

Speak Up Local Policy
Bupa Hong Kong (including Hong Kong Insurance and Quality Healthcare)

1. Why is speaking up important?

- 1.1. Consistently achieving high standards in the way we run our business helps us achieve the right outcomes for Bupa, our customers and our people, ultimately ensuring we deliver our purpose: *longer, healthier, happier lives and making a better world*. At Bupa we are committed to conducting our business responsibly and with honesty and integrity. However, all businesses face the risk of something going wrong or people behaving in ways which are not appropriate or acceptable. That's why a culture of openness and accountability is so important. We also need to have a framework in place to enable our people to report issues and concerns if they are not able to raise those concerns with their manager or they believe that their concerns have not been dealt with appropriately. Also, some of our people are bound by professional codes of practice that require them to highlight misconduct or malpractice to a relevant professional body.
- 1.2. The aims of this policy are to:
- provide a fair and consistent framework within which you are encouraged to speak up, in a responsible way, about any concerns you have as soon as possible, in the knowledge that those concerns will be taken seriously, investigated and responded to appropriately and any request for confidentiality respected;
 - provide you with guidance on how to speak up; and
 - reassure you that you can raise genuine concerns without fear, even if you turn out to be mistaken.
- 1.3. Bupa's people policies, systems and processes support our business by treating all of our people in a fair way. Decisions concerning speaking up within Bupa will not be influenced by race, sex, pregnancy or potential pregnancy, colour, sexual orientation, gender identity/expression/history, transgender or transsexual status, political belief or activity, religion, marital status, caring responsibilities, parental status, breastfeeding, irrelevant criminal or medical record, national or ethnic origin, disability, age, citizenship or membership of a representative body except where required or justified by any applicable laws.
- 1.4. This policy does not form part of any individual's contract with Bupa and it may be amended at any time.

2. Who is covered by the policy?

This policy applies to everyone working at all levels of Bupa within the Bupa Hong Kong insurance or health services businesses including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part time and fixed term workers, work experience students, casual and agency staff (together referred to as our people in this policy). The appendix contains supplemental information for Hong Kong.

3. What is speaking up?

3.1. We want Bupa to be a place where our people speak up whenever they have a concern about wrongdoing or dangers at work. This may include but is not limited to:

- Health and safety risks, including risks to Bupa customers, patients, residents and their families
- Bribes or kickbacks
- Fraud and corruption
- Questionable financial accounting or tax arrangements
- Information security breaches
- Breaches of law / regulation / a professional code – including criminal conduct
- Serious breaches of Bupa policies / processes
- Actions or behaviour which could damage Bupa's reputation
- Modern slavery concerns
- Environmental concerns
- Actual or potential conflicts of interest
- Anti-competitive behaviour
- Other dishonest or unethical conduct
- Actions intended to hide or cover up any of the above
- Concerns about wrongdoing, misconduct or risk of harm in Bupa's supply chain, i.e. by those individuals / organisations providing goods and/or services to Bupa

3.2. Please consider whether there is another, more appropriate, procedure under which to raise your concern. For example, any complaint relating to your own personal circumstances (such as the way you have been treated at work) should be dealt with under our Grievance Procedure which can be found in the Employee Handbook. If you have already followed another procedure but are not satisfied with the way your concern was dealt with you can raise it as a Speak Up under this procedure.

