



Bupa Global & UK Policy

# Speak Up Policy

*March 2023*

## 1. Purpose

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: helping people live longer, healthier, and 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're not able to raise those concerns with their manager or they believe that their concerns haven't been dealt with appropriately. Some of our people are bound by professional codes of practice that require them to highlight misconduct or malpractice to a relevant professional body.

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 are able to raise genuine concerns without fear, even if you turn out to be mistaken.

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 won't 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.

This policy doesn't form part of any employee's contract of employment, and it may be amended at any time.

## 2. Scope

This policy applies to everyone working at all levels of Bupa within Bupa UK 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). This policy applies to 'tied agents' and 'appointed representatives' of Bupa UK's insurance activity.

Area	Scope Area Breakdown	In Scope
<b>Provision business units</b>	Cromwell	✓
	Care Services	✓
	Clinics	✓
	Dental – Republic of Ireland	✓
	Dental - UK	✓
<b>UK Insurance</b>	UKI	✓
<b>BG</b>	BG Europe - Copenhagen (BDS, inc. BGA)	✓
	BG Europe - Head Office (UK)	✓
	BG APAC (China, Hong Kong, Singapore)	✓
	BG AIM (Africa, India, Middle East, inc. Bupa Egypt Insurance (BEI)	✓
	BG Egypt - Bupa Egypt Services (BES)	✓

	BG Branches (Switzerland)	✓
	BG DAC (ROI)	✓
	BG DAC Branches (Travel, Malta, Netherlands)	✓
<b>BGUK MU Functions</b>	All BGUK MU functions	✓
<b>Group Functions</b>	Bupa Group Functions	×

*Note: BGNA and Niva Bupa are not formally required to adopt and comply with Bupa policies.*

## 3. Principles and Requirements

### 1. Promoting Speak Up

We want to know about any breach or potential breach of our policies and standards, or any wrongdoing or risk of harm, to our people, customers, the public, the environment, or Bupa that may be occurring despite our rigorous compliance procedures. We take appropriate steps to ensure that our people feel able to report genuine concerns to us about such matters without fear of negative consequences and that they also see it as their duty to do so.

The role of the Speak Up Policy is to provide a means for our people to report such issues and concerns in circumstances where they don't feel able to report the issues and concerns to their line manager or they have done so but don't believe that the issues have been dealt with appropriately.

This may include but isn't limited to:

- Health and safety risks, including risks to customers (including patients, residents, and their families) as well as other people working at Bupa.
- Bribes or kickbacks.
- Information security breaches.
- Damage to the environment.
- Questionable accounting.
- Fraud and corruption.
- Serious breaches of Bupa's policies and/or procedures.
- Breaches of the law, regulation, or a professional code.
- Actions or behaviour which could damage Bupa's reputation.
- Miscarriage of justice.
- Breaches of modern slavery legislation.
- Other unethical conduct.\*
- Actions which are intended to hide or cover up any of the above.

### 2. Reporting Speak Up concerns

Our people are informed of how to report concerns to us under this Policy or to a regulator in appropriate circumstances and can report them confidentially and anonymously if they wish. Please note, that we may, in certain circumstances, be required to disclose information and identities of individuals by law, for the purpose of legal proceedings or government investigations, to carry out an investigation, to implement any recommendations following an investigation, to take appropriate action to protect individuals from harm, for audit and compliance purposes or in accordance with the rules of relevant professional bodies.

If you wish to report a concern under this policy and you can't speak with your managers locally, you can report using NAVEX Global, an independent company which is our partner in providing telephone and web reporting services for Speak Up matters. NAVEX Global is a trusted partner managing the whistle blowing, ethics and compliance hotlines for over 10,000 organisations worldwide. You can contact NAVEX Global through the Speak Up website at [www.bupa.com/speakup](http://www.bupa.com/speakup) or by calling NAVEX Global directly on 0808 234 6936.

