



# Simplyhealth Group Ltd

Sustainability Report 2025



Simplyhealth

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# Our annual sustainability report

**Welcome to our Annual Sustainability Report. We have created this dedicated Sustainability Report because sustainability is a fundamental part of our operating and business model here at Simplyhealth.**

Sustainability at Simplyhealth deserves its spotlight, allowing everyone to learn more and discover ways to get involved.

Back in 2019, we started to capture, track, and report our sustainability progress. We wanted to formalise our sustainability credentials, make clear our commitments, promise action for the future, and share our progress transparently.

In our third dedicated Annual Sustainability Report, we continue to take steps that reaffirm the importance of sustainability at Simplyhealth by obtaining independent limited assurance over some of our metrics.

We strive to ensure every step and action we take is in the best interests of all our stakeholders.

This report contains seven sections – CEO welcome, who we are, our approach to sustainability, future goals, the way we’re contributing to society and social change, our positive impact on the environment, and how we govern ourselves responsibly.

We have taken care to signpost each section so you can easily move between topics, recognising that they are all interconnected.

# Our approach to annual sustainability reporting and disclosures

## Reporting period

Simplyhealth Group Limited's reporting period runs from 1 January to 31 December every year, with a 2019 baseline year unless otherwise stated. Information contained in this report relates to the year ended 31 December 2025, with a cut-off period of 31 January 2026.

## Reporting boundary

Data included within this report relates to Simplyhealth Group Limited (the 'Company') and its subsidiary companies, including Denplan and Practi (together, 'Simplyhealth' or the 'Simplyhealth Group'). Simplyhealth People Limited provides the Accounts Payable Service on behalf of all entities. No business unit breakdowns are currently available or disclosed due to the nature of our centralised operations.

When reporting and disclosing, our organisational boundary includes information from all Trading Companies and Holding Companies. Disclosures are made at a consolidated 'Group' level, following the same approach as our financial accounting rules (UK GAAP). We therefore exclude any joint ventures where we do not have operational control and less than 50% shareholdings.

## Uncertainty

We try to be consistent with our reporting methodology year on year, while also improving the data collection methods used. Where there are any estimates or significant assumptions or judgements used, these are explicitly referenced in the supporting methodology detail.

## Approach to restatements

We will correct any identified errors by restating previous years, where the actual data is available. In addition, we conduct an annual review of changes to our operating structure, for example, acquisitions and shareholder investments. Any changes are calculated from the date of ownership or investment, to the end of the current reporting period. Any restatements made are explicitly referenced alongside data tables contained within this report.

## Overall progress

We engaged Grant Thornton UK LLP to provide independent limited assurance over our:

- Scope 1 emissions (tCO2e).
- Scope 2 market-based emissions (tCO2e).
- Scope 2 location-based emissions (tCO2e).
- Scope 3 total (tCO2e).
- Total energy consumption (kWh).
- Intensity ratios, per employee and per £1m turnover (tCO2e).
- Donations to charities and community causes – local donations.

- Donations to charities and community causes – national donations.
- Average time taken to pay invoices (calendar days).
- Percentage of suppliers paid within 30 days or less (average).
- Percentage of invoices paid on time (rolling 12 months).

This limited assurance engagement has been performed in accordance with ISAE 3000 (Revised) and where relevant ISAE 3410 for the year ended 31 December 2025. See limited assurance report with an unmodified opinion here: [Grant Thornton Assurance Report](#).



# CEO Welcome



Throughout 2025, we were guided by our clear purpose: to improve access to healthcare for all in the UK. Our strong focus has been to simplify access to workplace healthcare by removing barriers and reducing costs. In a world where NHS waiting lists and workplace health challenges persist, we offer much needed simplicity and affordable access.

### Business as a force for good

For over 150 years, Simplyhealth has been dedicated to improving access to healthcare across the UK. As an organisation, we have always invested our profits back into the business and into the community, and we are as determined today as we were then to be a force for good.

The team and I were immensely proud to have this commitment recognised again in 2025 through the recertification of our highly valued B Corp status, three years after our original certification. We're also delighted to have risen from

#46 to #31 in KPMG's global Customer Experience Excellence report, and to occupy the top position in the healthcare and insurance sectors. This is a significant acknowledgement of the outstanding service we provide to our customers, and of the work right across the business to deliver that.

From our roots in Manchester, Salford and Leeds back in 1872, when workers pooled small contributions to access free hospital care, we have continually strived to combine innovation with our vast experience, ensuring every decision we make is anchored in achieving healthier lives for all.

### Navigating a shifting landscape

The UK's macro environment continues to present both headwinds and opportunities. The NHS waiting list, although recently reduced for the first time in 17 years (excluding the pandemic), still stands at 7.39 million. It comes as no surprise that sickness absence in UK workplaces rose to a record high of 9.4 days per employee in 2025, up from 5.8 before the pandemic. With 2.8 million people economically inactive due to long-term sickness, the cost to the UK economy is now exceeding £212 billion annually.

Against this backdrop, we are continuing to support business and helping to protect the NHS by providing fast, convenient solutions to everyday healthcare needs, keeping workers as healthy as possible without increasing the load on NHS services.

### Innovation, advocacy, partnerships and policy leadership

We've continued our ambitious programme of digital and product innovation, streamlining benefits payments for our Healthplan customers, providing real-time data to support decision-making for our corporate customers and brokers, and making the joining process far simpler for Denplan patients.

Through our investment programme, Simplyhealth committed £7.2 million to healthcare businesses aligned to our purpose, ensuring that we are not just responding to today's needs, but are playing an important role in driving the future of healthcare innovation.

Over the past year, we've provided constructive insight to both businesses and government on how we can improve people's health in the workplace and represent our dental practitioner members, through dialogue with parliamentarians, health policy experts, clients and industry organisations.

We actively contributed to the Keep Britain Working Review, led by Sir Charlie Mayfield, and through our continued partnership with the Chartered Institute of Personnel and Development, we shared valuable research that will help employers improve their health and wellbeing strategies.

### Purpose in action

None of our achievements would have been possible without the passion, dedication and insight of the entire Simplyhealth team. Their focus on our purpose drives progress, whether responding to customer needs, nurturing our culture of care, or representing us in policy and partner forums.

We are proud to have delivered £1.2 million in charitable and community support in 2025 and to have led with an approach where every decision is shaped by community benefit and sustainability. Our teams have continued to volunteer, fundraise and drive positive impact within the communities we serve.

Together with our partners, customers and communities, we continue to be a genuine force for good, putting people first and inspiring positive sustainable change to enable everyone to thrive.

**Paul Schreier**  
Chief Executive Officer





## At a glance

### Who we are

**Simplyhealth** is a leading healthcare company, committed to helping everyone access affordable, everyday healthcare services. Our low-cost health plans and dental plans, including the market-leading Denplan, look after over two million customers by helping them find and fund their healthcare. Working with thousands of businesses and partners, we connect people to the high-quality healthcare providers so they can stay healthy and live their best lives at home and at work.

We are a company limited by guarantee with no shareholders and, since 1872, we've been led by our purpose of improving access to healthcare for all in the UK. We're investing millions into new health companies to accelerate the development of predictive and preventative healthcare services. Our aim is to support and protect the NHS through the provision of everyday healthcare and reduce workforce sickness rates.

We understand our own health depends on the health of our communities and our planet. Each year, we commit to giving a minimum of £1m to a range of health-related charities and community causes. In 2022, we became the first health insurer to be awarded B Corp status, in recognition of our high environmental and social ambitions, and continued positive impacts in using our business as a force for good. Our continued commitment to these ambitions has earned us a highly treasured recertification of our B Corp status in 2025.

To find out more, please visit:

[www.denplan.co.uk](http://www.denplan.co.uk)  
[www.simplyhealth.co.uk](http://www.simplyhealth.co.uk)

### Our purpose

Simplyhealth's purpose ('Our Purpose') is to improve access to healthcare for all in the UK.

Through our low-cost healthcare cover, and dental payment plans, our customers receive support for everyday needs, like doctor's appointments, eye care, physiotherapy, counselling, dental care and diagnostic scans - no matter their age, or pre-existing conditions.



# Our business units


## Our lines of business

**Simplyhealth Group Limited**  
2.4 million customers

 **Simplyhealth**

**Simplyhealth**  
We provide Healthcare Insurance to individuals, either directly ('Consumers'), through their employer ('Corporate Clients') or via dental services. Our solutions provide cover for everyday healthcare costs, including primary care and outpatients services.

**89.9% of revenue**  
**968,600 customers**

 **Denplan**  
Part of Simplyhealth

**Denplan**  
We provide dentists and their patients with products and services supporting the provision and funding of dental services.

**10.0% of revenue**  
**1,477,000 customers**

 **SIMPLYHEALTH VENTURES**

**Simplyhealth Ventures**  
We support like-minded organisations, including start-up companies, by providing financial investment and business support in achieving these aims.

**9 Investments**  
**£7.2m invested in 2025**

## Our portfolio

**Health Plans**  
**927,900 customers**

**Simply On Demand**  
(non-insurance, subscription to digital health services)

**40,700 customers**  
(discounted 'self pay' network of healthcare providers)

 **Denplan**  
Part of Simplyhealth

**Capitation Plans**  
**1,477,000 customers**

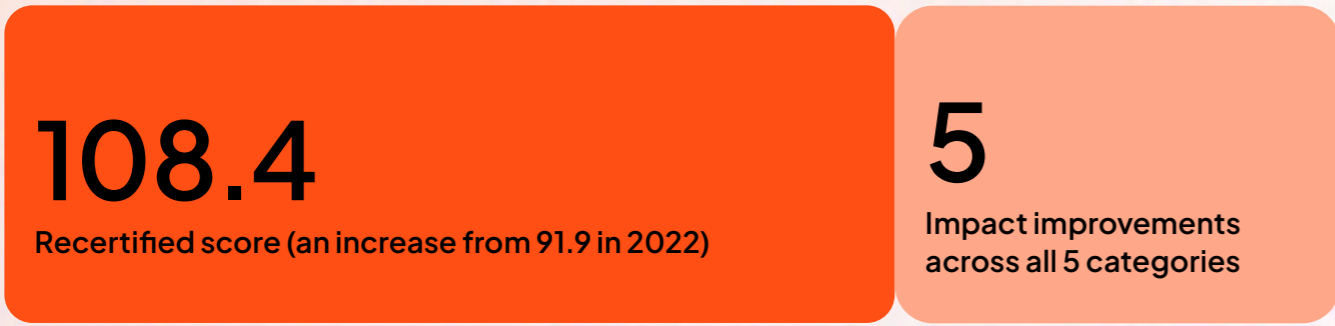
 

Our insurance plans are underwritten by Simplyhealth Access, including insurance products sold via our Denplan operation. Products sold via our Denplan operation provide administration of payment plans, support, guidance, and advice to member dentists. Simplyhealth Access is authorised by the Prudential Regulation Authority ('PRA') and regulated by the Financial Conduct Authority ('FCA') and the Prudential Regulation Authority.

