

Supplier Code of Conduct

Bupa A&NZ

Version 6.0

Bupa views its suppliers as partners and cares about the way our suppliers do business.

This Supplier Code of Conduct (Code) sets out the minimum standards of behavior that Bupa APAC expects its suppliers including their supply chain to meet in the areas of labour and human rights, health and safety, sustainability, business integrity, privacy and supplier diversity. This Code is not intended to apply to healthcare providers that Bupa HI Pty Ltd pays benefits to under the terms of its members' Health Insurance Policies, or to insurance brokers acting on behalf of clients.

Bupa's purpose is helping people live longer, healthier, happier lives and making a better world. We recognize the direct link between the health of society and the health of our planet. We are committed to engaging millions of people around the world in their health and wellbeing thanks to our healthcare expertise, while seeking positive impact on the environment and our communities. We live by the Bupa Code which means taking responsibility to care for our customers over the long term, building trust and strong relationships with our communities – and protecting our colleagues', partners' and Bupa's reputation.

Bupa expects suppliers to read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate this Code to related entities, suppliers and sub-contractors who support them in supplying to Bupa, so that they are aware of, understand and comply with this Code.

We expect our suppliers to operate ethically and to source and use ethical and sustainable products and suppliers. A suppliers' ability to meet or exceed standards detailed in this Code will be considered by Bupa when making procurement decisions. This will happen regardless of whether the Code has been formally incorporated into a contract with the supplier. Where Bupa contracts set out more specific social, environmental and/or ethical requirements, this Code supplements those provisions.

A supplier refers to any entity that supplies goods or services to Bupa or its related companies anywhere in the world. Where this Code refers to workers, this includes employees, contractors, agency, students, and temporary staff of the supplier and of its related entities.

Comply with laws

Suppliers must comply with the law in the countries where they operate.

Suppliers must conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation, and performance in accordance with applicable laws.

Suppliers must comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls (which may include, but is not limited to the laws and regimes enacted by Her Majesty's Treasury (UK), the United Nations, Australia, the Office of Foreign Asset Controls (US), the European Union, and those relevant to Hong Kong).

Human rights and workplace conditions

At Bupa, we respect and support human rights. We expect suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

Non-discrimination

Suppliers must not engage in or support discrimination in hiring and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, mobility, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personal association with a person who possesses or is thought to possess any of these attributes or any other characteristics protected by law. The Supplier must have suitable policies and practices in place that promotes equality, inclusion, and diversity, as well as creates a harassment and discrimination free organisation.

Bullying, Harassment and Disciplinary Practices

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment are prohibited.

Freedom of Association

Suppliers must respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

Suppliers must protect against acts of interference with the establishment, function or administration of workers' organisations in accordance with applicable laws. Where the right to freedom of association and collective bargaining are restricted under the law, a supplier shall allow workers to freely elect their own representatives.

Suppliers shall not discriminate, harass, intimidate or retaliate against workers for being members of a union or participating in trade union activities, and shall provide worker representatives with access to their workplace.

Wages and Benefits

Suppliers must comply with applicable laws relating to wages, superannuation, and benefits (including minimum wages, overtime pay, and piece rates) defined for the Country or

State/Territory the employee operates within, to prevent exploitation of the local workforce. Suppliers must not use deductions from wages as a disciplinary measure and must pay workers on time. Suppliers must be ethical employers that respect their employees' contributions, and that reward employees fairly.

Working Hours

Suppliers must not require workers to exceed prevailing local work hours. In line with International Labour Organisation (ILO) standards, workers shall not be required to work more than 60 hours per week (including overtime), except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off per seven-day week.

Modern Slavery

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Bupa's Modern Slavery statement outlines Bupa's commitment to assessing and addressing human rights risks across our organisation and suppliers. We recognise it can affect any sector or industry and we take seriously our responsibility to be alert to the risks in our business operations and supply chain. We expect our people and suppliers to share our commitment to take action to combat modern slavery. Suppliers are expected to act consistently with relevant modern slavery legislation at all times, and proactively identify, address and where appropriate, report on risks of modern slavery (including all forms of human trafficking, forced labour and debt bondage) in their business operations and supply chains.

Suppliers must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. In addition, workers shall not be required to pay employers' or agents' recruitment costs or any other fee for their employment. Suppliers must familiarise themselves with the UN Guiding Principles on Business and Human Rights and must work towards raising awareness internally to ensure compliance with their responsibilities in protecting Human Rights.

