

THE BUPA CODE

Passionate Caring Open Authentic Accountable Courageous Extraordinary





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The Bupa Code: living our values every day

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.

We know that's not always easy. In the real world, we face difficult choices. So we've written the Bupa Code to help you make the right ones. In this document, you'll find clear explanations of each principle and easy-to-follow guidance on how you can put them into practice.

The Bupa Code is a must-read and must-follow for all of us. There's a lot at stake, including our reputation and revenues if we fail to perform. Not to mention the confidence of our customers.

WHAT YOU NEED TO DO

- Read the Code and make sure you understand it.
- Ask your manager if you have any questions about the Code or how it applies to you.
- Make sure you know the policies and standards that apply to your job and how they affect you.
- Speak up if something at work makes you feel uncomfortable, or if you think there's been a breach of the Code. You can speak to your manager or use the confidential Speak Up hotline to raise a concern
www.bupa.com/speakup





we put our customers first

Bupa people go above and beyond. We want our customers, patients and residents to have a great experience and be treated fairly. And if things are less than perfect, we take complaints seriously and learn from them.

We want our customers to enjoy better health and care, and to love and trust us. We treat them fairly and we support them at every step of their journey. We will advocate for their health and wellbeing by promoting healthy lifestyles and workplaces, delivering truly outstanding, personalised customer experiences.

DO

- Ask yourself if what you're doing will help customers love Bupa and have a great experience.
- Treat customers with respect – and be truthful and open.
- Be easy to get in touch with.
- Do what we promise customers – and don't promise anything that we won't be able to deliver.
- If you don't serve the customer directly, serve someone who does brilliantly.

DON'T

- Ignore customer feedback and complaints.
- Tell anyone confidential information about customers – keep their data safe and don't misuse it.
- Sell products or services to customers that they don't want or need.
- Make it difficult for a customer to stop using a product or service if they want.

NEED TO KNOW

- You can find our complaints handling policies [here](#) – these are based on ensuring customers are treated fairly.
- We design our products and services to meet the needs of our customers and be good value for money.
- We only recruit people whose behaviours, values and skills mean they treat customers fairly.
- In most countries, there are regulations about how to treat customers. Make sure you understand what your local regulations are.

STILL UNSURE?

- If something goes wrong with a customer, listen to what they say and make sure it's put right.
- Speak to your manager if you have any issues with customers.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we stay safe and well

We look out for each other. Safety, health and wellbeing are vital. Each one of us is responsible for doing everything we can to protect our customers, patients, residents and each other from harm – and promote wellbeing.

At Bupa, we keep people healthy and safe. It's central to our purpose of helping people live *longer, healthier, happier lives*. So we promote a culture of zero-harm, we follow health and safety policies and procedures and we make sure everyone has the training and tools they need to do their jobs safely. We understand the role each and every one of us can play in protecting our health, safety and wellbeing.

DO

- Report all accidents, incidents and near misses so that we can stop them happening again.
- Complete your health and safety training.
- Follow our safety procedures.
- Understand what to do if there is an emergency on your site.
- Be aware of how your actions will affect the health and safety of you and people around you.
- Think about your own wellbeing, and take sensible steps to be at your best – mentally and physically. Use the tools and facilities available to help.

DON'T

- Carry out tasks you are not trained or allowed to do.
- Ignore safety procedures to get a job done quickly.

NEED TO KNOW

- Understand your role in making sure you have a healthy and safe place to work.
- Know where to find your [local health and safety procedures](#).

STILL UNSURE?

- Ask your manager if you have any questions about health and safety or if you're worried that an activity or workplace is unsafe.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we keep information safe

Information is key to our business and we're trusted to keep it safe. Whether it's information about our customers, patients, residents, people or business, we keep it secure.

Everyone at Bupa has responsibility for looking after information. From customer data to financial information, from confidential information from our business partners to HR records about each other, we understand its value and we protect it all. We make sure we only use it in the right way. Because we understand that keeping information safe is about protecting our customers, our colleagues and Bupa.

DO

- Lock your screen and lockers while you're away from your desk.
- Use secure email or secure couriers to protect information.
- Be careful of how you dispose of information.
- Think carefully before you share information.
- Check the identity of people you're dealing with.
- Tell your manager/IT/HR if any type of information is at risk.

DON'T

- Tell anyone your log-in details or passwords – or lend anyone your ID badge.
- Make it easy for people to read confidential information or steal your mobile device.
- Leave your mobile device or laptop somewhere it could get lost.
- Let yourself fall for scams or phishing emails.
- Use information, particularly customer information, for anything other than its intended purpose.