# Things to be proud of in 2025

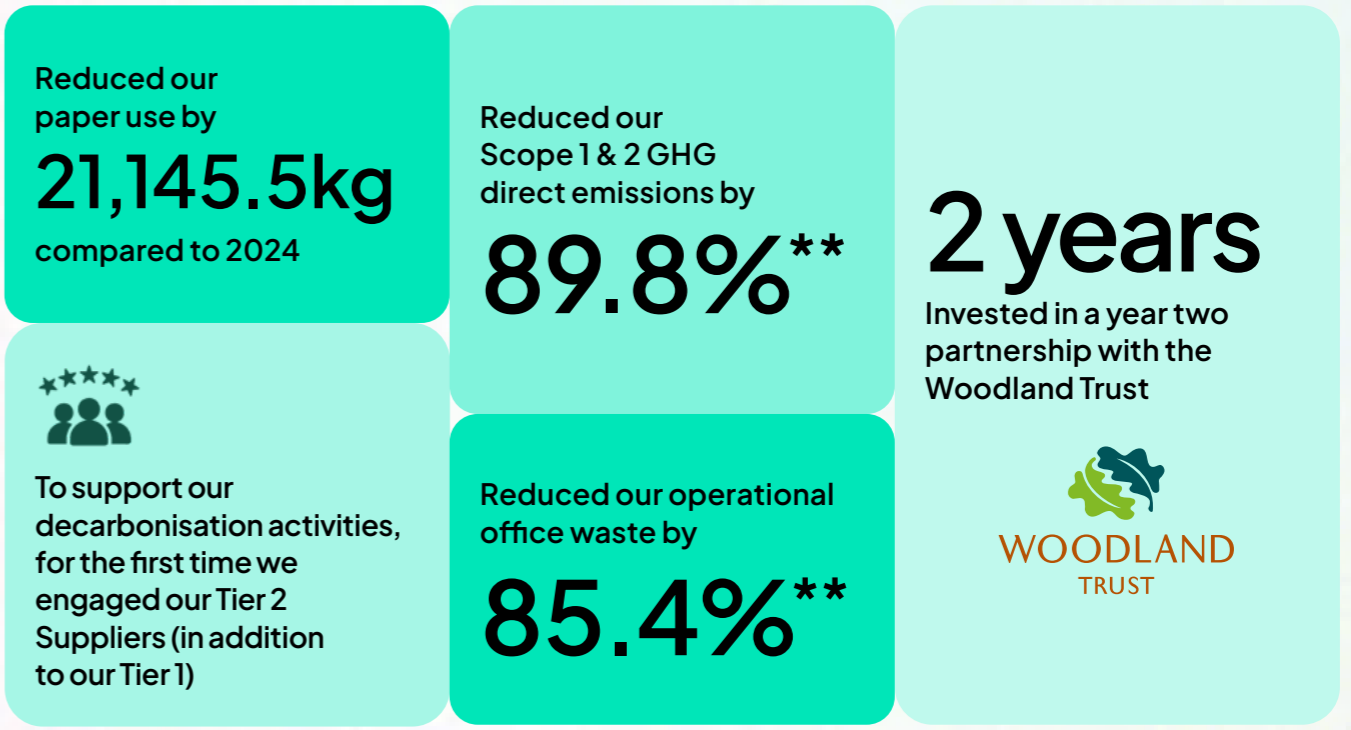
## B Corp Recertification



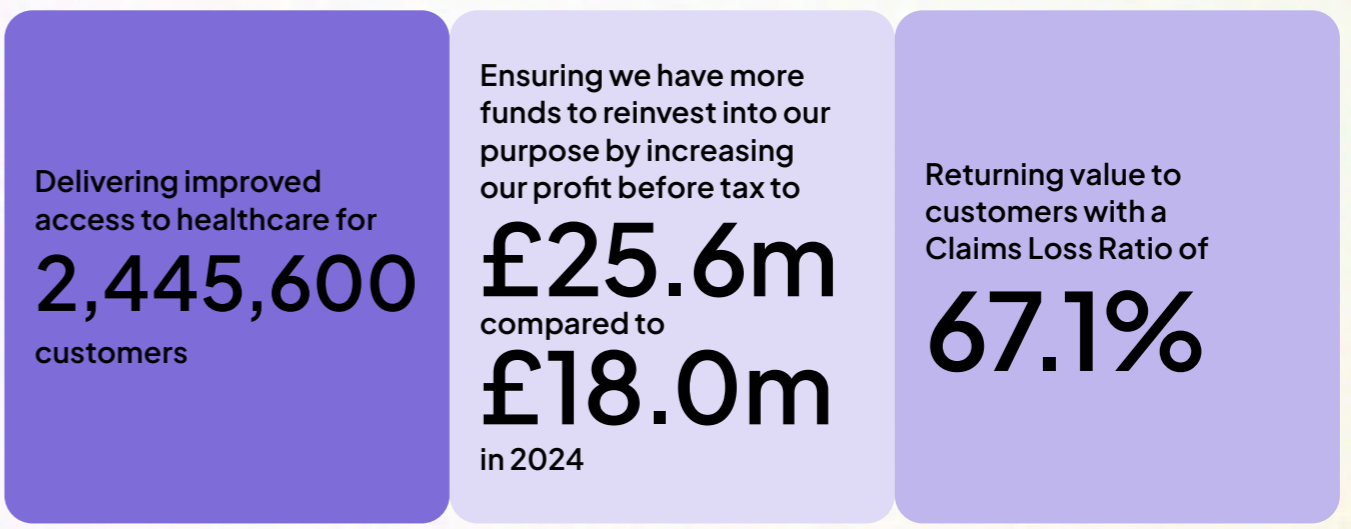
## Social Highlights



## Environmental Highlights



## Financial Highlights



\*Excludes charities supported via colleague matched funding  
 \*\*When compared to our 2019 baseline data (Market-based). GHG refers to Greenhouse Gas emissions. Scope 3 report boundary currently excludes investments. All calculations and certifications are assessed by Carbon Footprint Ltd following the GHG Protocol and using the 2025 emission conversion factors published by DEFRA & DESNZ.  
 \*\*\*BrightBites impact figures cover period Nov 2023 - Dec 2025, based on when funding and collaboration began.

# Human rights, anti-bribery & corruption

Simplyhealth is committed to upholding high levels of ethical standards and sound governance arrangements; we set high standards of integrity and objectivity in the management of our activities.

Our risk management framework is designed to ensure we comply with relevant international laws, rules and regulations and to develop a culture that protects the Simplyhealth Group's reputation. Simplyhealth condemns corruption in all its forms, and we will not tolerate it in our business or those we do business with. It is our policy to conduct our business honestly and ethically.

We adopt a zero-tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly. We fully support the Government's objectives to eradicate Modern Slavery and Human Trafficking, and we call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability.

We apply core human rights principles throughout the organisation, and through our vendor selection screening processes.

We continue to educate and inform our colleagues, making clear commitments, progressing against those commitments and owning the challenges faced. Over the last 12 months, all Simplyhealth colleagues have been enrolled on a 'helping you keep Simplyhealth compliant' series of SimplyLearn modules to build awareness and understanding of critical topics, including Modern Slavery, Conduct Risk, Fraud, and Anti-bribery and Corruption.

All our policies and procedures remain under review and adaptable to any changes in risks Simplyhealth faces.

For more information, please see our Modern Slavery and Transparency in Supply Chains statement on [our website](#).



# Our approach to sustainability

At Simplyhealth, we define sustainability as meeting the needs of the present without compromising on the ability of future generations to meet their own needs.

We have been using our business as a force for good for over 150 years, balancing the needs of people, profit, and the planet through:

- The way that we contribute to society and social change.
- The positive impact we have on the environment.
- By responsibly governing ourselves.

To Simplyhealth, ESG and sustainability are about more than just being green. It's about using business as a force for good in the world, always driven by Our Purpose.

### Purpose-driven sustainability strategy

The health of our business underpins our ability to help improve the health of individuals and their access to healthcare. In turn, this supports strong communities, benefitting society and our planet.

We're never complacent about our sustainability progress, and always look beyond our organisation to the world around us. We do this because we believe we have a duty and responsibility:

- To our customers – to help them manage and find solutions to the healthcare challenges they face.
- To our communities – to those locally, nationally, and globally who need our support and stewardship.
- To our colleagues – to help them cope and adapt to changing environments so they can better meet our customers' needs.

We do this with a firm focus on delivering Our Purpose more powerfully and aiming to improve health outcomes for our customers, communities, and colleagues, who we consider to be our key stakeholders.

### Engaging our key stakeholders and understanding our impact

Our stakeholders are critical to us, and we regularly reflect on and engage with the issues that are important to them. Engagement with our stakeholders helps us to understand our impact across the value chain and gain insight into the topics that matter most. We have identified who we consider to be our critical stakeholders under our s172(1) statement in our 2025 Annual Report and Accounts (see pages 36 – 38), which outlines how we engage with them, to ensure their views are considered and to deliver good customer outcomes.

We are also committed to complying with and staying ahead of evolving legislation and standards. We have ambitious sustainability goals to create greater value for all our stakeholders whilst reducing our negative impact.

### Holding ourselves to high impact standards

Our approach to sustainability has been informed by best practices, research forums, governance frameworks, and memberships, which continue to challenge our thinking, help us assess our current impact, and prepare for the future. These include, but are not limited to:

- Aligning to the UN's Sustainable Development Goals ('SDG's).
- Being a member and charity partner of Business in the Community.
- Being a B Corp-certified business using the B Impact Assessment tool.
- Consistency with the Taskforce on Climate-related Financial Disclosures ('TCFD').
- Using independent assessment from Carbon Footprint Ltd.
- Understanding best practices from the University of Cambridge Institute for Sustainable Leadership ('CISL').

### Our evolving aspirations and goals

Since 2019, Simplyhealth has had a formal sustainability strategy in place underpinned by a series of aspirations, goals and KPIs.

In our 2021 Annual Report, we shared these goals publicly for the first time. In 2022, we invested in two new roles to create a dedicated ESG team focused on evolving Simplyhealth's sustainability strategy, aligning our company-wide efforts, and accelerating our plans and actions.

During 2023, we developed our first ESG Framework to help align sustainability to every part of Simplyhealth's business strategy and functional areas, ensuring sustainability is embedded into everything we do.

Simplyhealth's ESG Framework has been designed to ensure:

- We strengthen the progress already made and direct our efforts and investments to support our short-term, mid-term (2030 goals) and longer-term ambitions.
- We align all Simplyhealth colleagues behind one purpose-led sustainability priority, improving access to healthcare in the UK for all by improving health outcomes.
- We value our stakeholders as we strive to create greater value for everyone and prioritise action.
- We deliver areas of impact to high ESG standards, using the B Corp Business Impact Assessment as our preferred and benchmarked model.
- We use B Corp and the assessment process as one method of assessing our year on year impacts and progress.

In 2024, we took the next step that reaffirms the importance of sustainability at Simplyhealth by obtaining independent limited assurance over some of our metrics.

In 2025, we have increased the number of metrics being assured as we continue to mature our approach across Environmental, Social and Governance topics.



# Our 2030 goals



In September 2023, our ESG Committee recommended four 2030 ESG goals to guide our actions and investments for the future. These were then approved by Simplyhealth's Board in December 2023.

Our ESG goals and KPIs support the UN's global 2030 agenda for sustainable development, with a particular focus on Sustainable Development Goal (SDG) 3 Good Health and Wellbeing, SDG 13 Climate Action, and the UK Government's 2050 Net Zero ambition.

