

# Bupa's Modern Slavery Act Statement<sup>1</sup>

for the financial year ended  
31 December 2023



<sup>1</sup>This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

This statement applies to the Relevant Entities detailed on page 19.

This statement is also published on the UK online Modern Slavery Statement Registry.

# Statement on modern slavery

**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.”**

In a rapidly changing world, fulfilling our purpose to help people and planet, and making a positive difference has never been more important. 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 (“the Act”).

This statement for the financial year ended 31 December 2023 outlines the steps taken by our UK-based businesses falling within scope of the Act to identify and prevent any form of modern slavery occurring within our supply chain or own business.

This statement was approved by the Board of The British United Provident Association Limited on 14 May 2024 and by the Boards of the Relevant Entities. A full list of the Relevant Entities covered by this statement is provided on page 19.



Signed by Iñaki Ereño, Group Chief Executive Officer, 14 May 2024.





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# Organisation structure and supply chains



## About Bupa Group

We are an international healthcare company serving over 50 million customers worldwide<sup>1</sup>. With no shareholders, we reinvest profits into providing more and better healthcare for the benefit of current and future customers.

Through 2023, we directly employed around 87,000<sup>2</sup> people, principally in the UK, Australia, Spain, Chile, Poland, New Zealand, Hong Kong SAR, Türkiye, Brazil, Mexico, the US, Middle East and Ireland. We also have an associate business in Saudi Arabia. From 2024 onwards, our associate business in India, Niva Bupa, will become part of our Bupa Global and UK Market Unit, following acquisition of a majority shareholding in January 2024.

For more information, visit [www.Bupa.com](http://www.Bupa.com).

<sup>1</sup> Customer counting methodologies may vary between Business Units.

<sup>2</sup> Based on average number of employees during the year and including 16,000 colleagues in Poland who are engaged under contract for service arrangements.

<sup>3</sup> Based on average number of employees during the year.

## Bupa in the UK

In the UK, Bupa UK Insurance is a leading health insurer, with 3.5m customers across medical insurance, health trusts, dental insurance and cash plans. Bupa Dental Care is a leading provider of private dentistry, providing dental services through around 430 centres across the UK and the Republic of Ireland. Bupa Care Services cares for around 6,400 residents in 117 care homes and 10 Richmond Villages. Bupa Health Services comprises 49 health clinics and the Cromwell Hospital. Bupa Global serves around 0.4m international private medical insurance customers and administers medical assistance for individuals, small businesses and corporate customers.

Through 2023, we directly employed 23,818<sup>3</sup> people in our UK businesses. Around 44% were based in our care homes, 21% in our dental clinics, 27% were office based and the remainder were in our health clinics or the Cromwell Hospital. We also use contingent workers across our UK businesses, who supplement our workforce for an indefinite or fixed period.



## Bupa's supply chains

In the UK, Bupa relies on domestic and global supply chains to support our various businesses and associated activities. In 2023, the Relevant Entities in scope of this statement spent £950m with 7,937 direct suppliers, of which 94% are located within the UK and the remaining 6% are dispersed across 47 countries.

The top 10 countries by highest procurement spend are detailed in Table 1. The listed countries account for 7,840 suppliers, equivalent to 99% of all direct suppliers to the Relevant Entities. Our top 5 procurement spend categories are detailed in Table 2.

**Table 1:** Top 10 countries by procurement spend for the Relevant Entities

Country	Supplier Count
United Kingdom	7,466
Ireland	247
United States of America	54
Denmark	23
Netherlands	19
United Arab Emirates	14
Spain	8
Cyprus	6
Kenya	2
Curaçao	1
Remaining 1% of direct suppliers to the Relevant Entities are located across 38 countries	

**Table 2:** Top 5 procurement spend categories for the Relevant Entities

Category	Description
Property Services	Includes construction services, fire alarms, water and asbestos testing and other property maintenance services such as painting and decorating, heating and plumbing.
Medical	All hospital equipment including ECG machines, mammography machines, MRI and mobile MRI, PPE equipment, gloves, physiotherapy services and primary healthcare partner contracts <sup>4</sup> .
Professional Services	Includes call centres, language translation services and advisory services in industries such as finance, law, accountancy/financial advisory and others.
IS Business Systems	Information business services and software.
Recruitment	Includes contingency worker/Managed Service Provider recruitment agencies and international nurse agencies.

