to appropriately and any request for confidentiality respected (to the extent possible under applicable law and regulation).

### **Further Information**

**If you have any questions regarding this Policy or its applicability to you, please contact your usual Bupa contact.**

**November 2016**