

Bupa Enterprise Speak Up Policy

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Bupa Global  
Latin America  
Local Speak Up  
Policy



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## Purpose



Consistently achieving high standards in the way we run our business helps us to achieve the right outcomes for Bupa, our customers and our people, ultimately ensuring we deliver our purpose of longer, healthier, happier lives.

Bupa is committed to conducting its 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 and why it's important 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.

The purpose of this local policy therefore is to:

- provide a fair and consistent framework within which our people are encouraged to Speak Up, in a responsible way, about any concerns they 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 our people with guidance on how to Speak Up, and
- reassure our people that they are able to raise genuine concerns without fear, even if they turn out to be mistaken.

## The Bupa Code

At Bupa, we're here to help people live longer, healthier, happier lives. The Bupa Code sets out what we expect from our people in order to achieve this. It means caring for our customers over the long term, building trust and strong relationships with our communities – and protecting our colleagues', partners' and Bupa's reputation. Put simply, it's about living our values every day.

Our Speak Up process helps us to do this. This local policy assists in the promotion of a culture of openness and accountability across Bupa and supports the management of people, legal, regulatory and reputational risks. It provides a framework for genuine concerns to be reported and dealt with in circumstances where the matter might otherwise go unreported or not be actioned appropriately

This local policy however is not intended to cover personal grievances relating to anyone's engagement or employment by Bupa. We have other policies and procedures in place for dealing with such matters.

## Impact of local law

Nothing in this local policy requires any person to take any action (or omit to take any action) that would be unlawful under any law or regulation to which that person is subject.

Furthermore, [Appendix 1](#) (Local Variations and Supplemental Information) shall apply to this policy in respect of the jurisdictions named in the appendix in order to ensure that Bupa complies with applicable local law and regulation.

## Who is covered by this local policy?

This local policy is applicable to all Bupa wholly owned or majority owned businesses – within Bupa Global Latin America Business Unit (BGLA).

The policy applies to everyone working at all levels of Bupa within those 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).



## What is Speaking Up?

We want Bupa to be a place where our people Speak Up whenever they have a concern about any breach of Bupa policies and standards or wrongdoing or any risk of harm to staff, customers, the public, the environment or Bupa.

This may include but is not 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
- Breaches of data privacy and Information security breaches
- Damage to the environment
- Breaches of professional practice requirements
- 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



## Follow the Speak Up process

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.

Where that is not possible, you should ideally raise any concerns you have with your line manager or a senior manager in your business unit.

Please also 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 the relevant business unit grievance procedure.

However, if you have a genuine concern that there has been a breach or potential breach of Bupa policies or standards or wrongdoing or any risk of harm to staff, customers, the public, the environment or Bupa and you feel that a manager has not addressed your concern or you do not feel able to raise it with them, then you should Speak Up.

### Reporting by telephone or using the Speak Up website

The Speak Up reporting facility is operated by an independent third party specialist provider, NAVEX Global, an independent provider of ethics and compliance services. The Speak Up reporting facility is available round the clock, every day of the year, in all countries where Bupa has a presence and in all relevant languages.

We hope you will feel able to Speak Up openly under this local policy, as doing so helps ensure we can investigate and respond to your concerns appropriately, but you will be able to raise issues anonymously if you would prefer by using the Speak Up reporting facility

There are two ways to submit a report:

- By calling the **freephone telephone numbers** for your relevant country – see [Appendix 2](#). The telephone lines operate 24 hours a day/seven days a week and, if requested, an interpreter can be brought into the call to assist the English-speaking operator. When you make contact, please make it clear which language you want to use
- By using the **Speak Up website** managed by NAVEX Global on behalf of Bupa. The website address is [www.bupa.com/speakup](http://www.bupa.com/speakup)

### Reporting directly to a Speak Up Officer or Bupa Executive

You can also report your concern directly to one of the Speak Up officers for your business unit set out in [Appendix 3](#).

If you do not feel able to raise it with them or you do not feel that they have acted appropriately, you can raise the matter with Bupa's Chief Legal Officer, Chief Risk Officer, Chief People Officer or Chief Internal Auditor:

Penny Dudley Chief Legal Officer	<a href="mailto:penny.dudley@bupa.com">penny.dudley@bupa.com</a>	+44 20 3314 1999
David Fletcher Chief Risk Officer	<a href="mailto:david.fletcher@bupa.com">david.fletcher@bupa.com</a>	+44 20 3314 1712
Nigel Sullivan Chief People Officer	<a href="mailto:nigel.sullivan@bupa.com">nigel.sullivan@bupa.com</a>	+44 20 3314 1411

Gareth Roberts

[gareth.roberts@bupa.com](mailto:gareth.roberts@bupa.com)

+44 20 3314 1921

Chief Internal Auditor

### Concerns relating to financial crime

Please remember that if, during the course of your work, you have reasonable grounds to suspect money laundering, terrorist financing or fraud, a confidential suspicion report should be made to the Group Head of Financial Crime:

Dara Fernandez Perez

[dara.fernandez@bupa.com](mailto:dara.fernandez@bupa.com)

+1(786) 200-0597

Head of Financial Crime



## 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, however, 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.