3.3. If you need help deciding if the concern you have should be raised under this policy, you can speak to:

- Your manager;
- Your local Speak Up Officer:

Bupa Hong Kong (Hong Kong Insurance)

Jonty Vavasour, Speak Up Officer, Hong Kong

- T: +852 9248 6108
- E: jonty.vavasour@bupa.com.hk

- Your deputy local Speak Up Officer

Bupa Hong Kong (Quality Healthcare)

Crystal Kong, Deputy Speak Up Officer, Hong Kong

- T: +852 6113 4536
- E: crystal.kong@qhms.com

- NAVEX, an independent company which is our partner in providing telephone and web reporting services for Speak Up matters. NAVEX is a trusted partner managing the whistleblowing, ethics and compliance hotlines for over 10,000 organisations worldwide. You can contact NAVEX through the Speak Up website at www.bupa.com/speakup or call NAVEX directly on:

- Hong Kong - 800-96-0658

4. What to do if you want to speak up

- 4.1. If you see an unsafe practice, risk or wrongdoing, decide whether you can tackle it yourself, there and then. A firm, polite challenge is sometimes all that is needed.
- 4.2. If not, we hope that in many cases, you will be able to raise any concerns with your manager or, where this is not possible, a more senior manager. You may speak to them or write to/email them if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.
- 4.3. Where you feel that a manager has not addressed your concern, or you prefer not to raise it with them for any reason, you can report it to one of the following:

- Your local Speak Up Officer
- NAVEX, an independent company which is our partner in providing telephone and web reporting services for Speak Up matters. NAVEX is a trusted partner managing the whistleblowing, ethics and compliance hotlines for over 10,000 organisations worldwide. You can contact NAVEX through the Speak Up website at www.bupa.com/speakup or call NAVEX directly on:

- Hong Kong - 800-96-0658

- One of the people named in the table below:

Name	Business Title	Contact details
Penny Dudley	Chief Legal Officer	T +44(0)20 7656 2313 M +44(0)7850 166 826 E penny.dudley@bupa.com
Nigel Sullivan	Chief People Officer	T +44(0)2076562275 M +44(0)7788781054 E nigel.sullivan@bupa.com
David Fletcher	Chief Risk Officer	T +44(0)2076562635 E david.fletcher@bupa.com
Jeremy Eagles	Chief Audit Officer	T +44 (0)203 314 1412 M +44 (0)785 138 3169 E jeremy.eagles@bupa.com

4.4. We will write to you within 5 working days let you know we have received your concern(s) and, where appropriate, a conversation will be arranged with you to discuss your concern(s).

5. What to do when someone speaks up

We hope that, in many cases, you will be able to raise any concerns with your manager or, where this is not possible, a more senior manager and that the concern can be resolved quickly and effectively. If you are a manager who has had a concern reported to you which you cannot resolve or you do not think that it is appropriate for you to deal with, please contact your Speak Up Officer as soon as possible for support.

6. Confidentiality and anonymity

6.1. We hope that you will feel able to speak up openly under this policy. If you want to speak up confidentially (i.e. you do not want us to share your name with anyone without speaking to you about it first) please make that clear, we will make every effort to keep the fact that you raised the concern a secret. If it is necessary for anyone investigating your concern(s) to know that you raised it, we will discuss this with you.

6.2. You may make reports anonymously, but we do encourage you to give your name as proper investigation may be more difficult or impossible if we cannot ask you questions about your concern. If you do want to report a concern without giving your name, please do so to NAVEX.

6.3. If you are concerned about being treated badly if someone finds out that you have raised a concern, supported someone who has raised a concern or taken part in the investigation or resolution of a concern, please be assured that you are protected against such poor treatment when you report genuine concerns. Please report any concerns you have about poor treatment to your manager or your Speak Up Officer.

7. Advice

If you feel you would like to take advice before speaking up or if you believe that you may be treated badly or that the concern you report may be covered up, you can take advice from your Speak Up Officer or raise a question through the Speak Up website at www.bupa.com/speakup.

8. Investigation and outcome

8.1. Once you have spoken up, we will, as soon as possible, decide whether this or another Bupa policy/procedure (e.g. the Grievance Procedure) applies and how any investigation should be carried out. You will be informed of the outcome of that assessment. You may be asked to attend one or more meetings to provide further information and may bring a colleague with you. You and your companion should treat any information about your concern and the investigation as confidential.