### Our 4 ESG goals

<b>1.</b> <b>Net Zero (Scope 1 &amp; 2)</b>	<b>2.</b> <b>Zero emission company fleet</b>
<b>3.</b> <b>£1m &amp; 1,000 days donated to charity and community causes, helping more than 100,000 people, per year</b>	<b>4.</b> <b>50% practice engagement in Green Dentistry (Denplan)</b>

We also have an ambition to deliver a 50% reduction in Scope 3 GHG emissions\* by 2030.

\*When compared to Simplyhealth's 2019 baseline data. Scope 3 totals currently exclude investments emissions.

# ESG framework

To improve access to healthcare in the UK for all, by improving health outcomes for our customers, communities and colleagues, we focus on the following aspirations within our ESG strategy:

### Our Stakeholders

Customers		Communities		Colleagues	
<b>Overall ambition</b> To improve health outcomes for our customers.	<b>Stakeholders</b> Consumers, Corporates, Dentists, Brokers, Voting Members.	<b>Overall ambition</b> To improve health outcomes for our communities.	<b>Stakeholders</b> Regulators, Suppliers, Investors, Partners, Ventures, Foundry, Local Community & Communities, Environment.	<b>Overall ambition</b> To improve health outcomes for our colleagues and help them live their best lives.	<b>Stakeholders</b> Present and future Simplyhealth colleagues.
<b>Why?</b> Because we believe a preventative approach to healthcare is better than cure. We're creating quick and easy ways for millions of people to live healthier lives.		<b>Why?</b> Because our future health as humans relies on the health of our communities, businesses and our planet. We're all citizens of a global community, so we're here for everyone.		<b>Why?</b> Because the health and happiness of our workforce is a priority to us. When our colleagues feel great, they pass it on.	

### Our Impact Areas & Aspirations

Environmental	Social		Governance
Climate Action, Circularity & Stewardship	Culture, Engagement, Government Affairs & Collective Action	Fair Treatment, Human Rights, Justice, Equity, Diversity & Inclusion	Impact, Governance & Disclosure
Take credible action in accordance with science to combat climate change and its impacts.  Operate in an ecologically safe space ensuring that humanity can thrive in the future.  Minimise our most significant environmental impacts in our operations and supply chain.	Lead and act beyond our own enterprise to have a broader systemic impact.  Embrace the role of influencing and supporting collective solutions that address social and environmental topics.  Build positive colleague experiences including satisfaction, belonging, psychological safety, engagement and happiness.  Grow a positive workplace culture with meaningful workplace conversations and a sense of shared purpose.	Provide individuals and their families with the means to support themselves and contribute to broader social and economic wellbeing.  Treat all people with dignity and respect their human rights.  Build an inclusive and diverse work environment and contribute meaningfully to just and equitable communities.	Act in accordance with our purpose, contributing to an inclusive, equitable and regenerative economic system for all people and the planet.  Continuously strive to improve by setting impact improvement goals and publicly commit and share progress.

These impact areas and aspirations are aligned to B Lab's new standards that were launched in April 2025, which focus on new impact categories, with a set of non-negotiable requirements for achieving future B Corp certification.

More details on B Lab's new standards can be found here: [An Introduction to the New B Corp Standards](#)

# Independently assessed via B Lab UK



In July 2022, we were proud to be certified as the UK's first B Corp health insurer.

To become a certified B Corp (a company dedicated to using business as a force for good), companies must commit to achieving high standards of social and environmental performance. This is independently assessed via B Lab UK, the team behind the B Corp certification.

We wanted to become B Corp certified because:

- It is our genuine (and legal) commitment to uphold our purpose, values, and beliefs and to continue to care for our customers, our community, the environment, and our colleagues.
- It gives us a framework to measure our actions, hold ourselves accountable and continuously improve our business.
- It provides us with the chance to support other businesses to become a force for good and carry the beacon that others can follow.

In 2022, we scored 91.9 in the Business Impact Assessment (which requires a minimum score of 80 to certify). B Corps are required to track their progress and impact every year. In addition to this Annual Sustainability Report, we also produce a 'Force for Good' B Corp Impact Report:



## We did it!

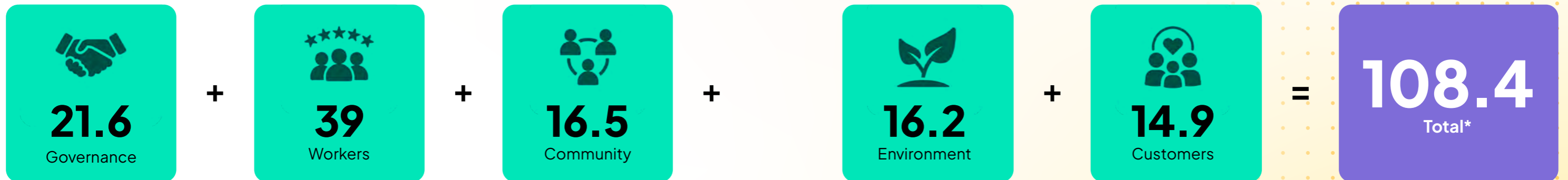
In November 2025, we were incredibly proud to announce that we successfully recertified as a B Corp with an increased score of 108.4.

We're even more excited to report that all five impact areas that were assessed have also improved, compared to three years ago.

These impact improvements are the result of prioritised actions and investments over a sustained period of time, recognising that as a responsible business striving to improve the positive impacts we deliver, we never stand still.

Compared to the UK B Corp community we are now well above the upper quartile of B Corps.

## Our B Corp Impact Scores for 2025



\*Total B Corp score is subject to rounding

## Did you know?

The median score for ordinary businesses for their first B Corp assessment is 50.9.



# Our 3rd B Corp month



Every March, B Lab and the global B Corp community join to celebrate what it means to be a B Corp. During March 2025, along with our fellow B Corps we wanted to show everyone our commitment to a healthier world. It's important to us to work with stakeholders who value this commitment too.

During March 2025, along with our fellow B Corps we wanted to show everyone our commitment to a healthier world. It's important to us to work with stakeholders who value this commitment too.

Collective action and collaboration sit at the heart of the B Corp community, so wanting to 'walk the walk' during B Corp month, we encouraged our colleagues to 'B Together' and get active by walking 30 minutes every day (or an alternative movement activity).

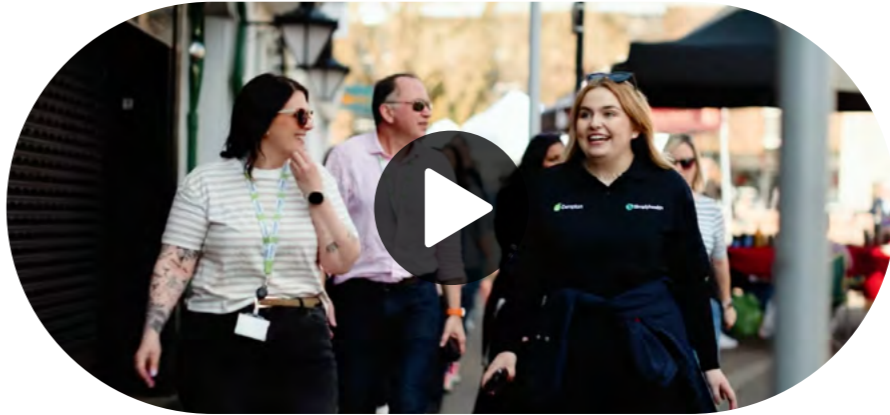
We wanted to show beyond a mark, B Corp is a movement of businesses making a mark on the world.

Every daily colleague walk during March 2025, unlocked a £5 donation for one of our wonderful local charities - **Andover Mind**.

Aligned to our 'All Together Healthier' value and showing the importance of movement and social connection for positive mental health and wellbeing, our colleagues did us proud! We were delighted to provide an incredible £10,000 of funding to Andover Mind.

Our social channels and regular customer communications were awash with stories, articles and facts to help spread the word.

Take a look at us in action at one of our organised colleague walks:



Although they are called Andover Mind, as part of the Mind Federation, they provide services right across mid and North Hampshire, supporting people with mental ill health. From youth services to Safe Haven spaces and primary care wellbeing 1:1s and peer sessions, the team at Andover Mind work relentlessly to help people in our community to:

- Increase their self-esteem and confidence.
- Increase their independence.
- Feel less excluded.
- Become less dependent on services.
- Reduce readmission to inpatient and residential care.
- Participate in training, volunteering and/or employment.

Every year, Andover Mind support around 8,000 people, improving access to mental health services and improving health outcomes.

To support other responsible businesses to further their positive impacts, we once again took the opportunity to thank our fellow B Corp's with a **10% corporate discount** which is still running now. This is one way that we are helping them to prioritise the health and wellbeing of their employees like we do.



# Happier & healthier customers

## The way we are contributing to society and social change

Our purpose to improve access to healthcare for all in the UK has never been more critical. Today, we take a great deal of pride and care to serve our 2.4m customers. Our health and dental plans support our customers, their families and their businesses with their everyday health needs, as we believe no one should go without the healthcare support they need. Our vision is a healthier UK, where everyone can navigate and fund their healthcare needs.

**As we continue grow Simplyhealth, we remain committed to:**

- Listening to our customers constantly, running monthly surveys (Customer Voice) to understand how we can improve and create greater value.
- Tracking our customer KPIs and good customer outcomes at our regular Leadership Forums and Trading Meetings.
- Reviewing the speed at which we pay claims, process administration changes, and respond to customers as the first contact resolution for any complaints received.
- Being customer and product-led, and proactively developing new products and propositions with the customers' needs at heart.
- Digitising our customer communications and minimising the impact of our print and marketing activities on the environment.
- Exploring how we can continue to support our customers (especially corporate clients and dentists), suppliers and partners to improve their own social impacts.

- Investing in new ventures, building new start-ups and establishing new strategic partnerships to innovate the next generation of digital health solutions, support health entrepreneurs in the UK and improve customer health outcomes.

**Our customer experience, impacts and progress from the last 12 months:**

- We've maintained our groupwide high customer satisfaction measurement, with an average of 71.7% of customers surveyed in 2025 being 'very satisfied', compared with 71.3% (2024), 71.4% (2023) and 67% (2022).

- We've ensured both Simplyhealth and Denplan Trustpilot scores continue to perform above average for the UK health insurance industry, scoring 4.5\* and 4.3\*\* respectively, in December 2025.
- We've improved our App Store and Google Play App reviews at 4.9 stars.
- We've enhanced our customer experience by continuing to refine our use of conversational, agentic and generative artificial intelligence ('AI') to support our customers, resulting in shorter waiting times for our customers and 24/7 support.
- We reached 4,746 dental professionals, across 36 Denplan face to face events and 457 training sessions, both virtually and in person. This resulted in 18,043 hours of Continued Professional Development ('CPD') delivered by Denplan to support with fast-changing regulations and policies within dentistry.

**We've delivered additional customers impacts in 2025 by:**

- Investing £7.2m in Simplyhealth Venture Capital (£1.8m in 2024) including new investments in Evaro (£5.0m), an AI powered digital pharmacy, and Karehero (£1.0m), who help to find and fund adult care services.
- Welcoming 40,700 new customers on our new low-cost whole of workforce product, **Simply on Demand**, which offers discounted access to our network of healthcare providers, supporting more businesses who want to do more to help their employees.
- Launched **Simply Dental** - our brand new, digital-first workplace dental benefit. Designed to make accessing preventative oral healthcare simpler for employees, we provide money back towards routine check-ups, hygiene visits, fillings, X-rays, emergency dental treatment, and more.