NEED TO KNOW

- We're responsible for protecting information no matter where it's stored – including in paper, emails, call recordings, USB sticks, mobile devices or anywhere else.
- You can find our Information Security policy [here](#) and our Privacy policy [here](#).
- There are laws and regulations which protect information such as personal data, and restrict how we how we can use and share it.

STILL UNSURE?

- Speak to your manager or Information Security team if you need further advice.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we work to high professional standards

To give the best quality care we need great people. So we make sure that our knowledge, qualifications, skills and experience meet our customers' needs and the standards of our profession.

We are a professional and competent organisation. We understand that we need to be fit to practice. For many roles we need to be accredited (licensed) for the service we provide. So we make sure we've completed all the training that's required of us and always follow Bupa's policies and procedures. And we participate in continuing professional development to keep up-to-date with the latest changes in our industry and our profession.

DO

- Keep up with any competence-based training that's needed for your role or required by regulators.
- Understand and follow the relevant Bupa policies and procedures for your role.
- Live up to the conduct standards of your profession.
- Meet and maintain the required employment checks for your role.
- Meet, maintain and improve the standards of care required in your role.
- Keep up-to-date with evidence-based practice in your area of expertise.

DON'T

- Breach your professional conduct standards, Bupa policies or the Bupa Code.
- Fail to disclose information that may affect your fitness to practice or put the safety of customers at risk.
- Miss updating your training records where it's required to show fitness to practice.

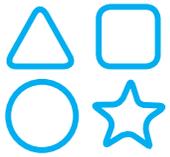
NEED TO KNOW

- Failing to disclose information that could affect your suitability for your role may put your employment, a customer's safety or Bupa's reputation at risk.
- If you don't stay up-to-date with professional accreditations and training, you could put our customers and your job at risk and Bupa could be investigated.
- Some people face unannounced alcohol and drug testing because of the nature of their role. If this applies to you, your contract of employment will tell you.

STILL UNSURE?

- Make sure you complete all the steps required to maintain your registration with your professional body and abide by their conduct standards.
- Make sure you're up-to-date with all the statutory training for your role.
- Raise your concerns if you feel you are not being supported with your training needs.
- Speak to your manager if you are unsure of what's required for your role or have any concerns around your or someone else's fitness to practice.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we celebrate diversity

Bupa is an inclusive organisation that welcomes everyone; all talents and backgrounds. We embrace our differences and we don't tolerate discrimination or bullying.

We want people to love working at Bupa. As a global company, we value different perspectives and encourage inclusion. We welcome diversity and we don't treat anyone differently because of their individual characteristics, race, sex, religion/beliefs, disability, marital or civil partnership status, age or sexual orientation or anything else about them. We create a safe and happy environment for our people. We understand the importance of making sure our workforce fully represents the communities in which we operate, and the customers we serve. And we don't tolerate any form of discrimination, harassment or bullying.

DO

- Treat everyone – colleagues, partners and customers – with respect and dignity.
- Welcome different points of view.
- Be aware that some actions may be acceptable in one culture, but inappropriate in another.
- Challenge behaviour that you think is inappropriate or upsetting to a colleague.
- Tell your manager about any bullying, discrimination or harassment you experience or that you witness.

DON'T

- Put up with bullying or harassment.
- Stop people from making their own unique contribution.
- Be derogatory about colleagues.
- Make offensive or inappropriate comments about another person.
- Display or share pictures or computer images which a reasonable person is likely to find offensive or derogatory.
- Make inappropriate physical contact that could cause another person to feel offended, humiliated, embarrassed or intimidated.

NEED TO KNOW

- **Harassment** is any physical or verbal behaviour that's not respectful – or that creates a frightening, humiliating or uncomfortable environment. It only has to happen once to be defined as harassment.
- **Bullying or intimidation** is mean, rude or insulting behaviour towards another person that will cause them upset, discomfort or humiliation.
- You can find your local policies and procedures [here](#).

STILL UNSURE?

- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we play by the rules

If we break the law or regulations, or act in any way that falls below our standards, it can damage our reputation and our business. We make sure that we understand the laws and regulations that affect us and follow them. We ensure we engage with suppliers and partners under the right contracts to protect Bupa.

