



Bupa

# Bupa Türkiye Speak Up Policy

## Purpose

This policy has been developed to ensure that we hold our business to the highest standards and achieve the right results for Bupa, our customers and our employees to achieve our purpose of living longer, healthier and happier lives.

Bupa Türkiye is committed to running its business accountably, with honesty and integrity. We know that every business is at risk of things going wrong or people behaving inappropriately or in an unacceptable manner. We therefore believe that it is crucial to build a culture of transparency and accountability. That's why we are committed to creating a system that enables our employees to report concerns if they are unable to share them with their managers, or if they feel that it is not being addressed appropriately, even if they do.

For this reason, this policy aims to provide a system where our employees;

- can report anonymously and confidentially if they believe that Bupa policies or standards have been breached
- or when they encounter behaviours that they think are wrong
- or when they are genuinely concerned about any harm to the public, our customers or the environment, and know that the necessary actions will be taken and that it is their responsibility to report their concerns.

Within this framework, the following subjects may be reported;

- Breach of the Bupa Code
- Violation of insurance, health and safety legislation;
- Bribery or kickbacks;
- Breach of data confidentiality;
- Risk of reputational damage to the organization or individuals;
- Harassment and/or bullying;

Although not covered by the policy, any person or organization affiliated with Bupa, such as a supplier or an employee's family member, is always encouraged to raise concerns about anyone acting on behalf of Bupa Türkiye and will be assessed transparently in accordance with the processes set out in this policy.

However, this policy does not cover personal complaints about anyone's assignment or employment by the Company.

## Why This Policy Matters?

This Policy assists in fostering a culture of transparency and accountability across Bupa and supports the management of employee, legal and regulatory obligations and reputational risks. Furthermore, it facilitates the reporting and addressing of genuine concerns, even in instances where it is believed that the matter may not be reported or may not be adequately addressed if reported.

### SCOPE

All Bupa Türkiye and its subsidiaries and agency employees, regardless of position or place of work, are also accountable for this policy.

**Employees** - Following and implementing this policy and relevant procedures put into effect within the framework of the "**Bupa Speak Up Policy**" applies to all Bupa Türkiye employees, contractors and temporary staff. **Moreover**, these policy obligations also apply to the management of the Company's risks in processes related to **third party outsourcing companies** for business activities and services.

Furthermore, this Policy does not constitute part of any person's contract with the Company and may be amended at any time.

The **Bupa Code** serves as our moral compass and empowers us to stand up for what is right for our customers, our patients and each other. It is a fundamental principle of the Bupa Code to report honestly when you encounter an unsafe practice, misconduct or new risk.

In addition, acceptable measurable risk limits for areas where risk taking or the negative impact of risk should be minimized are included in this policy, together with the principles set out in the Bupa Speak Up policy. It also defines the controls, processes, procedures, work instructions, and training materials to be developed under the policy.

### Key Principles for All Employees

**Speak Up:** Ideally, you should raise all concerns with your unit/department manager or a senior manager in your business unit/function. However, if you come across breaches of Bupa policies or standards or behaviour that you believe is wrong, or if you are genuinely concerned about potential harm to the public, our customers or the environment, but believe that it has not been dealt with appropriately by the manager despite your reporting it, or even if you have reported it, you should "Speak Up!"

**Act appropriately:** You must not harass or discourage anyone from speaking out.

Bupa Türkiye will not tolerate any harassment, victimization, retaliation or other mistreatment of individuals who raise a genuine concern or issue under this policy.