Expanding our 'My health' offering through healthcare partners with:

- Radox, where customers now have access to a further **26 new 'in-clinic' health tests**.
- HealthHero, where following a successful pilot, we fully launched our specialised **women's health GP service** to all customers.

\*Based on 4,516 reviews  
\*\*Based on 1,802 reviews



- Being placed 31st (up from 45th last year) in **KMPG UK's 2025 Customer Experience Excellence report**. Now in its 16th year, this research tracks how customer experience is evolving, importantly drawing upon 13,100 UK consumers own rated experiences across 441 different organisations. To be recognised as an organisation that is building strong customer relationships, achieving sharper growth and changing how service works (especially through agentic AI), is a huge accolade from our own customers.
- Launching our Management Information (MI) dashboards for our Corporate Clients and Brokers, providing enhanced data access and reporting capabilities enabling corporates to have wellbeing benefit insights at their fingertips, enabling faster, more informed decision-making to better support their employees.
- Continuing the roll out of our new insurance operating platform, with the majority of consumer policies now supported by the enhanced platform, offering improved experiences today and greater flexibility for future products and services. We were equally pleased to support the first corporate business being administered on the platform with the full roll out scheduled for 2026, with the full decommissioning of legacy platforms in 2027.
- Delivering a series of Denplan Connect and Dine with Denplan events, Practi 'Grow Your Dental Empire' and Simplyhealth Connect Broker Conferences – a wonderful way to share updates, gather feedback, network and build new relationships.
- Attending external events such as Corporate Adviser Workplace Protection, Wellbeing and Cash Plan Report Roundtable in the House of Lords, and REBA's 2025 Congress on Tackling the cost and complexity of delivering whole of workforce benefits. We shared our views about how together, with employers we can reverse the workplace sickness epidemic in the UK (see page 32 for more details).
- Championing women's health in the workplace by participating in powerful, honest and practical conversations such as the CIPD Women's Health in the Workplace webinar.
- Using our voice to represent our Dentists and the dental industry, to help secure the future of dentistry. This has included ensuring oral health is prioritised within the Government's 10-Year Plan, as we championed a mixed model practice. In October 2025, as a follow on from our 'Future of Dentistry' white paper, we hosted a Parliamentary Roundtable focused on 'Dental Care That Works For All'. Sponsored by Helen Morgan MP and Jess Brown Fuller MP, the event brought together parliamentarians, NHS and dental professionals, and sector representatives, to explore how we work collaboratively to secure a more sustainable, prevention-led future for dentistry.
- Being recognised within our industry at the Health and Protection Awards 2025 – Best Cash Plan Provider (Highly commended).



Overall



Partner services



Customer satisfaction and experience



“  
This service provides a safe space for those most in need, and it has helped me overcome something I thought was impossible. I would highly recommend it to friends and family who have lost hope during difficult times to get the help they need.  
”  
Customer feedback following Mental Health Support (Spectrum.Life), August 2025

“  
Had treatment on my shoulder. Collected receipts, which I uploaded onto the Simplyhealth site via my mobile phone with my camera. Once they had uploaded on the site, the site took over and arranged the rest. I had a confirmation message straight away, then I had the allowance paid into my account 3 days later. I cannot fault this system as it is so hassle free and user friendly.  
”  
Simplyhealth Health Plan customer, TrustPilot review, October 2025

“  
I was away from home and in some pain with my teeth. When I used the Denplan emergency number I was reassured that a real effort was being made to get me an appointment with a local dentist. I received kindness, positivity and was given realistic expectations as to when I might see a dentist, which turned out to be the next morning. Everyone I encountered was caring and helpful.  
”  
Denplan patient, TrustPilot review, September 2025

\*Includes Healthplan corporate clients, Denplan dental practices and Practi dental practices as at 31 December 2025  
\*\*Average from 1 January 2025 – 31 December 2025

Spotlight

# Reversing the UK workforce sickness epidemic

In the UK we are at a crossroads moment for the health of our nation and economic prosperity. Workforce absence is rising with employees now averaging nearly two weeks off sick every year, costing the UK economy £212bn annually\*.

Sickness amongst the workforce is largely preventable, especially with access to in-work provision such as health plans and on demand health services. Employer-provided health cover doesn't have to be expensive or only for the few.

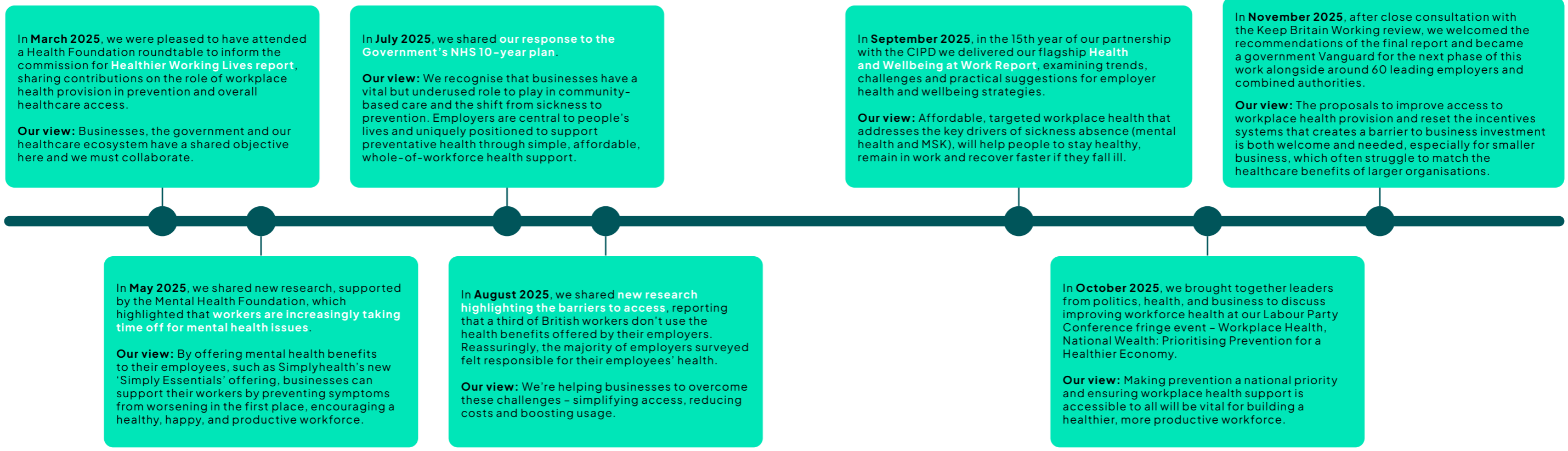
That's why throughout 2025, we've prioritised sharing research, hosting and participating in events, contributing to the discussion at a national and organisational level. We've been clear about the challenges around this sickness crisis, including NHS pressures and provision, and we've proactively offered realistic policy solutions for the future – to improve access to healthcare via the workplace and reduce health and social inequalities across the country.

We're playing a bigger role in society by using our voice, helping to influence and shape public policy through collective action with others.

## Looking ahead to 2026

Simplyhealth will now support the next phase of the Keep Britain Working review, as a Vanguard, contributing to efforts in demonstrating how employers and healthcare providers can improve access to workplace health provision, reduce absences and boost workplace productivity. The challenge is significant, but together we can address the long-term sickness epidemic, helping more people to stay in or return to work, building a healthier, more productive Britain.

### Highlights



\*<https://www.gov.uk/government/publications/keep-britain-working-review-final-report/keep-britain-working-final-report#executive-summary>

Spotlight

# Supporting vulnerable customers

During 2025, as part of our Vulnerable Customers Programme, we've been exploring ways to empower our customer-facing teams with a deeper understanding of different customer vulnerabilities and the various situations they may face. The aim is to give our Advisors the knowledge and confidence to tailor our customers' journeys with us, effectively removing the barriers that may otherwise lead to a harmful or negative customer outcome.

One of the ways we're delivering this is through our 16 Customer Personas, which are a reflection of our existing customers using the data we already hold. Using our relationships with external charities and their specific experience and expertise, they are helping us to deepen our knowledge of each vulnerability, while also offering resources and signposting for our customers, so they can access specialist support offered by these organisations.

Every month we spotlight different vulnerabilities and customer personas, delivering live webinars, e-learning modules and lots of learning resources to our customer-facing teams.

**“**  
*You have been so patient. You have the patience that I need.*

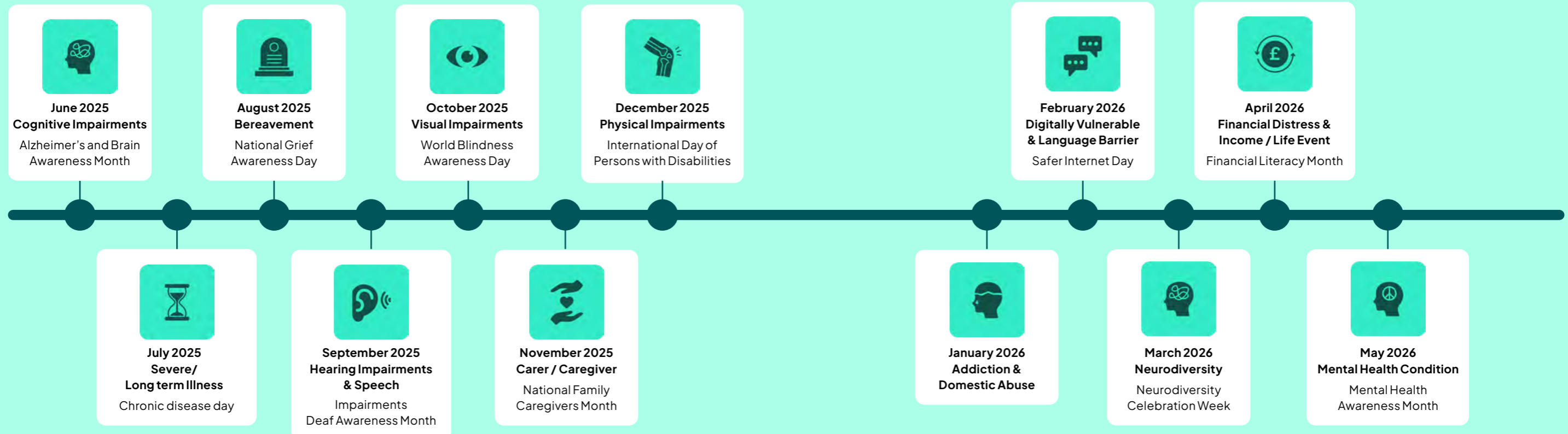
Harold, Carer/Care-giver and Simplyhealth customer

**“**  
*You're lovely. You're really lovely, and it's a pleasure talking to you. Thank you.*

Marion, Long-term illness and Simplyhealth customer

**“**  
*As I struggle online, I rang and spoke to a lovely lady at Simplyhealth. She was very helpful, answered my queries in an empathetic and friendly manner.*

Digitally vulnerable Simplyhealth customer



# Our communities

## The way we are contributing to Society and Social Change.

Communities matter and are a significant driving force for Simplyhealth. That's why we're proud to work closely with people and charities at a local, regional and national level, exploring ways to improve our impact and role.

Our societal impact stretches deeply into our local communities, through a national lens and on the global stage, including financial investments and humanitarian support. Looking out for each other can be a big gesture or a small help offer.