You can also contact the BGUK Speak Up Officers Nickie Titterington (by phone on 0113 360 6205 or via email to [nickie.titterington@bupa.com](mailto:nickie.titterington@bupa.com)), or Rachel Booth (by phone on 0113 360 6209 or via email

to [rachel.booth@bupa.com](mailto:rachel.booth@bupa.com)). Please note, colleagues in the EU may also request a face to face meeting to discuss the concerns

You may also contact one of the people named in the table below:

Name	Business Title	Contact Details
Penny Dudley	Chief Legal Officer	Tel: +44 (0)203 314 1999 <a href="mailto:penny.dudley@bupa.com">penny.dudley@bupa.com</a>
Nigel Sullivan	Chief People Officer	Tel: +44 (0)203 314 1411 <a href="mailto:nigel.sullivan@bupa.com">nigel.sullivan@bupa.com</a>
David Fletcher	Chief Risk Officer	Tel +44 (0)203 314 1712 <a href="mailto:david.fletcher@bupa.com">david.fletcher@bupa.com</a>
Jeremy Eagles	Chief Internal Auditor	Tel: +44 (0)203 314 1412 <a href="mailto:jeremy.eagles@bupa.com">jeremy.eagles@bupa.com</a>

### 3. Responding to Speak Up concerns

We take seriously all concerns that are reported to us and investigate them appropriately using existing processes and procedures as appropriate.

We provide appropriate progress updates and feedback to the individual who has raised the concern; track the progress of each case and act when required to ensure that issues are appropriately addressed, and any lessons learnt.

We report actual or suspected breaches of law to the relevant law enforcement agencies, where appropriate.

We carry out a review in cases where the individual raising the concern is dissatisfied with the way in which it has been handled.

We don't allow decisions concerning speaking up within Bupa to be influenced by race, sex, pregnancy or potential pregnancy, maternity, colour, gender identity/expression/history, sexual orientation, 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.

If we conclude that an individual has made false allegations maliciously, they may be subject to disciplinary action up to and including summary dismissal. In those circumstances we may also inform the person against whom the allegations have been made.

### 4. Protection and support

We take appropriate steps to ensure that our people who report genuine concerns are protected from negative consequences. We won't tolerate harassment or retaliation of any kind against anyone who seeks advice or raises a genuine concern covered by this Policy. Anyone who subjects a reporter to such treatment will face serious consequences which may include disciplinary action or dismissal.

We also act appropriately having regard to the interests of those about whom Speak Up reports are made. We dedicate the required level of skilled and other resources necessary to ensure that we fully comply with this Policy. We ensure that all our people who play a formal role in the operation of this Policy are appropriately skilled and trained and are clear about their roles and responsibilities.

We support staff to talk to a professional team about anxiety or any other mental health issue. Please contact Healthy Minds. This is a confidential, free of charge service for Bupa employees and family members. Mental health support includes phone or face-to-face therapy. For access to Healthy Minds please visit <https://www.bupa.co.uk/health-information/healthy-mind> or call 0345 600 2007 (the phone service is available 24 hours a day, seven days a week), ROI colleagues should call +44 161 497 0969. If you work in Dental or Care Services with a Cash Plan, please call 0330 123 0124. Other colleagues in Care Services can call our EAP (Employee Assistance Programme) on 0800 269 616 for a confidential chat.

You may also contact Protect, an independent charity which provides free, confidential legal advice on raising concerns at work. **You can contact Protect by calling 0203 117 2520.** Information is also available on the Public Concern at Work website, the address for which is <https://protect-advice.org.uk/> **For Ireland**, Transparency International. The Speak Up Helpline is open Monday to Friday, 10am-6pm (telephone: 1800 844 866).

## 5. External disclosure

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 shouldn't find it necessary to speak to someone outside Bupa.

### UK

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. You can take advice from Protect, an independent charity which provides free, confidential legal advice on raising concerns at work. You can call Protect on 0203 117 2520. Information is also available on their website, the address for which is <https://protect-advice.org.uk/>.

Parts of Bupa UK are regulated by the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA). You can report a concern to the FCA on (0)207 066 9200 during office hours or leave a message on voicemail or by emailing [whistle@fca.org.uk](mailto:whistle@fca.org.uk), or by writing to Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN.

