Bupa Australia Modern Slavery Statement 2024

This Modern Slavery Statement is currently under review by the Attorney-General's Department and has not been officially published on the Modern Slavery Statements Register.

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Acknowledgement of Country

Bupa would like to acknowledge and show respect to the Traditional Custodians of Australian land. We pay our respects to Elders past and present and recognise their cultural heritage, beliefs and continuing connection to land, waters and community. We embrace their knowledge of how to protect and nurture these lands, and all they contain, to keep this country and its people healthy.

Foreword from our CEO

As a purpose-led organisation, Bupa Australia is committed to helping people live longer, healthier, happier lives and making a better world.

For us to live our purpose, we recognise the need to be a responsible business. That's why we continue to evolve our approach to identifying and mitigating modern slavery risk, ensuring year-on-year improvement to help combat this global problem.

This Modern Slavery Statement is prepared in accordance with the Australian *Modern Slavery Act 2018* (Cth) **(the Act)**, covering the reporting period between 1 January 2024 and 31 December 2024.

Throughout 2024, we have continued to mature our approach to identifying, assessing and addressing areas of modern slavery risk within our operations and broader supply chain. There were no modern slavery risks or incidents reported via Speak Up (our whistleblowing platform) or our incident management system during the 2024 reporting period.

Some of the highlights of our modern slavery work in 2024 were:

- launching our Third-Party Management Framework **(TPMF)** in April, including the requirement for modern slavery risk assessments and subsequent due diligence for suppliers identified with higher modern slavery risks;
- introducing a required annual training and awareness module for our Executive and Senior Leadership, achieving a 100% completion rate in 2024, and providing modern slavery awareness sessions to other employees;
- prioritising modern slavery risk initiatives with our health insurance international and corporate partnerships;
- assessing the effectiveness of our modern slavery risk management controls and providing a framework for our 2025 modern slavery work plan and priority focus areas; and
- continuing to collaborate with health insurance industry participants through the Private Health Insurance Modern Slavery Community of Interest, and our partnership with Anti-Slavery Australia to enhance our awareness of emerging modern slavery risks, and improve existing anti-slavery initiatives.

Looking forward, we're committed to doing what is necessary to mitigate the risks of modern slavery in our business in 2025 and beyond.

Nicholas Stone

Nick Stone
Chief Executive Officer, Bupa Asia Pacific

This statement has been approved by the Board of Directors for Bupa ANZ Healthcare Holdings Pty Ltd (ACN 126 737 308) and Bupa ANZ Insurance Pty Ltd (ACN 098 309 025) on 27 May 2025 and Nick Stone is authorised to sign this as the CEO of those entities. Bupa ANZ Healthcare Holdings Pty Ltd and Bupa ANZ Insurance Pty Ltd are the two 'higher entities' within the meaning of section 14(2)(d)(ii) of the Act.

2024 snapshot

In 2023, we set out four priority focus areas for our 2024 Modern Slavery Statement for Bupa Australia. These focus areas, and progress against each, are summarised below.

2024 priority focus areas	Outcomes
Continue to roll out and embed modern slavery awareness and training for our people.	Developed and delivered the 2024 Bupa Australia Modern Slavery Training and Awareness Plan, which included: • over 340 Senior Leaders (100%), including the Executive Leadership Team, in our Australian businesses meeting the requirement for completing annual modern slavery training; • approximately 200 other employees undertaking training through a voluntary modern slavery module; • delivering bespoke modern slavery awareness training to Speak Up officers; and • delivering a World Anti-Slavery Day Webinar across Bupa Australia with Professor Jennifer Burn, Director of Anti-Slavery Australia.
Continue to roll out and embed the Supplier Assessment Framework (SAF) tool to identify and mitigate modern slavery risk in our supply chain.	• Undertook modern slavery assessments using a new **SAF** tool and issued due diligence questionnaires to new suppliers and suppliers undertaking contract renewals where they were assessed to have a medium or high risk of potentially engaging in modern slavery practices. • Commenced the **TPMF Enablement Project** to operationalise and improve the process for managing supplier-related modern slavery risk.
Continue to lead and participate in internal and external opportunities to engage on and progress modern slavery awareness and risk reduction.	• Held quarterly internal Bupa Australia Modern Slavery Working Group meetings to oversee delivery of our modern slavery work plan and 2024 focus areas. • Provided quarterly progress updates to the Bupa Asia Pacific (APAC) Environment, Social and Governance (ESG) Committee.[1] • Consulted with Bupa Group through regular meetings and knowledge sharing on modern slavery reporting requirements and business practice. • Maintained an active membership in the Private Health Insurance Modern Slavery Community of Interest, attending quarterly meetings.
Design and deploy a program to mitigate modern slavery risk with our partner network.	• Prioritised modern slavery mitigation efforts through our health insurance international and corporate partnerships modern slavery program.

1. Bupa Australia is part of the Asia Pacific (APAC) Market Unit within the Bupa Group, and comprises Australia, New Zealand and Hong Kong SAR.

Reporting entities

This is a joint Modern Slavery Statement made by Bupa ANZ Healthcare Holdings Pty Ltd (ACN 126 737 308) and Bupa ANZ Insurance Pty Ltd (ACN 098 309 025), which are the two "higher entities" within the meaning of section 14(2)(d)(ii) of the Act.

The following subsidiaries of Bupa ANZ Healthcare Holdings Pty Ltd and Bupa ANZ Insurance Pty Ltd are also considered reporting entities and are captured by this Modern Slavery Statement.

Bupa ANZ Healthcare Holdings Pty Ltd (ACN 126 737 308)

- Bupa Aged Care Australasia Pty Limited (ACN 120 380 654)
- Bupa Aged Care Australia Holdings Pty Ltd (ACN 082 931 744)
- Bupa Aged Care Australia Pty Ltd (ACN 082 931 575)
- Bupa Aged Care Holdings Pty Ltd (ACN 126 737 371)
- Bupa Health Services Pty Limited (ACN 003 098 655)
- Bupa Dental Corporation Pty Ltd (ACN 161 650 979)
- Dental Corporation Holdings Pty Ltd (ACN 127 265 212)
- Dental Corporation Pty Ltd (ACN 124 730 874)

Bupa ANZ Insurance Pty Ltd (ACN 098 309 025)

- Bupa HI Holdings Pty Ltd (ACN 129 951 855)
- Bupa HI Pty Ltd (ACN 000 057 590)

Definitions

Bupa Australia refers to the two higher reporting entities covered by the Act which capture Bupa's Australian operations: Bupa ANZ Healthcare Holdings Pty Ltd and its subsidiaries, and Bupa ANZ Insurance Pty Ltd and its subsidiaries. Further details on Bupa Australia's operations are provided in the following section of this Statement. References to "we", "us" and "our" are to Bupa Australia.

