

Bupa's Modern Slavery Act Statement¹

for the financial year ended
31 December 2024



¹This 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, customers, 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.”

Fulfilling our purpose to help people and planet, and make 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. We recognise our responsibility to help protect, preserve and promote human rights, and are guided by fundamental principles of human rights, such as those in the United Nations Universal Declaration of Human Rights. We are committed to identifying and addressing modern slavery risks across our organisation and supply chain, and complying in full with the provisions of the UK Modern Slavery Act 2015 (“the Act”).

This statement for the financial year ended 31 December 2024 outlines the steps taken by our UK-based businesses in scope of section 54 (Transparency in Supply Chains) of the Act to identify and prevent any form of modern slavery occurring within our business or supply chain.

This statement was approved by the Board of The British United Provident Association Limited on 20 May 2025 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, 20 May 2025.

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A photograph of two women smiling outdoors. The woman on the left is wearing glasses and a light-colored jacket. The woman on the right is wearing a purple headscarf and a grey jacket. They are both looking towards the right side of the frame.

Organisation structure and supply chains

About Bupa Group

We are an international healthcare company serving over 60 million customers worldwide¹. With no shareholders, we reinvest profits into providing more and better healthcare for the benefit of current and future customers.

Bupa has businesses around the world, principally in Australia, the UK, Spain, Poland, Chile, Hong Kong SAR, India, Türkiye, Brazil, Mexico and New Zealand. We also have associate businesses in Saudi Arabia².

For more information, visit www.Bupa.com.

¹ Customer counting methodologies may vary between business units, and in certain business units customers are counted more than once if they choose to purchase or utilise multiple products or services as part of our connected care offering.

² Refers to Bupa Arabia and My Clinic.

³ Includes both Bupa owned and franchised units.

⁴ 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 around 3.9 million customers across medical insurance, health trusts, dental insurance, subscriptions and cash plans. Bupa Dental Care is a leading provider of private dentistry, providing dental services through around 400 centres across the UK and the Republic of Ireland. Bupa Care Services cares for around 6,200 residents in 116 care homes and 10 Richmond Villages. Bupa Health Services comprises 79 health clinics³ and the Cromwell Hospital. Bupa Global serves around 0.4 million international private medical insurance customers and administers medical assistance for individuals, small businesses and corporate customers.

Through 2024, we directly employed 24,688⁴ people in our UK businesses. Around 43% were based in our care homes, 22% in our dental clinics, 26% 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. In 2024, the Relevant Entities (see “[Defined terms](#)”) in scope of this statement spent approximately £1 billion with 8,014 direct suppliers, of which 93% are registered within the UK. The remaining 7% are dispersed across 46 countries. The top 10 countries⁵ by highest procurement spend are detailed in Table 1. The listed countries account for 7,917 suppliers, equivalent to 98% 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	7542
Ireland	247
United States of America	67
United Arab Emirates	16
Netherlands	16
Denmark	15
Cyprus	6
Spain	6
New Zealand	1
Curaçao	1
Remaining 2% of direct suppliers to the Relevant Entities are located across 37 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 ⁶ .
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.
IS Presentation Services	Includes customer and employee communication platforms for brand, marketing, customer interaction, customer support services and technical IT support.

⁵ Based on suppliers' registered addresses.

⁶ 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 and policies

Our Modern Slavery Working Group met 12 times in 2024. It comprises representatives from functions including Procurement, People, Risk, Clinical Governance (including Safeguarding), Legal, Sustainability, Internal Communications and Healthcare Provider Management. Its purpose is to plan and implement our anti-slavery programme. It also prepares our UK Modern Slavery Act Statement for review and approval by the Bupa Enterprise Risk Committee, Boards of the Relevant Entities, and the British United Provident Associated Limited Board. In 2024, the Working Group continued to drive continuous improvement across our anti-slavery programme, focusing on our priorities set for the year (see “[Measuring effectiveness](#)”).

At all meetings, the Working Group considered external developments that could impact Bupa’s modern slavery risk profile and/or compliance obligations. In addition, the Working Group continued to engage with Bupa Australia, which is also subject to domestic modern slavery legislation, to ensure programme alignment and share learnings.

The Bupa Code

The Bupa Code is our global standard for employee conduct which outlines the high standards of ethical behaviour we expect from our people. 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. More information about the Bupa Code is available [here](#).