<sup>4</sup>A small number of contracts with healthcare providers, such as those supporting our customer health assessments, are managed through our Procurement function. The majority of contracts of this nature are overseen by our Healthcare Provider Management team (see "[Due diligence processes](#)").

# Governance

Our Modern Slavery Working Group met 11 times in 2023. It is comprised of representatives from functions including Procurement, People, Risk, Legal, Sustainability and Internal Communications. The purpose of the Working Group is to plan and implement our anti-slavery programme for the year ahead and to prepare our UK Modern Slavery Act Statement for review and approval by the Bupa Enterprise Risk Committee, the Boards of the Relevant Entities and the Board of the British United Provident Associated Limited.

In 2023, focus areas for the Working Group included ensuring the delivery of a modern slavery risk assessment of our UK operations (see [“Assessing and managing risk”](#)) and developing and overseeing the implementation of an action plan to respond to this assessment. The Working Group also worked together to develop our modern slavery awareness campaign (see [“Training and awareness”](#)) and engaged with UK modern slavery charity, Unseen (see [“Collaboration”](#)). At all meetings, the Working Group considered modern slavery external developments that could impact Bupa’s risk profile and/or compliance obligations. In addition, the Working Group engaged with Bupa Australia, which is also subject to domestic modern slavery legislation, to ensure alignment and share learnings.

## New in 2023:

- We expanded Modern Slavery Working Group representation to include Safeguarding and Healthcare Provider Management for our UK insurance business.
- We updated the Modern Slavery Working Group Terms of Reference to ensure it accurately reflects the purpose, objectives and responsibilities of the Group and its individual members.





## Bupa's policies

Our Enterprise Policies define our minimum requirements and expectations to ensure compliance with all applicable laws and regulations as well as effective risk management. They are located on our employee communications platform, Workvivo, and their principles are communicated to our people through employee inductions, online learning and briefings via our internal communications channels. Every Enterprise Policy is subject to regular review as part of a rolling review cycle to ensure they comply with legal and regulatory requirements and align with our strategy. More information about Bupa's risk management activities can be found in our [2023 Annual Report and Accounts](#).

### Enterprise-wide policies relevant to modern slavery

- **The Bupa Code** – The high standards of ethical behaviour we expect from our people are outlined in the [Bupa Code](#). Alongside our values, the Code acts as a moral compass for everyone that works at Bupa and demonstrates our commitment to being a responsible business. It gives us all a simple decision-making framework to help us do the right thing by our people, customers, residents and patients.
- **Enterprise People Policy** – This sets out organisation-wide 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. Supporting Standard and Guidance documents help employees implement appropriate procedures to meet their obligations under the Policy.
- **Enterprise Speak Up Policy** – 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. 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 from retaliation 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. More information on Bupa Speak Up is available [here](#).
- **Enterprise Suppliers Policy** – This 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 throughout the contracting lifecycle. It mandates specific requirements including segmentation assessments that take account of a supplier's modern slavery risks.
- **Enterprise Financial Crime Risk Policy** – There is an intrinsic link between modern slavery and financial crime, with modern slavery thriving through corruption and generating proceeds of crime which are laundered through the global 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. Supporting guidance and risk assessment templates help employees implement appropriate procedures. More information on our approach to preventing financial crime is available [here](#).

## Policies for our UK businesses relevant to modern slavery

In addition to our Enterprise-wide policies, we also have policies and standards that are designed specifically for our UK businesses:

- **Background Screening Standard** – Applies to all our employed and contingent workers. It documents our approach to background screening, both pre- and during employment, including mandatory identity verification and right to work checks.
- **Protecting Our People Policy** – Seeks to make our UK employed and contingent workers aware of their responsibilities to prevent and protect one another from harm, hate or abuse. Modern slavery is expressly referenced with advice provided as to how concerns can be raised. There is also signposting to supporting resources including the Unseen website, Victim Support website and the UK Modern Slavery Helpline.
- **Contingent Worker Policy** – Details the principles and processes we must apply to ensure the fair, consistent and lawful engagement of contingent workers in our UK entities.
- **Safeguarding Customers Policy** – Sets out the minimum requirements for our UK businesses to discharge appropriate accountability for safeguarding children, young people and adults at risk of harm or abuse. These requirements include clear lines of accountability, robust communication and escalation processes and staff training. Modern slavery is explicitly called out as a form of abuse to which our customers could be exposed, and the UK Modern Slavery Act 2015 is acknowledged as one of the key pieces of legislation that underpins the adult safeguarding legislative framework in the UK.