Bupa Group refers to the British United Provident Association Limited's wholly owned and controlled companies. References to Bupa Group do not necessarily refer to each of the entities respectively, but to the group as a global organisation. Certain other Bupa Group companies are reporting entities under other modern slavery legislation in international jurisdictions.

Reporting entities' structure, operations and supply chains

Bupa Group's structure

Bupa Group is an international healthcare company serving over 60 million customers worldwide[2]. With no shareholders, Bupa Group reinvests 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 Arabia[3]. For more information, visit **www.bupa.com**.

2. Customer counting methodologies 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 (includes other services Blua, General Insurance, Telehealth etc.).
3. Refers to Bupa Arabia and My Clinic.

Bupa Australia's structure and operations

Our customers

As of 31 December 2024, Bupa Australia's operations served approximately

4.9 million
health insurance customers[4]

1.75 million
health provision customers

5,600
aged care and retirement village residents

Our people

In 2024, we directly employed around **13,700 people** in our Australian businesses.[5]

47%
in Bupa Villages & Aged Care Australia

19%
in Bupa Health Services

12%
in Bupa Health Insurance

22%
in Bupa Australia's corporate offices

We also use contingent workers across our businesses who supplement our workforce for an indefinite or fixed period. They are defined as those who are not employed or paid directly by Bupa Australia.

4. Customer counting methodologies 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 (Includes other services Blua, General Insurance, Telehealth etc.).
5. The 13,700 people figure is based on average number of employees during the year.

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Bupa Australia's structure and operations

Bupa Australia provides a broad range of health and care services which are delivered through two Australian higher reporting entities and its Australian subsidiaries as summarised below:

Bupa ANZ Healthcare Holdings Pty Ltd

Bupa ANZ Healthcare Holdings Pty Ltd's (ACN 126 737 308) principal activity is to act as a holding company for its subsidiaries. The principal functions during the modern slavery reporting period were the:

- operation of care homes in Australia by Bupa Aged Care Australia Pty Ltd (ACN 082 931 575) (BACPL) as an approved provider of aged care under the *Aged Care Act 1997* (Cth);
- operation of a retirement village in Australia by Bupa Care Villages Australia Pty Ltd (ACN 625 963 359) (BCVA);
- operation of health services businesses in Australia by Bupa Health Services Pty Ltd (ACN 003 098 655) (BHS) and its subsidiaries, which encompassed primary health services, optometry, medical visa examination services and the provision of dental and medical facilities and support services; and
- undertaking of investment in healthcare related innovation, research, and development activities by Bupa Innovations (ANZ) Pty Ltd (ACN 614 905 967) (BIPL).

Key operations

Bupa Villages and Aged Care Australia

Throughout 2024, Bupa Villages and Aged Care Australia operated 57 aged care homes and one retirement village to provide residential aged care, respite, and specialised dementia care services for around 5,600 residents.

Health Services

- ***Bupa Dental Care***
  Bupa Dental Care maintained 170 dental clinics across Australia providing a full range of dental services including routine check-ups, cleaning, oral hygiene advice and specialist care.
- ***Bupa Optical & Hearing***
  Bupa operated 49 optical stores that delivered quality eye care advice and information alongside an extensive range of frames and lenses. We facilitated the delivery of hearing services via our partner Amplifon at 22 of our optical stores.
- ***Services for the Australian Government: Bupa Medical Visa Services, Australian Defence Force Health Services and Veterans***
  Bupa Health Services are responsible for the provision of visa medical assessments to visa applicants for the Department of Home Affairs across nine locations.
  We also provided an integrated health care system to the Australian Defence Force (ADF). This system provided end-to-end health care to ADF personnel, delivering services both on-base and through a network of off-base providers. We also provided medical and advisory services to the Department of Veterans' Affairs for the benefit of veterans and their families.
- ***Health Care Centres***
  In 2024, Bupa Health Services established five health care centres, offering access to GPs and other healthcare professionals.

Bupa Telehealth

Eligible Bupa health insurance customers living with a chronic health condition, recovering from or preparing for a hospital stay, or seeking support to make healthy lifestyle changes can access a range of health coaching programs through Bupa Telehealth.

Blua digital health

Blua is Bupa's digital health platform and connects eligible Bupa customers to services such as 24/7 online doctor appointments and chemist delivery (provided and delivered by third parties) as well as a range of online health information and tools for easy and convenient access.

Bupa Ventures

In February 2024, Bupa Ventures was launched as the corporate investment arm of Bupa Australia. It partners with technology driven companies who have customer health and experience at their heart.

Bupa Foundation

Bupa Foundation (Australia) Limited ('Bupa Foundation') is a charitable institution, with the principal purpose to promote the prevention and control of diseases in human beings. Bupa Foundation provides funding in line with its charitable objectives and supports a range of partnerships and programs focused on helping people live longer, healthier, happier lives and making a better world. These include:

- flagship partnerships in programs to improve the health of individuals and public health-focused programs that promote the prevention and control of diseases;
- community programs and investments in line with the Bupa Foundation's areas of focus of healthy minds, and healthy planet, healthy people; and
- community investments in response to national issues such as Indigenous health that promote prevention and control of diseases.

