



Modern Slavery Guidance for Suppliers to Bupa in the UK

Contents



03 Introduction

04 Using this Guidance

05 What is modern slavery?

10 Bupa's expectations of suppliers

12 Implementing and maintaining an anti-slavery compliance programme

26 Examples of taking a risk based approach with suppliers

29 Useful resources and further reading

Introduction

Welcome to this Modern Slavery Guidance for suppliers worldwide working with Bupa entities in the UK.

Our business is founded upon and is centred around supporting the health and wellbeing of our people, our customers, our residents, and the communities in which we live and operate. We strive every day to fulfil our purpose: *“helping people live longer, healthier, happier lives and making a better world”*.

Being an ethical business is foundational to the way we do business and to our wider environmental, social and governance (ESG) agenda. As part of this, we are committed to identifying and addressing modern slavery risks across our organisation and supply chain in accordance with the UK Modern Slavery Act 2015.

We expect all suppliers to share our commitment to combatting modern slavery.

This guidance is intended to support you, our suppliers, by refreshing your awareness of modern slavery and by providing practical examples of steps you can take in your business and supply chain to detect and prevent it.



Using this Guidance

This guidance seeks to:

- **Refresh your understanding** of what modern slavery is, how the issue is escalating globally and in the UK, and how to spot potential indicators;
- **Provide an overview of the legislative and regulatory framework** relating to modern slavery;
- **Explain Bupa's minimum expectations** of our suppliers on modern slavery risk management; and
- **Set out the key pillars of an anti-slavery compliance programme**, providing practical examples of how to implement these pillars in order to manage modern slavery risk in your workforce and supply chain.



What is modern slavery?

What is modern slavery?

- Modern slavery is the removal of a person's freedom to exploit them for personal or commercial gain. It generates billions in illicit funds each year.
- Types of modern slavery include:
 - **Forced labour:** work or services people are forced to do against their will, usually under threat of punishment.
 - **Child labour:** a child is exploited for someone else's gain.
 - **Financial exploitation:** someone is coerced into handing over funds or assets.
 - **Human trafficking:** the recruitment, transportation, harbouring or receipt of people through force, fraud, coercion or deception, with the aim of exploiting them for profit.
 - **Domestic servitude:** someone forced to work in someone else's home with little freedom or pay.
 - **Criminal exploitation:** someone is forced into crime such as carrying drugs, forced begging, theft or fraud.
 - **Sexual exploitation:** actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes.



Case study: Lea's story

Lea works in a factory that manufactures medical equipment. She works 10 hours a day, 6 days a week and is paid less than the national minimum wage. She and the other workers are not given payslips.

The work can be physically demanding and workers are told by bosses that if they don't complete their tasks by the end of their shift they must stay until it is finished. If they refuse, or make mistakes in their work, their wages are docked.

They are not given appropriate clothing for the work. Accommodation is provided but it is substandard and run down, with intermittent electricity. Rent is also deducted from their wages, with the amount varying each week.

This case study includes several indicators of modern slavery, and is the reality for many workers globally. We all have a duty to be vigilant to the signs of modern slavery; take appropriate steps to understand and mitigate the risks in our supply chains; and protect those working for us.





Modern slavery cases are escalating

- **Cases of modern slavery are growing globally.** According to the 2023 Global Slavery Index, almost 50 million people are trapped in conditions of modern slavery around the world.
- In the UK, there are an estimated **122,000** victims of modern slavery. Calls to The UK Modern Slavery and Exploitation Helpline and referrals to the Home Office's National Referral Mechanism are **increasing year on year**.
- These figures are still likely to be underestimates given the **hidden nature of the crime** – victims may be too scared to report, not know their rights, or not realise they are victims.
- Forced labour is the most prevalent form of modern slavery globally. The 2022 Global Estimates of Modern Slavery report indicated that **86% of forced labour cases were found in the private sector**. Businesses therefore have a critical role to play in tackling modern slavery.
- Some jurisdictions impose legal requirements on companies to take steps to identify, prevent and report on modern slavery. More information on this can be found on slide 9, Snapshot of the legislative landscape.