We recognise the impact that breaking the law would have on Bupa's purpose of *longer, healthier, happier lives*. So we do business responsibly. We follow the laws, regulations, policies and standards that affect us, wherever we are in the world. And we look to the expertise of our legal and compliance teams to manage legal risk and protect Bupa under appropriate contracts.

DO

- Follow all the laws and regulations that apply to what you do in your role.
- Follow all the policies and standards that affect you.
- Treat all information as strictly confidential, unless you're sure the information is publicly available.
- Mark all requests for legal advice *confidential and legally privileged* – *request for legal advice* and send it to your legal team.
- Report any litigation or threats of it to your local legal team.

DON'T

- Show anyone legal advice or requests for legal advice – as this means we may lose our rights to keeping the advice confidential.
- Instruct external lawyers directly – go via your local legal team.
- Deal with a regulator without speaking to your local compliance team first.
- Choose a supplier or partner, or let them start work, without following your local legal and procurement engagement policies.
- Sign a contract unless you have authority to do so.

NEED TO KNOW

- Your local legal team is available to help on all legal matters.
- Know where to find your local [legal](#), [privacy](#) and [procurement policies](#).

STILL UNSURE?

- Check with your manager or local legal teams if you're unsure about the laws and regulations that affect you.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we act ethically

Bupa people do business in the right way. We don't give bribes, we don't accept bribes and we don't allow anyone to do so on our behalf. We make sure that any gifts and entertainment we offer and receive are appropriate and recorded in the right way.

We want to be recognised for earning business and giving business to others fairly. So we don't allow bribery or corruption in any circumstances. Where it's appropriate we may offer or receive business entertainment (as long as it's not too lavish). And we're sensitive to differing cultural attitudes around the world. To protect Bupa, we never compromise our zero-tolerance approach to bribery and corruption.

DO

- Think twice before offering or accepting gifts and entertainment.
- Know the value of gifts and entertainment that you need to have approved and recorded.
- Make sure that everyone you work with – including suppliers, agents and intermediaries – understands our zero tolerance policy to bribery and corruption.
- Ask for pre-approval before offering or accepting gifts and entertainment, according to what's allowed in your country.
- Register gifts and entertainment above local limits.

DON'T

- Do anything to compromise Bupa's reputation of honesty and integrity.
- Bribe anyone or unlawfully offer them something valuable to gain a business advantage.
- Accept a bribe.
- Allow anyone to offer or receive a bribe on Bupa's behalf.

NEED TO KNOW

- If you're corrupt, you're never safe from the law, wherever you are. In addition to local laws, the UK and US anti-bribery rules can apply worldwide.
- If someone offers a bribe on Bupa's behalf, we can be held responsible. The company, our directors and our employees could all face legal action.
- Bribery doesn't have to involve money. You can be corrupted by gifts or anything of value.
- You can find your local policies and procedures [here](#) – these make clear exactly what is acceptable and what's not.

STILL UNSURE?

- Speak to your manager if you're worried about bribery or corruption.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we declare conflicts

We avoid situations where our personal interests, loyalties and relationships could affect – or be seen to affect – our choices for Bupa and our customers. And we're aware of how things can look. So we declare any conflicts of interest straight away.

We want our customers and suppliers to trust us to do business fairly. So we make choices based on what's right for Bupa and our customers – not on what's right for ourselves or our partners. We go out of our way to avoid the appearance of conflicts too. And if a conflict comes up, we declare it on the 'Conflicts of Interest' declaration form.

DO

- Act in the best interests of Bupa and our customers.
- Put your loyalty to Bupa above your loyalties to family and friends in business situations.
- Make treatment and care decisions based on the best quality outcome for the customer, not the cost.
- Declare a conflict of interest in line with your local procedures.

DON'T

- Get involved in the hiring, supervising, management or career planning of any relative or partner.
- Let your personal relationships influence, or be seen to influence, your decisions at work.

NEED TO KNOW

- A **conflict of interest** is a situation where your personal, family or financial interests conflict with Bupa's or our customers' interests.
- If you're not sure whether you have a conflict of interest ask yourself:
 1. Does it affect the choices you make in your job?
 2. Would people question your ability to do your job if they knew about it?
 3. Would it embarrass you if other people knew about it?
 4. How would you and your manager feel if it was reported in the media?
- You can find your local policies and procedures [here](#).

STILL UNSURE?

- Tell your manager if you think anyone else might have a conflict of interest.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we represent Bupa

We care about Bupa's brand and reputation. That shows in what we do, how we act and the way we present ourselves. We're aware that what we say in public or on social media could affect how our customers and communities see us. We respect Bupa's assets and never use them for personal gain.

