

**Modern
Slavery Act
Statement
2025**

Introduction

The Global Slavery Index by Walk Free¹ estimates that 122,000 people in the UK and almost 50 million people worldwide are living in conditions of modern slavery.

At Bupa, we are committed to playing our part in combatting modern slavery. We do this by working to address the risks in our operations and supply chains, collaborating with others and ensuring we report transparently and in compliance with the provisions of the UK Modern Slavery Act 2015 (“the Act”).

This statement for the financial year ended 31 December 2025 outlines the steps taken by our UK-based businesses in scope of the Act (“in-scope businesses”) to identify and prevent any form of modern slavery occurring within our business or supply chain. It has been prepared with the support of the UK anti-slavery charity, Unseen².

This statement was approved by the Board of The British United Provident Association Limited on 12 May 2026 and by the Boards of the in-scope businesses. A full list of these businesses is provided on page 16. This statement is also published on the UK Modern Slavery Statement Registry.



Signed by Iñaki Ereño, Group Chief Executive Officer, 12 May 2026.

¹ [Global Slavery Index | Walk Free](#)
² More information about Unseen is available [here](#)

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Summary of our progress in 2025

The following table summarises key progress against the priorities we set for the year with links to where more detailed information can be found in this statement.

Priority	Progress in 2025
Remain focused on heightened risk areas in our UK operations, including our visa sponsored colleagues in Bupa Care Services	✓ We improved information on modern slavery provided to our visa sponsored care workers and their managers. ✓ We leveraged a range of listening activities to support rapid identification of any issues with our visa sponsored workers. ✓ We mandated training for Bupa Care Services employees with designated safeguarding responsibilities. ✓ Leadership teams in Bupa Care Services and the Cromwell Hospital held sessions on modern slavery. ✓ We improved modern slavery content in our safeguarding policy and training at the Cromwell Hospital, working with Unseen.
Continue to enhance modern slavery risk management in our procurement processes	✓ We enhanced modern slavery risk management through the launch of an Enterprise Third Party Risk Management Policy. ✓ We undertook a deep dive into risk management of recruitment agencies used to source temporary care workers. ✓ We refreshed our Responsible Supply Chain Statement, adding new requirements relevant to modern slavery.
Consider how people systems can be further leveraged to support the detection of modern slavery risk	✓ We analysed company loan data to detect potential indicators of financial control among our visa sponsored care workers. ✓ We started to explore automating our payroll check looking at potential indicators of exploitation across our UK workforce. ✓ We developed a management information dashboard for review at our monthly Modern Slavery Working Group meetings.
Maintain focus on training and awareness, taking a risk-based approach	✓ We delivered 9 bespoke training sessions to teams with a heightened role in modern slavery risk identification and management, including our UK Procurement, Employee Relations and Clinical Governance teams. ✓ We extended the reach of our annual Anti-Slavery Week internal awareness campaign. ✓ We enhanced modern slavery content in our mandatory risk training module taken by around 20,000 of our UK employees.
Collaborate with Unseen to inform our approach and combat modern slavery	✓ We delivered essential dental care to modern slavery survivors, working with Unseen, Dentaid and the Bupa Foundation. ✓ We convened recruitment agencies that work with Bupa Care Services to discuss modern slavery, facilitated by Unseen. ✓ Unseen supported the preparation of our Modern Slavery Act statement.
Monitor external developments to inform our anti-slavery programme and reporting	✓ We tracked and discussed relevant external developments at all 11 meetings of our Modern Slavery Working Group. ✓ We informed our anti-slavery programme with external insights and intelligence from Unseen.



Organisation structure and supply chains

About Bupa Group

We are an international healthcare company serving over 68 million customers worldwide³. 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 Arabia⁴. For more information, visit www.Bupa.com.

³ Our customer definition has been updated to align with our 3x100 Strategy. Customers (which includes 100% of our Associate businesses) are defined as the number of Bupa products or services that an individual chooses to access, whether funded personally, by their employer or other affinity – where they have the option to choose a non-Bupa alternative. The difference between the previous and current definition is not materially different in total.

⁴ Refers to Bupa Arabia and My Clinic.

⁵ Includes both Bupa owned and franchised units.