Child and Underage Labour

Child labour is strictly prohibited. The minimum age for employment or work is the higher of: 15 years of age, the minimum age for employment in the relevant country, or the age for completing compulsory education in the relevant country. This Code does not prohibit participation in workplace apprenticeship programs or light work as defined by the ILO. Children under the age of 18 shall not be employed for any hazardous work or work that is inconsistent with their individual development. The Supplier will not engage with any vendor, supplier or other third-party arrangement that has practices which exploits children. The Supplier will also ensure internal practices reflect this and work with any relevant law enforcement authorities to resolve any incidents when the Supplier becomes aware.

Financial Crime

Bribery and Corruption

Bupa expects the highest standards of integrity and ethical behavior from its Suppliers. Suppliers must comply with all local and national laws and regulations on bribery, corruption and other prohibited business practices. Bupa defines bribery as '*the act of giving, paying or receiving, or requesting, agreeing to receive or accept something of value e.g. money or a gift, in order to obtain an advantage for acting improperly*'. Bupa strictly prohibits bribes and considers this to cover payments to speed up routine actions (so called *facilitation payments*) no matter how large or small in value. This applies regardless of whether it is legal or common practice in a country.

- Suppliers must employ reasonable measures and controls to ensure that their workers and suppliers do not commit bribery or corruption, or become involved in such activities.
- Suppliers must not, directly or indirectly, offer, make or authorize any payment to improperly influence a third party to secure an undue business advantage.
- Suppliers must not offer or receive any gifts, entertainment or hospitality that may improperly influence (or be perceived to improperly influence) the outcome of business transactions or awarding of contracts, with Bupa or with any other party.
- Suppliers must have policies and/or procedures in relation to conflicts of interest. A conflict of interest may occur when a supplier's personal or professional interests may impact on their ability to act impartially in the best interests of Bupa in respect of the Supplier's obligations. This includes personal relationships between our suppliers and Bupa employees or customers where actions could be perceived as being unfairly preferential.

Fraud

Fraud is a constantly evolving risk type. Its success relies on finding and exploiting weakness and can materialise in any industry, function or process where illegal benefit can be achieved.

- Bupa works hard with its customers, providers and third parties to prevent fraud and expects its suppliers to cooperate with those efforts.
- Suppliers must have appropriate and reasonable preventative measures in place to protect itself, Bupa and the wider community from fraud.
- Suppliers must advise Bupa without delay where it detects a fraud which may have an impact on Bupa, its business or its customers.

Sanctions

Suppliers must ensure they conduct their business in compliance with all applicable lawful local and international sanctions regimes. As such, suppliers must:

- Fully comply with all lawful sanctions regimes affecting their business.
- Not have dealings with designated individuals and entities (such as suspected terrorists or narcotics traffickers) who are subject to international economic sanctions).
- Implement effective internal controls to minimise the risk of any non-compliance with relevant sanctions regimes, including training and support for their employees and contract workers.

Anti-Money Laundering

Bupa is committed to strictly comply with all applicable Anti-Money Laundering (“AML”) and Counter Terrorist Financing (“CTF”) laws and regulations. While acting on our behalf, we expect our suppliers to:

- Not knowingly engage or attempt to engage in any transaction involving proceeds derived from unlawful activity.
- Perform applicable AML / CTF related responsibilities in utmost good faith and immediately report to the relevant regulatory or enforcement authority any matter suspected to be related to money laundering or terrorist financing (and then to advise Bupa, at the first opportunity when such a disclosure is permitted).

Tax evasion

A failure to pay taxes that are legitimately owed deprives governments of much-needed funding to pay for public works – something which disproportionately affects the most vulnerable in society. Bupa is committed to playing its role in combatting tax evasion.

- Suppliers must not engage in any applicable tax evasion offences, nor should they criminally facilitate the evasion of taxes by other parties.
- Suppliers must ensure that they put in place reasonable procedures to prevent the occurrence of such offences by associated persons, including their employees, subcontractors and persons acting on their behalf.

Health and safety

At Bupa, no job is so important or urgent that it cannot be done safely. Our suppliers play a significant role in our business and our commitment to keep each other, our workers, customers and the public safe.

Suppliers must identify and comply with relevant workplace and product health and safety laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work.