Bupa ANZ Insurance Pty Ltd

Bupa ANZ Insurance Pty Ltd (ACN 098 309 025)'s principal activity during 2024 was to act as a holding company for its subsidiaries. The principal functions during the modern slavery reporting period were:

- operation by Bupa HI Pty Limited (ACN 000 057 590) (BHI) of its private health insurance business under *the Private Health Insurance (Prudential Supervision) Act 2015* (Cth);
- distribution of travel, home and contents, and motor insurance products by BHI as an authorised representative of Open Insurance Pty Ltd (ACN 166 949 444);
- distribution of pet insurance by BHI as an authorised representative of Petsure (Australia) Pty Limited (ACN 075 949 923); and
- provision of health and wellness services to the corporate market by Bupa Wellness Pty Ltd (ACN 145 612 951).

Key operations

Bupa Health Insurance

Bupa Health Insurance provides quality and affordable health insurance and services to around 4.9 million[6] Australians, overseas students and visitors through our digital and online services, 53 retail stores and a customer call centre. In addition to issuing health insurance, Bupa Health Insurance distributes certain general insurance products including car, home, landlords, and pet insurance.

Bupa Wellness

Bupa Wellness' products and services (provided and delivered by third parties) support the better health and wellbeing of Bupa's corporate and international clients, and their eligible employees and students, through proactive and preventative health and wellbeing programs such as flu vaccinations and skin checks.

Supporting functions

To support our operations, our enabling functions of People, Finance, Corporate Affairs & Sustainability, Technology, Customer & Transformation, Legal, and Risk & Compliance continue to be centralised and operate across Bupa Australia entities.

Investments

Bupa's investment portfolio is primarily invested in investment grade short-term cash instruments, bonds and senior loans which are managed internally and through external asset managers.

Our brands

Bupa	Bupa Aged Care	Bupa Retirement Villages	Bupa Dental	Bupa Optical & Hearing
Bupa Medical Visa Services	Bupa Health Services	Bupa Telehealth	Bupa Foundation	
Healthcare Centres Powered by Bupa	blua. Digital health by Bupa	Bupa Health Insurance		

6. Customer counting methodologies 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 (Includes other services Blua, General Insurance, Telehealth etc.)

Our suppliers

Bupa Australia relies on a diverse supply chain providing goods and services to support our operations. In 2024, we engaged with 4,347 suppliers across 18 countries, with an approximate spend of A$1.2bn.

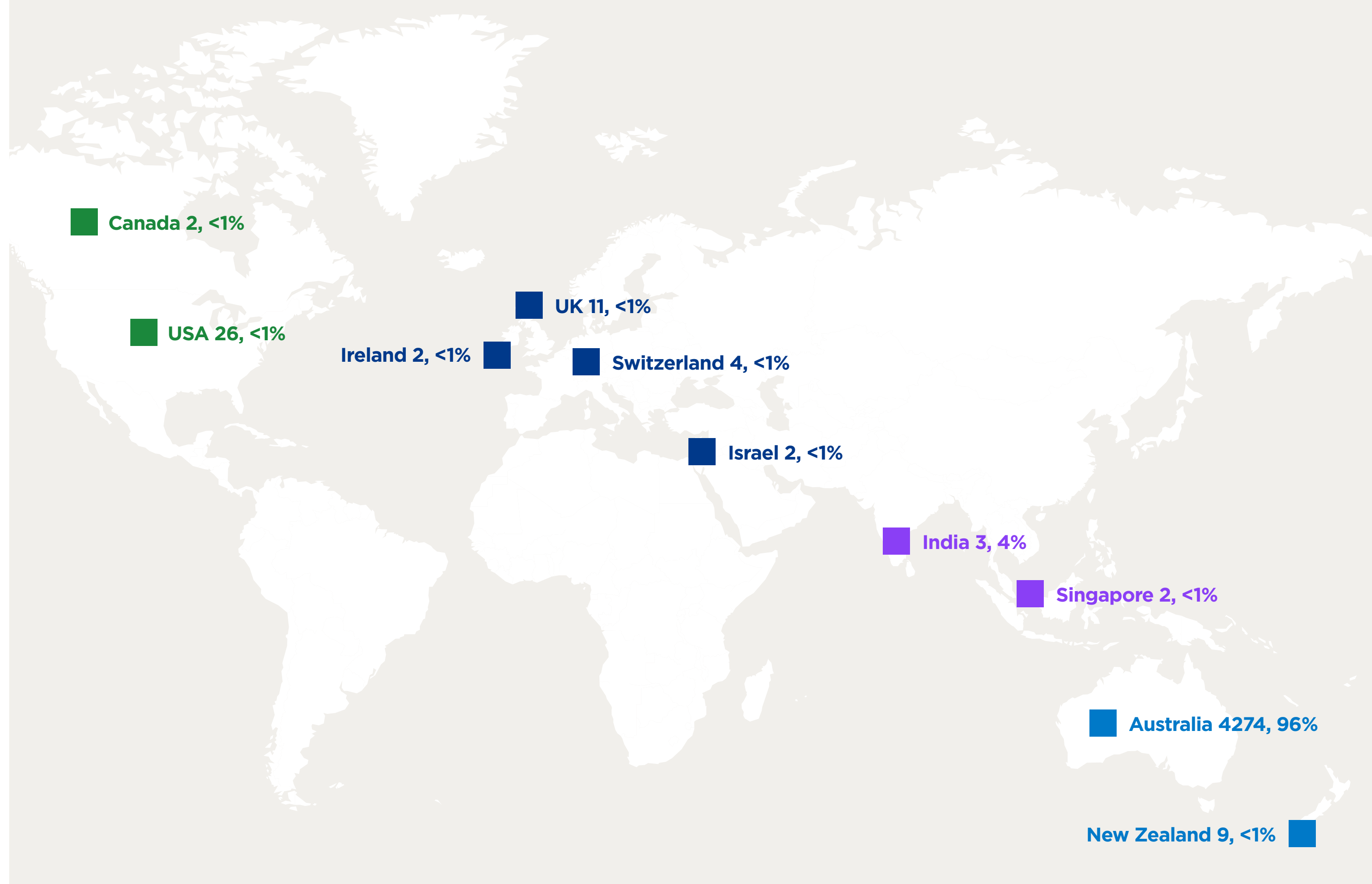
Our current modern slavery response focuses on our tier one (direct) suppliers who:

- we have a direct, ongoing contractual arrangement with;
- are directly linked to our business operations and core to our services; and
- we have a level of influence over their pricing, services, and business practices.