⁶ 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 4.2 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 6,000 residents in 113 care homes and 10 Richmond Villages. Bupa Health Services comprises over 110 health clinics⁵ including on-site services and the Cromwell Hospital, New Victoria Hospital and King Edward VII 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 2025, we directly employed 25,117⁶ people in our UK businesses. Around 39% were based in our care homes, 21% in our dental clinics, 27% were office based and the remainder were in our health clinics or hospitals. We 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 businesses. In 2025, our UK businesses spent nearly £1.1 billion with 7,826 direct suppliers, of which 94% are registered within the UK. The remaining 6% are dispersed across 49 countries. The top 10 countries⁷ by highest procurement spend are detailed in Table 1. The listed countries account for 7,731 suppliers, equivalent to 99% of all direct suppliers to our UK businesses. Our top 5 procurement spend categories are detailed in Table 2.

Table 1: Top 10 countries by procurement spend

Country	Supplier Count
United Kingdom	7,358
Ireland	239
United States of America	64
Netherlands	22
United Arab Emirates	18
Denmark	14
Cyprus	6
Spain	5
New Zealand	4
Curaçao	1
The remaining 1% of direct suppliers to our UK businesses are located across 40 countries.	

Table 2: Top 5 procurement spend categories

Category	Examples of goods/services
Soft Facilities Management (the service and people elements of running our facilities)	Mailroom services, security, grounds maintenance, couriers, cleaning, catering, archiving and storage.
Information Technology (IT)	Information business services, telecoms, hardware and software.
Professional Services	Call centres, language translation services and advisory services in industries such as finance, law, accountancy and others.
Medical and Pharmacy	All hospital equipment including ECG machines, mammography machines, MRI and mobile MRI, PPE, gloves, physiotherapy services and primary healthcare contracts ⁸ .
Hard Facilities Management (the physical elements of running our facilities)	Construction services, fire alarms, water and asbestos testing and other property maintenance services such as decorating, heating and plumbing.

⁷ Based on suppliers’ registered addresses.
⁸ A small number of contracts with third party healthcare facilities, 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 Hospital Management team (see “[Due diligence processes](#)”).

Governance

Our Modern Slavery Working Group met 11 times in 2025. The Working Group comprises functional representatives including Procurement, People, Legal, Clinical Governance (including Safeguarding), Internal Communications and Risk. Its purpose is to plan and oversee implementation of our anti-slavery programme. It also prepares our annual UK Modern Slavery Act Statement for review and approval by the Boards of the in-scope entities, and the British United Provident Association Limited Board.

In 2025, the Working Group led the continuous improvement of our anti-slavery programme, focusing on our priorities for the year. It also developed a management information dashboard for review at each meeting, to support tracking of potential or actual modern slavery incidents raised through internal reporting mechanisms. At all meetings, the Working Group considered external developments that could impact Bupa's modern slavery risk profile and/or compliance obligations.

The Bupa Code

The Bupa Code is our global standard for employee conduct. It 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 Policies relevant to modern slavery

Our Enterprise Policies apply across the Bupa Group. They set out how we manage key areas of risk and help us to comply with legal and regulatory requirements. For more information about Bupa's risk management approach, please see our [2025 Annual Report and Accounts](#).

Enterprise Policy	Description
Third Party Risk Management Policy and Standard	New in 2025, these replaced our Enterprise Suppliers Policy and enhance our third party risk management, including on human rights risks. See “Due diligence processes” for further detail.
People Policy	Sets out requirements to mitigate Bupa's people risks, ensuring lawful practices and protection of our people.
Speak Up Policy	Speak Up is our whistleblowing service and can be used by anyone who has a concern either about Bupa or third parties providing goods or services to Bupa. It ensures people can raise concerns about wrongdoing, misconduct or risk of harm in confidence and anonymously, if preferred. More information on Bupa Speak Up is available here .
Risk Management Policy	Sets out requirements for enterprise risk management across Bupa including incident management.
Sustainability Policy	Supports the delivery of Bupa's sustainability strategy and sets out our high-level expectations of our businesses to ensure compliance with relevant ESG laws and regulations.
Financial Crime Risk Policy	Sets out our obligations regarding financial crime, which can be intrinsically linked to modern slavery. More information on our approach is available here .



Policies for our UK businesses relevant to modern slavery

UK Standard	Description
Protecting our People Standard	Sets out our UK employed and contingent workers' responsibilities to prevent and protect one another from harm, hate or abuse, including modern slavery.
Recruitment and Selection Standard	Ensures we remain fair, consistent and compliant with all applicable laws and regulations when recruiting.
Background Screening Standard	Applies to our employed and non-employed workers, such as bank workers and agency 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.
Immigration Standard	Sets out the requirements to ensure Bupa complies with UK Visas and Immigration laws, including the particular requirements associated with visas and/or sponsorship.