### How to Speak Up

We understand that it takes courage to speak up, and so we want to provide you with options on "How to Speak Up" to help you feel as comfortable as possible in doing so. You can "Speak Up" in one of three ways below to make your voice heard anonymously and discreetly:

- **Call the toll-free telephone line (0800-621-2352 for Türkiye), available in all countries covered by the Bupa Speak Up policy.:** The telephone line operates 24 hours a day and seven days a week. When you contact us, please specify the language you would like to speak, and an interpreter can be provided if necessary. See the Speak Up website ([www.bupa.com/speakup](http://www.bupa.com/speakup)) for contact numbers for the country you want to speak to. The Speak Up Line is operated on behalf of Bupa by an independent third-party specialist provider called NAVEX Global.
- **By reporting online via the Speak Up website ([www.bupa.com/speakup](http://www.bupa.com/speakup)):** Your report will be shared with ELA and our corporate Speak Up representatives. (For further information, you can review the BAS Speak Up Procedure)
- **By speaking directly with our Company Speak Up representatives or your senior management:** If you feel you cannot talk to your manager about your concern but would like to talk to someone in the company about it, contact the Speak Up Representatives or your immediate supervisor. Details of Bupa Group Companies Speak Up representatives, along with their contact information, are included in this policy.

**Your real concerns that you prefer to talk about openly will somehow be addressed, regardless of which of the above methods you choose.**

**If we do not follow this policy, our company and Bupa may not be aware of an unsafe practice, risk or misconduct that has the potential to harm our employees, customers, the public, the environment and the company's interests. Therefore, failure to comply with this policy may expose our Company and individuals to legal and/or regulatory sanctions.**

**Contact Information (Speak Up Representatives)**

Name and Title	E-Mail	Phone
Penny Dudley, Bupa Group CLO	penny.dudley@bupa.com	+44 (0)20 7656 2313
David Fletcher, Bupa Group CRO	david.fletcher@bupa.com	+44 (0)20 7656 2635
Nigel Sullivan, Bupa Group CPO	nigel.sullivan@bupa.com	+44 (0)20 7656 2275
Jeremy Eagles, Bupa Group CAO	jeremy.eagles@bupa.com	+44 (0)20 3314 1412
Sally Thornton, Group Functions Speak Up Representative	sally.thornton@bupa.com	+44 (0)113 360 8259
Rachel Booth, BGUK & BINS Speak Up Representative	rachel.booth@bupa.com	+44 (0)113 360 6209
Joanne Kingsbury, Bupa Hong Kong Speak Up Representative	joanne.kingsbury@bupa.com.hk	+852 2517 5080
Calum Cook, ANZ Speak Up Representative	calum.cook@bupa.com.au	+61 3 9937 4633
Monica Paramés, Sanitas (ELA) Speak Up Representative	mparames@sanitas.es	+34 91 585 25 75
Dorota Sawicz, LuxMed (ELA) Speak Up Representative	dorota.sawicz@luxmed.pl	+48 22 450 5083
Miguel Kutz, Bupa Chile (ELA) Speak Up Representative	miguel.kutz@bupa.cl	+56 (2)2 998 1800
Jessica Fierman, BGLA (ELA) Speak Up Representative	jfierman@bupalatinamerica.com	(786) 461-7994
Roberto Miller Machado Torres, Care Plus (ELA) Speak Up Representative	rmiller@careplus.com.br	+55 11 4197 9011
Diego Gomez, Bupa Mexico (ELA) Speak Up Representative	DGomezPalacioBorboa@bupalatinamerica.com	+52 (55) 5202 1701
<b>Ayça Özyılmaz, Bupa Turkey (BUT) CRO and Speak Up Representative</b>	<b>ayca.ozyilmaz@bupa.com.tr</b>	<b>+90 530 051 42 66</b>

## Our principles

### Encouraging Speak Up

We want to know about any breach or potential breach of our policies and standards; any misconduct or risk of harm to our employees, customers, the public or the environment; or any misconduct or risk of harm that may occur despite our rigorous legal compliance procedures.

We take the necessary steps to ensure that our employees know that they can report their genuine concerns about such matters to us without fear of adverse consequences and that they see it as their duty to do so, and we strive to raise awareness and build trust among our employees through periodic announcements.

The purpose of the Speak Up Policy is to establish appropriate procedures for our employees to address situations where they feel unable to raise genuine issues and concerns with their manager, or where they feel that, despite raising them, no reasonable action has been taken

### Reporting of Speak Up Concerns

Our employees are informed about how to report genuine concerns to the Company or, in appropriate circumstances, to the relevant regulatory authorities through this policy and the procedures that have been organized to address them.