You can report a concern to the PRA on 0203 461 8703 during office hours or by emailing [PRAwhistleblowing@bankofengland.co.uk](mailto:PRAwhistleblowing@bankofengland.co.uk) or by writing to Confidential Reporting (Whistleblowing), PRA CSS, 20 Moorgate, London EC2R 6DA.

You don't need to have raised your concern internally before you contact either the FCA or PRA and you don't have to tell Bupa that you have raised a concern with the FCA or PRA. You can also raise a concern with both Bupa and the FCA and/or PRA at the same time.

### Ireland

If you feel you'd like to take advice from someone who doesn't work at Bupa 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 Transparency International Ireland (TII), the largest not-for-profit organisation in Ireland that provides advice in relation to whistleblowing. TII is the Irish branch of the worldwide organisation, Transparency International. They operate a free, Speak Up Helpline which offers information, referral advice and advocacy support to people looking to report wrongdoing, or to witnesses and victims of corruption or other wrongdoing. TII can offer workers who wish to make a protected disclosure an appointment with the Transparency Legal Advice Centre (TLAC). The Speak Up Helpline is open Monday to Friday, 10am – 6pm (telephone: 1800 844 866).

Disclosure to regulators: Concerns can be reported to the Central Bank of Ireland (the CBI) on 1890 130014 Monday–Friday (9.30am–5.00pm), by leaving a message (disclosing contact details) on voicemail, by emailing [confidential@centralbank.ie](mailto:confidential@centralbank.ie), or by writing to Protected Disclosures Desk, Central Bank of Ireland, PO Box 11517, Spencer Dock, Dublin 1, D01 W920. Concerns should only be raised with the CBI to the extent they relate to contraventions of provisions of financial services legislation, or the concealment or destruction of evidence relating to such contravention.

### **DIFC, UAE: Bupa Global Middle East (DIFC) Ltd.**

We encourage you to report your concerns using the means internally available within Bupa. This includes reporting to the Compliance Officer, People Partner, your Line Manager or using the Speak-Up channel. However, there may be circumstances where you may believe it's appropriate, or may prefer, to report the concerns directly to the regulator or to another relevant authority. Nothing in this Policy prohibits you from reporting possible violations of law, regulation, or rule to any supervisory authority, governmental or regulatory agency.

### Reporting to the DFSA

You can report a regulatory concern directly to the Dubai Financial Services Authority (DFSA) by emailing DFSA at [whistle@dfsa.ae](mailto:whistle@dfsa.ae). You don't need to have raised your concern internally before you contact the DFSA, and you don't have to tell Bupa that you have raised a concern with the DFSA. You can also raise a concern with both Bupa and the DFSA at the same time.

## 4. Responsibilities

Role	Responsibilities
<b>MU Policy Sponsor - Stuart Brown, Legal Director</b>	<ul style="list-style-type: none"> <li>Sponsors the policy and has overall accountability for the content of the policy and for ensuring a view of compliance is maintained.</li> </ul>
<b>MU Policy Owner - Rachel Booth</b>	<ul style="list-style-type: none"> <li>Develop policy content in conjunction with relevant SMEs and business users.</li> <li>Ensure policy is taken to appropriate MU level committee for approval.</li> <li>Create MU and Local Standards which underpin the Policy Principles and Requirements.</li> <li>Support implementation of policy into the business (e.g. provide guidance, training materials as necessary).</li> <li>Define mechanisms to monitoring the adequacy of implementation and compliance.</li> <li>Maintain a clear understanding on compliance with the policy and the adequacy of improvement plans.</li> <li>Report details of compliance (and more importantly non-compliance) to relevant MU committee.</li> <li>Review policy on a defined basis.</li> </ul>
<b>Speak Up Officer - Nickie Titterington</b>	<ul style="list-style-type: none"> <li>Input to the development of policy content, seeking input from relevant business users as necessary.</li> <li>Communicate updated policy to relevant parties in the BL/MU function.</li> <li>Support the implementation of the policy within the BL / MU function.</li> <li>Working with business and process owners to ensure controls to deliver policy requirements are built into processes, procedures, work instructions and training material.</li> <li>Ensure the appropriate level of data is available to be able to monitor compliance (and inform MU Policy Owner if not).</li> <li>Maintain an understanding of compliance and report back to the MU Policy Owner on compliance.</li> </ul>

## 5. Monitoring and Reporting

### **Monitoring**

Minimum standard controls are defined in the minimum standard controls document associated with Enterprise Speak Up policy.