Enterprise-wide policies relevant to modern slavery

Our Enterprise Policies apply across the Bupa Group. They ensure we manage key risks and comply with legal and regulatory requirements in the jurisdictions in which we operate. They are accessible via our employee communications platform, Workvivo. We communicate their principles through inductions, online learning and briefings through our internal communications channels. Every Enterprise Policy is subject to regular review as part of a rolling cycle. More information about Bupa's risk management activities can be found in our [2024 Annual Report and Accounts](#).

- **Enterprise People Policy** – Sets out requirements to mitigate Bupa's people risks, including ensuring lawful practices and the protection of our people. Through our People Policy we promote a workplace environment that is fair, respectful, inclusive and protective of the rights of all employees.
- **Enterprise Speak Up Policy** – Speak Up is our 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 from retaliation and supported. Every report is subject to appropriate action. More information on Bupa Speak Up is available [here](#).
- **Enterprise Suppliers Policy** – Mandates requirements to ensure appropriate supplier selection, contracting, and management. This includes inherent risk assessments that take account of a supplier's modern slavery risks, and suppliers' adherence to expectations defined in our Responsible Supply Chain Statement (see "[Relevant standards for suppliers](#)").

- **Enterprise Risk Management Policy** – Sets out requirements for effective management of risks and incidents. These include defining roles and responsibilities for risk management and ensuring governance structures are in place. Incident management processes must be documented, and all incidents escalated and investigated/responded to appropriately.
- **Enterprise Sustainability Policy** – Supports the delivery of Bupa's sustainability strategy by addressing the risks related to our sustainability ambitions, goals and KPIs. It sets out our high-level expectations of our businesses to ensure compliance with all relevant ESG laws and regulations.
- **Enterprise Financial Crime Risk Policy** – Modern slavery and financial crime are intrinsically linked. This policy sets out our obligations regarding bribery and corruption, money laundering, terrorist financing, fraud, sanctions and failure to prevent the facilitation of tax evasion. More information on our approach to preventing financial crime is available [here](#).



Policies for our UK businesses relevant to modern slavery

We also have policies and standards that are designed for our UK businesses:

- **Protecting Our People Standard** – Sets out our UK employed and contingent workers’ responsibilities to prevent and protect one another from harm, hate or abuse. In 2024, following recommendations by our charity partner Unseen (see “[Collaboration](#)”), we updated the Standard to explain the different types of modern slavery and the signs that someone could be a victim. We also set out the steps our people should take to report concerns related to modern slavery, and provided information on supporting resources including the UK Modern Slavery Helpline. Further information about our charity partner Unseen is available [here](#).
- **Recruitment and Selection Standard** – Ensures we remain fair, consistent and compliant with all applicable legal and regulatory requirements when recruiting. In 2024, following recommendations by Unseen (see “[Collaboration](#)”), we updated the Standard to highlight modern slavery as a risk that our people, particularly hiring managers, should be aware of when recruiting. We included scenarios demonstrating how modern slavery could manifest. For example, through visa sponsored workers joining Bupa who could be vulnerable to exploitation by unscrupulous third parties (see “[Assessing and managing risk](#)”).
- **Background Screening Standard** – Applies to our employed and contingent workers. It documents our approach to screening, both pre- and during employment, including mandatory identity verification and right to work checks.
- **Contingent Worker & IR35 Standard** – Details the processes we must apply for the consistent and lawful engagement of contingent workers in the UK. In 2024, further to Unseen’s recommendations (see “[Collaboration](#)”), we highlighted contingent workers’ increased vulnerability to modern slavery risks. We also set out our expectations that hiring managers stay vigilant to potential indicators.

- **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 include lines of accountability, escalation processes and staff training. Modern slavery is explicitly called out as a form of abuse to which our customers could be exposed.

Relevant standards for our suppliers

- **Responsible Supply Chain Statement** – Defines the minimum standards of business conduct we expect from our direct suppliers and their own suppliers. These include complying with all applicable laws and regulations and conducting themselves to the highest ethical standards. They should also respect all internationally proclaimed human rights, including the prevention of modern slavery, forced labour, human trafficking and child labour. More information on the Responsible Supply Chain Statement is available [here](#).
- **Modern Slavery Guidance for Suppliers to Bupa in the UK** – Launched in 2024, this provides our minimum expectations of suppliers regarding modern slavery risk management. The Guidance is available [here](#).