Bupa Australia's supplier categories

Category	Description	% of 2024 spend
Medical	Medical and health provision services, including allied health, as well as equipment and consumables.	41.8%
Technology	Technology hardware and infrastructure including personal devices, software and services such as cloud, printing, data and telecommunications.	17.0%
Facilities management	Utilities, waste, fleet management and cleaning, as well as construction, equipment and maintenance.	15.3%
People services	Clinical and non-clinical recruitment as well as human resource services including training, culture and wellbeing, and workers' compensation.	8.1%
Professional services (including travel)	Consulting as well as outsourced services including legal advice, subscriptions and brokers. Car hire, venue-finding, conference and event management, travel agency services, and offsite meetings.	8.5%
Marketing	Advertising and design agencies, media services, sponsorships, and promotional merchandise.	7.2%
Food & beverage	Bread, butchery, dairy, fruits and vegetables, and groceries as well as alcohol, and other beverages.	2.1%

Number of suppliers and percentage of spend by country[7]



Our businesses contract with many suppliers across the globe, but the majority of suppliers are based in Australia. We have 12 suppliers in total from 8 source countries (France, Hong Kong SAR, Netherlands, Germany, Finland, Spain, Nepal, and South Korea), falling outside the top 10 percentage of spend, representing less than 1% combined total spend.

7. While the suppliers we contract with are based in the countries listed above, Bupa Australia recognises that some of these suppliers may have supply chains of their own outside of those countries.

Our partner provider and intermediary network

Bupa Australia has a partner provider and intermediary network, comprising third-party entities that provide products and services directly to or for our current or prospective health insurance members.

Examples of Bupa Australia's partner provider network include:

- hospitals and other healthcare providers who provide treatment and services to our members where eligible members can claim the cost of certain treatment and services;
- health and wellness providers who provide health and wellbeing services to eligible employees and students of Bupa Australia's health insurance corporate and international clients on Bupa Australia's behalf;
- a virtual doctor service to provide telehealth services, available 24/7, to Bupa Australia's international members and eligible domestic members via Blua; and
- healthcare program providers that provide out-of-hospital healthcare programs to Bupa Australia's members for healthcare prevention.

Intermediaries act as sales distribution channels for Bupa products and services. Examples of Bupa Australia's intermediary networks include:

- corporate brokers, migration agents and education institutions who market our health insurance products to prospective customers, such as corporate employees, international students and visitors;
- education institutions, where we enter into contracted agreements with the university, college, TAFE, school, etc. to be the preferred provider for overseas student health insurance;
- corporate clients who can offer Bupa Health Insurance products as a part of their employee offerings; and
- comparison sites and commercial partners.

Risk of modern slavery practices in our operations and supply chains

In 2024, there were no new areas of modern slavery risk identified, and no incidents reported through our confidential whistleblowing service, Speak Up, internal incident management processes, or any other channels.

Our operational risk

Most people who work for Bupa Australia are directly employed. This lowers the risk of modern slavery within our own operations. While this does give us more control, we acknowledge there remain areas where this risk may be present, including for contingent workers.

Contingent labour[8] may present a risk of modern slavery where Bupa Australia does not have a direct line of sight into the operations of agencies and other people-related suppliers on which we rely.

We continue to monitor and improve our methodology for assessing any modern slavery risk with controls that are in place to manage the risk of modern slavery within our workforce. More details are available in **Our operations: People and contingent worker actions**.

Supply chain risk

Insurance and healthcare suppliers, and the types of products manufactured to support these industries, have long and complex supply chains. We recognise there is a potential risk of modern slavery occurring where these industries are relevant to our supply chain and spend.

Supplier Assessment Framework (SAF) tool

During 2024, we strengthened our approach to modern slavery risk identification for new and renewing suppliers. Suppliers who are identified as either industries of interest or who may have operations in countries of interest were assessed using a new in-house SAF tool developed in 2023, which has been incorporated into our TPMF.

This tool allows us to undertake modern slavery assessments at the risk identification and due diligence stages prior to the awarding and onboarding of suppliers.

We review the sources used for the SAF annually, using external advisory support.

Industries of interest

When developing the SAF tool, we engaged an external human rights consultant to identify industries of interest that pose a higher potential modern slavery risk to Bupa Australia's business operations and supply chain. This is based on a risk scoring model derived from the external consultancy's methodology for mapping modern slavery risk across all 11 sectors, 24 industry groups, 69 industries and 158 sub-industries of the Global Industry Classification Standard (GICS) framework.

8. Contingent workers for the purposes of this Statement are those engaged and paid through an external recruitment agency or third-party supplier to supplement our workforce from time to time.

Bupa Australia's identified industries of interest

Industries	Application in Bupa Australia operations
Electronics	Electronic medical equipment; IT hardware; mobile phone supplies; solar panels and batteries; electronic record systems; patient monitoring devices; laundry equipment.
Footwear, garments, apparel	Uniforms and workwear; patient apparel; footwear.
Rubber products	Medical equipment (syringes, catheters, and tubing); emergency equipment.
Gloves and masks	Personal Protective Equipment (PPE) for patient care and staff protection.
Textiles, yarn, thread	Bedding, pillows and linen; medical and surgical drapes.
Waste, rubbish, disposal services	Medical waste disposal; general waste management; confidential document shredding; hazardous waste disposal; construction and renovation waste; organic waste disposal.
Labour hire, recruitment	Recruitment or outsourced services for: administrative and support staff; sales and marketing staff; cleaning and facility management and maintenance; security personnel; temporary and seasonal workers; university/student recruitment programs; contractual, temporary, and outsourced roles; migration and education agents.

Countries of interest

The SAF assesses risk for almost every country in the world by aggregating data from seven credible sources[9] relevant to geographic risk, arriving at a comprehensive and easily understood SAF geographical score.

Bupa Australia considers countries of interest to be those where a supplier operates through their supply chain in connection with a country that falls below our acceptable SAF geographical score.

Example of countries of interest are China, Malaysia, India and Nepal.

Case study

Identifying and prioritising risks through mapping

We continue to acknowledge the challenges we, and many other large businesses, face in achieving full transparency of a multi-tiered supply chain. At present, only direct (tier one) third-party suppliers and investment partners are in scope of our due diligence processes.