### Confidentiality and anonymity

We hope that you will feel able to Speak Up openly under this local policy. If you want to Speak Up confidentially 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 to know that you raised it, we will discuss this with you.

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 by contacting NAVEX Global through the website at [www.bupa.com/speakup](http://www.bupa.com/speakup) or by telephone (see local numbers in [Appendix 2](#)). You will be given a personalized report key and password that you can use to access the Speak Up system to receive updates on the concern you have raised from NAVEX Global.

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 local Speak Up Officer, or to the People Director for BGLA.

### Advice

If you feel you would like to take advice from someone who does not 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 your Speak Up Officer or raise a question through the Speak Up website at [www.bupa.com/speakup](http://www.bupa.com/speakup).



## Investigation and outcome

Once you have spoken up we will acknowledge receipt in writing within five working days and, as soon as is reasonably practicable, decide whether this or another Bupa policy/procedure (e.g. a 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.

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 by appropriately qualified personnel. 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.

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 one month, you will be notified of this in writing 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.

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

We will always try to deal with your concern fairly and in an appropriate way. By using this local policy you can help us to achieve this.

If you are not happy with the way your concern has been handled you can raise it with either your Speak Up Officer or the Chief Legal Officer (see contact details above).

### Record keeping and data protection

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.

Bupa Group companies may process data relating to employees for legal, personnel, administrative and management purposes and in particular to the processing of any sensitive personal data relating to employees, including information that may be provided pursuant to a Speak Up made by that employee or another person.

BGLA may make such information available to other Bupa Group companies, relevant regulatory authorities or to other persons as may be required by law or regulation.



## Protection and support for our people

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.

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.

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 Speak Up Officer or the Chief Legal Officer or if you prefer you can report it confidentially under the Speak Up reporting process.

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.

**Last updated** February 2020

## Appendix 1 – Local Variations and Supplemental Information

The following provisions shall apply in addition to, or as variations to, the provisions set out above in respect of the specific jurisdictions named below. Such additions and/or variations will apply to persons who are resident in, ordinarily work in (whether resident or not) or who are otherwise subject to the laws and regulations of a jurisdiction named below.

### State of Florida, United States of America



**Data protection:** In the event that a Speak Up matter may involve protected health information (PHI), it will be handled in accordance with the U.S. Health Insurance Protection & Portability Act (HIPPA), as this applies to all BGLA entities' treatment of PHI.



### Dominican Republic

**Data Protection:** In the event that a Speak Up matter involves the provision of personal data which reveals political opinions, religious, philosophical or moral convictions, union affiliation or sexual orientation, it is hereby acknowledged that such information is provided consciously, free and voluntarily solely for the purposes stated in this policy.



### Ecuador

**Protection and support for our people:** Note that the Ecuadorian Constitution and Criminal Code offer protections to victims and witnesses of criminal acts (see articles 78 and 198 of the Constitution and 445 and following of the Criminal Code).




















### Peru




**Protection and support for our people:** Note that Article 14 of Legislative Decree No. 1327 establishes that complaints of corruption that are made in bad faith cease, immediately, to be protected acts and the employee who makes such false allegations may be referred to the Peruvian public prosecutor and the Technical Secretariat. Similarly, the reporting of illegal and arbitrary acts also loses the protection afforded under the whistleblowing system and an employee may also be reported to and sanctioned by the competent national authority.

**Follow the Speak Up process:** Note, in accordance with Article 12 of Law N° 29542, a complainant may apply Article 12 of Law No. 27378 which establishes benefits for effective collaboration in organized crime. This protection is available even if such person is part of the investigation, the criminal proceedings, or even judged for said crimes.