Signs of modern slavery



By familiarising ourselves with potential signs, we can become more vigilant.

According to the UK charity [Unseen](#), potential indicators can include one or more of the following:

- **Behaviour** – withdrawn, scared and anxious; fearful of authorities; possible language barriers (migrant workers can be more vulnerable to modern slavery)
- **Appearance** – unkempt, malnourished, few possessions, old or new physical injuries
- **Work** – long hours, inappropriate clothing for the job
- **Accommodation** – overcrowded and poorly maintained; may not know home address
- **Lack of control** – no identification, no access to their bank account
- **Lack of freedom** – monitored, transported to work, acts as if instructed by another, no free access to finances

Snapshot of the legislative landscape



The UK

- **The Modern Slavery Act 2015** criminalises slavery, forced or compulsory labour and human trafficking.
- **Section 54 of the Act** obliges large organisations to **publish annual statements** setting out the steps taken to ensure modern slavery is not taking place in their supply chains or business. Bupa's Modern Slavery Statement is available [here](#).
- There is potential for the Act to be **strengthened** in the future, with additional penalties and reporting requirements introduced.



Other jurisdictions

- Legislation similar to the UK Modern Slavery Act 2015 exists in countries including **Australia**, the **US**, **Canada**, **Norway** and **Germany**, with large corporates required to report on how they prevent and address modern slavery risks in their operations and supply chains. Some go even further by imposing due diligence requirements.



Developments in the EU

- The **Corporate Sustainability Reporting Directive (CSRD)** will apply to certain companies (in and outside the EU) from 2025 onwards. This requires annual reporting on material ESG issues, including human rights.
- EU regulation will also **ban products made using forced labour** from the EU market, and through the **Corporate Sustainability Due Diligence Directive (CSDDD)**, environmental and human rights due diligence requirements will be mandated for certain EU and non-EU companies.

Public scrutiny of how businesses manage modern slavery risk continues to grow. Collectively, we need to be taking appropriate steps to address the risk.

Bupa's expectations of suppliers

1

Meet the expectations detailed in our [Responsible Supply Chain Statement](#)

2

Comply with all Applicable Laws on anti-slavery and/or human trafficking

Do not engage in any activity that would constitute an offence under section 1, 2 or 4 of the UK Modern Slavery Act 2015, if such activity had been carried out in the UK

3

Agree to our modern slavery contractual provisions

4

Implement and maintain a **reasonable** anti-slavery and human trafficking compliance programme

5

Notify us as soon as possible where a **suspected or actual incident** occurs, and let us work with you to **remediate**

6

Work **transparently** and **collaboratively** with us, and others, to take positive action towards the eradication of modern slavery

The next section of this guidance looks in detail at implementing and maintaining an anti-slavery compliance programme, setting out Bupa's minimum requirements where relevant

Implementing and maintaining an anti-slavery compliance programme

Key pillars of an anti slavery compliance programme



1. Policies that express commitment to, and drive action towards, the eradication of slavery, forced labour and human trafficking (including ensuring compliance with relevant laws where applicable)



2. Risk-based due diligence to identify modern slavery risks in your operations and supply chains, with appropriate mitigations put in place



3. Ongoing monitoring and assurance to manage changes to risk profile and ensure controls continue to be effective



4. Training and awareness
Risk-based employee and supplier training about modern slavery risks and preventative policies and procedures



5. Reporting mechanisms for staff and those in your supply chain to confidentially report concerns



6. Remediation
Ensuring appropriate actions are implemented to remediate any incidents, in partnership with other organisations

The following slides look at each of these pillars in more detail. Pages 14 to 19 look at managing modern slavery risk in your own operations, while pages 19 to 24 look at managing modern slavery risk with suppliers

Policies for your operations (1/2)

You should have policies in place for your business that set out your commitment and expectations regarding modern slavery risk management.