Bupa's brand and reputation matter and we do everything we can to protect them. At Bupa, we have a reputation for professionalism and we want everyone who works with us to experience it. So we behave, act and dress in a professional way. We understand that whether we're inside or outside work, we still represent Bupa. So we think twice before we speak, post on social media or put pen to paper. We never forget that we represent Bupa.

DO

- Dress appropriately for your role – as advised in your local policy.
- Follow our email, internet and phone policy.
- Make sure all marketing activity, internal communications or letters to customers follow our global brand standards.
- Think about how your actions will affect Bupa's reputation.
- Leave talking to the media to the experts in the Corporate Affairs team.
- Tell your local legal team about any misuse of our logo or trademarks.
- Check whether we need a licence before using another business's photos, music or other intellectual property.
- Tell your manager if you suspect our property has been stolen or used fraudulently.

DON'T

- Post anything on social media that could damage Bupa, our people or our customers.
- Speak to journalists – including making off-the-record comments – without checking with your Corporate Affairs team.
- Use Bupa's equipment, stock or other assets for personal gain.

NEED TO KNOW

- If you post on social media about Bupa, you must say you work for us and that your views aren't necessarily Bupa's views.
- You can find your local policies and procedures [here](#).
- You can find the global brand standards [here](#).

STILL UNSURE?

- Ask your manager if you have any questions about dress and behaviour.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we're ready for anything

Sometimes we have to be prepared for the worst as well as the best. We make sure we know what to do and who to get in touch with if something happens. And we keep our contact details up-to-date.

We protect our people, property and physical assets. Each and every one of us understands our responsibilities in keeping our buildings secure. We design and implement Business Continuity and Crisis Management plans for when things go wrong. And we make sure Bupa has our up-to-date contact details.

DO

- Challenge people who don't have the right identity badge.
- Make sure you understand what to do if there is an emergency where you work.
- Report any incidents straight away.
- Keep your manager and People systems updated if your contact details change.
- Complete and submit a journey management form if you're planning an overseas business trip to a high-risk destination. Then get any costs associated with security approved by your Managing Director.

DON'T

- Allow anyone unauthorised into our buildings.

NEED TO KNOW

- We have risk managers for each location who will brief you on your local incident reporting processes.
- Travel Safety and Security Information is available on the [Travel and Expenses Group SharePoint site](#).
- You can find your Business Continuity contacts [here](#).

STILL UNSURE?

- Ask your manager if you have any questions.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.





we take care of the planet

What's good for the environment is good for health. So we work in a way that has a positive impact. And we help others change by creating conversations about the links between health and the environment. We look for opportunities to reduce waste and conserve energy.

We recognise that healthy people need a healthy planet. So we work to reduce the impact Bupa has on climate change. We invest in low-carbon technology, maximise the use of renewable energies and do our best to cut down on water and waste. And we engage with millions of people on how having a positive impact on the environment will lead to positive impacts on health.

DO

- Consider the effect of your actions on the environment.
- Be aware of opportunities to reduce our environmental impact.
- Follow all environmental laws and standards that affect you.
- Suggest ways we can reduce waste and save energy to your manager.

DON'T

- Travel to a meeting without thinking whether you can connect just as well through technology.

NEED TO KNOW

- Climate change and health are interconnected: air pollution is now the main cause of lung conditions, such as asthma, and a risk factor for poor heart health and cancer.
- Bupa aims to grow the amount of renewable energy we use through self-generation and the purchase of green electricity and to continue to advocate for a healthier planet.
- You can find your local policies and procedures [here](#).

STILL UNSURE?

- Check with your manager if you're unsure about the environmental laws that affect you.
- If you can't speak to your manager, speak up confidentially using the Speak Up website bupa.com/speakup or call the hotline to raise a concern.



we speak up

We're committed to being a place where our people are free to question things and are courageous in raising anything we are concerned about.

If you are concerned about something and you can't talk to your manager about it, you can speak up knowing that it will be taken seriously and treated confidentially.



Ask yourself three questions

1. **IS IT RIGHT FOR OUR CUSTOMERS?**
2. **IS IT RIGHT FOR ME AND BUPA?**
3. **COULD I HAPPILY EXPLAIN MY DECISION?**

If you're still unsure, you can seek guidance from your manager or use the confidential Speak Up hotline to raise a concern.