## Relevant standards for suppliers

- **Responsible Supply Chain Statement** – Sets out our commitments as well as the minimum standards of business conduct we expect from our direct suppliers and those within their supply chains, including complying with all applicable laws and regulations, conducting themselves to the highest ethical standards, abiding by all Bupa policies and respecting all internationally proclaimed human rights, including the prevention of modern slavery, forced labour, human trafficking and child labour. Our Responsible Supply Chain Statement is available [here](#).
- **Suppliers Handbook** – A reference guide for Bupa's suppliers to ensure a high-level understanding of Bupa policies and their key principles. A section is dedicated to the Modern Slavery Act 2015 and useful external resources are signposted for suppliers to learn more. The Suppliers Handbook is available [here](#).







# Due diligence processes

## Our operations

Within our workforce, we conduct a series of checks as part of our people screening and onboarding processes, including identity verification, seeking confirmation that individuals have the right to work in the UK, criminal record checks and, where appropriate, adverse financial screening checks. Our Employment Compliance team reviews, and takes the necessary steps to resolve, any adverse findings arising from pre-employment screening checks.

Modern slavery indicators can be evident in payroll data, for example multiple workers receiving wages into a single bank account could be indicative of them not having control of their funds or receiving their full earnings. We therefore continued to leverage our payroll and people systems for insights, repeating the annual payroll check of our UK direct employees that was initially piloted in 2022. This check identifies any instances in which three or more employees share the same bank account details and live at the same address. No cases of concern were identified, however we will repeat the check in 2024.

## Our supply chain

Prospective suppliers managed by our Procurement function are subject to a segmentation process that assesses their level of risk across several risk taxonomies, including modern slavery, and determines the associated due diligence requirements. Modern slavery due diligence questions are mandatory for all suppliers, except for those assessed as low risk at segmentation. These questions assess compliance with the UK Modern Slavery Act 2015 (where applicable), affirm whistleblowing mechanisms are in place and assure compliance with legal requirements relating to right to work, payment of the National Minimum Wage or equivalent, and age. Responses are reviewed by appropriate teams and subject matter experts, with any anomalies or gaps investigated and addressed accordingly before the supplier is formally onboarded. Following onboarding, due diligence is repeated at regular intervals in accordance with the supplier's risk tiering.

In 2023, we reviewed and updated our existing tender and onboarding due diligence question sets, seeking to obtain deeper information about suppliers' modern slavery risk management. We intend to implement these updated question sets in 2024.

Our Standard Terms and Conditions of Purchase require suppliers to comply with Bupa's policies relating to modern slavery and to notify us immediately of any actual or suspected breach of these or of the Modern Slavery Act 2015 in order for us to determine an appropriate course of action.

We continue to acknowledge the challenges we and many other large corporates face in achieving full transparency of a multi-tiered supply chain. At present, only direct suppliers are in scope for our due diligence processes. However, we are committed to deepening our understanding of our extended supply chain and in 2023 took steps in this regard through completing a workwear deep dive (see "[Assessing and managing risk](#)").

## Healthcare providers

We contract with hospitals and other healthcare providers, which provide treatment and services to our health insurance customers, rather than provide goods and services to Bupa directly. These relationships are not included within the supplier relationships outlined above. In 2023, we expanded representation on our Modern Slavery Working Group to include Healthcare Provider Management for our UK Insurance business. In addition, in alignment with the findings of our risk assessment of our UK-based operations (see "[Assessing and managing risk](#)"), we took steps to review our approach to modern slavery risk with healthcare providers in the UK. In 2024, we plan to begin to introduce a new ESG clause into contracts with our largest providers, which will explicitly reference modern slavery risk.

### New in 2023:

- We reviewed and enhanced our tender and onboarding due diligence modern slavery question sets, seeking to understand in greater depth how suppliers identify and manage modern slavery risks in their supply chains and operations. We plan to implement these enhancements in 2024.