New in 2024:

- Our charity partner Unseen undertook a review of our policies. Acting on their recommendations, we enhanced modern slavery content in our Protecting Our People Standard, Recruitment and Selection Standard, and Contingent Worker & IR35 Standard.
- We launched guidance for suppliers to our UK businesses, setting out our minimum expectations regarding modern slavery risk management and to help raise awareness of the issue.



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 and confirming that individuals have the right to work in the UK. 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 continued to leverage our payroll systems for insights, running our annual payroll check of our UK direct employees to detect 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 through this check in 2024.

Our supply chain

Prospective suppliers to our UK-based businesses managed by our Procurement function are subject to an inherent risk assessment, which determines their risk tiering and the due diligence required. In 2024, following a review in 2023, we rolled out revised modern slavery due diligence questions. These assess compliance with the UK Modern Slavery Act 2015 (where applicable), explore the jurisdictions in which the supplier operates, verify they have policies and processes in place to mitigate modern slavery risks, check compliance with defined labour standards, and require disclosure of previous incidents, investigations or convictions relating to modern slavery. Responses are reviewed by subject matter experts, with any concerns investigated and resolved before the supplier is onboarded. This can involve policy reviews and direct engagement to corroborate information. Modern slavery due diligence questions are mandatory for all suppliers, except those assessed as low risk at inherent risk assessment stage. Following onboarding, due diligence is repeated at regular intervals in accordance with the supplier's risk tiering.

We include modern slavery provisions in our standard contract templates for suppliers to our UK-based businesses, and in 2024 we worked with an external law firm to review and update these provisions. Amends included broadening compliance requirements beyond the Modern Slavery Act 2015, thereby accounting for our suppliers that are based outside the UK, and requiring our suppliers to have reasonable anti-slavery measures in place. This acknowledges that some of our suppliers may have a lower level of modern slavery risk in their business/supply chains. The amended provisions went live in July 2024 and are used in all new contracts on Bupa terms, as well as in contracts being renewed.

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 of our due diligence processes. However, we are committed to deepening our understanding of our extended supply chain, and continue to explore opportunities to support this, including how risk intelligence platforms may facilitate assessment.

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 2024, to clarify our requirements and expectations of our healthcare providers, we introduced a new ESG clause into contracts which incorporates modern slavery provisions. These include the requirement for hospital and healthcare providers to maintain policies and procedures to ensure compliance with all applicable anti-slavery and human trafficking laws.

By the end of 2024, our top 15 UK independent hospital group providers had agreed to the modern slavery provisions of the ESG clause, which account for 81% of our annual UK health insurance claims spend.



New in 2024:

- We implemented improvements to our standard due diligence questionnaire, enabling us to obtain more meaningful information about our suppliers' approach to modern slavery risk management.
- We worked with a law firm to update the modern slavery provisions within our standard supplier contract terms, broadening compliance requirements and requesting our suppliers implement appropriate anti-slavery measures commensurate to their businesses and particular risk profiles.
- We introduced modern slavery provisions, as part of a broader ESG clause, into agreements with our 15 largest independent hospital group providers.



Assessing and managing risk

Supporting our international visa sponsored workers

In 2024, we continued to develop activities started in 2023 to support our international visa sponsored workers. We updated our Overseas Candidate Guide to include a section on how candidates can protect themselves from those who might seek to exploit them. As part of this, we defined modern slavery and exploitation and provided examples of warning signs, such as agencies charging fees to support applications. We also provided guidance on how to raise concerns internally and externally. The Guide is provided to all international visa sponsored care workers after they have accepted a role with us and before they arrive in the UK.

We also updated our Hiring Manager Checklist used by hiring managers in our care homes in respect of international visa sponsored workers. It reminds them of the particular risks these workers face and advises them to check for warning signs of exploitation, for example that they have not been charged fees by third parties, have freely chosen accommodation, and are able to access and understand all employment documentation and systems.

In 2024, we undertook assurance activity to assess the reach and effectiveness of these initiatives, interviewing a sample of international visa sponsored workers and care home managers across 14 homes. We found that all care home managers knew the indicators of modern slavery and how to raise concerns, and those using the Hiring Manager Checklist found it clear. However, more awareness raising would be beneficial (64% of home managers interviewed knew about the Checklist). Staff spoken to were confident that if they did have concerns, they would feel able to report them to their manager or through Speak Up. In 2025, we will continue to explore enhancements to our processes to support our international visa sponsored colleagues, including updating the welcome guide they receive when first joining us.