To improve our understanding of our risk profile, Bupa Australia engaged a human rights and ESG consultancy to map and understand both overall and individual supply risk, using supplier and spend data for the 2024 reporting period.

The mapping identified:

- the individual suppliers and industries calculated to have the most elevated potential risks of modern slavery within Bupa Australia's overall assessed inherent risk profile;
- a visual representation of the supply chains for our most elevated first-tier industries by spend and inherent risk;
- the relative slavery risk in our supply chain on a tier-by-tier basis, up to the 10th tier; and
- geographical depiction of the cumulative risk of modern slavery across our global supply chain.

Bupa Australia will use this information to prioritise the remaining suppliers who have yet to go through due diligence to ensure we're focused on those with the biggest risk to our operations.

9. The seven sources include: World Population Prospects 2022 Revision; Global Slavery Index 2023; US Department of State Trafficking Victims Protection Act; International Trade Union Council (ITUC) Global Rights Index 2023; World Bank Worldwide Governance Indicators; Freedom House 'Freedom in the World' Report 2023; and International Labour Organisation (ILO) Women and Men in Informal Economy 2016.

Our approach to modern slavery risk

Policies, frameworks and tools

Bupa Australia, and where specified, the broader Bupa Group, have a range of internal policies, supporting frameworks and tools which guide our approach to mitigating the risk of modern slavery in our operations and supply chains.

Enterprise-level policies

Our enterprise policies apply across 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-level policies and frameworks

Bupa Code

Bupa Code is our global standard for employee conduct that 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 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 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 APAC **Supplier Code of Conduct.**

Enterprise Risk Management Policy

Sets out requirement 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 Risk Management Framework

The framework ensures that appropriate governance arrangements and risk management processes are in place to identify, assess, manage, monitor and report risks. It also ensures effective controls are implemented and monitored to reduce risk exposure. Bupa Australia's operational modern slavery risks are managed through this framework.

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**.

Enterprise Brand and Reputation Management Policy

Sets out the actions that Bupa Australia expects all of its people to take to protect our brand and reputation, including escalating all potential and live issues to Corporate Affairs & Sustainability immediately. These actions help to create a risk-aware culture across Bupa Australia and an alternative frame through which our people can identify inappropriate business practices across our operations.

Local policies and frameworks

ANZ Speak Up Policy

This is the ANZ-specific version of Bupa Group's Enterprise Speak Up Policy.

APAC Supplier Code of Conduct

Our **Supplier Code of Conduct (SCOC)** sets out the minimum standards of behaviour that Bupa Australia expects from its suppliers, including within their supply chains, to meet our requirements for labour and human rights, health and safety, sustainability, business integrity, privacy, and supplier diversity.

APAC Incident and Issue Management Framework

The framework supports the Enterprise Risk Management Policy by providing definitions and minimum standards to support effective incident and issue management, ensuring a consistent approach to capturing, managing, and reporting incidents and issues across businesses in Bupa Australia. This framework applies to all our employees and third-party contracted service providers.

Governance and risk management

Bupa Australia's modern slavery program of work is led by the APAC ESG & Sustainability Team, progressed by our Modern Slavery Working Group, and governed by the APAC ESG Committee with oversight from the APAC Executive Leadership Team.

Identification and management of risk

The risks associated with modern slavery are identified through active monitoring of our obligations and threats to our business, both internal and external. Bupa Australia has incorporated the **SAF** tool and due diligence requirements into our TPMF to include mandatory assessment of potential modern slavery threats across our network of suppliers. Bupa Australia's critical processes are documented and key controls mitigating modern slavery risk are regularly monitored and tested. Bupa Australia's Modern Slavery Working Group regularly monitors the risk environment, including emerging threats, potential incidents, and control performance.

Managing incidents of modern slavery

No incidents of modern slavery were reported through the APAC Incident and Issue Management Framework processes or through Speak Up. Local incident management processes are established to identify, investigate, and remediate any confirmed incidents in a timely manner.

We require potential or actual modern slavery incidents to be recorded through our incident management online reporting system so that any incident can be assessed and escalated as required.

Upon becoming aware of a modern slavery incident within our business or supply chain, we take the following steps:

1. identification and escalation
2. respond and recover
3. investigate and remediate
4. analyse and learn
5. review processes and associated procedures

Importantly, Bupa Australia will prioritise victims' rights in any remediation activity. We will also seek to assess and address the root causes of any incidents.

New in 2024

Dedicated modern slavery resource

In 2024 we assigned the responsibilities of modern slavery subject matter expert to the Sustainability Manager Australia. This requires them to review SAF and modern slavery due diligence assessments and coordinate continuous improvement in combating modern slavery, through the Modern Slavery Working Group and actions in the annual work plan.

Reviews in 2024

In 2024 we conducted a gap analysis on our modern slavery compliance obligations and reviewed the current risks and associated controls and supporting policies. These have been updated in Bupa Australia's risk management system and are managed in accordance with our Enterprise Risk Management Framework. Bupa Australia's policies and associated frameworks and supporting tools that are associated with modern slavery risk were also reviewed. Any gaps identified that require long-term action have informed the 2025 priority focus areas and **2025 Bupa Australia modern slavery work plan.**

Our operations: People and contingent worker actions

Minimum wage rates

Bupa Australia has robust business processes in place to ensure that our people are paid at least the legal minimum wage rates determined by the Fair Work Commission each year. Bupa Australia has an internal working group through which remuneration and industrial relations specialists collaborate to review employee pay rates to ensure that their pay rate does not fall below the legal minimum wage rate.

Raising concerns and whistleblowing

Our ANZ Speak Up Policy provides a fair and consistent framework for all employees and other stakeholders in Bupa Australia-owned and controlled businesses to speak up, in a responsible way, about any genuine concerns about wrongdoing, misconduct, a breach of the law, or a risk of harm within Bupa.

Employees, contractors, contingent workers and other stakeholders (including customers, residents, contracting parties etc) are informed that genuine concerns raised through Speak Up will be taken seriously, investigated and responded to appropriately, and any request for confidentiality respected. They are also advised about the protections which will apply to them in Australia and New Zealand.