As a minimum, your suite of policies should include¹:

- Clear expectations regarding your employees' ethical conduct (may take the form of values or principles).
- A commitment to compliance with all applicable laws and regulations, setting out people's responsibilities and, where applicable, the processes that are in place to ensure compliance. Examples include a People Policy setting out how "people risks" are mitigated; an employee Code of Conduct; and/or safeguarding, health and safety, recruitment and background screening policies.

¹The type and nature of policies will vary depending on the size, nature and risk profile of the organisation



Policies for your operations (2/2)

- A grievance and/or whistleblowing policy that includes a confidential mechanism through which concerns can be raised. The policy should make it clear that those raising concerns will be protected from retaliation. See slide 16, “Reporting mechanisms”, for more information.
- A commitment to providing workers with written contracts setting out important information such as their working hours, pay and overtime rates, and holiday and sick pay entitlements.
- Some organisations may elect to produce specific modern slavery policies.

For policies to be effective, they should be endorsed and overseen by the top level of the organisation, and effectively communicated to your workforce.



Due diligence and ongoing monitoring for modern slavery risk in your workforce



You should have safeguards in place to identify modern slavery risks in your workforce at onboarding stage and throughout the employment lifecycle. As a minimum, you should have:

- **Appropriate pre-employment checks**, including identification verification, right to work checks and ensuring any labour providers/recruitment agencies are reputable
- **Appropriate communication** (such as through a contract) to each employee of the **terms and conditions of their employment**

You could also consider:

- Undertaking a **risk assessment** of your operations to identify internal risks, gaps and vulnerabilities, including high risk sectors and jurisdictions the business operates in; employee populations that may be more vulnerable to modern slavery; and existing controls that mitigate the risks identified
- Controls testing to assure the **effectiveness of procedures** to mitigate modern slavery risks associated with employees
- Data analytics to identify **indicators of modern slavery** within employee data, such as shared addresses and bank accounts
- **Worker surveys** to explore awareness of and confidence in grievance / whistleblowing mechanisms, amongst other matters

Training and awareness raising for your workforce

Your people need to know how to spot the signs and raise concerns in order to identify modern slavery risks and remediate incidents. We strongly recommend building awareness of modern slavery across your organisation, taking a risk-based approach that aligns with the structure of your business and risk profile. This could look like:

- **Communicating relevant policies** to your employees (see slide 14, [Policies for your operations](#))
- Providing **tailored training to relevant teams, taking a risk-based approach**. For example, training for your Procurement function on due diligence processes and enhancing Category Managers' general awareness of modern slavery risks in global supply chains
- Developing a specific e-learn **modern slavery training module** to all or part of the employee population, on a mandatory or voluntary basis, setting out key indicators and how to raise concerns internally and externally
- **Adding modern slavery content to existing associated training**, such as training on your Code of Conduct or Safeguarding training.
- **Sharing materials with your suppliers where appropriate** for them to consider implementing within their own organisations





Reporting mechanisms

As a minimum, you should have a mechanism through which your employees - and those in your supply chain - can confidentially raise concerns, including about potential exploitation and modern slavery, without fear of retaliation.

Such a mechanism could look like a web portal or dedicated phone line. It must establish a **transparent process**, communicated to all employees, for assessing grievances and concerns.

Some countries impose legal and/or regulatory requirements that such channels are established, and certain protocols followed – you should ensure you are familiar with such requirements for the jurisdictions in which your business operates.

Using Bupa's Speak Up service

If you do not have a reporting mechanism that you and/or your suppliers can use to raise concerns, you can use Bupa's Speak Up service:

[EthicsPoint](#) – Bupa

You can raise genuine concerns online or by phone about wrongdoing, misconduct or risk of harm in confidence and anonymously, if preferred. The Speak Up phone line can take queries and concerns in 75 different languages.

