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1 Scope

This policy applies to all Bupa UKMU, Centre, Bupa Global and IM UK employees. It also applies to all non-employed, including contractors, self employed medical professionals, 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.

This policy does not form part of your contract of employment and will be reviewed from time to time to ensure that it reflects Bupa's legal obligations and business needs.

2 Purpose

We want people to love working for Bupa. Therefore, we are committed to developing working practices and policies that reward loyalty, increase employee engagement and support our purpose of people living longer, healthier, happier lives.

In accordance with the Bupa Code 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. This Policy sets out your responsibilities to declare and report potential and actual conflicts of interest and the actions Bupa will take to manage any risk.

A declared conflict of Interest(actual or potential) is one that involves yourself and is declared by you.

A reported conflict is one that you have witnessed that involves others or where you have reasonable cause for concern that a situation or action could be detrimental to our customers our people or our business

From time to time, circumstances may arise in which our duties to our customers differ from what is best for us or for another customer. This is a conflict of interest.

We actively encourage individuals to recommend Bupa to friends and family as a great place to work and recognise that potential conflicts of interest can occur in the workplace.

3 Responsibilities

You are responsible for making sure that:

- You comply with this policy
- you successfully complete the Conflicts of Interest mandatory learning during your induction and on an annual basis if this is required in your role.

- If you support UK Insurance you complete an annual Bupa UK Conflicts of Interest Declaration Form , regardless of having a conflict to declare.
- You declare any business and or personal potential or actual conflict of interest using the Bupa UK Conflicts of Interest Declaration form, or the Care Services Conflicts of Interest Declaration Form.
- You declare any personal relationship with a government/public official that may cause a conflict of interest
- You declare your intention to stand as a candidate for parliamentary elections
- You comply with the action plans and controls your manager puts in place to prevent the potential conflict of interest becoming a reality or to address any actual conflict of Interest.
- You report any actual or potential conflicts of interest that you observe involving others to your manager, the UK Conflicts Officer or via Speak Up if you feel unable to speak directly to your manager.

Your manager is responsible for making sure that:

- This policy is implemented
- Those required to complete the mandatory learning are identified
- Completion of the Conflicts of Interest mandatory learning is monitored in GROW.
- Individuals who support UK Insurance complete an annual declaration regardless of having a conflict to declare.
- Home Managers maintain an accurate register of any Conflicts of Interest and the associated action plans
- Action plans are implemented to address any declared Conflicts of Interest and are recorded and shared with the UK Conflicts Officer if requested.
- Any reported Conflict of Interest should be communicated to the UK Conflicts Officer using the declaration form
- Investigations are managed and the UK Conflicts Officer engaged if necessary. The mitigating action plan is recorded and forwarded to the UK Conflicts Officer

The UK Conflicts Officer is responsible for making sure that:

- A central record of Conflicts of Interest is maintained across the UK (excluding front line Care Services people)
- Controls are in place and adhered to for risks regarded as “significant”
- Each member of the Bupa Leadership Team (BLT) is provided with accurate quarterly reports for their specific business and the action plans that are in place for any significant risk
- Appropriate advice and guidance is provided to managers
- HR, Legal, Compliance and Financial crime teams are engaged as appropriate.

The BLT is responsible for making sure that:

- Any personal potential conflict of interest is recorded with action plans to mitigate the risk
- Significant conflicts of interest are raised to the Chief Risk Officer.
- Conflict of Interest is a standing item on quarterly BLT meetings to allow proper monitoring of the risk.
- Business Conflicts of Interest are given sufficient and appropriate attention to minimise any risk to Bupa

4 Key points

4.1 Personal Conflicts of Interest

A conflict of interest is a situation where your personal, family or financial interests conflict with those of our customers or of Bupa's, where the interests of Bupa differ to those of one or more of our customers, or where the interests of two or more of our customers or stakeholders to whom we owe a duty vary .

It is important that we avoid such risks and the appearance of conflicts of interest to make sure our customers, suppliers and other business partners trust us to do business fairly.