They can report to us discreetly and anonymously if they wish. However, disclosure of information may be required in certain circumstances, such as in the processing of a report, legal proceedings or government investigations or the implementation of any recommendations following an investigation, to take appropriate measures to protect individuals from harm, for audit and compliance purposes, or where relevant professional organizations have rules.

### Addressing Speak Up Concerns

As Bupa Türkiye:

- We take all concerns brought to our attention seriously and investigate them accordingly using the available processes and procedures;
- We provide the person raising the concern with progress updates to address their situation;
- We monitor how each case is handled and how issues are appropriately resolved so that we can take steps to ensure that lessons learned are implemented;
- We will report any actual or suspected violations of law to the appropriate legal authorities;
- In cases where the person raising the concern is not satisfied with the way the matter has been handled, the matter will be reviewed and the Company does not allow various reasons
- *(such as race, origin, sex, pregnancy or potential pregnancy, sexual orientation, gender identity/expression/history, political belief or activity, religion, status, caring responsibilities, parental status, breastfeeding, unrelated criminal or medical record, disability, age, citizenship or membership of a representative organization, marital status, except as required or justified by any applicable law)* to influence the decisions to be made in the Speak Up processes,
- If it is concluded that a person has deliberately made false allegations, they may be subject to disciplinary action up to and including immediate dismissal. In these cases, we may also inform the person to whom the allegations have been made.

## Protection and Support

We will take the necessary steps to ensure that employees who report genuine concerns are protected from any adverse consequences to which they may be subject. We also protect the interests of the people who report through Speak Up.

Therefore, under this policy, we will not tolerate harassment or retaliation against anyone who seeks advice or raises a genuine concern. Anyone who targets someone for speaking up will face serious consequences, which could include disciplinary action or dismissal of employment.

## Resources and Training

We assign people with the skills and resources needed to ensure full compliance with the Bupa Speak Up policy. In particular, we ensure that all our employees who play a formal role in the implementation of this Policy are clarified about their roles and responsibilities and have the appropriate training and skills.

## Legislative and Regulatory Compliance

We comply with applicable laws and regulations in conducting all processes covered by this Policy.

## Retention of Records

All records, including concerns raised under this policy and the results of investigations, are kept securely and confidentially.

## Controls, Execution and Monitoring

Together with the Bupa Speak Up Policy, we are taking the necessary steps to ensure that this policy is adhered to and that it works effectively and consistently across Bupa Türkiye.

## Policy Requirements

Detailed policy requirements have been defined under “**Bupa Speak Up Policy**” to support the principles defined in this policy.

It is ensured that the Bupa Türkiye is in compliance with these policy requirements, which are expected to be complied with across all Bupa Companies. The checklist for assessing compliance is attached to the Bupa Risk Management Policy and is detailed in the “**Compliance Checklist**”.

### Control Strategy:

We adopt technologies, processes and procedures to enable effective governance and risk management practices. Please refer to the “**Bupa Speak Up Policy - Minimum Standard Controls**” document for the minimum standard controls to be implemented within this framework and the key indicators used to measure the effectiveness and adequacy of these controls in practice.

### Monitoring and Reporting

See the “**Bupa Enterprise Policy Supporting Document**” for monitoring and reporting requirements.

**Risk Appetite and Thresholds**

The risk thresholds set by the risk appetite statements are converted into measurable metrics, agreed by the Bupa Board, that can be used to manage the business on a day-to-day basis.

Group risk thresholds allow the Board of Directors to be notified of material breaches or risks to ensure that they are aware of the issues. Company management is therefore accountable for managing all risks and incidents, even if they are below Group risk thresholds.

The risk threshold limits set out below ensure that Speak Up risk is managed in line with the Group's operational risk appetite: **"Bupa has no appetite for operational risk failures that result in a material\* impact on its customers, employees or performance"**.

The word " severity" used for risk threshold is defined in terms of impact and likelihood. Below the table is a separate definition of severity.