### Aligned to our 2030 ESG goals, we remain committed to:

- Pledging and delivering a minimum of £1m annually to charities and community causes to continue to deliver Our Purpose more powerfully.
- Providing every colleague with three volunteering days per year, to support local communities.
- Match funding colleague fundraising efforts for charities of their choice, up to £1,000 per colleague, per campaign/event (no cap).
- Match funding monthly payroll charity donations from £5 to £50 per month, per colleague via our Give As You Earn Scheme ('GAYE').
- Paying our suppliers in a time-efficient manner to support their financial stability, especially our Tier 3 smaller suppliers.
- Setting new engagement targets which prioritise conversations with our suppliers to support them to decarbonise their own operations and our supply chain as part of a just transition, leaving no one behind.
- Maintaining our support for Test Valley Borough Council (Hampshire) in their pursuit of the redevelopment of Andover town centre as part of Andover Vision.

### Our community impacts and progress from the last 12 months:

- Donating 3,714 hours of volunteering support during work hours, a threefold increase in 12 months (1,191 hours in 2024) as we continue to invest our time and skills in the support of charity and community partners.
- Increased the number of colleagues volunteering from 15% (2023), to 18.5% (2024) and an all-time high of 55.3%.
- Collectively match funded £29,962 via our colleagues, corporates and dental practices to support their fundraising efforts totaling £84,871 raised for charity.
- Match funded £14,520 of donations via Give As You Earn ('GAYE') monthly payroll giving, with 9.3% of colleagues donating monthly in 2025.
- In total distributing over £1.17m to 33 different health and community-related charities (excluding charities supported via colleague matched funding).

### We've delivered additional community impacts in 2025 by:

- Contributing as an active member and leader of **Business in the Community's South East Regional Leadership Board** and Southampton Pride of Place Board. Together, with other responsible businesses we are helping to tackle the most pressing challenges in our local areas. We're working collaboratively with the voluntary sector and local councils to build and deliver a vision for their future that serves everyone, with input from everyone. We're already providing sustained resource, advice and support to motivate and empower local stakeholders and look forward to continued collaborations.
- Supporting 135 carers with personalised, virtual one to one mentor and befriending support, to enable them to prioritise their own wellbeing and offer practical support and a listening ear. Through our Let's Care Together programme in partnership with Business in the Community, 132 volunteer befrienders were trained from Simplyhealth and other BitC businesses.

- Joining **Business in the Community's Wellbeing Leadership Board**. Together with other leading businesses we are helping to build a movement that is committed to positioning health and wellbeing as a strategic boardroom issue with a particular focus on mental health and driving collective action through evidence-based, practical solutions.
- Supporting 4 colleague volunteers to mentor young people from low-income backgrounds, as they focus on self-discovery and career readiness. Through our partnership with **The Early Careers Foundation** we are dedicated to changing the way talented young people gain exposure to the world of work.
- Continuing to fund and contribute to working group sessions to embed the **Andover Food Partnership Network**. Recognising that access to healthy, affordable food can have a significant impact on overall health and wellbeing, we're collaborating with local partners as we aim to make healthy nutritious food available for all in our local area.
- Supporting **Trinity Winchester** and **Unity** in Test Valley, to deliver mobile Dental Clinics in partnership with **Dentaid - The Dental Charity**. In 2025, across Andover and Winchester over 85 vulnerable people have been supported with emergency dental care, where no local NHS provision is available.
- Continuing our positive impacts through our Women's Health Charity Alliance, sharing resources and providing £137,500 in funding for women's health topics. This included supporting **Endometriosis UK**, **Miscarriage Association**, **Ovarian Cancer Action**, **Prevent Breast Cancer** and **Wellbeing of Women**.



\*Excludes charities supported via colleague matched funding  
For further details about how calculations are performed please see Appendix 4 - Our approach to charitable donations reporting on pages 92-93.



# Improving children’s oral health through BrightBites

Through our partnership with **Dentaid The Dental Charity**, together, we’re on a mission to reach 500,000 school-aged children through our fun and engaging oral health education programme – **BrightBites**.

In 2023, 15 million\* school days were missed due to dental problems, with one-in-nine\* (11%) children missing school due to their teeth.

During 2024 and 2025, Government data once again confirmed that tooth decay was the most common reason for hospital admissions for children aged five to nine\*\*.

We’re committed to changing this by targeting schools, nurseries and clubs for low-income families, to support children to learn about the importance of good oral health, so they can form good habits to keep their teeth and mouths healthy.

Our BrightBites education sessions are delivered by a fantastic team of volunteers from Dentaid, Denplan and the Denplan dental community. As well as delivering in-person oral health education sessions, we ensure every child leaves with a toothbrush, toothpaste and a smile on their face!



Impact figures cover period Nov 2023 – Dec 2025, based on when funding and collaboration began.

\*According to the [Denplan Oral Healthcare Report 2023](#)

\*\*Gov UK: Hospital Tooth Extractions [2024 and 2025](#)

# Our colleagues

## The way we are contributing to Society and Social Change.

Our priority is the health and happiness of all our people, physically and mentally. We want to create opportunities and experiences for everyone, delivering a more diverse, equal and inclusive workforce. We aspire to be widely recognised as a healthy workplace by both colleagues and partners.

### At Simplyhealth, we remain committed to:

- Delivering the culture we aspire to, including living our values every day and the associated behaviours.
- Creating opportunities and experiences for everyone, delivering a more diverse, equal and inclusive workforce free from discrimination and based on fairness, dignity and respect.
- Providing everyone with access to facilities, personal and career development opportunities and employment on an equal basis, regardless of race, nationality or ethnic origin, disability, age, gender, sexual orientation, pregnancy or maternity, gender identity, religion or belief.

- Supporting the health and wellbeing of our colleagues and being recognised as a healthy workplace by both colleagues and partners.
- Delivering exceptional learning and development opportunities, creating the conditions to embed a learning culture.
- As a minimum, paying our colleagues in line with the London Living Wage, regardless of location.



Understanding and celebrating who we are

**41**  
Average colleague age

**8.7**  
years average colleague length of service

**817**  
employees (Full Time Equivalent of 777)

Gender diversity

**67.1%**  
Female

**32.9%**  
Male

Neurodiversity

- 77% Neurotypical
- 4.5% Dyslexic
- 3.5% ADHD (Attention Deficit Hyperactivity Disorder)
- 1% ASC (Autistic Spectrum Condition)
- 1% OCD (Obsessive Compulsive Disorder)
- 1% Other
- 3% experience more than one of the above
- 12% Prefer not to say

**7%** of us identify as belonging to the LGBTQIA+ community

Source: Simplyhealth Chatterbox Survey, October 2025

**Age**

- 16.4% 18 – 29 years
- 35% 30 – 39 years
- 21.2% 40 – 49 years
- 20.9% 50 – 59 years
- 6.5% 60+ years

Source: Simplyhealth HR System

**Ethnicity**

- 84% White
- 4.5% White other
- 4% Asian
- 0.5% Mixed other
- 0.5% Black
- 1% Other
- 5% Prefer not to say

**Religion**

- 49.8% No religion
- 33.5% Christian
- 2.2% Other
- 1.8% Hindu
- 0.7% Sikh
- 0.4% Buddhist
- 0.4% Muslim
- 11.2% Prefer not to say

Source: Simplyhealth Chatterbox Survey, October 2025. All figures as 28 December 2025, unless otherwise stated. Where Simplyhealth Chatterbox Survey (October 2025) figures are used, a 79% overall response rate was recorded. Some breakdown figures will not equal 100% due to multiple selections being available, some questions being non-compulsory and rounding.

Our colleagues and their experiences

**100%**

of colleagues have accessed SimplyLearn, our learning experience platform, in 2025

**83%**

of colleagues would recommend us as a great place to work, 0.4 above benchmark\*

**82%**

average response rate in our bi-monthly colleague engagement survey

**61%**

of colleagues engaged with our annual wellbeing survey in 2025

**8.2**

our overall colleague engagement score, 0.3 above benchmark

\*Financial Services benchmark from Peakon via Simplyhealth's bi-monthly engagement survey.

# Our colleague impacts from the last 12 months

## Diversity and Inclusion:

- Making reasonable adjustments for all new job applicants and colleagues who are or have become disabled to accommodate their needs, ensuring we give full and fair consideration to all applicants.
- Delivering on our promise in 2022 to continue to build understanding and awareness around our expectations in fostering an inclusive workplace.
- Maintaining our great progress from the last two years, through our nine Colleague Support Groups, raising their profile and promoting colleague participation.
- We are committed to developing women in leadership roles with 60% of our Simply Stars programme being filled by women. Additionally, 27.3% of our leadership roles (Level 3 and above) are filled by women.

## Employee Engagement:

- Running our bi-monthly colleague engagement survey, receiving a 82% average response rate in 2025, with an engagement score of 8.2 out of 10, which is 0.3 above benchmark\*. We're confident our survey is representative because across the entire year, 96% of colleagues have completed at least one survey.
- Delivering a series of quarterly colleague briefings where Simplyhealth's progress and performance are shared transparently, and colleagues can ask our Executive Committee and business speakers anything they like.

- Delivering our Living Our Values Everyday (LOVE) Awards so together we can celebrate, recognise and say thank you to those who are leading the way in living our values and acting as custodians of our culture. In total, 781 LOVE Awards were awarded and over 2,000 value-based e-cards sent between colleagues.
- Supporting 22 Values Champions' to help act as catalysts for change in their business area, challenging the status quo and sharing best practice examples. Ultimately, we're aiming for every colleague to feel connected to our values, embrace them and uphold them.

## Health and Wellbeing:

- Performing 0.5 above benchmark\* for Health and Wellbeing, with 8.5 out of 10 in our colleague engagement survey.
- Asking colleagues in depth about their health and wellbeing via our annual 'All Together Healthier' survey and using this insight to inform our yearly wellbeing programme.
- As a result, we can report some impressive five and six-year highs, and we have seen meaningful improvements across mental wellbeing, financial wellbeing and resilience topics.

- Enrolling all colleagues into our new AI driven mandatory Display Screen Equipment training and assessment, covering compulsory Health and Safety topics and valuable tips and advice to help to keep safe and healthy whilst working, particularly from home.
- Providing a network of 30 Mental Health First Aiders, who are all extremely passionate about mental wellbeing. They exist to listen, support and signpost colleagues to further help.
- Celebrating being a Finalist at the 2025 Engage Awards for Best Employee Wellbeing Strategy.

## Training and Development:

- Supporting all colleagues throughout the year with various personal development opportunities, including 19 colleagues undertaking apprenticeships on topics such as coaching, compliance, risk, accounting and AI.
- Educating and informing our colleagues via a 'helping you keep Simplyhealth compliant' e-learning modules to build awareness and understanding of critical topics, including Modern Slavery, Conduct Risk, Fraud, and Anti-bribery and Corruption. Delivering 9,355 hours of virtual colleague training through our bespoke learning experience platform, SimplyLearn, with 100% of registered users accessing the platform during 2025.
- SimplyLearn now hosts 150 internal programmes, 868 courses, as well as 11,599 LinkedIn Learning courses and online wellbeing resources.