Policies for your suppliers (1/2)

You should have policies in place for your suppliers that set out your commitment and expectations regarding modern slavery risk management. As a minimum, you should have:

- **A documented approach to supplier risk assessment**, including consideration of modern slavery risk and controls appropriate to the level of risk (such as standard due diligence, enhanced due diligence, contractual provisions, and audits).
- **A document for your suppliers that sets out your expectations** of those within your supply chain, for example respecting all internationally proclaimed human rights, including provisions on the prevention of modern slavery, forced labour, human trafficking and child labour; providing a safe and hygienic working environment that is compliant with health and safety law/regulations; and complying with applicable anti-bribery and corruption legislation. See Bupa's Responsible Supply Chain Statement as an example. You may request that suppliers confirm their compliance with these expectations through contractual provisions.



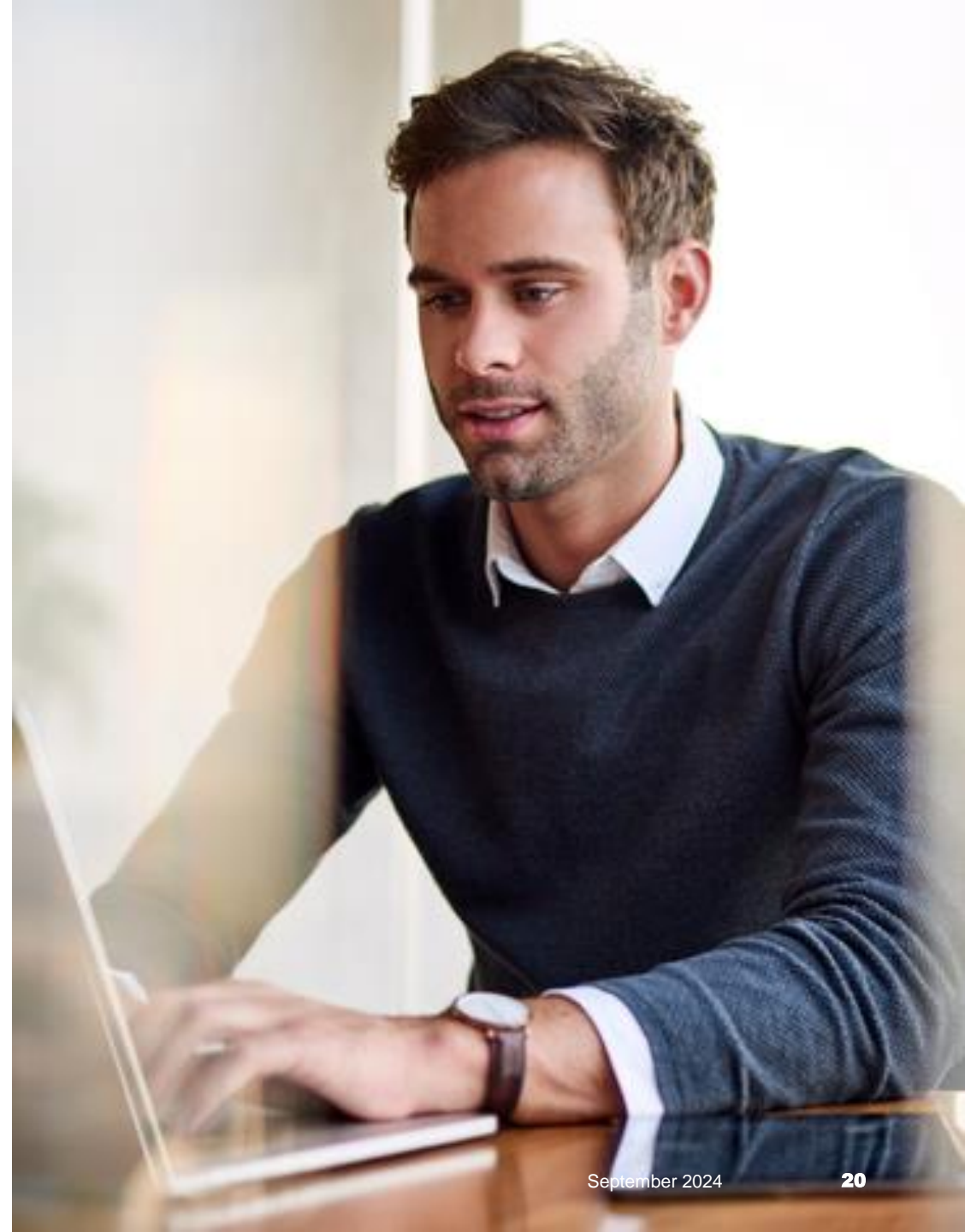
Policies for your suppliers (2/2)

Labour providers

If you rely on labour providers, you should take steps to assure they uphold the same standards as your organisation.