We acknowledge that awareness is fundamental to identify and tackle modern slavery, and in 2024 we took a number of steps to build awareness of modern slavery risk across our Care Services population. For more information, see [“Training and awareness”](#).

Monitoring the risk environment

We continue to monitor for external developments that are relevant to our operations and/or supply chain.

In our 2023 Modern Slavery Statement, we noted escalating cases of modern slavery among migrant workers in the wider UK care sector. This trend continued through 2024. Between April and June, 61% of reports made to the Gangmasters and Labour Abuse Authority (GLAA) concerned labour abuse within the UK care sector.⁷

⁷ [18/10/24 Exploitation is on the rise in the care sector - GLAA](#)

Risk arising through our supply chain

Monitoring the external landscape

Through regular horizon scanning, we note reports of interest such as the Department of Health and Social Care's 2023 *Review of the Risk of Modern Slavery and Human Trafficking in the NHS Supply Chain*⁸. Bupa procures some of the products named in this review as higher risk for modern slavery for our clinics, hospital, care homes and dental centres in the UK, including gloves, masks, gowns, surgical instruments and uniforms.

Enhanced due diligence and supplier audits

In 2024, we introduced enhanced due diligence for suppliers to our UK-based businesses identified as high risk for modern slavery during our standard due diligence stage (see "[Due diligence processes](#)"). An additional, more probing questionnaire is issued when new suppliers, or suppliers subject to contract renewal, inform us they operate in high risk jurisdictions (with reference to sources including the Global Slavery Index). This explores how they comply with the UK Modern Slavery Act 2015, enable their workers to raise concerns, provide training, and manage modern slavery risks associated with their own suppliers.

Modern slavery risk is incorporated into our supplier audit programme with focused questions forming part of desktop and physical inspections. In 2024, we updated our audit script to enable deeper evidence gathering and assurance activities. Fifteen supplier audits were undertaken in 2024, with questions relating to modern slavery risk management asked in all cases. No cases of modern slavery were identified in any supplier audits.

Our approach to remediation

Should any concerns be identified throughout the supplier lifecycle, we would engage with the supplier to ensure a full understanding and 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.

⁸ [Review of risk of modern slavery and human trafficking in the NHS supply chain - GOV.UK](#)



Mitigating risks associated with lower value purchasing

In 2024, we took steps to mitigate the risks associated with lower value purchasing at site level (rather than managed by our Procurement function).

We designed a checklist for those with purchasing responsibilities at site level to ask suppliers. It sets out higher risk goods, services and jurisdictions; provides due diligence questions to ask suppliers; and advises how to contact the Procurement function for guidance. The checklist is promoted through training and awareness raising activities, and is accessible on our employee communications platform, Workvivo.



Risk arising through our patients, customers, residents, and others visiting our sites

We recognise that our customers, patients and others visiting our healthcare facilities, such as private carers accompanying some patients, could be victims of modern slavery. In 2024, we undertook a review of our processes for handling potential or actual incidents of modern slavery involving visitors at the Cromwell Hospital and appointed an additional safeguarding specialist in the hospital. We found staff to be passionate about safeguarding all those present at the hospital. Awareness of potential signs of modern slavery was good, and staff told us they felt empowered to raise concerns. In 2025, we will further enhance modern slavery content in our safeguarding training at the hospital, ensure materials are on site about the UK Modern Slavery Helpline, and continue to work with staff to build awareness of the signs of modern slavery and reporting channels. In addition, we will embed the use of our *Patient with Private Carers: Statement of Understanding*, which sets out clear expectations around breaks and meals for private carers accompanying patients to hospital.

Speak Up and escalation mechanisms

We continue to monitor our whistleblowing service, Speak Up, to identify any potential or actual incidents of modern slavery reported internally or by our suppliers and partners. We promote the service to our people through regular internal communications and mandatory training. According to *People Pulse*, our people survey, 85% of respondents in the UK said they felt confident to use the Speak Up service to raise concerns (*People Pulse*, November 2024). Any report raised through the service would be subject to appropriate action. In 2024, no reports were received through Speak Up relating to modern slavery.