# Assessing and managing risk

## Responding to a worsening external risk environment

As a part of our risk management approach, we continually monitor modern slavery related external developments relevant to our operations and/or supply chain. Through this monitoring, we identified escalating cases of modern slavery among migrant workers in the UK care sector. The modern slavery charity, Unseen, reported a 606% increase in the number of modern slavery care sector calls received by its helpline between 2021 and 2022. This development is associated to recent changes to immigration visa rules, coupled with the nationwide shortage of care staff. Together, these factors are driving a significant increase in the number of overseas workers coming to the UK to work in care, which is increasing the potential for exploitation within the sector.

## Taking action to support our international visa sponsored workers

In 2023, we developed an Overseas Candidate Guide, sent to all international visa sponsored care workers before they arrive in the UK. This guide includes information on how to set up a UK bank account and other practical guidance to support moving to and living in the UK. Our Bupa Care Services leadership team monitors weekly all international visa sponsored workers to ensure they are receiving sufficient pastoral support and they have accommodation arranged in the UK.

We know that our care home managers play a vital role in helping our international visa sponsored workers settle into their roles as well as in spotting signs of exploitation. In 2023, we created a checklist to ensure hiring managers are aware of the risks and know how to support international visa sponsored colleagues at the interview stage and beyond. This includes consideration of language differences and making Bupa's internal employee loan scheme available.

At the end of 2023, we launched an international inclusion project across our UK care homes and retirement villages. Through engaging with care home managers and our international visa sponsored colleagues, we aim to continuously improve the guidance and support we provide.



In 2024, we will be exploring how we can enhance our face-to-face induction process, including extending it to help international visa sponsored workers become more comfortable with their new role and workplace, and building in additional opportunities for them to become familiar with UK practices. We will continue to monitor the developing nature of risks facing the care sector and respond proactively with appropriate mitigating measures.



## Refreshing our assessment of modern slavery risks in our UK operations

In 2023, we refreshed our assessment of modern slavery risks in our UK based businesses. Key internal stakeholders from all relevant businesses, including senior People and Safeguarding representatives, were interviewed with areas explored including business activities, employee training, general awareness, and due diligence.

The assessment identified our visa sponsored population as a heightened area of risk for continued focus but that overall, our UK businesses do not have a high exposure to modern slavery risk. While supply chain was out of scope for the risk assessment, the development of modern slavery guidance for local, low value purchasing at site level, not managed by Procurement, was suggested, to enhance awareness of modern slavery risks associated with such purchasing. Additional recommendations included reviewing modern slavery content in our safeguarding training and policies, clarifying the escalation process should modern slavery concerns be raised to managers, and giving further consideration to managing modern slavery risk with healthcare providers. As set out in this statement, we commenced or completed a range of actions correlating to the findings of the risk assessment in 2023. Continuing to act on the findings will remain a priority for 2024.

## Our supply chain

We identify suppliers with increased modern slavery risks by reviewing their geographical locations (with reference to sources including the Global Slavery Index) and sectors, including recognised high risk sectors such as medical, facilities management and IT hardware/software. For suppliers identified as high risk for modern slavery, we undertake further due diligence (in addition to that set out in “[Due diligence processes](#)”), issuing them with a high risk modern slavery questionnaire annually, where they have not already completed due diligence questions or been audited in the preceding 12 months. In 2023, we reviewed and enhanced this questionnaire for implementation in 2024, to enable us to explore in further depth the specific policies and processes our high risk suppliers have in place to identify and manage modern slavery risks in their supply chains and own operations, as well as assure that their approaches align with our expectations.

Modern slavery risk is also incorporated into our annual supplier audit programme with focused questions forming part of the audit script for both desktop and physical inspections. In 2023, 18 supplier audits were undertaken, with questions relating to modern slavery risk management asked in all cases.

Should any concerns be identified in the course of audits, we would engage with the supplier to ensure a full understanding and thorough assessment of any issues. Depending on the nature of the matter, we would collaborate with the supplier to agree a remediation action plan. Contract termination would only be considered where a supplier is unwilling to undertake appropriate remedial action.

## Workwear deep dive

In 2023, we took additional steps to understand the higher risk areas of our supply chain by conducting a workwear “deep dive”. We conducted desktop research and analysis to better understand the nature and extent of modern slavery risk within the workwear sector and held a series of interviews with a major supplier exploring processes, employee awareness and understanding, and general controls. Recommendations arising from the exercise to be implemented in 2024 include the development of supplier guidance on our expectations regarding modern slavery risk management. The deep dive proved a valuable, insightful exercise and we shared the findings and our recommendations with our non-UK procurement teams.