## Appendix 2 – Local telephone numbers

Location	Local telephone number														
Australia	 1-800-47-9241														
Bolivia	 800-11-0351														
Brazil	 0800-892-0679														
Chile	 <p>1. From an outside line dial the direct access number for your location:</p> <table> <tr> <td>Chile (AT&amp;T)</td> <td>800-225-288</td> </tr> <tr> <td>Chile (Telefonica)</td> <td>800-800-288</td> </tr> <tr> <td>Chile (ENTEL)</td> <td>800-360-311</td> </tr> <tr> <td>Chile (ENTEL - Spanish Operator)</td> <td>800-360-312</td> </tr> <tr> <td>Chile (Easter Island)</td> <td>800-800-311</td> </tr> <tr> <td>Chile (Easter Island - Spanish)</td> <td>800-800-312</td> </tr> </table> <p>2. At the English prompt dial</p> <table> <tr> <td></td> <td>855-831-3143</td> </tr> </table>	Chile (AT&T)	800-225-288	Chile (Telefonica)	800-800-288	Chile (ENTEL)	800-360-311	Chile (ENTEL - Spanish Operator)	800-360-312	Chile (Easter Island)	800-800-311	Chile (Easter Island - Spanish)	800-800-312		855-831-3143
Chile (AT&T)	800-225-288														
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Chile (Easter Island - Spanish)	800-800-312														
	855-831-3143														
China	 4009914141														
Denmark	 <p>1. From an outside line dial the direct access number for your location:</p> <table> <tr> <td>Denmark</td> <td>800-100-10</td> </tr> </table> <p>2. At the English prompt dial</p> <table> <tr> <td></td> <td>855-831-3143</td> </tr> </table>	Denmark	800-100-10		855-831-3143										
Denmark	800-100-10														
	855-831-3143														
Dominican Republic	 <p>1. From an outside line contact your local operator. 2. Request a reverse charge or collect call to be placed to the United States, to the number below. 3. All reverse charge or collect calls will be accepted by the Contact Center using an automated English message.</p> <table> <tr> <td>Dominican Republic</td> <td>971-371-7786</td> </tr> </table>	Dominican Republic	971-371-7786												
Dominican Republic	971-371-7786														
Egypt	 <p>1. From an outside line dial the direct access number for your location:</p> <table> <tr> <td>Egypt (Cellular)</td> <td>02-2510-0200</td> </tr> <tr> <td>Egypt (Cairo)</td> <td>2510-0200</td> </tr> </table> <p>2. At the English prompt dial</p> <table> <tr> <td></td> <td>855-831-3143</td> </tr> </table>	Egypt (Cellular)	02-2510-0200	Egypt (Cairo)	2510-0200		855-831-3143								
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Egypt (Cairo)	2510-0200														
	855-831-3143														

Location	Local telephone number	
<b>Guatemala</b>		1. From an outside line dial the direct access number for your location: Guatemala 999-9190
		2. At the English prompt dial 855-831-3143
<b>Hong Kong</b>		800-96-0658
<b>Ireland</b>		1. From an outside line dial the direct access number for your location: Ireland (UIFN) 0-800-222-55288 Ireland 1-800-550-000
		2. At the English prompt dial 855-831-3143
<b>Mexico</b>		001-844-451-1637
<b>New Zealand</b>		1. From an outside line dial the direct access number for your location: New Zealand 000-911
		2. At the English prompt dial 855-831-3143
<b>Panama</b>		1. From an outside line dial the direct access number for your location: Panama 800-0109 Panama (Spanish Operator) 800-2288
		2. At the English prompt dial 855-831-3143
<b>Peru</b>		1. From an outside line dial the direct access number for your location: Peru (Telephonica – Spanish ) 0-800-50-000 Peru (Telephonica) 0-800-50-288 Peru (Americatel) 0-800-70-088
		2. At the English prompt dial 855-831-3143
<b>Poland</b>		00-800-151-0165
<b>Spain</b>		1. From an outside line dial the direct access number for your location: Spain 900-99-0011
		2. At the English prompt dial 855-831-3143

Location	Local telephone number
<b>United Arab Emirates</b>	 <p>1. From an outside line dial the direct access number for your location:</p> <p>United Arab Emirates      8000-555-66</p> <p>United Arab Emirates      8000-021</p> <p>2. At the English prompt dial 855-831-3143</p>
<b>United Kingdom</b>	 0808-234-6936
<b>United States of America</b>	 1-855-831-3143

## Appendix 3 – BGLA Speak Up officers

You can also report your concern directly to the Speak Up Officer for your business unit:

<b>Business Unit</b>	<b>Speak Up Officer Deputy Speak Up Officer</b>	<b>E-mail</b>	<b>Contact number</b>
Bupa Global Latin America	Jessica Fierman General Counsel & Legal Director, Latin America (Speak Up Officer)	<a href="mailto:jfierman@bupalatinamerica.com">jfierman@bupalatinamerica.com</a>	+1 (305) 275-3416
Bupa Global Latin America	Olivia Rodriguez (Deputy Speak Up Officer)	<a href="mailto:orodriguez@bupalatinamerica.com">orodriguez@bupalatinamerica.com</a>	+1 (305) 398-8988