They should not subcontract without your permission and workers should not be charged recruitment fees (in the UK, this is illegal).

Further, in the UK labour providers to certain sectors must be licensed (see the [Gangmasters and Labour Abuse Authority website](#) for more information).



Risk based due diligence for your suppliers (1/2)

Due diligence is the process of evaluating information and identifying pertinent risks about a third party before entering into an agreement with it.

Supplier due diligence will enable you to identify and mitigate any modern slavery risks associated with prospective and existing suppliers.

Your approach may vary depending on your structure, risk profile and appetite, but as a minimum, **you should assess your suppliers for modern slavery risk and tailor due diligence to their risk profiles.**

A risk assessment helps to identify risks intrinsic in a relationship / arrangement and informs the next steps required.



Risk based due diligence for your suppliers (2/2)

A risk assessment helps to identify risks intrinsic in a relationship / arrangement and informs the next steps required.

A basic modern slavery risk assessment should take account of:

- **Operating jurisdiction:** Certain jurisdictions are higher risk for modern slavery for reasons including less mature legislative frameworks and increased vulnerability through conflicts. The [Global Slavery Index](#) details the countries with the highest prevalence of modern slavery - these could be compared against the geographies of your suppliers.

And

- **Industry / sector:** Certain industries / sectors are higher risk due to the nature of the work, e.g. those with high use of temporary or migrant workers, those that are low skilled and/or low paid, where workers are isolated, and where there is potential for unscrupulous third parties to exploit individuals, e.g. recruitment agencies. In addition, goods can be higher risk due to the components themselves and/or the means through which they are sourced, e.g. cotton (for workwear), minerals and metals (electronics).



Additional due diligence for suppliers assessed as high risk for modern slavery

Where a supplier is operating in a high-risk jurisdiction and supplying a high-risk service or goods, you should consider taking additional steps to mitigate the associated modern slavery risks.

If your risk assessment indicates a supplier has increased modern slavery risks, consider as a minimum:

- Seeking assurance from the supplier that it complies with all applicable modern slavery laws and regulations (this could be achieved through contractual provisions).
- Requesting information from the supplier about how it manages its modern slavery risks, including whether there have ever been any incidents within its supply chain and/or operations. This will help you better understand the risks to which your organisation could be exposed through association. Example questions are available online, including the UK government's [Modern Slavery Assessment Tool](#) and the [Walk Free Modern Slavery Benchmarking Tool](#); see also slides 25 and 26 for potential questions.
- Reviewing the risk profile of the supplier and refreshing the above activities periodically in accordance with the level of risk.



Ongoing monitoring and assurance of your suppliers

Suppliers that have increased risks for modern slavery should be subject to ongoing review to ensure that mitigants continue to be effective and ensure there are no new developments impacting their risk profile and your own exposure. Such activities could include:



Refreshing onboarding information requests issued to suppliers (i.e. due diligence reviews). The frequency of refreshment could be aligned with the supplier's risk rating



Issuing enhanced questions to high risk suppliers (i.e. enhanced due diligence) exploring in further depth their processes and controls to mitigate their modern slavery risks



Undertaking desktop and/or physical site inspections/audits to verify processes, controls and worker welfare



Promotion and ongoing monitoring of grievance and whistleblowing mechanisms

Remediation



Remediation is a vital component of modern slavery management, ensuring incidents do not reoccur and victims are safeguarded.

It is important to consider and document how you would respond to an incident, should one occur. The process may vary depending on whether the incident has occurred within your organisation or the supply chain.

