



Supplier Code of Conduct

14th October 2024

Business Use Only

| **Our values** | **Brave** | **Caring** | **Responsible**

Contents

Purpose	3
Scope	3
Standards	4
1. <i>The Bupa Code</i>	4
2. <i>Conflict of Interest</i>	4
3. <i>Fit & Proper Persons</i>	5
4. <i>Whistle Blowing (Speak Up) Policy</i>	5
5. <i>Brand</i>	5
6. <i>Modern Slavery</i>	6
Supporting Information	6

Purpose

This Supplier Code of Conduct sets out the minimum requirements third party suppliers must adhere to in relation to policy areas not covered through due diligence.

We expect all our suppliers to meet or exceed all the requirements in this standard. If you are not currently compliant with the expectations defined in this standard, or if you're unable to commit to compliance, you must let us know. We will review the areas where there are gaps and may agree to work with you on defining a plan to resolve any issues. However, if the issue is serious enough or cannot be resolved in a reasonable time frame, we reserve the right to review the terms of any contract or supply arrangement (existing or potential). Actions resulting from this review could include, in accordance with any applicable contractual right, termination.

We reserve the right to review your policies, procedures or any other documentation related to this standard. In some higher risk instances, we may undertake an audit to validate your adherence to our standards and applicable policies. The provisions in this standard are in addition to and not in lieu of any legal agreement or contract.

Suppliers must ensure that the relevant local country and jurisdictional legislation and/or regulatory requirements are adopted in addition to the requirements in this standard.

Scope

The Standard applies to all suppliers providing a product or service to BGIUK and Bupa Group Functions.

Standards

1. The Bupa Code

The Bupa Code explains what living our values means to us. It acts as our moral compass, empowering us to stand up for what's right for our customers, residents, patients, and for each other. Third party suppliers in scope of this standard agree to abide by the principles within the Bupa Code. You can find the Bupa Code here: [The Bupa Code | Bupa Group](#).

Suppliers are expected to have policies, practices, and procedures, which are compliant with current local legislation and any applicable regulatory standards, in the following areas, where applicable:

- Conduct / Ethical behaviour, including anti-bribery and corruption, gifts and entertainment
- Conflicts of Interest (see Conflict of Interest section in this standard)
- Issue resolution / grievance / complaints
- Diversity & Inclusion, including anti-bullying and harassment
- Background screening
- Disciplinary
- Performance management
- Whistleblowing / Speak Up (see Whistleblowing / Speak Up section in this standard)
- Wellbeing, Health and Safety
- Putting Customers First / Treating Customers Fairly
- Security, including Information Security
- Legal and Regulatory Compliance
- Professional Standards / Continuing Personal Development / Accreditation
- Intellectual property
- Business Continuity

Suppliers must make sure relevant staff (i.e. everyone who does any work connected to Bupa) are aware of policies and procedural information, providing them with appropriate access, to enable them to effectively deliver the responsibilities of their role in line with expected standards.

2. Conflict of Interest

Bupa is committed to ensuring transparency and fairness in all our business dealings and takes the responsibility of identifying and effectively managing conflicts of interest very seriously. We expect the same commitment from our suppliers.

We define a conflict of interest as a situation in which an individual's ability to exercise judgement or act in their role is, could be, or is seen to be impaired or otherwise influenced by their involvement in another role or relationship.

Suppliers must act with integrity, abide by all relevant regulations and laws, and not permit any form of bribery or corruption.

Suppliers must have mechanisms in place to effectively identify and manage conflicts of interest and the risks they may present, including:

- a regularly reviewed policy / procedures that define how actual and potential conflicts are identified, managed, and reported.
- having training / communications in place, to ensure the relevant supplier staff (i.e. everyone who does any work connected to Bupa) are aware of the policy and procedures in place.
- Ensure that gifts and entertainment are declared and managed appropriately.

- Having a process in place to notify Bupa of any conflicts identified that may be relevant.

3. Fit & Proper Persons

Suppliers are expected to have recruitment, selection and background screening practices in place, that comply with all relevant legislation, regulatory requirements, and that align with expected industry standards.

Background checks and previous employment screening must be satisfactorily completed, to make sure people working on the Bupa contract are, and remain, fit and proper for their role.

All relevant staff (i.e. everyone who does any work connected to Bupa) must be appropriately trained and have the required professional qualifications, in line with their role, to meet any regulatory requirements.

4. Whistle Blowing (Speak Up) Policy

The Bupa Code acts as our moral compass and empowers us to stand up for what's right for our customers, residents, patients and each other. However, all businesses face the risk of things going wrong and people behaving in ways which are not acceptable.

Everyone connected to Bupa must do the right thing and speak up if something is wrong that may affect our customers, people, Bupa, the public or the environment. This includes behaviour that is not in line with the Bupa Code or breaches our internal policies and processes, regulatory requirements or laws.

Speak Up is Bupa's whistleblowing service and can be used by anyone who has a concern either about Bupa or individuals / organisations providing goods or services to Bupa. It 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.

Suppliers which do not have a confidential whistleblowing channel enabling relevant staff (i.e. anyone who does any work connected to Bupa) to raise concerns that may affect Bupa, are required to make those staff aware of how to raise such concerns through our Speak Up service.

Speak Up is available 24 hours a day, 7 days a week, via a telephone number in each country (0808 234 6939 for the UK), through the internet (www.bupa.co.uk/speakup), and via the QR code included in the guidance below. Concerns can be raised anonymously if preferred.

Bupa does not tolerate the unfair treatment of anyone who raises or supports the investigation or resolution of concerns raised through Speak Up. Supplier whistleblowing channels must mirror this commitment.

5. Brand

Our brand is one of our strongest assets. It represents what our customers, our people, our communities and our key stakeholders experience about Bupa. Bupa's reputation is crucial to building trust, achieving our strategic goals and delivering on our purpose of helping people live longer, healthier, happier lives and making a better world. It is everyone's responsibility to own and protect Bupa's brand, including our suppliers.

To ensure we build, promote and protect Bupa's brand and reputation we expect suppliers to

- Identify and manage reputational risk

- To gain permission to use and protect the Bupa brand identities (Bupa Masterbrand and any other Bupa brands) including logo, font, colours and icons in line with Bupa guidelines
- To protect and manage Bupa domain names and owned media channels including social channels and Trademarks
- Not to encroach on the infringement or misuse of Bupa trademarks or domain names

6. Modern Slavery

Being an ethical business is foundational to the way we do business and to Bupa's 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. We expect all our suppliers to share our commitment to combatting modern slavery risk in their operations and within their own supply chain. Modern slavery risks include, but are not limited to, forced labour, child labour and human trafficking.

For further information on how to meet our expectations, see our Modern Slavery Guidance for Suppliers to Bupa in the UK. This is available on our Bupa Global Procurement Tool and in the Reference Materials section of Process Unity.

Supporting Information

Guidance

Guidance:

Further guidance can be found in Bupa's Responsible Supply Chain Statement.



Bupa Responsible
Supply Chain Statement

Bupa's Speak Up service can be accessed through the below QR code.



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