

Bupa is committed to helping people live longer, healthier, and happier lives. Our commitment to our customers, people, and communities is a natural extension of this promise. In an ever increasing complex regulatory industry, Bupa Latin America and the Caribbean is committed to ensuring superior business ethics in what we do, what we say and how we treat our employees, customers, and our business partners.

It is with this in mind that we are pleased to introduce you to Bupa Latin America and the Caribbean's Compliance Program. [ACREED • Principles of Excellence](#), sets the framework for how we, as members of the Bupa group, should conduct business in the region.

The goal of the [ACREED](#) program is to build upon the culture of integrity and trust that comes with the policies that carry the Bupa name. [ACREED](#), an acronym for the six Bupa values – accountable, caring, respectful, ethical, enabling, and dedicated – strives to promote prevention, detection, and the resolution of conduct that does not conform to applicable laws or Bupa's high standards of business ethics. This program applies to all Bupa Latin America and the Caribbean's directors, employees, officers, and representatives.

The [ACREED](#) program provides guidance and oversight, but it cannot and should not be seen as a substitute for an individual's personal sense of honesty, integrity, and fairness. Everyone across the Bupa community is encouraged to rely on their common sense to recognize right from wrong, and use the [ACREED](#) program as a supplement to guide and inform these decisions.

As we continue to grow as a company and as a community, please remember that your conduct reflects on your individual professionalism and the reputation of Bupa.

[A. General](#)

Bupa people care. Our strong caring ethics, dedication, and respect are valued by people at some of the most vulnerable times in their lives. Trust is intrinsic to the way we operate as a business, locally and internationally. At the heart of our global business are our values. These are the principles that determine the way we behave, as a company, as employees, and as business partners. These values also bring us together as a family, giving us a common culture, inspiring trust and loyalty in all our people.

[B. Scope of our Compliance Program](#)

The [ACREED](#) program applies to all Bupa Latin America and the Caribbean's ("Bupa") directors, officers, employees, and representatives. Additionally, Bupa encourages, and in some cases requires, its vendors, including producers and other independent contractors, to follow and adhere to the program's values. We believe that our policyholders will also benefit from the [ACREED](#) program because they will have their healthcare needs served by a company with high standards of business ethics.

[C. Our Purpose](#)

Bupa's purpose is helping people live longer, healthier, happier lives. This is a responsibility which should not be underestimated, particularly as it applies to the lives of all our customers, but also to those of our employees.

[D. Our Role](#)

Bupa's role is to be a healthcare partner, providing expertise for life. We share the responsibility of helping our members make informed decisions and building relationships that last a lifetime

and are relevant at every stage of life. Only when we are committed to this role and the principles in this booklet, can we help people live longer, healthier, happier lives.

E. Core Values

Bupa expects all its employees to conduct themselves in a manner anchored in the values upon which Bupa was founded. Thus, all Bupa employees subscribe to **ACREED**:

Accountable: We are accountable for the quality, efficiency and value of our services, and act in the best interests of our customers.

Caring: We genuinely care about people's health and wellbeing. We exist for no other reason.

Respectful: We respect people's individuality, privacy and dignity, and try to respond to their individual needs.

Ethical: We are committed to acting responsibly and in the best interest of our policyholders and the environment.

Enabling: We use our knowledge and experience to help people choose the solutions that are more appropriate for them.

Dedicated: We are dedicated to providing a professional, reassuring service and seek opportunities to go the extra mile to exceed people's expectations.

F. Bupa will comply with all Applicable Laws

Bupa, its directors, officers, employees, and representatives are responsible for complying with the **ACREED** program, applicable federal and state laws, rules and regulations, and Bupa's high standards of business ethics. Although employees and representatives are not expected to be experts in the matters for which they are responsible, it is important to know enough to determine when to seek advice from supervisors or the company's Legal Services Department. If you have any difficulty understanding these principles, please contact your supervisor or the Bupa Compliance Hotline (1-877-308-8707).

G. Compliance Organization

The Compliance Officer is responsible for monitoring compliance, managing the Bupa Compliance Hotline, and any investigations into compliance-related matters which may arise from time to time.

The Compliance Officer has independent access to the Audit Committee of the Board of Directors to execute management, and to the Managing Director to ensure a culture of compliance is embedded into the Company's tone from the top down and is given the attention and independence necessary to function as it should.

All directors, officers, employees, and representatives of Bupa are participants in the **ACREED** program and may be required on an annual basis to certify in writing that he or she has conducted Bupa business in compliance with the **ACREED** program.

H. Reporting of Compliance Violations

Suspected violations of the **ACREED** program, federal and state laws, and Bupa's high standards of business ethics will be investigated. Supervisors and employees who neglect or ignore indications of violations of this program by subordinates and colleagues may be subject to disciplinary action. Violation of laws and regulations or failure to comply with the **ACREED** program may result in disciplinary action being taken against you. It is a violation of the **ACREED** program to take retaliatory action against a director, officer, employee, or

representative for reporting to the Compliance Officer or their supervisor a good faith belief that a violation has occurred.