**We've delivered additional colleague impacts in 2025 by:**

- Supporting early careers and developing talented young people through a collaboration with Exeter University. In 2025, we signed off a new Degree Apprenticeship Programme designed primarily for school leavers. Going live in 2026, the programme will provide opportunities within our Technology and Finance teams.
- Continuing to invest in smart/hybrid working, with 91% of colleagues in 2025 agreeing that our approach to smart working continues to work well for them, with 84% agreeing their wellbeing is positively impacted due to this flexible balance.
- Hosting a 'Mind and Mingle' masterclass event focused on mental health in the workplace for World Mental Health Day. Colleagues discovered practical ways to improve their wellbeing, learned about the support available to them (via our partners and charities), connected with each and our supportive networks who took time out for themselves in a relaxed, welcoming environment.
- Prioritising colleague health with on-site health checks, with over 90 colleagues benefitting from a detailed understanding of their health status, receiving signposting for proactive steps towards maintaining and improving their wellbeing, along with a discount from our partner, Randox Health.



Spotlight

# Our 'All Together Healthier' wellbeing programme for colleagues

We are passionate about safeguarding and supporting the mental and physical health of our people, and we aim always to be a healthy workplace.

Our annual 'All Together Healthier' wellbeing programme has been designed by us, through our partnership with award-winning and fellow B Corp certificated workplace wellbeing company, **Kamwell**. Through our carefully curated programme, we aim to empower all colleagues to make choices that support their health and wellbeing, enabling them to live their best lives and thrive at work and home.



Crucial health topics that reflected the priorities of our colleagues:

- Mental health.
- Women's health.
- Men's health.
- Physical health.
- Family health.
- Financial wellbeing.

How we raised awareness, built understanding and connected colleagues:

- 34 Wellbeing webinars, including colleague panels.
- New 'Support While You Wait' for those waiting to access longer-term or specialist mental healthcare (NHS or private).
- 1,470 total wellbeing webinar minutes.
- 90 Health checks.
- £600 flexible spending pot to support personal health and wellbeing spend.
- 5 Alternative in-office therapies e.g. Reflexology, Reiki and Massage.
- 2 Healthy fundraising challenges.
- 9 Colleague Support Groups.
- 30 Mental Health First Aiders.
- 3,714 hours volunteered in the local community.

The 2025 results we achieved together\*

The programme overall:

- 97% of colleagues rated the programme as good or excellent.
- 92% of colleagues agree that the programme provided them with information and/or tools that positively impacted their wellbeing (a 5-year high!).

How colleagues perceive Simplyhealth and our wellbeing support available:

- 88% of colleagues agree Simplyhealth demonstrates a commitment to their wellbeing (a 6-year high!).
- 90% agree that they feel able to ask for help when they need it (a 6-year high!).
- 83% of colleagues agree their manager takes action to support their wellbeing (a 3-year high!).
- 78% rate their relationships as good or very good (a 6-year high!).

How colleagues have made self-improvements:

- 92% of colleagues are exercising at least one day per week (+2% on 2024).
- 68% of colleagues act on wellbeing insights from the programme.
- Colleagues reported improved wellbeing in life, with meaningful uplifts in resilience (66% up 12%), mental wellbeing (54% up 8%) and financial wellbeing (55% up 8%), when compared to 2024.

What we'll focus on for 2026 based on colleague feedback

- Targeted line management support within some teams showing less capability, to help with visibility and checking in around wellbeing topics.
- Greater awareness on presenteeism, leaveism and reducing the growing gap on stigmas associated with disclosing physical and mental wellbeing status.
- Continued progress on spotting the early signs and symptoms of burnout and knowing how to respond/action.
- Better understanding our young colleague population and their needs.

\*2025 All Together Healthier Survey (August 2025) with a 61% engagement and 54% completion rate

# What our colleagues tell us

“ Following my health check, the results have given me the kick I needed to start making changes, like improving my diet and reducing the amount I’m drinking. It’s also given me motivation to see how much I can move the dial on the more concerning results when I go back in 6 months for the follow up.

Simplyhealth Colleague,  
All Together Healthier Survey, August 2025

“ There’s really good financial wellbeing support here. Plenty of helpful tools and resources to make things easier to manage. It’s reassuring to know that Simplyhealth genuinely looks out for colleagues in that way.

Simplyhealth Colleague,  
Chatterbox Survey, October 2025

“ Not only are the webinars regarding health and wellbeing great for us, but with the information I learned in them, I was able to pass over that knowledge to friends and family suffering with the same issues that were discussed. I find this really rewarding.

Simplyhealth Colleague,  
Chatterbox Survey, September 2025

“ I really loved the colleague panels on neurodiversity. It was incredibly powerful to hear people share their personal stories with such honesty and courage. It goes a long way in normalising the different ways our minds work and creating a more inclusive culture. I also really enjoyed the walk for Mind – it was such a refreshing way to connect with colleagues and spend time together outside the usual setting. Getting outdoors makes a big difference.

Simplyhealth Colleague,  
All Together Healthier Survey, August 2025

“ It’s obvious that Simplyhealth genuinely cares about colleague wellbeing. There’s a real effort to make sure people feel supported, and it shows in the way we work and look out for each other.

Simplyhealth Colleague,  
All Together Healthier Survey, August 2025

“ The emotional spending session resonated with me. It led to a bit of a breakthrough around why I’ve been doing certain things. That awareness has helped me curb my spending and reduce some of my finance anxiety. I’ve been tracking my spending and become more self-aware of my purchases. This has helped me regain control of my finances.

Simplyhealth Colleague  
All Together Healthier Wellbeing Survey, August 2025



# Our positive impact on the environment

At Simplyhealth, we know that humans can't be healthy without a healthy planet. That's why we're continuing to take steps to protect our planet's resources and its ecosystems. We think globally and act locally to protect our environment.

Our sustainability program is extensive and covers a range of activities, from reducing our carbon footprint to responsible paper use, reducing our waste, and our extensive recycling activities.

**Aligned to our 2030 goals, we are committed to the following environmental targets:**

- Achieve zero-emissions fleet by 2030.
- Reach Net Zero\* (Scope 1 & 2 direct emissions) by 2030.
- Reduce operational waste by 80%\* by 2030.
- Improve office recycling rates to 95% by 2030.

**We also have an ambition to:**

- Reduce operational waste by 80%\* by 2030.
- Reduce Scope 3 indirect emissions by 50%\* by 2030.
- Become a Net Zero business before 2050.

**Our environmental impacts and progress from the last 12 months:**

- Recertifying as a CO2e Assessed (including Supply Chain) Organisation, CO2e Reducing Organisation, Carbon Neutral and a Carbon Neutral Plus Organisation following a review of our 2025 GHG emissions\*.
- Continuing to invest in the recommendations of our energy assessment for Anton House, Andover, via the Energy Savings Opportunity Scheme ('ESOS').

**We've strengthened our 'Pathway to Net Zero' by achieving the following progress against our targets and ambition:**

- Reducing our Scope 1 & 2 (market-based) direct emissions by 89.8%\*.
- Reducing our operational waste by 85.4%\* and sending no operational waste to landfill.
- Reducing our Scope 3 (market-based) emissions by 19.4%\*.
- Maintaining our commitment to manage our fleet emissions, ensuring 100% of company cars (Sales team) are hybrid or Electric Vehicles ('EV').\*\*
- Increasing the number of EV within our company fleet, from 7.3% (2024) to 15.9%.

**We've delivered additional environmental impacts in 2025 by:**

- Championing sustainability within Contact Centre environments by joining forces with [Call Centre Helper](#) and sharing how our own ESG principles are being put into practice.
- Supporting over 20 Denplan dental delegates to learn more about sustainable dentistry, delivering five online training sessions as part of Denplan's Green Dentistry Programme and education series, which is helping to raise awareness and drive climate action.
- Proactively approaching 100% of our Tier 1 & Tier 2 suppliers, receiving replies from all suppliers, with the majority providing emissions information, to help improve the accuracy of our supply chain emissions disclosures and identify further opportunities to collaborate on decarbonisation efforts.

- Delivering our second annual Smart Working and Travel Colleague Survey to improve the accuracy of our homeworkers and employee commuting GHG emissions (survey completed in January 2025, reporting on 2024 activity).
- Partnering with [The Woodland Trust](#) for a second year on our 'Go Digital' campaign to incentivise our customers to become paperless and [support Free Trees Packs in communities across the UK](#). From 1 January to 31 December 2025, the campaign had resulted in 30,517 Simplyhealth customers and Denplan patients registering their email addresses, bringing the total to 68,927 email addresses received since our collaboration began.

- Along with other supports, this has enabled 1.1 million trees to be planted by 3,420 schools and 2,333 community groups during Autumn 2024 and Spring 2025.



\*When compared to Simplyhealth's 2019 baseline data (market-based). Scope 3 totals currently exclude investments emissions. All calculations and certifications are assessed by Carbon Footprint Ltd following the GHG Protocol and using the 2025 emission conversion factors published by DEFRA & DESNZ.  
 \*\*Excludes one diesel Event's team van and hire cars.



2025 Greenhouse Gas ('GHG') emissions

Table A

Scope	Activity	Tonnes CO2e
Scope 1	Site gas	0
	Refrigerants	0
	Company car travel	50.52
	Vans	2.21
<b>Scope 1 Sub Total</b>		<b>52.73</b>
Scope 2	Electricity (Market-based) (Location-based = 51.51tCO2e)	0
<b>Scope 2 Sub Total</b>		<b>0</b>
<b>Scope 1 &amp; 2 Sub Total</b>		<b>52.73</b>
Scope 3	Purchased goods and services	4,069.42
	Capital goods	287.57
	Employee commuting	185.58
	Home workers	280.15
	Paper	66.78
	Well to tank	136.15
	Electricity transmission and distribution	0
	Employee-owned car travel	7.58
	Flights	16.86
	Hotel stays	5.94
	Hire cars	7.51
	Cash opt out cars	2.83
	Upstream transportation and distribution	236.24
	Upstream leased assets	51.34
	Waste	0.08
	Water (and waste water)	0.32
	Rail travel	6.99
	Taxi travel	1.39
	Downstream transportation and distribution	5.70
	<b>Scope 3 Sub Total</b>	
<b>Total Tonnes CO2e</b>		<b>5,421.16</b>

The following Scope 3 categories are not relevant to be reported by Simplyhealth: Processing of sold products; Use of sold products; End of life treatment of sold products; Downstream leased assets; Franchises.

Financed investments (such as reserves and pensions invested) are currently outside of Simplyhealth's reporting boundary and intend to be disclosed in future reporting years.

For further details about how calculations are performed please see Appendix 3 - Our approach to GHG emissions reporting on pages 86 - 91.

Simplyhealth's Total Energy Consumption

Table B

kWh	2019	2020	2021	2022	2023	2024	2025
<b>Total</b>	4,370,833	3,032,167	2,424,192	2,244,028	1,480,069	896,554	591,476

Simplyhealth's Total GHG Emissions

Table C

Tonnes of CO2e	2019	2020	2021	2022	2023	2024	2025
<b>Market-based</b>	7,174.73	6,659.90	7,057.04	6,736.55	6,234.68	5,784.93	5,421.16
<b>Location-based</b>	7,773.79	7,082.28	7,350.02	6,929.43	6,374.99	5,854.25	5,472.67

Simplyhealth's Intensity Ratios

Table D

Tonnes of CO2e (Market-based)	2019	2020	2021	2022	2023	2024	2025
<b>Per employee</b>	6.48	8.27	7.26	7.025	7.62	7.44	6.98
<b>Per £1m turnover</b>	25.28	25.17	28.73	28.62	24.93	23.60	22.75

- Baseline year is 2019.
- All annual totals exclude Investment emissions including those associated with Venture Capital investments (Scope 3).
- 2023, 2024 & 2025 annual totals are the only reporting periods to include 'employee commuting' and 'Downstream/Upstream transportation and distribution' emissions.