The Procurement function also uses third party digital tools to proactively monitor the external landscape and identify risks, including modern slavery, that are associated with entities in our supply chain. Should any matters be flagged that require action or investigation, we would liaise directly with the relevant supplier.

## Speak Up and escalation mechanisms

We continue to monitor our whistleblowing mechanism, Speak Up, to identify any potential or actual incidents of modern slavery reported internally or by our suppliers and partners. In 2023, no reports were received through Speak Up relating to modern slavery.

Responding to the findings of the risk assessment of our operations (see earlier in this section, “[Assessing and managing risk](#)”), we reviewed our escalation process should our people raise modern slavery concerns to line managers. We confirmed that our Manager Advice Team is the central point of contact for manager guidance. The team direct our line managers to appropriate policies and procedures relevant to the circumstances, escalate cases as appropriate and maintain case note records. No modern slavery concerns were raised to the Manager Advice Team in 2023.

### New in 2023:

- With cases of labour exploitation among migrant workers in care increasing externally, we took a range of actions to support our international visa sponsored care workers.
- We completed a risk assessment of our UK operations and began to progress its recommendations.
- We reviewed and enhanced the questionnaire issued to suppliers assessed as high risk for modern slavery.
- We completed a deep dive of our workwear supply chain, exploring through desktop research the nature and extent of modern slavery risk in the workwear sector and engaging with a major supplier to understand their risk management processes and controls.



## Collaboration

In August 2023, we became a corporate member of the charity Unseen which works with businesses, governments, communities, and individuals to eradicate slavery and operates the UK's Modern Slavery Helpline. The purpose of the partnership is to utilise Unseen's modern slavery expertise to support the development of our anti-slavery programme. We focused our partnership first on internal training and awareness raising (see "[Training and awareness](#)"). In 2024, we will continue to work closely with Unseen, with planned activities including analysis of our policies and processes and review of our Modern Slavery Statement.

Through our membership of the Independent Healthcare Providers Network, we participated in a roundtable meeting to learn more about NHS England's approach to modern slavery risk in its supply chain.



## Training and awareness

In 2023, we focused on increasing awareness of modern slavery across our UK-based workforce as well as delivering targeted, risk-based training to relevant teams and functions.

Across our business, we ran a week-long internal communications campaign around Anti-Slavery Day in October. We opened with a "call to action" to all employees, endorsed by senior leaders. As part of the week's activities, we held a webinar and panel discussion featuring representatives of our Modern Slavery Working Group and Unseen, shared case studies from Unseen and tested employees' understanding through a quiz. Our communications were hosted on Workvivo, where our people can access and engage with content. 2,933 colleagues interacted with the content through views and clicks, and 93% of quiz participants could correctly identify the signs of modern slavery.

We also continued to focus on providing communications and training to the most relevant teams, including Procurement and Care Services.

Procurement employees received bespoke annual training reminding them of the indicators of modern slavery, the rise in cases globally, the crucial role Procurement plays in its identification and mitigation, and internal processes that must be followed. The session built on content delivered in 2022, encouraging engagement and learning through discussion of scenarios modelled around categories high risk for modern slavery. We challenged our colleagues to think about the categories that could be higher risk and the characteristics that make them so and reminded them of the importance of raising concerns. 62 people completed the training, representing 95% of our UK-based Procurement function. We will continue to provide this tailored training annually.

In conjunction with Unseen, we also delivered modern slavery training to our UK Care Services business, including our care home and retirement village managers and regional directors, setting out what it is and flagging the escalating cases in the care sector. We explained to our colleagues why combatting modern slavery is important to Bupa, provided specific guidance relating to risk mitigation, advised them how to report concerns and provided scenarios for group discussion.

We also targeted our people managers across our insurance businesses, gathering them on calls to raise awareness of the potential indicators of modern slavery and remind them how to report concerns or seek advice through the appropriate channels.

Responding to the findings of the risk assessment of our own operations (see "[Assessing and managing risk](#)"), we initiated a review of modern slavery content in safeguarding training for our UK businesses, supported by Unseen. We developed an improvement plan to ensure consistency and tailor case studies to our different business contexts, which will be implemented in 2024.

We will continue to develop our modern slavery training and awareness programme in 2024, exploring further opportunities to provide bespoke, risk-based training to relevant teams and functions.