If you do not feel comfortable reporting compliance concerns with your supervisor or other member of the management team, you may speak to the Compliance Officer directly or use Bupa's toll-free Compliance Hotline: 1-877-308-8707. Bupa will investigate all matters reported to the Compliance Hotline and, if appropriate, may initiate a full investigation into the matter.

I. Education and Monitoring of the Compliance Program

Bupa will continue to maintain and update training and monitoring programs to educate its employees and representatives about the **ACREED** Compliance Program. All employees will be required to participate in compliance training on an annual basis. This may consist of additional written policies, informational handouts and memoranda or, when appropriate, training seminars in selected areas. Bupa will conduct periodic audits of the **ACREED** program and will continue to monitor and promote compliance with new federal and state laws and regulations.

J. Bupa's Principles

The following are some basic principles of business conduct that apply to all employees and Bupa representatives. However, they should not be seen as an exhaustive list of all the legal and regulatory requirements with which we need to comply. The Compliance Program includes written detailed policies and procedures on each of those principles. Should you have any questions, concerns, or would like to further discuss or learn more about any of these principles, please contact the Compliance Officer.

1. Preserving Confidentiality

We must always take all necessary measures to protect the confidential information entrusted to us by our policyholders, our employees, our producers, and other parties, unless permitted in accordance with applicable federal and state law.

2. Protecting Bupa's Information

We must maintain the confidentiality and integrity of all Bupa proprietary information, property and resources. Such information must be appropriately safeguarded, and may only be used for Bupa's business purposes.

3. Conflicts of Interest

The responsibility to ethically handle conflicts of interest requires that you always fully disclose any conflicts or potential conflicts to Bupa and abide by any conditions placed on you to control or eliminate the conflict. Additionally, you must not use corporate property, information, or your position to further any personal opportunity.

4. Competition and Fair Dealing

Bupa participates in highly competitive markets. We will compete vigorously and fairly, and always in an ethical manner. We will avoid any practice that could result in or be perceived as inappropriately obtaining information from our competitors such as theft, spying, price fixing, antitrust violations, or bribery.

5. Accurate Books, Records, and Reports

We must ensure that information within our control is recorded accurately and in a timely manner in the company's recordkeeping system. This includes separating business and personal expenses, and recording all transactions in a manner that maintains accountability for

all of Bupa's assets and permits preparation of accurate financial statements. Other pertinent records include, but are not limited to, claims records, premium payment records, and medical records. All billings must be true and correct and accurately reflect covered services already provided. Bupa employees, directors, independent contractors, and vendors should not misrepresent Bupa, its regulators, or its customers in any facts or reports.

6. Anti-Kickback and Anti-Inducement, Bribery, Gratuities, Meals, Gifts, and Entertainment

We should not make or accept any payments or give gifts related to Bupa's business activities to/from government officials, officials of public international organizations, or members of national legislative bodies, their families or their staff. Contact with any such person where payments or gifts have been discussed should be immediately reported to the Compliance Officer, your supervisor, or to Bupa's Compliance Hotline. With respect to non-government business, you may accept or offer gifts, meals, travel, and entertainment as long as they are customary and commonly accepted business courtesies, not excessive in value, not in violation of any contracts or laws, and given or accepted without an express or implied understanding that the recipient or Bupa is in any way obligated by acceptance of the gift. No gift, meal, or contribution should be offered or received which might influence or which someone might perceive could influence a person's judgment.

7. Fraud and Abuse Prevention, Detection, and Reporting

We should not engage in or permit any misuse of company property. You are obligated to detect and report any suspected incidents of fraud or misuse of company property in accordance with the procedures set forth through the **ACREED** Compliance Program.

8. Employing or Contracting with Ineligible Persons

Some of our entities are United States corporations; these entities and all U.S. citizens and residents wherever they are located or employed must comply with U.S. laws which prohibit doing business with prohibited individuals and nations against which the U.S. maintain economic sanctions or embargoes. Entities owned or controlled by U.S. Bupa companies must also comply with U.S. laws which prohibit doing business with Cuban entities, the Government of Cuba, or Cuban nationals outside the United States. Directors, employees, producers, agents and vendors should consult the Bupa Compliance Hotline if there are any questions about Bupa's ability to do business with a particular country or party.

9. Reports of Suspected Violations, Confidentiality of Reports, Non-Retaliation

We are each responsible for reporting known and suspected violations of Bupa's policies or legal requirements. Bupa takes all reports seriously and expects employees and producers to be truthful and fully cooperate with investigations. Any reports of known and suspected violations should be brought to the attention of your immediate supervisor, Bupa's Compliance Officer, or reported to the Bupa toll-free Compliance Hotline. Employees may be subject to disciplinary action if it is discovered that they have not reported known or suspected violations. An individual who makes a good faith report to his/her immediate supervisor, Compliance Officer, and/or the Bupa Compliance Hotline will not be subject to retaliation by Bupa for making the report.