As a minimum conflicts of interest may occur where Bupa or one of our employees is:

- Likely to gain financially or avoid a financial loss at the expense of customers
- Has an interest which is different to the customers interest
- Has an incentive to favour one customer over another
- Have business interests outside Bupa that conflict with the best interests of Bupa or our customers
- Receives or will receive an incentive for a service provided to a customer other than the standard commission or fee for that service
- Works with relatives at Bupa, especially if one reports directly to the other.
- Has other roles outside of Bupa
- Has relationships with individuals who work for Bupa, Bupa suppliers or Bupa competitors
- Has shares/financial investments with a competitor

Certain conflicts of interest will never be permissible, for example where you are making a decision around contracts or suppliers where you will benefit financially.

4.2 Business Conflicts of Interest

Conflicts of interest may be at a business level, for instance, taking certain actions for commercial gain at the cost of customer outcomes (e.g. having remuneration structures that drive revenue over customer outcome).

Further detail on the regulatory context and requirements can be found in the supplementary note to this policy.

Where such conflicts are declared or reported any assessment and action plans will involve the Risk and Compliance team.

4.3 Mandatory Learning

Depending on your role your manager will advise if you need to complete the Conflicts of Interest mandatory learning within 30 days of joining Bupa and then on an annual basis. This learning explains what a conflict of interest is, your obligations to declare or report any potential or actual conflict and the process to follow.

4.4 Declaring a Conflict of Interest

If you find yourself in a situation where there is a potential or actual conflict of interest you should complete and submit the Bupa UK Conflicts of Interest Declaration form or the Care Services Conflicts of Interest Declaration form. Your manager will receive a copy of this declaration and will put in place the necessary actions to manage the risk.

5.5 Assessment of Declared Conflicts of Interest

Any declared potential or actual conflict of interest will be assessed by your manager. They will evaluate the risk and put in place controls and action plans to manage the risk. The manager will contact the UK Conflicts Officer if they need further advice.

Your manager will provide the appropriate support to enable you to adhere to the controls required and this will be monitored.

You must comply with the controls and action plans.

4.6 Reporting a Conflict of Interest

If you have a concern or witness a situation that suggests there is a conflict of interest you should report this to your manager or to the UK Conflicts Officer or via Speak Up. You should complete and submit the [Bupa UK Conflicts of Interest Declaration form](#) or the Care Services Conflicts of Interest Declaration form. This will be investigated and if necessary remedial action taken.

5.7 Investigation of Reported Conflicts of Interest

When a conflict of interest incident is reported an investigation will take place through the Bupa UK investigation process. Such investigations will be carried out by operational management.

If you are subject to regulatory approval or are appointed as a director or officer of a Bupa Legal entity, you may also have binding obligations that may affect how you manage Conflicts of Interest.

5.8 Reporting

Conflicts of Interest will be recorded on a confidential Conflicts Register for as long as the conflict remains and for a minimum of three years once it no longer applies. Records may be kept for a longer period than this if legal or regulatory requirements dictate.

Regular reports will be provided to the relevant risk and compliance teams.

5.9 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 legislation. For further information please read the Employee Privacy Notice.

5.10 Framework Review

The UK Conflicts Officer along with the UK Policy Owner will conduct an annual review of the process.

6 Consequences

Failure to declare or report a conflict of interest or implement relevant controls and any other breaches of this policy will be addressed through the disciplinary policy.

6 Appendices	
Bupa documents	Supplementary Detail to Conflicts of Interest Policy Conflicts of Interest - A Managers Guide Care Services Conflicts of Interest – A Managers Guide Speak Up Policy Investigation Process Disciplinary Policy Employee privacy notice
Bupa forms	Conflicts of Interest Appendix: Conflicts of Interest Declaration Form Care Services Conflicts of Interest Declaration Form

Key Contacts	
Policy sponsor:	People Director Bupa UK
Policy owner:	People Operations Director

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