Standards and guidance for our suppliers

Name	Description
Responsible Supply Chain Statement	Updated in 2025, this defines the minimum standards of business conduct we expect from our direct suppliers and their suppliers. New requirements relevant to modern slavery include that our suppliers must not make workers pay recruitment fees for their employment. It is available here .
Modern Slavery Guidance for Suppliers to Bupa in the UK	This provides our minimum expectations of suppliers regarding modern slavery risk management. It is signposted through our due diligence processes and is available here .

Due diligence processes

Our operations

For each person we employ in the UK, we conduct a series of checks as part of our people screening and onboarding processes. These include 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. Our Immigration team oversees the onboarding of sponsored colleagues and ensures compliance with UK Visas and Immigration laws.

In 2025, we continued to leverage our payroll systems for insights. We recognise that modern slavery could be indicated by multiple workers receiving wages into a single bank account or sharing a single address. To mitigate these risks, we ran our annual checks to detect instances in which three or more UK direct employees share bank account details and/or live at the same address. We also started to explore how we could automate these checks and increase their frequency. This exploratory work will continue in 2026. No cases of concern were identified through this check in 2025.

Our supply chain

Modern slavery due diligence questions are mandatory for all suppliers managed by our Procurement function, except those assessed as low risk overall. Any adverse responses by suppliers are reviewed by appropriate internal teams, including Legal and Sustainability. Concerns are investigated and resolved before a supplier is onboarded. The resolution process can include requesting further information from a supplier and reviewing relevant documentation. We include modern slavery provisions in our standard contract templates for suppliers to our UK-based businesses. Following onboarding, due diligence is repeated at regular intervals in accordance with the supplier's overall risk tiering.





Evolving our approach

In 2025, we launched our Enterprise Third Party Risk Management Policy and Standard. These mandate screening of all third parties and that an inherent risk assessment, proportionate to the risk of the third party, is undertaken prior to engagement. This must cover human rights risks, including modern slavery and exploitation. Factors used to determine the level of inherent human rights risk presented by a supplier include the jurisdiction in which the supplier is registered, operates or sources goods from, and the types of goods or services being supplied. This recognises that modern slavery prevalence is greater in certain jurisdictions and sectors, in line with respected international sources including the Global Slavery Index and ITUC Global Rights Index 2025. Due diligence, monitoring and contracting processes must then be applied, appropriate to the level and nature of risk identified. Our UK businesses began implementing the new policy requirements with suppliers in 2025 and roll out will continue through 2026. We will report on progress in our 2026 Modern Slavery Statement.

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 managed by our Procurement function are in scope of our due diligence processes. However, we remain committed to deepening our understanding of our extended supply chain and continue to explore opportunities to support this, including further deep dives (see “[Assessing and managing risk](#)”).

Our third party hospital and healthcare network

We contract with hospitals and other healthcare facilities, which provide treatment and services to our health insurance customers, rather than provide goods and services to Bupa directly. In 2025, we continued to roll out a new ESG clause, which includes modern slavery provisions, to our third party hospital and healthcare network. The modern slavery provisions include the requirement for facilities to maintain policies and procedures to ensure compliance with applicable anti-slavery and human trafficking laws. By the end of 2025, 136 providers of healthcare facilities had agreed to the modern slavery provisions. This builds on the 15 hospital group facilities that agreed them in 2024. Together, these figures account for 83% of our annual UK health insurance spend.

In addition, we added modern slavery related questions to the due diligence questionnaires we issue to our network. By the end of 2025, these new questions had been issued to 805 facilities. No concerns were identified through these new due diligence checks.



Assessing and managing risk

Improving modern slavery information provided to our visa sponsored care workers

We updated our International Colleague Welcome Guide for visa sponsored workers when they join Bupa Care Services. These updates included an overview of exploitation, clarification of internal and external routes to raise concerns, and details of UK employment rights. We also updated our Recruiting and Employing International Colleagues Guide for our care home managers to support recruitment and ongoing management of visa sponsored workers. Throughout 2025, both documents were communicated in modern slavery training and awareness sessions (see [“Training and awareness”](#)). They are also available on our Care Services digital repository for employees to access.

Listening activities

In 2025, we focused on listening to our visa sponsored colleagues in Bupa Care Services, to provide tailored support and facilitate detection of issues.