The Speak Up Oversight Group shall meet four times a year and more frequently as required and shall maintain documented procedures and processes governing how it operates to ensure that its responsibilities under this Policy are fully performed.

### **Reporting**

SUO to submit data to the Board twice yearly.

SUO to submit data to the ARCC quarterly.

## 6. Definitions

The following defines the key terms used within this policy;

### Speak Up/Speaking Up

- Means to report a genuine concern covered under this Policy in circumstances where a person doesn't feel able to raise the concern with their manager or they have done so but don't feel that the matter has been dealt with appropriately.

## 7. References and Associated Documentation

### Risk appetite and thresholds

Risk thresholds convert risk appetite statements, agreed by the Bupa Board, into measurable metrics which can be used to manage the business on a day-to-day basis.

The Group risk thresholds are there to trigger an escalation to the Board when breached to ensure the Board are aware of material breaches/risks. Business management should manage all risks and incidents even if they are below the Group risk thresholds.

The following risk thresholds will ensure that Speak Up risk is minimised in line with Bupa's agreed operational risk appetite which states: Bupa has no appetite for operational risk failures that result in a material impact to Bupa's customers, people, or performance.

Some risk thresholds use the word 'material'. Material in this sense is the dimension of impact and likelihood within a certain threshold. Materiality for the risk thresholds is defined below:

Risk	Description	Risk threshold. A breach of risk threshold occurs when...
<b>Speak Up</b>	Failure to enable people to share concerns confidently and anonymously about things that could cause harm to our people, customers, the public or the environment.	Bupa fails to ensure people can raise concerns confidently and anonymously about things that could cause harm to our people, customers, the public or the environment resulting in material* harm to our customers, people and/or performance (e.g. our people aren't aware of Speak Up; our people do not have confidence in Speak Up; we do not maintain appropriate levels of confidentiality when concerns are raised; we do not enable our people to raise concerns anonymously).
<b>Listen Up</b>	Failure to listen, learn and act when a concern is raised through Speak Up.	Bupa fails to respond appropriately to a concern raised through Speak Up