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. When asked if they felt confident to use the Speak Up service to raise concerns (via our People Pulse survey in November 2024), respondents scored +83 points. 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.

New in 2024

In 2024 the ANZ Speak Up Policy was reviewed, and modern slavery was explicitly listed as a concern that could be raised. Dedicated Speak Up officers were consulted in 2024 on the process for identifying, reporting, and notifying of any potential modern slavery concerns.

Migrant workers

Bupa Australia conducts right-to-work checks both at onboarding and throughout the employment lifecycle to ensure compliance with visa conditions and other requirements. This includes:

- background checks performed as part of the recruitment process for new employees via our external provider (e.g. identity verification, right to work, criminal record checks);
- fortnightly monitoring to ensure visa currency throughout the duration of employment; and
- reviewing visa terms and conditions as part of any changes to roles, to ensure continued compliance.

These checks provide confidence that any potential non-compliance and risks are flagged.

Contingent workers

Bupa Australia uses recruitment agencies and third-party suppliers to provide contingent workers in a range of settings across our organisation. These entities are required to comply, through Bupa Australia contractual clauses, with the APAC Supplier Code of Conduct which explicitly calls out Bupa Australia's position against modern slavery. It obliges agencies and suppliers to have appropriate anti-slavery controls and to comply with applicable laws relating to wages and entitlements, and prevents suppliers and agencies from requiring contingent workers to surrender any government-issued identification as a condition of employment.

International recruitment agencies engaged to support talent acquisition are also subject to the APAC Supplier Code of Conduct through Bupa Australia contractual clauses.

Case study

Mitigating modern slavery risks through strategic workforce transformation

In 2024, we implemented a sourcing strategy designed to increase direct employment through both offshore and onshore recruitment initiatives. This approach prioritised early-career talent pipelines, workforce development, and the international attraction of key clinical roles, particularly in our regional care homes.

As a result, our reliance on third-party agencies decreased by 14%, significantly mitigating employment risks while strengthening workforce sustainability and operational resilience.

Our supply chain: Third-party risk management

In April 2024, we undertook a staged delivery of an updated Third-Party Management Framework (TPMF). This Framework addresses modern slavery risk identification and management for suppliers and third parties. The TPMF has a five-step approach that includes risk identification, due diligence, awarding and onboarding, monitoring and reporting, and renewal and termination. It was applied to new suppliers and suppliers due for contract renewal.

Our TPMF supports and addresses one of our priority areas, which is to continue to roll out and embed the **SAF** tool to identify and mitigate modern slavery risk in our supply chain.

Higher potential risk assessments will alert Bupa Australia to make further enquiries of the third-party on their practices and controls, and allows for better monitoring and customised contract clauses.

Third-party governance

In 2024, Bupa Australia set up a dedicated team to manage third-party governance.

The business commenced the TPMF enablement project in June 2024 to design and develop a fit-for-purpose, consistent, coherent, and connected (automated) system to govern and manage supplier risks, enable segmentation, and improve workflow.

The updated system will automatically send online inherent risk due diligence questionnaires and calculate standardised residual risk rankings based on responses, which will improve and quicken existing assessments. The system will also enable monitoring and action plans for risk-based continuous monitoring, and the reporting of the supplier's risk profile including modern slavery risks within its supplier management platform.

The first stage of the TPMF enablement project is planned to be completed by 1 July 2025 and will be rolled out to all new suppliers and when suppliers renew their contracts.

Bupa Australia recognises that existing suppliers engaged prior to July 2025 may not have undertaken segmentation, risk assessments, and the newly introduced detailed due diligence assessment questionnaire. We will take a staged approach for our existing suppliers prioritising due diligence for assessing modern slavery residual risks for suppliers mapped with higher modern slavery (inherent) risk.

New in 2024

Due diligence and monitoring

Where suppliers are flagged as higher risk through the **SAF**, Bupa Australia completes enhanced due diligence checks through a questionnaire exploring the supplier's practices and controls.

A modern slavery due diligence questionnaire was developed and introduced in May 2024 to assess the actions undertaken by third-party suppliers to mitigate and reduce modern slavery risks in their operations and their supply chain and help assess residual risk.

The questionnaire covers supply chain visibility and screening, human rights policy and governance, compliance to relevant modern slavery legislation, training and awareness, response and remediation, and modern slavery due diligence.

By assessing the questionnaire responses, our third-party risk owners can identify the actions that should be monitored and reviewed, and how often this should happen.

Managing modern slavery risk in investments

Our external asset managers have a considered approach to modern slavery risks. At minimum, external asset managers are required to consider modern slavery risks in the investment process and how they monitor these risks on an ongoing basis, both within their own business and engagement with suppliers and as well as through the investments they make on behalf of their clients.

Investments in companies with the most significant adverse impacts on climate and health, namely companies materially involved in the exploration, extraction and production of fossil fuels, the manufacture of tobacco, or the creation of controversial weapons are precluded.

Contract clauses

Bupa Australia negotiates modern slavery obligations and protections in applicable contractual arrangements where the parties acknowledge there is a risk of modern slavery in the relevant engagement. Depending on the arrangement, and for suppliers assessed with higher modern slavery risks, the clauses negotiated may require compliance with applicable modern slavery laws, impose reporting requirements, encourage collaborative efforts and/or seek assurances of compliance with modern slavery laws from relevant supply chain participants. Contract non-compliance incidents are required to be logged and managed in accordance with our APAC Incident and Issue Management Framework.

Supplier Code of Conduct (SCOC)

Bupa Australia suppliers, through their contractual requirements, are required to read, understand, and take steps to ensure that their business and supply chain comply with our SCOC (**available on our website**).

Modern slavery is clearly defined in the Supplier Code of Conduct, setting out Bupa Australia's expectation that:

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

The Supplier Code of Conduct also sets out our requirements around non-discrimination, bullying, harassment and disciplinary practices, freedom of association, wages and benefits, working hours and expressly prohibits child labour.

Case study

Linen provider due diligence

Bupa Australia's Aged Care business purchases a range of linen products, including towels, sheets and blankets, with an annual spend of $400k in 2023. As a textile product, linen is considered an industry of interest in our modern slavery SAF.