- Relevant members of our Care Services People team were trained on how to leverage listening sessions in care homes to identify and/or escalate any concerns. Eighty-six listening sessions took place in 2025.
- Our Care Services Inspection team introduced modern slavery questions to their care home visits. These explored worker awareness of modern slavery and checked for any indicators or concerns amongst those spoken to. Modern slavery questions were asked in 50 care home inspections, engaging around 150 employees, with no concerns identified.
- We surveyed a sample of our visa sponsored colleagues, exploring whether they had been charged recruitment or other fees by agencies or other third parties. We also sought to identify whether they were experiencing exploitation. No cases of modern slavery were identified through survey responses.
- We undertook 8 roadshows, during which our People team visited care homes with high numbers of sponsored workers. They provided immigration support, information on health and wellbeing benefits including financial support, and training and development opportunities. Through these roadshows, visa sponsored colleagues were able to raise any issues with representatives from our People team, Immigration team and others. Leaflets highlighting modern slavery indicators and how to raise concerns were also shared at each roadshow. Due to their success, we will roll out further sessions in 2026.

Modern slavery risk and the UK Care sector

Externally, since 2022, cases of modern slavery involving migrant workers coming to work in the UK care sector on Health and Care Visas have escalated. It is anticipated that cases are likely to decline following the closure of the care worker visa route in 2025. However, heightened risk is expected to remain for some time. This is due to the high number of migrant workers already in the UK on health and care visas. In 2025, we continued to prioritise support for our visa sponsored workers in Bupa Care Services through a range of initiatives. These are set out on pages 10 and 11.



Using data insights to identify potential issues

We are aware from UK Modern Slavery Helpline data that financial control is usually involved in cases of exploitation in the care sector. Many migrant workers pay excessive fees to agencies to help secure work. They then may struggle to cover living expenses as they are still repaying agency debts. In some cases, they may be controlled by a third party they owe money to until the debt is repaid. Sometimes, the debt is never repaid, and they are held in debt bondage indefinitely.

At Bupa, all our UK based employees can apply for interest free company loans to support them in exceptional circumstances. In 2025, we undertook analysis of loans provided to our visa sponsored colleagues to identify potential indicators of financial control. No cases of exploitation were identified through this analysis. However, in 2026 we will introduce further steps in our loan process to safeguard our people against requesting loans under pressure from a third party.

Making a difference for displaced care workers

Between July 2022 and December 2024, the government revoked more than 470 licences from care sector providers to tackle exploitation and abuse. This resulted in over 39,000 visa sponsored care workers being displaced and urgently seeking employment with new sponsors.

During 2025, Bupa worked closely with regional partnerships across England to support displaced visa sponsored care workers in finding work. By year end, 31 were employed and working in 13 of our care homes. Many told us that their previous employers could not offer them the hours promised, leading to severe financial struggles. In some cases their wages were paid late. One individual commented that they lived with the fear of waking one day to a notification that they had 60 days to find another sponsor or leave the country. Being employed by Bupa was described as a “blessing” and “reason to smile again”, with positive feedback given about our onboarding and induction processes. In addition, a regional partnership said, “working for an organisation with the scale and processes that Bupa can offer is an aspiration for many of the workers approaching us”. In 2026, we will continue our efforts to recruit displaced workers into available eligible roles.

Risk arising through our supply chain

Deep dive review of our care sector recruitment agencies

The recruitment sector can be higher risk for modern slavery, particularly where labour is temporary, low skilled and/or isolated. Given the heightened risk in the UK care sector, in 2025, we completed a deep dive review of Bupa Care Services' main recruitment agencies. We took steps to understand the number of sponsored workers provided by these agencies. We also completed enhanced due diligence to understand their policies, processes and controls to combat modern slavery. In addition, we refreshed our contractual arrangements with the agencies. Acknowledging a collaborative approach is vital to effectively tackle the issue, we brought the agencies together in a roundtable facilitated by Unseen. At this session, we discussed modern slavery risks in the care and recruitment sectors, shared our initiatives, and discussed areas for collaboration. Attendees commented on the roundtable's value and the conversation will continue through 2026.

Responding if an incident occurs in our supply chain

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.

Risk arising through our acquisitions

We continue to invest in the breadth and quality of our clinical provision. In the second half of 2025, we acquired the New Victoria Hospital and King Edward VII Hospital. Integration plans are in place for both acquisitions to transition to Bupa's policies, processes and controls. In 2026, we will work with both hospitals to integrate them into our anti-slavery compliance programme.



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

We recognise that our customers, patients and others visiting our healthcare facilities, such as private carers accompanying patients, could be victims of modern slavery. In 2025, we continued to review our processes for handling potential or actual incidents of modern slavery involving visitors at the Cromwell Hospital:

- We updated the hospital's safeguarding training, highlighting potential signs and reinforcing the steps to report concerns.
- We improved content in the hospital's Safeguarding Policy, building out indicators and examples. We also introduced a flowchart setting out the steps to follow when modern slavery is suspected.
- Unseen delivered bespoke training to Safeguarding leads and other key personnel at the 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 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 2025). Any report raised through the service is reviewed and subject to appropriate action. In 2025, no reports were received through Speak Up relating to modern slavery.