You should also know where to get help. In the UK, you can call the 24/7 Modern Slavery & Exploitation Helpline, free of charge, to get advice and support on an issue or situation and next steps. For those outside the UK, the [Global Modern Slavery Directory](#) provides details of international agencies that can help.

Business Use Only

In documenting the process, you could consider:

- Who should be notified? Consider internal and external parties.
- How should a matter be investigated? Include root cause analysis.
- What support could be provided to any potential modern slavery victims?
- If the incident occurs in the supply chain, how can you support the supplier in resolving the matter?

Examples of taking a risk-based approach with suppliers

Taking a risk-based approach – examples (1/2)

	Risk assessment	Onboarding due diligence	Monitoring and assurance
Supplier A	UK based, 4-person marketing consultancy firm = LOW RISK	Given the low risk level and likely lack of applicability of the UK Modern Slavery Act 2015, a request for compliance with any supplier Code of Conduct / Responsible Sourcing Principles, plus inclusion of a modern slavery clause in the contract requiring compliance with applicable laws and notification in the event of any incidents, may be sufficient However, it would be good practice to issue a due diligence questionnaire	Periodic review of the risk assessment (potentially at contract renewal) to assure the supplier and its associated risk rating hasn't changed
Supplier B	Large UK company with operations in Europe. Provides security solutions e.g. CCTV = MEDIUM RISK	Due diligence questionnaire assuring compliance with the MSA 2015, the supplier's approach to modern slavery risk management ¹ and any potential or actual incidents in the organisation or its supply chain plus remediation of the same Request compliance with any supplier Code of Conduct / Responsible Sourcing Principles or similar Include a modern slavery clause in the contract requiring compliance with applicable laws and notification in the event of any incidents	Periodic risk assessment / due diligence refresh to confirm the supplier's risk profile hasn't changed Desktop and/or physical audit to verify answers to due diligence questionnaire, review appropriate process/policy documentation and assure there are no additional concerns
Supplier C	Large company based in a high risk jurisdiction ² to which IS services will be outsourced = HIGH RISK	Due diligence questionnaire exploring compliance with the MSA 2015 if applicable, approach to modern slavery risk management ¹ , whether the supplier has operations in other high-risk jurisdictions, and confirming any potential or actual incidents in the organisation or its supply chain plus remediation of the same Request compliance with any supplier Code of Conduct / Responsible Sourcing Principles or similar Include a modern slavery clause in the contract requiring compliance with applicable laws, implementation of a reasonable anti-slavery and human trafficking compliance programme across its own business and supply chain, obligation to notify in the event of any incidents, and audit rights	Regular due diligence refresh (every 1-2 years) Periodic bespoke questionnaire probing in further depth risk management measures, e.g. training provided to employees and suppliers and how modern slavery risk is considered across Procurement activities Regular desktop and physical audits, reviewing documentation and speaking to workers, verifying answers to due diligence questionnaire and assuring there are no additional concerns with site(s)

¹ Including policies, training, access to whistleblowing hotlines/other reporting mechanisms and general identification and management of risks associated with its employees and supply chain

² With reference to appropriate sources such as the Global Slavery Index: [Global Slavery Index | Walk Free](#)

Taking a risk-based approach – examples (2/2)