In 2024, the business undertook a competitive and risk-based market exercise involving five suppliers at tender stage. The preferred supplier on value grounds also provided preferred responses to our modern slavery questions. In line with the newly introduced TPMF, the Sustainability Manager assessed the supplier using the SAF tool.

The SAF assessment confirmed that this supplier did pose a higher modern slavery risk given a high textile industry score and due to countries of interest being identified through their supply chain. The vendor was asked to provide further information on their human rights policies and actions through our due diligence questionnaire before proceeding, and to implement an annual reassessment.

The supplier completed the due diligence questionnaire which highlighted they had established policies, mapped out their supply chain, and conducted external auditing of their manufacturing suppliers through Sedex Members Ethical Trade Audits (SMETA).

The contract was amended to require the supplier to issue annual evidence of their external auditing reports, and provide any similar reporting if they planned to make supply chain changes in their sourcing of textiles for our Australian Aged Care businesses. The signing of this updated contract met Bupa's appetite for risk, and meant the continuation of a relationship with a long-standing supplier.

Our operations and supply chain: Training and awareness

Bupa Australia continues to rollout and embed modern slavery awareness and training for its people as a priority focus area.

In 2024, we developed a modern slavery training and awareness plan that focused on training employees in our businesses and support functions. Key actions in the plan included the following:

- **Review, update, and development of modern slavery content for training modules**
  In 2024, an existing voluntary module was reviewed to incorporate changes to the TPMF. Additionally, a link to the published 2023 Modern Slavery Statement, risks and controls identified in 2023, and further information on using our incident management framework to manage allegations of modern slavery in our operations and supply chain, were added.

New in 2024

A new Senior Leader module, required to be completed annually, was developed and rolled out in October 2024 with a 100% completion rate.

- **Identification and delivery of bespoke training and awareness on modern slavery topics**
  We identified groups for targeted face-to-face training and awareness sessions that expanded on topics and information covered in the online modern slavery module. This resulted in:
  - the delivery of bespoke modern slavery awareness training to Speak Up officers in Bupa Australia to recognise the signs of modern slavery;
  - a focused training and awareness program for our Health Insurance business; and
  - Anti-Slavery Day webinar for Bupa Australia employees. For more information see **Stakeholder engagement and collaboration**.

- **Resources**
  We continue to develop and maintain a dedicated modern slavery page on Bupa's intranet to provide resources for Bupa Australia employees to help them to understand and address modern slavery risks. These resources include self-paced learning modules, a recorded webinar, Bupa Australia's SAF tool, due diligence forms, and resources and links for raising concerns regarding actual or potential instances of modern slavery.

  This training and awareness plan will be reviewed on an annual basis and is part of our annual modern slavery work plan.

Case study

Partner provider and intermediary program

In 2024, we initiated an International and Corporate Portfolio (ICP)-led program to support modern slavery mitigation activities, firmly embedding ethical practices at the core of our operations.

Embedding modern slavery clauses in agreements
This year we have integrated modern slavery clauses into all contract templates for new business and renewals across our ICP health insurance business. This critical step ensures that our commitment to preventing modern slavery is legally binding and explicit in our agreements and applies across both our International and Corporate health insurance operations.

This work will be maintained into 2025 as we continue to work through our existing agreements and align them to the updated modern slavery contractual requirements.

Training for on-campus representatives
To increase awareness of modern slavery, we conduct training sessions for our on-campus representatives at our partner universities. These sessions are designed to equip our representatives with the knowledge and skills necessary to recognise the signs of modern slavery and understand their role in preventing it. By empowering our front-line people with this critical awareness, we enhance our overall capacity to identify and address potential risks effectively.

Awareness-building
In addition to our internal measures, we have taken proactive steps to raise awareness and educate our external intermediary relationships about modern slavery impacts. We published an article in our B2B intermediary newsletter, which highlighted the importance of vigilance, shared best practices, and emphasised our collective responsibility in combating modern slavery. Furthermore, we offered free training in relation to modern slavery awareness, to our agent and institution intermediaries, helping them recognise signs of exploitation and empowering them to take necessary actions within their spheres of influence.

Assessing effectiveness

In 2024, our Modern Slavery Working Group and APAC ESG Committee met quarterly to monitor, manage and report on progress made on initiatives to address priority focus areas and to develop our organisational capacity to meaningfully address the risk of modern slavery in our operations and supply chain.

The APAC ESG Committee is provided with comprehensive quarterly reporting, highlighting any risks to delivering our initiatives and next steps. Reporting in this way elevates the topic to the most senior levels of our organisation, assisting Bupa Australia with achieving its outcomes and progress with business-wide modern slavery initiatives.

The Bupa APAC Executive Leadership Team, through the APAC ESG Committee and their relevant representatives in our Modern Slavery Working Group, receive updates on programs of work occurring within the business, designed to actively mitigate the risk of modern slavery in our operations and supply chain, particularly the effectiveness of the TPMF.

We continue to measure the effectiveness of our actions to address modern slavery risk through the following measures:

- reviewing and assessing the outcomes and effectiveness of our 2024 priority focus area deliverables, actioned through our 2024 modern slavery work plan;
- receiving monthly reports detailing modern slavery online learning module completion rates;
- ‘lessons learnt’ process following the preparation of the 2023 Modern Slavery Statement;
- feedback received from our Executives and Senior Leaders who completed the newly introduced 2024 online module;
- volume of reports received through Speak Up or our incident management system relating to modern slavery;
- gap analysis and assessment of current risk controls including documentation review of current policies, frameworks and tools; and
- review of areas we consulted on modern slavery and our current Modern Slavery Working Group membership.

Consultation

Consultation and collaboration on anti-slavery practices at Bupa Australia primarily occur through our Modern Slavery Working Group and the APAC ESG Committee.

These bodies comprise senior representation from across our organisation and provide insight, direction, and endorsement for ongoing programs of work related to modern slavery risk mitigation.

In 2024, we continued to engage with Bupa Group, which is also subject to UK modern slavery legislation, to ensure program alignment and share learnings.