We also monitored for any modern slavery-related queries directed to our Manager Advice Team. This is the central point of contact for our people managers that provides guidance on policies and procedures, escalates cases as appropriate, and maintains case records. In 2024, we added a “modern slavery” flag to the case management system used by the team, to ensure any modern slavery queries raised could be easily identified and tracked. We also produced a flow chart for use by the team, which sets out the escalation routes for any modern slavery queries raised. No concerns were raised to the Manager Advice Team in 2024 regarding modern slavery in our workforce.



New in 2024:

- With cases of migrant care worker exploitation rising in the UK, we continued to develop our support for international care workers coming to work in our Care Services business on health and care visas by updating our Overseas Candidate Guide and Hiring Manager Checklist.
- We introduced an enhanced modern slavery questionnaire to suppliers identified as high risk for modern slavery through our standard due diligence process.
- We reviewed and refreshed our supplier audit script to enable deeper evidence gathering and assurance activities.
- We designed a modern slavery local purchasing checklist for use by those in the business that purchase low value goods and services not managed by our Procurement function. This checklist is included in all modern slavery training and awareness raising across our UK businesses.
- We added a “modern slavery” flag to the case management system used by our Manager Advice Team to facilitate the identification and tracking of modern slavery-related queries raised by our people managers to the team. We also produced a flow chart for use by the team which sets out the escalation routes for any modern slavery queries raised.
- We undertook a review of our processes for handling potential or actual incidents of modern slavery involving visitors at the Cromwell.





Collaboration

Throughout 2024, we continued to work closely with the anti-slavery charity, Unseen which works with businesses, governments, communities, and individuals to eradicate slavery and operates the UK's Modern Slavery Helpline. More information about how Unseen supports its partners is available [here](#). As well as supporting our training and awareness initiatives (see "[Training and awareness](#)"), Unseen completed a review of our policies relevant to modern slavery risk management and suggested potential enhancements. These included building additional information into some of our internal policies (see "[Policies](#)").

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

We also started to explore with Unseen opportunities to help survivors of modern slavery with urgent dental needs. The Bupa Foundation, a Bupa funded charity that runs and helps fund practical projects that improve both people and planet health, works closely with Dentaaid the Dental Charity. In 2025, we will bring together the Bupa Foundation, Bupa Dental Care, Dentaaid and Unseen, to help survivors of modern slavery access free dental care and oral health advice. Dentaaid mobile dental units and volunteers will provide free treatments to Unseen clients, funded by the Bupa Foundation. We will report on this activity in further detail in our 2025 Modern Slavery Statement. For more information about the Bupa Foundation, visit www.bupafoundation.org.

Training and awareness

Enhancing awareness through bespoke training sessions and our annual campaign

In 2024, we stepped up our training and awareness raising about modern slavery across our UK operations. We focused on delivering risk-based training to relevant teams and functions across our UK-based workforce. We delivered 8 bespoke training sessions to teams with heightened modern slavery risk identification or management roles, including UK Speak Up Officers (responsible for receiving concerns raised through the Speak Up service and ensuring their appropriate resolution) and the Manager Advice Team (see [“Speak Up and escalation mechanisms”](#)).

A further 10 broader awareness raising sessions took place which targeted people managers and leaders in each of our UK businesses. Three of these sessions were to our Care Services leaders and home managers, as we recognise the importance of continuing to maintain awareness of modern slavery risk amid escalating cases involving migrant workers in the care sector (see [“Supporting our international visa sponsored workers”](#)).

Some of these awareness sessions were conducted as part of our annual internal communications campaign structured around Anti-Slavery Day on 18th October. This week featured messaging about modern slavery on the electronic screens in our offices, awareness-raising events, such as a staff quiz at the Cromwell Hospital and a webinar co-hosted with Unseen, as well as a variety of communications on Workvivo. Through Workvivo platform analytics, we confirmed that 8,131 colleagues viewed our 2024 modern slavery awareness raising communications, representing a significant increase (177%) on the equivalent viewing figures for 2023 (2,933 colleagues).



To further measure the impact and effectiveness of our annual internal communications campaign, in November we issued a survey to our people inviting them to share feedback:

- Over 1,000 colleagues responded to this survey.
- 73% confirmed they had seen or heard about the communications.
- 82% agreed that they had learned more about modern slavery as a result of the campaign.

