

Responsible Supply Chain Statement



October 2022

Introduction

Bupa's purpose – helping people live longer, healthier, happier lives and making a better world – reflects our belief that we have an increasing part to play, not only in the health of our customers, but also in the health of our planet. We will fulfil this through our [Sustainability](#) strategy which is founded on strong actions on wider Environmental, Social and Governance (ESG) issues, including inclusion and diversity, responsible business conduct, social impact, governance and transparency. We operate in accordance with the law, our Bupa Code, and [Bupa Values](#) and have policies, processes and controls in place to ensure that our conduct reflects this.

We want to build a future where our healthcare services deliver benefits for both people and planet; where we innovate and collaborate to find real solutions to the biggest sustainability challenges around healthcare; and where people become healthier as the planet does.

These are bold ambitions, and we can't do this on our own.

We need you, our partners, to share our vision and values, and work closely with us to innovate and find the right solutions that could accelerate the transformation that is required.

We value the relationships we hold with our suppliers and seek to work with those that share our commitment to:

1. Acting in accordance with the law
2. Protecting and empowering people
3. Bupa's sustainability targets including our mission to become Net Zero by 2040
4. Strong action on wider ESG topics including inclusion and diversity, responsible business conduct, social impact, governance, and supply chain transparency
5. Contributing to society

This Responsible Supply Chain Statement sets the minimum standards of business conduct that Bupa expects from our direct suppliers and that need to be applied in turn, through the supply chain.

In return, Bupa commits to:

- Treating suppliers fairly
- Paying suppliers on time, as per contracted terms
- Selecting suppliers without prejudice
- Supporting improvements in social, environmental and ethical practices
- Using research, collaboration, and innovation to accelerate sustainable healthcare solutions
- Maintaining a supply chain that reflects and aligns to our own standards of responsible business conduct
- Actively encouraging innovation

1. Acting in accordance with the law

Bupa expects suppliers to fully comply with all applicable laws and regulations.

2. Protecting and empowering people

Human rights

Bupa expects suppliers to respect all internationally proclaimed human rights, as per the provisions of the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) core labour standards. This includes, but is not limited to, specific provisions on:

- Prevention of modern slavery, forced labour, human trafficking and child labour;
- Freedom of Association/collective bargaining, wages and benefits, working hours;
- Compliance with the rights and entitlements of indigenous peoples.

Suppliers must report non-compliance within their direct operations or supply chain to Bupa immediately.

Inclusion and Diversity

Bupa expects suppliers to ensure equality of opportunity for all. Suppliers should not tolerate discrimination or harassment, including on the basis of protected characteristics (i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

Health, Wellbeing and Safety

Bupa expects suppliers to:

- Provide a safe and hygienic working environment that is compliant with general health and safety law, as well as industry-specific standards and codes. Necessary training should be provided to employees.
- Mitigate health and safety risks and establish suitable risk management assurance. Evidence of health and safety management systems should be available on request.
- Ensure the legal minimum wage is adhered to across the entire workforce and limit working hours according to national or local law.

3. Commitment to Bupa's sustainability targets

As a minimum, Bupa expects suppliers to:

- Comply with all applicable environmental regulatory requirements.
- Align and work with Bupa to support our ambitions to become a Net Zero business by 2040 across all emissions scopes, including Scope 3.
- Demonstrate an understanding of environmental risks, impacts and responsibilities associated with the products and services they provide.
- Provide information to Bupa about the environmental credentials of a procured product or service on request.
- Where possible, offer product and service options that offer reduced environmental impact.

Bupa encourages suppliers to:

- Review Bupa's [Sustainability](#) website and our activities and programmes that seek to reduce environmental impact and mitigate environmental risks;
- Measure, monitor, and endeavour to make continuous improvements in environmental performance. This includes, but is not limited to, carbon emission accounting in accordance with the Greenhouse Gas Protocol and setting 1.5 degree aligned Science-Based targets across all 3 emission scopes.
- Provide an annual carbon emissions report covering at a minimum scope 1 and 2, and all available scope 3 emissions (on request).
- Ensure that their Scope 1, 2 and 3 carbon emission report covers at a minimum the most material scope 3 emission categories (at least 66% of suppliers' total scope 3 emissions).
- Demonstrate continuous improvement, offering Bupa alternative lower carbon products and services, and/or new ways of fulfilling the same need through a different approach.
- Have a Carbon Reduction Plan in line with climate science, their services and capabilities – SMEs are encouraged to use publicly available resources like the [SME Climate Hub](#) and [CDP](#) to demonstrate a high-

level simple plan on request and can seek support and guidance from Bupa on execution/mitigating circumstances.

- Minimise the use of energy, water and raw materials. Where possible, using renewable or sustainably sourced energy and materials.
- Make practical efforts to eliminate or reduce levels of generated waste and reuse and recycle waste materials wherever possible.
- Consider the environmental credentials and performance of suppliers within their own supply chain and require them to operate to a minimum set of standards, exceeding them wherever possible.
- Reduce reliance on offsetting in favour of direct decarbonisation activities.

4. Strong action on wider ESG Topics

Bupa expects suppliers:

- Not to offer any form of gift or hospitality for the purposes of improperly influencing business decisions.
- To conduct themselves to the highest ethical standards.
- To identify and manage conflicts of interest that may affect their business relationship with us. Any conflicts of interest must be declared with us as soon as possible.
- To comply with the spirit and letter of all applicable sanctions.
- To take appropriate measures to prevent themselves from being misused to enable financial crime and protect against fraud, money laundering or any other kinds of financial crime.
- To adhere to the principles in Bupa’s published [Approach to Tax](#).
- To have processes in place to ensure all levels of the supply chain are paid promptly, in line with individual agreements.
- To have processes in place for secure and appropriate handling of all information, including personal data, and sensitive/special category personal data, within their organisation and across their supply chain.
- To ensure appropriate visibility and management is in place to consider potential disruptions to the supply chain, with adequate business continuity measures to be deployed as required. This should be evidenced by a policy, plan, business impact analysis and risk assessment that can be deployed within adequate, agreed time periods and tested at least annually.
- To have processes in place to allow the confidential reporting of concerns or make relevant staff aware of [Bupa Speak Up](#) which allows for confidential (and anonymous, if preferred) reporting by any party.

5. Contributing to society

- In line with its purpose, Bupa is committed to making a positive impact in the communities where it operates.
- Bupa encourages the suppliers it works with to support and contribute to the local communities in the areas the supplier operates, to help improve social and economic wellbeing.
- Bupa is happy to share further information on what it does and where there may be scope to collaborate to help make a better world.

Date of last review	October 2022	Date for next review	Oct 2023
Owner	Jane Scadding, Procurement & Commercial Director, BGUK and Group		

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