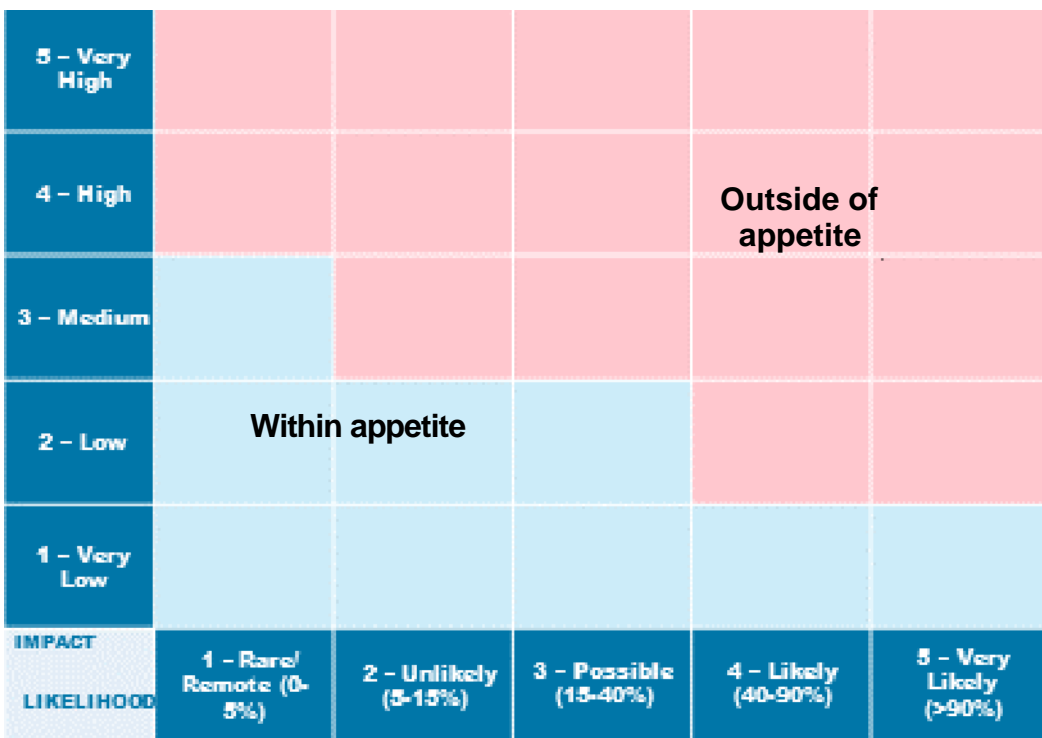
		resulting in material* harm to our customers, people and/or performance (e.g. Bupa doesn't implement the recommendations made following the investigation of a concern raised through Speak Up).
<b>Retaliation</b>	Failure to protect people who raise concerns/queries through Speak Up or assist with the investigation and/or resolution of a concern raised through Speak Up.	Bupa fails to protect someone who raises a concern/query through Speak Up or assists with a Speak Up investigation resulting in poor treatment of that individual (e.g. a reporter is dismissed because they raised a concern through Speak Up).
<b>Compliance</b>	Failure to monitor and respond to relevant changes in legal and regulatory requirements in relation to whistleblowing.	Bupa fails to comply with all applicable laws and regulations relating to whistleblowing resulting in a material* instance of non-compliance.

**Definition of material**

For Impact Definitions refer to Risk Assessment Methodology – Impact Definitions.

Material is defined by the dimensions of impact and likelihood within a certain threshold.

The red squares indicate where the risk is material and therefore outside of risk appetite. The blue squares indicate where the risk is not material and consequently within risk appetite.



## Control Strategy

Bupa will:

- enable people to share concerns confidently and anonymously about things that could cause harm to our customers, people, performance, the public or the environment.
- listen, learn, and act when something is not right.
- protect people who raise concerns/queries through Speak Up or assist with the investigation and/or resolution of a concern raised through Speak Up; and
- monitor and respond to relevant changes in legal and regulatory requirements in relation to whistleblowing.

Standard controls that must be operated can be found [here](#).

## Document Control

<b>Information Security Classification:</b>	Business Use Only
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<b>Title/Version:</b>	BGUK MU Speak Up Policy	
<b>Author/s:</b>	Nickie Titterington	Speak Up Officer

<b>MU Exec Sponsor</b>	Stuart Brown
<b>Policy Owner:</b>	Rachel Booth
<b>Approval:</b>	Legal Risk Committee
<b>Date Approved:</b>	
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<b>Next Review Date:</b>	<b>1st March 2024</b>

Change History				
Version	Status	Date	Author / Editor	Details of Change <i>(Brief detailed summary of all updates/changes)</i>
0.1		13/03/2021	Nickie Titterington	Telephone numbers changed for SUO's.
0.2		06/01/2022	Nickie Titterington	Updated phone numbers for Healthy Minds. Insert option of face to face meetings for colleagues reporting in the EU.
2.0	FINAL	03/03/2022	Lindsey Peel	Updated version numbers.
3.0	FINAL	29/03/2022	Nickie Titterington	Amended title/version numbers.
4.0	FINAL	18/04/2022	Nickie Titterington	Amended Protect website address. Added in Dubai Regulator.
4.1	DRAFT	06/03/2023	Heather Fitt	Added all existing content into policy template to solve formatting issues. Updated purpose.

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