Risk (Level 3)	Definition of Risk	Risk Threshold
<b>Speak Up</b>	Failure to enable our employees to safely and anonymously raise concerns about things that could harm our customers, society or the environment.	Failure to confidentially and anonymously disclose real concerns that could cause significant* harm to our employees, customers, the public or the environment (e.g., employees not knowing about the Speak Up Line, not trusting Speak Up, not ensuring the necessary confidentiality when reporting, not reporting anonymously)
<b>Listen Up</b>	Failure to listen, take action or learn from lessons learned when a concern is raised through Speak Up	Severe* harm to our customers, employees and/or performance due to failure to respond appropriately to a concern raised through Speak Up (e.g. when Bupa fails to implement recommendations made following investigation of a concern raised through Speak Up)
<b>Retaliation:</b>	Failure to protect individuals who raise concerns/questions through Speak Up or assist in the investigation and/or resolution of a concern raised through Speak Up	The company fails to protect an individual who raises a concern through Speak Up or assists in its investigation, resulting in mistreatment of that individual (e.g., a person is terminated for raising a concern through Speak Up).
<b>Compliance</b>	Failure to monitor and respond to relevant legal and regulatory changes related to the reported concern	Failure to comply with all applicable legal and regulatory requirements or resulting in a severe* instance of non-compliance



Definition of Severity

5- Extreme	5	10	15	20	25
5- High	4	8	12	16	20
5- Medium	3	6	9	12	15
5- Medium	2	4	6	8	10
1- Very Low	1	2	3	4	5
IMPACT					
LIKELIHOOD	1 – Rare (0%-5%)	2 – Unlikely (5-15%)	3 – Possible (15-40%)	4 – Likely (40-90%)	5 – Almost Certain (90%)

NOT COVERED BY RISK APPETITE

COVERED BY RISK APPETITE

The definition of severity is defined by the Risk Ratings shown in the Risk Heat Map below (Risk Rating is obtained by multiplying the likelihood of the risk by its impact, taking into account the “**BAS Risk Management Framework (RMF) Implementation Guide**”).

- The area colored in red indicates that the risk is severe and therefore falls outside the appetite limits.
- The area colored in blue indicates that the risk is not considered severe and therefore remains within the risk appetite.

## Definitions

<b>Speak Up</b>	This means that if an individual is unable to raise a concern with their manager, or if they do raise a concern, they do not feel that the matter has been dealt with appropriately, they should report a genuine concern under this policy.	
This policy has been developed in accordance with the " <b>Bupa Speak Up Policy</b> ", which is part of Bupa's corporate policies established and approved by the Board of Directors of Bupa Acıbadem Sigorta.		
<b>Distribution List</b>	<input checked="" type="checkbox"/> Bupa Turkey <input checked="" type="checkbox"/> BAS <input checked="" type="checkbox"/> SDS <input checked="" type="checkbox"/> Sencard Dental <input checked="" type="checkbox"/> Sencard Partners <input type="checkbox"/> Executive Committee <input type="checkbox"/> Directors <input type="checkbox"/> Coordinators <input type="checkbox"/> Managers <input type="checkbox"/> Regional Managers <input checked="" type="checkbox"/> Whole Company <b>Additional Distribution Options:</b> .....	
<b>Responsibilities</b>	Responsibilities regarding Bupa Corporate Policies are defined in the " <b>Bupa Corporate Policies-Responsibilities</b> " document.	
<b>Contact Person(s)</b>	Ayça Özyılmaz (Bupa Turkey (BUT) CRO - Chief Risk Officer) Övünç Kaya (Bupa Acıbadem Sigorta Internal Control and Compliance Manager)	
<b>Approved By</b>	Board of Directors	
<b>Confidentiality</b>	Internal Shares Only Approval of BUT Chief Risk Officer (CRO) must be obtained for sharing with the third parties.	
<b>Version History</b>	<b>Current Version:</b> V3 <b>Date of Approval:</b> March 6, 2024 <b>Effective Date:</b> March 31, 2024	<b>Previous Version:</b> V2 Previous Version Publication Date: November 30, 2022 <b>Previous Effective Date:</b> November 14, 2022

## REFERENCE DOCUMENTS

- Bupa Türkiye Speak Up Procedure
- Bupa Code of Conduct