We also monitored for any modern slavery-related queries raised to our Employee Relations team. This is the central point of contact for our people that provides guidance on policies and procedures, escalates cases as appropriate, and maintains case records. No concerns were raised to the Employee Relations Team in 2025 regarding modern slavery.

Collaboration

We continued to work closely with Unseen in 2025. They supported our training and awareness initiatives (see [“Training and awareness”](#)) and reviewed our 2024 and 2025 Modern Slavery Statements. They also provided specialist insight and advice throughout the year.

We delivered essential dental care to survivors of modern slavery working with Unseen, Dentaid the Dental Charity, and the Bupa Foundation⁹. Three clinics were attended by 25 survivors, with volunteers, including Bupa staff, providing 99 treatments.

As detailed in [“Assessing and managing risk”](#), we also collaborated with recruitment agencies supplying temporary workers to our care homes, bringing them together at a roundtable facilitated by Unseen.



⁹ A Bupa funded charity that runs and helps fund practical projects that improve both people and planet health.

Training and awareness

Risk-based training and broader awareness activities

In 2025, we continued to take a risk-based approach to training. We delivered 9 tailored training sessions to teams with a heightened role in risk identification and/or management. This included Bupa Care Services People Partners, who hold employee listening sessions across our care homes; the Inspection team, who undertake in-person inspections of our care homes; and Cromwell Safeguarding leads, who are responsible for overseeing the handling of any modern slavery incident at the hospital. Additionally, bespoke training was provided to our UK Clinical Governance team, who are responsible for due diligence checks on third party hospital and healthcare facilities. We also continued to deliver tailored annual training for our UK Employee Relations and Procurement teams. Of those attending the Procurement sessions, 94% reported that their understanding of modern slavery had improved as a result. In addition, our leadership teams at Bupa Care Services and the Cromwell held modern slavery sessions. As part of National Patient Safety Awareness Week, we ran training on modern slavery for our UK clinical community.

Anti-Slavery Week

We continued to run our anti-slavery awareness campaign structured around Anti-Slavery Day on 18th October. Our 2025 campaign featured communications on Workvivo and a webinar co-hosted with Unseen. We leveraged business-specific communication channels such as people manager meetings, bulletins and newsletters. Analysis showed that 8,373 colleagues viewed our 2025 modern slavery awareness raising communications, up from 8,131 colleagues in 2024.

We surveyed our people inviting them to share feedback about the campaign:

- 89% confirmed they had seen or heard about the communications.
- 85% agreed their understanding of modern slavery had improved as a result of the campaign. Over half of those reported it had improved “significantly”.
- 81% reported they would know what to do if they had concerns relating to modern slavery.



Enhancing our digital learning modules

In 2025 we mandated modern slavery online training for Bupa Care Services roles with designated safeguarding responsibilities. This includes senior care assistants, registered nurses, deputy managers, hiring managers and home managers.

Around 20,000 employees across our UK businesses are required annually to complete our “Risking It” e-learning module. This summarises different risks applicable to Bupa and the steps we should take to manage those risks. In 2025, we enhanced the modern slavery content in the module. We explained what it is, potential indicators, how it could manifest in Bupa, and how to report concerns. These changes were implemented in December, and the enhanced module will roll out in 2026.

Measuring effectiveness

We continue to consider how best to measure the effectiveness of our modern slavery processes and controls by reviewing the key performance indicators (KPIs) we use to inform our anti-slavery programme.

KPI	2025 outcomes	Total since 2022 ¹⁰
Number of reports received through Speak Up relating to modern slavery.	0	0
Number of modern slavery queries submitted to the Employee Relations team.	0	0
Number of cases of modern slavery identified through annual payroll check of shared bank account and/or address.	0	0
Number of specialist staff receiving tailored modern slavery training.	152	618
Number of employees viewing our annual modern slavery campaign communications.	8,373	19,437

¹⁰ Total numbers include single employees who have attended multiple training sessions/viewed modern slavery content across consecutive years.

Our priorities for 2026

- Remain focused on heightened risk areas within our operations. This will include exploring how we can further support our visa sponsored colleagues. We will also work with our newly acquired hospitals to integrate them into our anti-slavery compliance programme.
- Continue to enhance modern slavery risk management in our procurement processes.
- Further leverage internal processes and systems to support the governance of modern slavery risk in our organisation and supply chain.
- Maintain our focus on training and awareness raising on 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

In-scope 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 in-scope entities.

In-scope entities covered by this statement:

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