	Risk assessment	Onboarding due diligence	Monitoring and assurance
Supplier D	Small IS company located in a high risk jurisdiction that has only a few direct employees but a larger book of temporary workers = HIGH RISK	<p>Due diligence questionnaire exploring approach to modern slavery risk management¹, whether the supplier has operations in other high risk jurisdictions, and confirming any potential or actual incidents in the organisation or its supply chain plus remediation of the same</p> <p>Request compliance with any supplier Code of Conduct / Responsible Sourcing Principles or similar</p> <p>Include a modern slavery clause in the contract requiring compliance with applicable laws, implementation of a reasonable anti-slavery and human trafficking compliance programme across its own business and supply chain, obligation to notify in the event of any incidents, and audit rights</p>	<p>Regular due diligence refresh (every 1-2 years)</p> <p>Periodic bespoke questionnaire probing in further depth risk management measures e.g. training provided to employees and suppliers and how modern slavery risk is considered across Procurement activities</p> <p>Regular desktop and physical audits, reviewing documentation and speaking to workers, verifying answers to due diligence questionnaire and assuring there are no additional concerns with site(s). Noting that the supplier is an SME and may not have certain policies or processes in place, consider a bespoke approach taking account of the extent of modern slavery risk. This could look like:</p> <ul style="list-style-type: none"> • Requiring the supplier to develop a specific policy; or • Sharing training materials and policy templates for them to emulate/implement; or • Providing training in the form of an online module or document; or • Obtaining a senior level attestation regarding processes and compliance.
Supplier E	Small recruitment agency in the UK that provides temporary staff, sometimes at very short notice = HIGH RISK	<p>Due diligence questionnaire exploring compliance with the MSA 2015 if applicable, approach to modern slavery risk management¹, and confirming any potential or actual incidents in the organisation or its supply chain plus remediation of the same</p> <p>Request compliance with any supplier Code of Conduct / Responsible Sourcing Principles or similar</p> <p>Include a modern slavery clause in the contract requiring compliance with applicable laws (including checks pertaining to legal right to work), implementation of a reasonable anti-slavery and human trafficking compliance programme across its own business and supply chain, obligation to notify in the event of any incidents, and audit rights</p>	<p>Regular due diligence refresh (every 1-2 years)</p> <p>Periodic bespoke questionnaire probing in further depth risk management measures e.g. training provided to employees and third parties and how modern slavery risk is considered across sourcing activities</p> <p>Regular desktop and physical audits, reviewing documentation to assure compliant recruitment practices, interviewing workers, verifying answers to due diligence questionnaire and assuring there are no additional concerns with site(s). Noting that the supplier is an SME and may not have certain policies or processes in place, consider a bespoke approach taking account of the extent of modern slavery risk. This could look like:</p> <ul style="list-style-type: none"> • Requiring the supplier to develop a specific policy; or • Sharing training materials and policy templates for them to emulate/implement; or • Providing training in the form of an online module or document; or • Obtaining a senior level attestation regarding processes and compliance.

¹ Including policies, training, access to whistleblowing hotlines/other reporting mechanisms and general identification and management of risks associated with its employees and supply chain

² With reference to appropriate sources such as the Global Slavery Index: [Global Slavery Index | Walk Free](#)

Useful resources and further reading

Useful resources and further reading (1/2)

About the UK Modern Slavery Act 2015

- Transparency in supply chains: a practical guide: **Transparency in supply chains: a practical guide - GOV.UK (www.gov.uk)**
- Modern Slavery Statement registry: **Modern slavery statement registry - GOV.UK (modern-slavery-statement-registry.service.gov.uk)**