# Our pathway to Net Zero progress

Since 2019, we have been proactively mapping our Pathway to Net Zero based on two parallel pathways: reducing our overall total emissions, and balancing our emissions.

## Scope 1

Having invested in a new Heating, Ventilation and Air Conditioning ('HVAC') system for our Head Office, in 2024 to 2025, we have now removed all gas sources from our office operations, with no gas emissions reported for 2025, in addition no refrigerant emissions or leaks.

Our company car travel is now responsible for the majority of our Scope 1 emissions. Over the last 12 months we have reduced our company car emissions by a further 30.9%. This is in part due to a higher number of company car leases being renewed in 2025 compared to prior years. We experienced delays in new cars being delivered, and therefore more colleagues used hire cars. This accounts for a small increase in our hire car (Scope 3 emissions) for 2025.

We are continuing with our commitment to lower our Scope 1 emissions by switching our company cars to 100%\* electric vehicles ('EV') by 2030.

In total our Scope 1 emissions have reduced by 89.8% since 2019 (baseline).

## Scope 2

Our Scope 2 electricity emissions (location-based) have once again reduced by 25.7% compared to the previous year (2024). In total our Scope 2 emissions have reduced by 89.4% since 2019 (baseline).

We continue to have renewable electricity tariffs in place.

## Scope 3

Overall, we have seen a decrease of our Scope 3 (market-based) emissions in 2025 by 5.4% (compared to 2024), and a decrease of 19.4% since 2019 (baseline).

Our 2025 purchased goods and services and capital goods make up 80.4% of Simplyhealth's overall GHG (market-based) emissions. In 2025, alongside a drive for greater cost efficiency across the business, we encouraged colleagues to carefully consider whether all purchases needed to be made and if there were alternative options available, or suppliers with greater aligned environmental ambitions.

In the last 12 months, we also extended our proactive approach to engaging our supply chain on their decarbonisation journey and progress, now reaching our Tier 2 suppliers, in addition to our Tier 1 suppliers who were engaged for the first time in 2024.

We're delighted with the majority of our Tier 1 and Tier 2 suppliers returning primary data to us based on their emissions, as well as sharing opportunities to collaborate on decarbonisation activities. This change in methodology has also positively impacted our 2025 purchased goods and services and capital goods emissions with a reduction of 2.7% over the last 12 months.

As we look further down our Scope 3 emissions, we can report the following more significant reductions, compared to the previous year (2024):

- Downstream transportation and distribution (34.2% reduction).
- Upstream transportation and distribution (28.8% reduction).
- Paper (29.4% reduction).

These improvements can be attributed to our strategic focus on customer digital adoption, with a particular focus on removing paper use across the organisation, including the paper itself, and the emissions associated with receiving 30,478 less paper claims to process from our customers compared to 2024.

## Carbon Offsets

Our primary objective is to reduce our overall GHG emissions in line with the targets we have set the organisation. Following our emissions assessment, we once again took the decision to offset our remaining emissions to maintain carbon neutrality plus.

We recognise that some carbon offsetting schemes continue to come under increased scrutiny. We welcome the additional governance and regulation in the global offsetting and carbon credits market which is underway.

We continue to work closely with our outsourced partner, Carbon Footprint Ltd and their partners to select carbon offsetting projects that help us balance our remaining emissions. We do not use carbon offsets to substitute carbon emissions reductions and investments.

## Overall progress

Based on our 2025 market-based emissions, our overall carbon footprint has decreased by 24.4% from 2019 (baseline) and decreased by 6.3% from 2024 to 2025.

In 2025, Simplyhealth's energy consumption has reduced by 305,078 kWh (34.0%) compared with 2024. When compared with our 2019 (baseline) our energy consumption has reduced by 86.5%.

We remain on track to achieve the targets we have set as part of our Pathway to Net Zero. For further background relating to our year on year performance please see our Environmental ESG KPIs on pages 82 - 85.

For further details about how calculations are performed please see Appendix 3 - Our approach to GHG emissions reporting on pages 86 - 91.



\* Excludes one Diesel Event's team van and hire cars

# How we govern ourselves responsibly

Our stakeholders are important to us – they are the reason we exist and why we responsibly govern ourselves. As a financially regulated business and the UK’s leading health and dental plan provider, we take our responsibilities seriously. We align all our decision-making to the vision, values and purpose of our business. Most importantly, we reflect on important issues to our stakeholders, and we regularly engage with them to understand their views and needs and overall impact and outcomes. We do this ethically and transparently.

**At Simplyhealth, we remain committed to great governance by:**

- Considering our principal stakeholders when reaching decisions, assess whether we have any additional stakeholder groups whose interests may be related to our operations and strive to achieve consistency and transparency in our decisions. Please see pages 36 - 38 in our 2025 Annual Report and Accounts for our Section 172(1) statement and a summary of who we believe are our principal stakeholders and how we engage with them.
- Taking the appropriate and responsible steps to deliver against all relevant current and emerging regulations without issues.
- Considering risk and risk management as a fundamental part of Our Purpose and a significant aspect of corporate governance – it is central to our culture and decision making and provides an essential contribution towards how we achieve our goals.

- Ensuring we have the organisational structure, policies and guiding frameworks to support the effective governance of the business in meeting our strategic goals, our delivery of excellent customer service and improved customer health outcomes.
- Maximising value through our investment portfolio in a responsible way. We aim for an investment portfolio that not only delivers a return but also makes a positive impact on more general social and environmental areas.

**Our governance impacts from the last 12 months:**

- We’ve continued to bring in new experience, expertise and capabilities into Simplyhealth’s Board, including the **appointment of our new Chairperson, Rita Clifton CBE**. Rita brings a wealth of experience in brand and customer strategy, as well as business and governance leadership, operating across a number of high profile boards. Rita shared some of her reflections from her first 100 days at our all colleague briefing in July 2025.

- We made two new Senior Leadership appointments, welcoming James Henderson (Sales & Marketing Director) and Matthew Nolan (Head Dental Officer) to drive forwards our growth ambitions, while ensuring our sales, marketing and clinical practices are well-governed.
- We were recognised in the 2025 Fast Payer Awards hosted by ‘**Good Business Pays**’ (only 10% of UK large companies receive this award).
- We have Simplyhealth’s Objectives and Key Results (‘OKR’) Framework to ensure our business is aligned and focused on the correct priorities and we are tracking inputs, outputs and outcomes.
- We have prioritised the implementation and progress around the Financial Conduct Authority’s (‘FCA’s) Consumer Duty rules, aiming to deliver higher and more precise standards of protection.

**We’ve delivered additional governance impacts by:**

- Undertaking an external Board assessment to provide practical support to the Board to drive sustained improvements in Board effectiveness, performance and governance practices.
- Being transparent about the environmental risks and opportunities facing our business.

We have published our third and voluntary TCFD submission. See Appendix 1 on pages 60 - 81. This was informed by Simplyhealth’s annual ‘Climate Change Risk Assessment’ determining that Simplyhealth’s identified risks have remained stable in their performance and we conclude that our strategy is resilient to climate change over the short to medium term.

**Improvements to our investment portfolio**  
 Collectively, we manage an investment portfolio valued at £214m across two different funds. In 2025, we took the decision to transfer our Pimco Investments to a M&G Sustainable Fund, and we updated our guidance associated with the management of our Schroders Fund (in 2024). These decisions were taken by our Board in order to strengthen our ESG position, ensuring our investments return value and deliver greater positive impact in the world. At 31 December 2025, both funds were outperforming benchmarks against financial returns, through increased valuations, as well as ESG metrics. In addition to excluding companies assessed to be in breach of the United Nations Global Compact principles (including human rights, labour, environment protection and anti-corruption), we continue to actively exclude companies with business activities deemed to be damaging to the environment and/or the wellbeing of society.

**18**  
 calendar days – average time taken to pay invoices

**98.9%**  
 Suppliers paid within 30 days or less (average)

**98.4%**  
 Invoices paid on time (rolling 12 months)



For further details about how calculations are performed please see Appendix 5 - Our approach to supplier payment practices reporting on pages 94 - 95.

# Appendix 1 Taskforce on climate- related financial disclosures

We welcome and support the Task Force on Climate-related Financial Disclosures ('TCFD') and its recommendations. We recognise these regulations form part of the concerted effort from government, regulators and businesses to deliver on the government's Net Zero strategy, published on 19 October 2021.

We are making TCFD-aligned disclosures for all areas of Simplyhealth Group, excluding one category of our Scope 3 emissions which is currently reported outside of our boundary (Financial Investments). Further information about Simplyhealth's GHG emissions reporting boundary can be found on pages 86 - 91.

This 2025 disclosure has been included voluntarily to evidence consistency with the TCFD recommendations and recommended disclosures set out within the 2021 TCFD implementing guidance. We have chosen to make this disclosure to be as transparent as possible about the climate-related risks and opportunities at Simplyhealth and demonstrate the responsible governance we have in place around these.

Additional information is provided in the 'Our positive impact on the environment' section of this report (pages 52 - 57), in addition to Appendix 2 (ESG KPIs) which reflects the key sustainability performance indicators we use to track and report environmental and climate-related progress within our business.

### Why climate change matters to us and our stakeholders

We recognise that the health of our customers, communities and colleagues depends on our planet's health. The emissions that cause climate change come from every part of the world and affect everyone. We believe that everyone must take climate action.

In June 2025, the Climate Change Committee ('CCC') shared their [2025 Climate Progress Report](#) to UK Parliament, making one message clear - climate change is here, now.

### Our role and responsibility

Everything will be affected by climate change, which means everything will need to change and transition, involving all business sectors, including our own in healthcare. We already know many of the solutions needed and Simplyhealth is committed to cutting emissions, adapting to climate impacts and financing required adjustments and capital investments, where needed.

Since 2019, Simplyhealth has been tracking and taking steps to reduce our GHG emissions, and we are looking forward with optimism based on the progress we have made in recent years (see ESG KPIs on pages 82 - 85).

The world is at a defining moment where the future of all generations will be decided by the decisions we make today. We therefore take our role and responsibility very seriously. We remain committed to measuring, assessing, and investing in our Pathway to Net Zero, including a just transition (that is fair and inclusive and leaves no one behind), while managing our associated climate risk impacts and opportunities across our operations and supply chain.