8.2. In some cases, we may ask either one person or a team of people to investigate your concern including colleagues with relevant experience or specialist knowledge of the subject matter. Any investigation will be carried out in a fair and timely way. We expect all of our people to co-operate fully, openly and honestly in relation to any investigation. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing/danger. We are committed to implementing such findings and recommendations.

8.3. We will aim to keep you informed of the progress of the investigation and its likely timescale. The length of time needed to investigate will depend on the concern(s) raised. However, if the investigation is going to take longer than 1 month, you will be notified of this by the Speak Up Officer. Please also be aware that sometimes the need for confidentiality

may stop us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

9. What can you do if you are not satisfied with the outcome?

- 9.1. We will always try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 9.2. If you are not happy with the way your concern has been handled you can raise it with either your Speak Up Officer or Penny Dudley, Chief Legal Officer (contact details in section 4.3 above).

10. Protection and support for our people

- 10.1. We understand that people who speak up are sometimes worried that they will be treated badly because they have done so. We encourage openness and will support people who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2. We also appreciate that being the subject of an investigation into a concern can be worrying and will provide appropriate support in these circumstances also.
- 10.3. We will not accept the unfair treatment of any person who raises, or takes part in the investigation of, a genuine concern. Unfair treatment includes dismissal, disciplinary action, bullying, threats and any other poor treatment connected with speaking up. If you feel that you have suffered any such treatment as a result of speaking up, you should inform your manager, your Speak Up Officer or the Chief Legal Officer.
- 10.4. You must not threaten or react negatively against those who speak up or take part in the investigation of concerns in any way. If you are involved in such conduct you will be subject to disciplinary action. In some cases, the person who has spoken up could have the right to sue you personally for compensation.
- 10.5. If you would like to speak to a professional about anxiety or any other mental health issue, you can contact our Employee Assistance provider which offers a confidential, free-of-charge service for Bupa employees. Mental health support includes phone or face-to-face consultations. For access to a counselor under the Employee Assistance Programme please call +852 8100 1617 (the phone service is available 24 hours a day, seven days a week).

11. External disclosure

- 11.1. The aim of this policy is to provide a way of reporting, investigating and responding to any wrongdoing or danger at Bupa internally. In most cases you should not find it necessary to speak to someone outside Bupa.
- 11.2. The law or a professional body may say that in some circumstances it may be appropriate for you to report your concerns to a body outside Bupa such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone outside Bupa.

12. Record keeping

Adequate and relevant records will be kept in accordance with our records retention policies and procedures. These may include but will not be limited to investigatory notes, witness statements,

minutes of meetings, mails, notes of telephone calls and copies of correspondence. These records will be kept in an organised and confidential manner.

13. Data protection

We are committed to handling the personal information of our people in the right way and as such all such information and records will be held in accordance with the relevant Data Protection laws and regulations. For further information please read the Employee Privacy Notice which can be found on the Speak Up website www.bupa.com/speakup

14. Review

This policy will be reviewed annually by the Speak Up Officer or more often if required.

Last reviewed: April 2023

Appendix
Local Variations/Supplemental Information for Hong Kong



Special Administrative Region of Hong Kong

Confidentiality and anonymity: Note that the Employment Ordinance specifically protects employees against dismissal by reason of his or her giving evidence or information in any proceedings or inquiry in connection with the enforcement of the Employment Ordinance, work accidents or breach of work safety legislation. Moreover, employees are also protected from discrimination by way of victimisation when he/she exercises his/her Speak Up rights to give evidence or information in proceedings under the Race Discrimination Ordinance, the Disability Discrimination Ordinance, the Sex Discrimination Ordinance and the Family Status Discrimination Ordinance, an employee who makes disclosures under the Anti-Money Laundering and Counter-Terrorist Financing Ordinance are also protected from civil and criminal liability where the disclosure is related to any actual or suspected money laundering or proceeds of crimes under applicable anti-money laundering rules.