Support in identifying your modern slavery risks

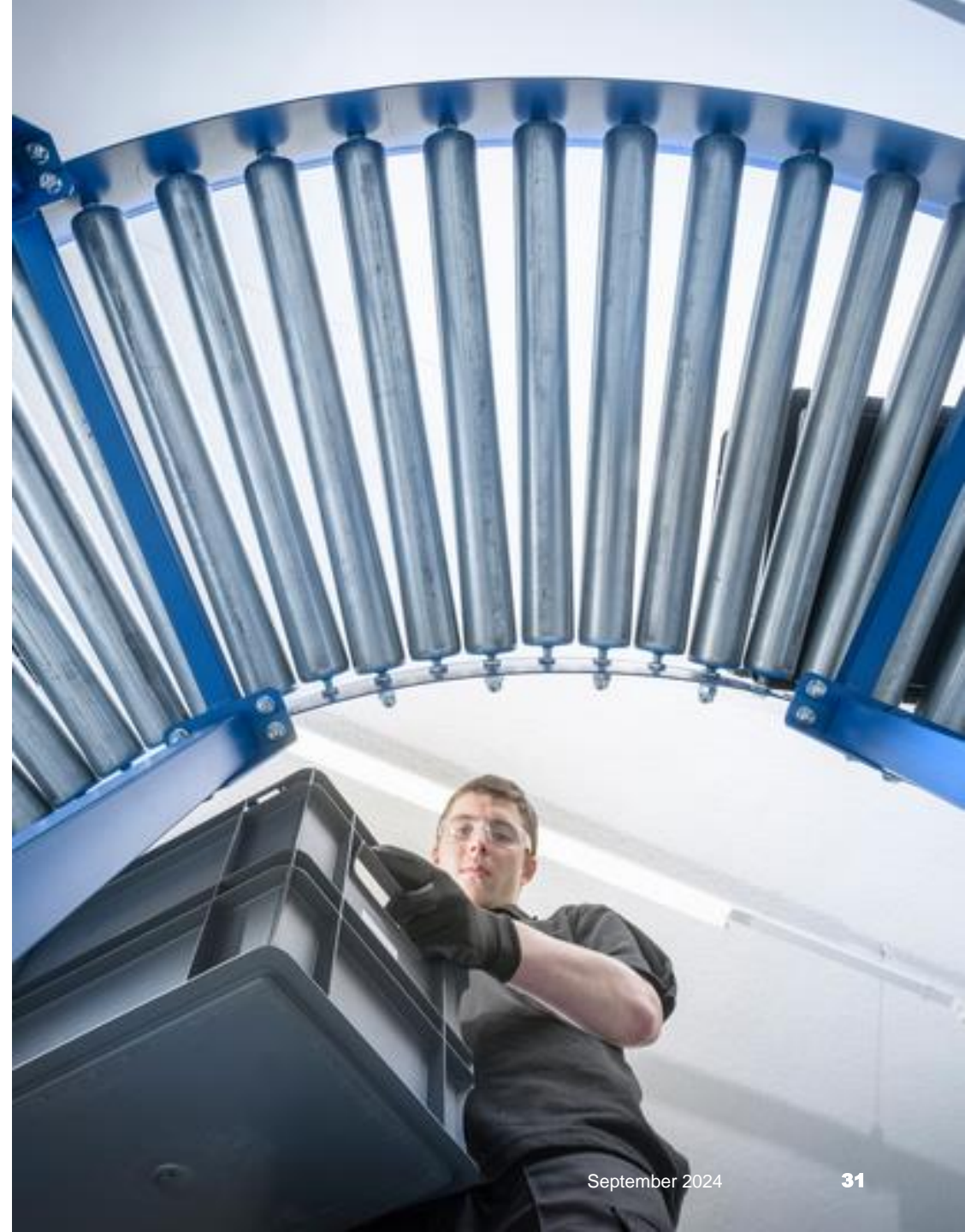
- Global Slavery Index: **Global Slavery Index | Walk Free**
- Modern Slavery Assessment Tool (risk identification and management tool to help public sector organisations understand where there may be risks of modern slavery in their supply chains): **Modern Slavery Assessment Tool - Supplier Registration Service (cabinetoffice.gov.uk)**
- Chartered Institute of Procurement and Supply: **Modern Slavery - Modern Slavery in Supply Chains | CIPS**



Useful resources and further reading (2/2)

Anti-slavery, anti-exploitation and labour rights charities and organisations

- Unseen: [Home - Unseen \(unseenuk.org\)](https://unseenuk.org)
- Anti-Slavery International: [Anti-Slavery International | Fighting for Freedom from Slavery \(antislavery.org\)](https://antislavery.org)
- Slave-Free Alliance: [Slave-Free Alliance | Modern Slavery Training and Services \(slavefreealliance.org\)](https://slavefreealliance.org)
- Stronger Together: [Stronger Together, tackling modern slavery in supply chains \(stronger2gether.org\)](https://stronger2gether.org)
- International Labour Organisation: [ILO Homepage | International Labour Organization](https://ilo.org)
- The Global Modern Slavery Directory: [Global Modern Slavery Directory](https://www.gmsd.org)



Thank you