Suppliers must provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities by:

- taking reasonable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease for workers;
- providing appropriate equipment, resources, instruction, education and training for workers to safely carry out their duties, including personal protective equipment;
- engaging with workers, customers, members of the community, and Bupa to manage health and safety risks;
- implementing effective systems to ensure products and service delivery meet relevant standards and legislative requirements, and safety considerations are considered throughout the product lifecycle;
- ensuring facilities and amenities for workers (including any accommodation provided) are clean, safe and meets their basic needs. Basic needs include providing ready access to clean toilet facilities, potable water, and where accommodation is provided, hot water for bathing, adequate heating and ventilation, reasonable personal space and reasonable permission to enter and exit facilities;
- monitoring the health of workers and the conditions at the workplace for preventing illness or injury of workers arising from the supplier's business activities; and
- supporting workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination.

Suppliers must prepare for, respond to, manage and report workplace incidents, injuries and emergencies, providing medical assistance to impacted parties as required. Suppliers must have systems, training and emergency equipment in place to effectively respond to and manage incidents and emergencies.

Environmental Sustainability considerations

Suppliers must minimize the adverse environmental impacts of their operations, products and services. Bupa expects suppliers to implement an environmental management system in line with recognised standards such as ISO 14001.

Environmental Laws, Permits and Reporting

Suppliers shall comply with applicable environmental laws, standards and notices from regulators. Suppliers shall obtain, maintain, keep current and comply with necessary environmental permits, approvals and registrations.

Product Stewardship Content

Suppliers shall deliver electrical or electronic equipment in line with relevant regulations in the regions of operation and of intended equipment use. Suppliers shall develop products or services that achieve improved environmental performance across the whole lifecycle including low energy consumption, delivering greenhouse gas emissions reductions and product reuse or recycling.

Pollution Prevention and Resource Efficiency

Suppliers must identify, monitor, minimise, and treat hazardous pollutants released to air, water and soil. This includes management of wastewater such as discharges and spills entering storm drains and release of air emissions such as volatile organic compounds, chemicals with ozone depleting potential, particulates and combustion by-products. Suppliers shall work to reduce the use of raw materials and resources in their operations, as well as the elimination, substitution, re-use and recycling of materials and solid waste. Packaging supplied to Bupa shall be sustainably sourced, made from recycled content and recyclable where possible.

Reducing environmental impact and managing climate risk

Bupa has committed to a Net Zero target by 2040, which includes scope 3 emissions (those associated with our supply chain). In order to support our ambitions, at a minimum, Bupa expects suppliers to:

- Comply with all applicable environmental regulatory requirements.
- Demonstrate understanding of environmental risks, impacts and responsibilities associated with the products and services they provide.
- Provide information to Bupa about the environmental credentials of a procured product or service on request.
- Where possible, offer product and service options that offer reduced environmental impact.

In addition, Bupa encourages suppliers to:

- Have policies or programmes that seek to reduce environmental impact and mitigate environmental risks;
- Measure, monitor, and endeavor to make continuous improvements in environmental performance. This includes, but is not limited to, carbon emission accounting in accordance with the Greenhouse Gas Protocol.
- Minimise the use of energy, water and raw materials. Where possible, use renewable or sustainably sourced energy and materials.
- Consider the principles of the circular economy, making practical efforts to eliminate or reduce levels of generated waste and reuse and recycle waste materials wherever possible.

- Consider the environmental credentials and performance of suppliers within their own supply chain and require them to operate to a minimum set of standards.

Animal Welfare

Bupa supports the ethical and humane treatment of animals. Bupa ensures that animal transportation on our network meets and exceeds the standards of the IATA Live Animal Regulations. We expect that suppliers to Bupa will:

- Ensure that any animals involved in the goods & services provided to Bupa are treated humanely;
- Avoid the use of animals in experiments that cause suffering or distress and are not essential to humans or animals;
- Avoid cruel or inhumane use of animals in any industrial activity;
- Avoid supporting cruel or inhumane use of animals in any sporting or entertainment event.

Privacy

Bupa's [Privacy Statement](#) outlines our privacy commitment and explains how we collect, use, disclose and protect our customers' personal information. Privacy is a non-negotiable part of how we work. Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers and employees from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with Bupa. This includes suppliers not doing anything which would cause Bupa to be perceived as acting inconsistently with the Bupa Privacy Statement and the Bupa Privacy Principles.