### New in 2023:

- We conducted a training and awareness session for our UK Care Services business, supported by Unseen.
- We enhanced our annual modern slavery awareness campaign to include an interactive webinar featuring a subject matter expert from our charity partner Unseen and tested employees' knowledge through a quiz.
- We reviewed modern slavery content in our safeguarding training modules and developed an improvement plan for implementation in 2024.





# Measuring effectiveness

We continue to consider how best to measure the effectiveness of our modern slavery controls by reviewing the KPIs we use to inform our anti-slavery programme and enable stakeholders to understand and assess our activities over time. This is something we will continue to progress in 2024.

KPI	2022 performance	2023 performance
Number of reports received through Speak Up relating to modern slavery	0	0
Number of specialist staff receiving tailored modern slavery training	80	178
Employees interacting* with our annual modern slavery campaign	1,024	2,933

In addition, at the end of 2023 we reviewed our performance against the priorities we set out in our 2022 Statement:

Our priorities for 2023**	Status at end 2023
Refresh our modern slavery risk assessment to enhance our understanding of risk areas within our UK businesses and inform future action planning	Completed – see “see <a href="#">“Assessing and managing risk”</a> ”
Review and refine our existing approach to supplier due diligence, which in turn will positively impact our modern slavery due diligence processes	<ul style="list-style-type: none"> <li>▪ We reviewed and enhanced modern slavery questions at tender and standard due diligence stage – see <a href="#">“Due diligence processes”</a></li> <li>▪ We reviewed and enhanced the questionnaire for suppliers assessed as high risk for modern slavery – see <a href="#">“Assessing and managing risk”</a></li> <li>▪ Implementation of improvements planned for 2024</li> </ul>
Continue to deepen our understanding of our supply chain beyond direct tier 1 suppliers, including completing a deep dive risk assessment of our workwear supply chain	We completed a deep dive into our workwear supply chain – see <a href="#">“Assessing and managing risk”</a>
Build on work delivered in 2022 to develop measures to gauge the effectiveness of our processes, policies, and controls	Progress made, continued focus area for 2024 – see <a href="#">“Measuring effectiveness”</a>
Explore opportunities to collaborate with appropriate non-governmental organisations (NGOs), charities and business groups	We became a corporate member of Unseen in 2023 – see <a href="#">“Collaboration”</a>
Continue to monitor modern slavery legislative developments, both domestically and internationally	Ongoing – see <a href="#">“Governance”</a>

# Priorities for 2024

- Continue to progress actions in response to the findings of the 2023 modern slavery risk assessment of our operations.
- Progress our International Inclusion Project, supporting international visa sponsored workers and their managers in our care homes and retirement villages.
- Further our review and enhancement of modern slavery risk management in our procurement processes, including rolling out the revised modern slavery due diligence question sets that are issued to Procurement-managed prospective and high risk suppliers, and implementing recommendations from our workwear deep dive.
- Continue to engage with our charity partner, Unseen, to inform our approach and work together to combat modern slavery.
- Review the measures we use to gauge the effectiveness of our processes, policies and controls.
- Maintain close monitoring of modern slavery legislative and regulatory developments that may inform our anti-slavery programme and/or impact our modern slavery risk profile.





## Defined terms

In this statement:

**Bupa** means The British United Provident Association Limited

**Relevant Entities** means the companies which fall within scope of section 54 of the Modern Slavery Act 2015 and which are named below

**Bupa Group** and **Group** refer to Bupa and its wholly owned and controlled companies

**We, us and our** are references to the Relevant Entities

## Relevant Entities required to make a statement pursuant to section 54 of the Modern Slavery Act 2015:

- Bupa Care Homes (ANS) Limited
- Bupa Care Homes (CFG) Limited
- Bupa Care Homes (AKW) Limited
- Bupa Insurance Services Limited
- Oasis Dental Care Limited
- Bupa Care Homes (BNH) Limited
- Bupa Investments Overseas Limited
- Richmond Villages Operations Limited
- Bupa Care Homes (CFC Homes) Limited
- Bupa Occupational Health Limited
- The British United Provident Association Limited
- Bupa Finance plc
- Medical Services International Limited
- Xeon Smiles UK Limited
- Bupa Insurance Limited
- Oasis Dental Care (Central) Limited