As part of the process of preparing this joint Statement, our Modern Slavery Working Group consulted with relevant Executives and Bupa Australia businesses of the reporting entities and the entities they own and control in Australia. A final draft of the Statement (together with an overview of our reporting approach) was also provided to the Boards of the reporting entities.

In 2024, our Modern Slavery Working Group membership and terms of reference were reviewed to enable stronger consultation with its reporting entities and controlled entities.

APAC ESG Committee membership 2024
Chair: Chief Sustainability & Corporate Affairs Officer
Managing Director of Bupa Villages and Aged Care Australia
Managing Director of Bupa Villages and Aged Care NZ
Director of ESG & Sustainability APAC, Corporate Affairs & Sustainability
Director of Corporate Affairs & Sustainability, NZ Corporate Affairs & Sustainability
Director of Corporate Affairs & Sustainability, HK Corporate Affairs & Sustainability
Director of Corporate Affairs – Health Insurance, Corporate Affairs & Sustainability
ESG Governance Advisor, Corporate Affairs & Sustainability (Secretariat)
Customer Advocate, Customer & Transformation
Director of Environment & Climate Action, Finance
Director of Procurement, Property & Operations, Finance
Group Financial Controller, Finance
General Manager of Corporate Partnerships, Health Insurance
General Manager of Customer Strategy & Performance, Health Insurance
Chief of Staff, Health Services
Legal Director (Health Insurance, Marketing & ESG), Legal
Director of Organisational Development, People
Organisational Development Lead, People
Chief Risk Officer (Functions), Risk & Compliance
Director of Technology Operations, Technology
Head of Technology Value Realisation, Technology

Modern Slavery Working Group membership 2024
Chair: Director of ESG & Sustainability APAC, Corporate Affairs & Sustainability
Head of Sustainability APAC, Corporate Affairs & Sustainability
Sustainability Manager Australia, Corporate Affairs & Sustainability
ESG Governance Advisor, Corporate Affairs & Sustainability (Secretariat)
Customer Advocate, Customer & Transformation
Director of Procurement, Property & Operations, Finance
Head of Procurement, Property & Operations Transformation, Finance
Procurement Specialist, Systems & Process, Finance
Finance Manager, Environmental Reporting, Finance
Senior Property Compliance Manager APAC, Finance
Senior Manager Financial Crime, Finance
General Manager, Operations Support, Health Services (Dental)
International Direct Channel Manager, Health Insurance
Senior Legal Advisor (Health Insurance, Marketing & ESG), Legal
Head of People (Bupa Aged Care and Villages), People
Head of Risk and Education (Employee Governance), People
Operational Risk & Control Enablement Leader, People
Head of Strategic Sourcing (Bupa Aged Care and Villages), People
Chief Risk Officer (Functions), Risk & Compliance
Technology Domain Manager, Technology

We also continue engagement and consultation with colleagues in Bupa Group, which is required to produce a Modern Slavery Statement under UK legislation.

Stakeholder engagement and collaboration

Bupa Australia remains an active member of the Australian Private Health Insurance Modern Slavery Community of Interest. This Community of Interest has representation across most of Australia's largest private health insurance providers and seeks to identify ways in which our sector can continually enhance and harmonise our collective approach to reducing modern slavery risk. Bupa Australia participated in all quarterly meetings during 2024.

To ensure our knowledge and approach remains up to date, we attended the Australia modern slavery in-person roundtable with the Attorney-General's Department on Addressing and Reporting on Human Rights in a Changing Regulatory Environment, which was hosted by the Sustainability Professionals Association (SPA). This session included a follow-up panel discussion and Q&A session with leaders from Walk Free and other businesses who are leading the way in effectively addressing and reporting on human rights in a changing regulatory environment.

On Anti-Slavery Day, we hosted a webinar open to all Bupa Australia employees featuring Professor Jennifer Burn AM, Director of Anti-Slavery Australia, to explore the role of business in addressing modern slavery and what it means to be a business leader. The session provided an overview of modern slavery risks in Australia, key developments in the regulatory landscape, and examples of leading business responses. Discussions also considered areas where Bupa could strengthen its approach to modern slavery risk.

Insights from this session have contributed to Bupa's ongoing work, including informing our modern slavery statement and shaping priority areas for further action. We look forward to future engagement with Anti-Slavery Australia to stay informed on best practices and evolving modern slavery risks.

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Our 2025 priorities

In 2025, as part of our efforts to continually improve the effectiveness of how we mitigate modern slavery risk, we will evolve our priority focus areas per below:

Proposed 2025 priority focus areas	Outcome
Governance, policies, and processes (new priority focus area)	In response to gap analysis undertaken in 2024, we will improve our modern slavery guidance and review and update policies and frameworks. This will be supported by enhanced reporting and governance through the APAC ESG Committee. We will also review and implement any changes made to the *Modern Slavery Act 2018* (Cth).
Training and awareness	We will continue to rollout and embed modern slavery awareness and training to our people through a dedicated 2025 training and awareness plan. This will include a review of existing training materials, and a requirement that 95% of Senior Leaders complete the online module annually.
Third-party (supply chain) modern slavery risk management	We will continue to embed effective modern slavery risk management of our suppliers through the TPMF with a staged roll out of due diligence assessments and monitoring for existing high risk 2024 suppliers, renewals, and new suppliers.
Enhanced modern slavery initiatives through internal and external consultation	We will enhance our modern slavery initiatives through continued engagement with reporting and controlled entities, partner provider network and intermediaries, the Private Health Insurance Modern Slavery Community of Interest, and other related industry groups and sustainability networks. In addition, we will continue to connect with Anti-Slavery Australia and human rights consultancies to improve our anti-slavery initiatives.

Mandatory criteria index

Mandatory criteria	Section	Page
Identify the reporting entity.	Reporting entities	6
Describe the reporting entity's structure, operations and supply chains.	Reporting entities' structure, operations and supply chains	8-14
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risk of modern slavery practices in our operations and supply chains	16-17
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our approach to modern slavery risk	18-28
Describe how the reporting entity assesses the effectiveness of these actions.	Assessing effectiveness	30
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation	32-34
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Our 2025 priorities	36

Bupa