Diversity & Inclusion

Bupa is committed to being a diverse and inclusive company and achieving greater diversity in our supply chain. At Bupa, diversity means difference in all its forms, both visible and not visible, and includes differences that relate to gender, age, cultural background, disability, religion and sexual orientation, as well as differences in background and life experience, and interpersonal and problem-solving skills. In line with this, Bupa prefers suppliers who promote diversity in their supply chain, including:

- those who publicly commit to Indigenous procurement targets and support Indigenous Australians by directly procuring goods and services from Indigenous owned enterprises and organisations that employ Aboriginal and Torres Strait Islander Australians;
- those who engage with social enterprises and minority-owned organisations in the delivery of goods and services;
- those with strong female gender representation, improve gender equality, actively promote women and, seek to address overrepresentation of women in departures and gender pay equity gaps; and
- those that initiate procurement activities aimed at improving the lives of people with disability or who are disadvantaged.

Corporate Governance and Ethics

At Bupa, we act with honesty and integrity and don't make or receive improper payments, benefits or gains. Suppliers must act ethically and be honest, transparent and trustworthy in all their dealing with others.

Responsible Sourcing of Minerals

Suppliers are expected to exercise due diligence to reasonably assure that the tin, tantalum, tungsten and gold in the products it manufacturers does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuse in the Democratic Republic of Congo or an adjoining country. Suppliers shall not direct or indirectly support organisations and individuals associated with illegal activities, human rights abuses or terrorism.

Intellectual Property

Suppliers must respect intellectual property rights of Bupa and other third parties. Any transfer of technology and knowhow must be handled in a manner that protects intellectual property rights.

Policies

Suppliers should develop, maintain and implement policies consistent with this Code and maintain appropriate management systems and documentation to demonstrate compliance with the Code.

Suppliers must provide workers, their suppliers, and members of the community in which they operate or provide services with a confidential means to report violations of this Code.

Enforcement provisions

Bupa reserves the right to periodically assess or audit your practices that relate to compliance with this Code.. In such event the supplier should co-operate by providing information, documents and access to staff, as Bupa reasonably requires. Such reviews may include, without limitation, Supplier's trading locations (including head offices) and related Supplier information, including processes and policies, records, certifications, permits and other documentation which evidences the Suppliers' compliance with Bupa's code. The Supplier is expected to fully co-operate with Bupa in these reviews and will promptly remedy any non-conformances identified during this inspection.

If a supplier becomes aware of a reasonable risk of a breach of this Code, the supplier must notify Bupa as soon as practicable. Any identified deficiencies must be corrected on a timely basis as directed by Bupa.

Where Bupa has reasonable grounds to suspect a breach of this Code by a supplier, Bupa may require the supplier to take additional steps which may include the provision of additional information or, in serious cases, submit to an independent audit at the supplier's premises at the supplier's cost. We take this Code seriously and any material non-compliance may result in the termination of the supplier's business relationship with Bupa.

Risk management

Commitment to risk management and corrective action systems are key to a reliable supply chain for Bupa. Suppliers are expected to maintain sound governance and risk management practices

Continuous improvement

Suppliers are encouraged to go beyond compliance to applicable laws and take responsibility to continually improve social and environmental conditions and ethical behavior.

It is important to us that anyone can report concerns about illegal, unethical or improper conduct.

Revision History

Document Title	Owner	Review Date
Bupa Supplier Code of Conduct	Head of Procurement	Yearly

REV	Description/Change	Reviewer	Date Effective
V1.0	First Draft	Rebecca Crimean, Simon Dormer, Christopher Best, Sean Wroe, Andrew Swain	17 th September 2018
V2.0	Second Draft	Richard Allen, Anu Srinivasan, Andrew Ashcroft, Rob McCulloch	31 st October 2018
V3.0	Final - Published	Richard Allen	12 th November 2018
V4.0	Annual Review	Liss Balla, Anu Srinivasan, Ben Vanden Boom, Rob McCulloch and Lee Barker	25 th February 2020
V5.0	Annual Review	Paul Morris, Anna Lin, Anu Srinivasan, Ben Vanden Boom and Lee Barker	14 th April 2021
V6.0	Annual Review	Paul Morris, Anna Lin, Anu Srinivasan, Jacqui Lee, Lee Barker, Sheldon Liew, Nicholas Daly, Sebastian Godolphin, Justine Keenan, Guy Jarvi, Mohammed Khan, Kristy Rogan, Julie Bissinella, Tania Killeen-Noy and Ben Vanden Boom	21 st March 2022