Launched e-learning modules for Care Services and Dental Care

In 2024, we developed and rolled out two e-learning modules for employees of our Care Services and Dental Care businesses, which together account for 65% of our direct workforce. These describe what modern slavery is and how to spot the signs, as well as explain why combatting the issue is so important and how to raise concerns. They also highlight potential risk areas, for example the purchasing of goods or services at site level, and the procedures we have in place to mitigate these risks, including the checklist to support local purchasing (see [“Risk arising through our supply chain”](#)).

Improved modern slavery content in Safeguarding training

Modern slavery content is included in all levels of our Safeguarding training. In 2024, following a review of the training in 2023 supported by Unseen, we implemented changes to our level 1 and level 2 Safeguarding e-learning modules that are mandatory for clinical staff and employees who have contact with patients. These changes bring consistency to how we talk about modern slavery and how to report concerns. We also updated the case studies included in the e-learning to facilitate understanding of how modern slavery risk could materialise. In 2025, we will continue to implement enhancements to our Safeguarding level 3 training, which is provided on a face-to-face basis.

Continued training of Procurement colleagues

We continued to deliver annual training to our Procurement function, reminding them of the indicators of modern slavery and how it can manifest in supply chains. We also reiterated the crucial role Procurement plays in its identification and mitigation, and guided the team through the changes to processes implemented in 2024 (see [“Due diligence processes”](#) and [“Risk arising through our supply chain”](#)). Attendees discussed hypothetical scenarios that could occur across our operations and supply chain. Seventy-two people completed this training, representing 92% of our UK-based Procurement function. We will continue to review and deliver this training annually.



New in 2024:

- We enhanced our training programme by delivering 8 bespoke training sessions to teams with heightened modern slavery risk identification/management roles (including Speak Up Officers and the Manager Advice Team).
- We ran 10 broader awareness sessions for people managers and leaders in each of our UK businesses.
- We designed and launched two e-learning modules for our Care Services and Dental Care businesses.
- We updated the modern slavery content in our level 1 and level 2 Safeguarding modules (mandated for clinical staff and employees who have contact with patients).
- We extended the reach of our annual internal modern slavery awareness campaign, with over 8,000 of our people viewing the content.

Measuring effectiveness

We continue to consider how best to measure the effectiveness of our modern slavery controls by reviewing the key performance indicators (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 2025.

KPI	2022 Performance	2023 Performance	2024 Performance
Number of reports received through Speak Up relating to modern slavery	0	0	0
Number of modern slavery queries submitted to the Manager Advice Team	0	0	0
Number of specialist staff receiving tailored modern slavery training	80	178	208
Number of employees viewing our annual modern slavery campaign communications	1,024	2,933	8,131
Number of supplier audits that included modern slavery questions	11	18	15

Tracking our performance

At the end of 2024, we reviewed our performance against the priorities we set out in our 2023 Statement:

Our priorities for 2024 ⁹	Status at end 2024
Continue to progress actions in response to the findings of the 2023 modern slavery risk assessment of our operations.	Good progress made in 2024. See “ Due diligence processes ”, “ Assessing and managing risk ” and “ Training and awareness ” for detail.
Progress our International Inclusion Project, supporting international visa sponsored workers and their managers in our care homes and retirement villages.	Good progress made in 2024, and a continued focus area for 2025. See “ Assessing and managing risk ”.
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.	Completed. See “ Due diligence processes ” and “ Assessing and managing risk ”.
Continue to engage with our charity partner, Unseen, to inform our approach and work together to combat modern slavery.	Completed. See “ Collaboration ”.
Review the measures we use to gauge the effectiveness of our processes, policies and controls.	Good progress made in 2024. See “ Assessing and managing risk ” and “ Training and Awareness ”.
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.	Completed, and will remain a continued focus area for 2025. See “ Governance ” and “ Assessing and managing risk ”.

⁹ As set out in our 2023 Modern Slavery Act Statement.

Our priorities for 2025

- Remain focused on heightened risk areas within our operations, including exploring how we can further support our visa sponsored colleagues.
- Continue to enhance modern slavery risk management in our procurement processes.
- Consider how internal people systems can be further leveraged to support the identification and management of modern slavery risk in our workforce.
- Maintain our focus on training and awareness raising of modern slavery, taking a risk-based approach.
- Monitor closely external developments relating to modern slavery to inform our anti-slavery programme and reporting.
- Continue to collaborate with our charity partner, Unseen, to inform our approach and work together to combat modern slavery.

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