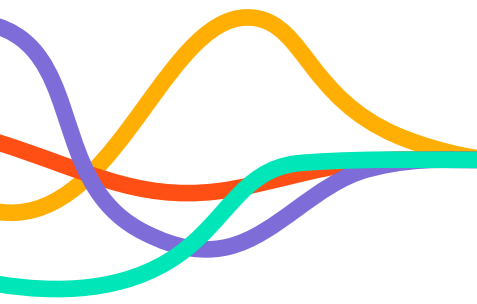


\* Excludes one Diesel Event's team van and hire cars



Summary of Voluntary TCFD Progress and Disclosure

TCFD Action	TCFD Action	Full consistency with the voluntary disclosure recommendations?	TCFD Action	Full consistency with the voluntary disclosure recommendations?
<b>Governance</b>	a) Describe the Board's oversight of climate-related risks and opportunities.	Yes	Board have oversight with additional information included in Simplyhealth's 2025 Annual Climate Change Risk Assessment.	Page 66
	b) Describe management's role in assessing and managing climate-related risks and opportunities.	Yes	Devolved down from our Board, responsibility is allocated to Management, where assessing and managing climate-related risks and opportunities is integral to what we do. This is achieved through Committee Governance and Subject Matter Experts (ESG & Risk).	Page 66
<b>Strategy</b>	a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long-term.	Yes	2025 Annual Climate Change Risk Assessment completed with time horizons, impact and likelihood scales assessed.	Page 68 and 70-77
	b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	Yes	For each risk identified additional consideration has been given to 'should consider' elements including business, sector or geography affected, risk owners, financial impacts and steps to manage or mitigate. The same thorough approach has now been applied to all five opportunities identified.	Page 68 and 70-77
	c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Yes	Two different scenarios have been considered. This included an evaluation of the Early and Late Action scenarios proposed by the Prudential Regulation Authority and the potential stressed results on our investment portfolio, as well as a 2°C temperature increase scenario.	Page 69
<b>Risk Management</b>	a) Describe the organisation's processes for identifying and assessing climate-related risks.	Yes	A well-established Annual Climate Change Risk Assessment process is now undertaken and embedded as part of Simplyhealth's overall Risk Management Framework.	Page 78
	b) Describe the organisation's processes for managing climate-related risks.	Yes	Clear processes in place, with risk owners who review, manage and report on all climate-related risks every six months.	Page 78
	c) Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	Yes	Climate-related risks are categorised under the 'Climate Change & ESG' subcategory in Simplyhealth's overall Risk Management Framework.	Page 78
<b>Metrics and Targets</b>	a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management practices.	Yes	Clear metrics in place linked to Simplyhealth's 'Pathway to Net Zero', 2030 ESG Goals (see page 20) and ESG KPIs (see Appendix 2 - pages 82-85)	Page 81
	b) Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	Yes	Scope 1, 2 and 3 GHG emissions are provided	Page 54-55
	c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	Yes	Targets are provided and examples of how performance is assessed through external certifications.	Page 81



# Progress to date

Over the last four years, Simplyhealth has been developing its Climate Change Risk Assessment ('CCRA') approach, to improve the awareness, understanding and action on climate-related topics, as well as to support our voluntary TCFD-aligned disclosures.

Over recent years these steps have included:

1. An initial assessment by Simplyhealth's Risk team and subsequent review in 2021 by Simplyhealth's Operations Committee (where further stakeholder inputs were gathered, discussed and challenged).
2. Our first formal CCRA was created, reviewed and approved in September 2022 by Simplyhealth's Group Finance Committee and subsequently by the Risk & Capital Board Committee. For the first time this included further considerations following a geopolitical risk assessment.
3. In Simplyhealth's 2022 Strategic Report we voluntarily included our first TCFD-aligned disclosure, with consistency against 7 of the 11 disclosure recommendations.
4. During 2023, our CCRA approach was strengthened with the inclusion of Simplyhealth's first 'Pathway to Net Zero' plan, details of further 'should consider' elements including which business, sector or geography could be affected, identification of individual risk owners, further financial impacts (where available) and steps to manage or mitigate.
5. In August 2023, our updated CCRA was reviewed and approved by the newly shaped ESG Committee (ownership transferred from the Group Finance Committee) and in September 2023, was subsequently reviewed and approved by the Risk & Capital Board Committee. At the same time the key risks and opportunities in the 2023 CCRA were fully integrated into Simplyhealth's overall Risk Management Framework. Individual risk owners were identified and they are now responsible for reviewing, managing and reporting every six months, with any significant movement tracked and escalated within Simplyhealth's Risk function.
6. In March 2024, based on our 2023 TCFD (See Appendix 1 of 2023 Annual Sustainability Report), we undertook a TCFD Gap Analysis and Peer Benchmarking Review. This enabled us to mature and strengthen our approach with clearer referencing to metrics and targets, including further detail on scenario analyses and modelling and steps taken to track progress.
7. In 2025, we successfully completed one annual cycle of our climate-related risks being assessed by risk owners across the business, via our Riskconnect reporting tool. This has delivered greater internal reporting transparency and accountability.

On an annual basis, the CCRA will continue to be updated and reviewed by both Management and Board Committees.

## Scope 1,2 & 3 emissions

Simplyhealth's 2024 GHG emissions are available to view on pages 54-57 of this report with supporting commentary about the progress made over the last 12 months.

In addition to our sustained Scope 1 and 2 emissions reductions we have already made year on year (2019-2025), we are confident that our transition plan will accelerate our progress towards to our 2030 Scope 1 & 2 target and overall ambition.



# Governance

Our system of governance is designed to ensure that we are well positioned to deliver our ESG Goals, which are built on science-based research, methodologies and frameworks and take a proactive approach towards exploring and mitigating climate-related risks and opportunities.

**a. Describe the Board’s oversight of climate-related risks and opportunities**

On an annual basis, the CCRA is reviewed by the Risk & Capital Board Committee (delegated by the Board) following a review by the ESG and Group Finance Management Committees. This includes a refresh of our risks and opportunities of climate-related change, including physical and transitional risks.

The CCRA is delivered as part of Simplyhealth’s overall Risk Management Framework, which includes:

- Agreement of Board risk appetite statements.
- A risk management system.
- Regular risk monitoring and reporting (6 monthly for CCRA risks and opportunities).
- An effective risk and control culture.

The Risk & Capital Board Committee use this insight to inform the Board of any considerations of strategy, business plans, budgets, investments, and the setting of performance objectives for the business.

Further information is provided on page 42 - 51 of Simplyhealth’s 2025 Annual Report and Accounts.

Additionally, financial metrics and investments are tracked and reported within Simplyhealth’s monthly Business Performance Report and monthly Risk Appetite Report.

The CEO Report to the Board also acts as an additional communication channel between management and the Board to monitor and oversee progress against climate-related goals and targets.

For an overview of how our Board and Committees are structured, please view pages 54 - 59 of Simplyhealth’s 2025 Annual Report and Accounts. At the current time, Simplyhealth’s Remuneration Policy does not include climate-related targets or metrics.

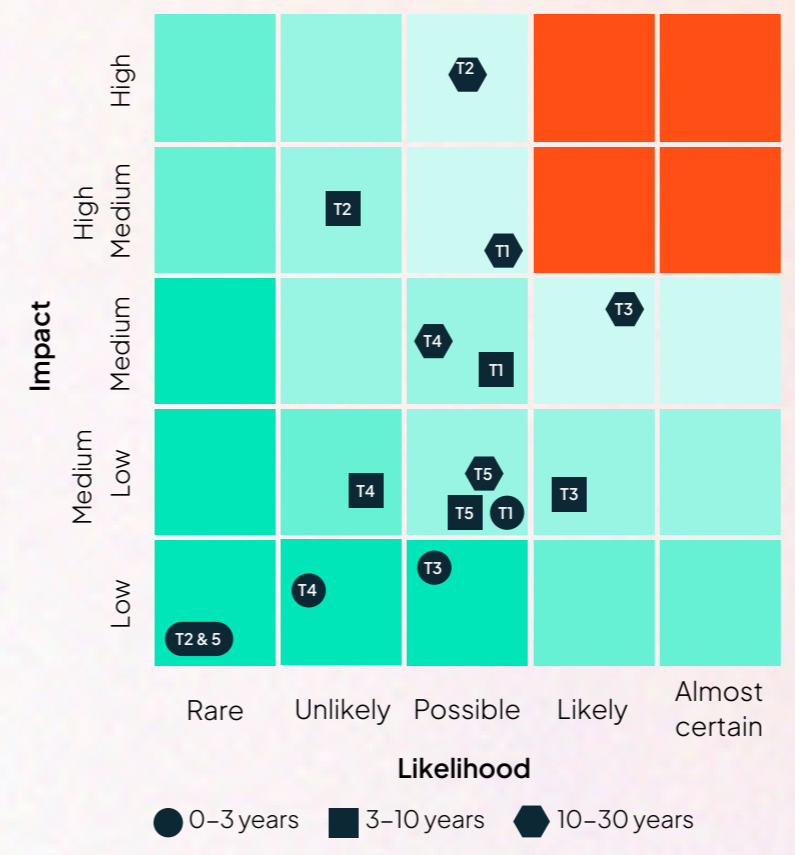
**b. Describe management’s role in assessing and managing climate-related risks and opportunities.**

Regulatory accountability for the financial risks of climate change is held by the Chief Financial Officer and documented in his Statement of Responsibilities. The financial risks of climate change are overseen by the Group Finance Management Committee, which review our risk exposure before submission to the Risk & Capital Board Committee. This Committee reports to the Board.

These are also overseen, tracked and managed under the governance of our ESG Committee, chaired by our Chief Customer Officer. The Committee meets bi-monthly and ensures we continue to progress on our environmental impacts and we maximise the opportunities from a transition to a Net Zero economy.

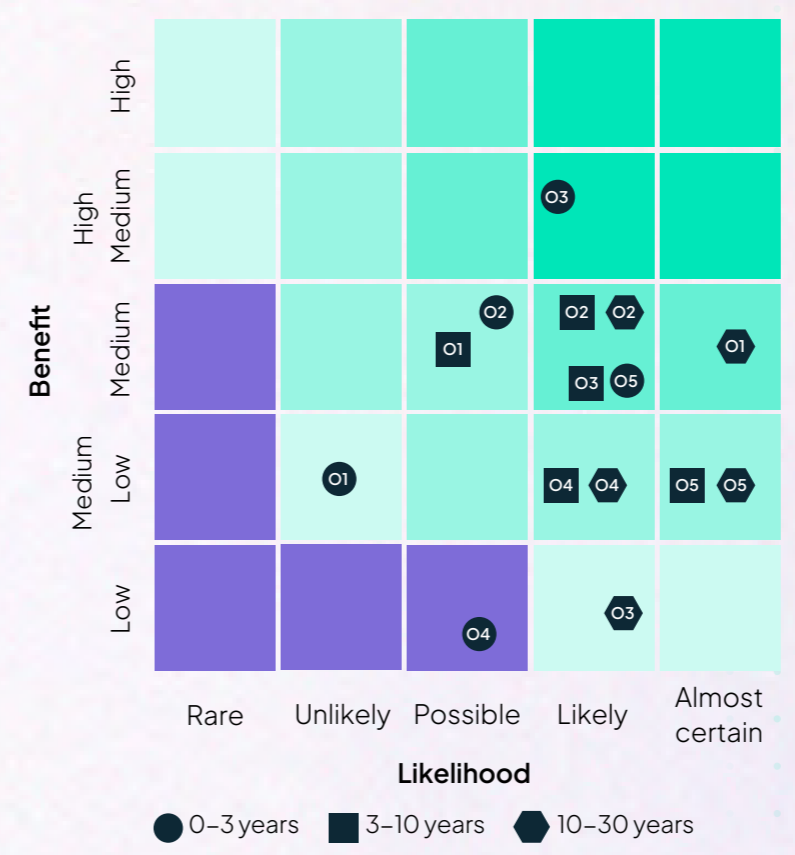
Subject Matter Experts within Simplyhealth’s ESG and Risk teams are also responsible for assessing and sharing best practice action to business climate risk owners. They regularly undertake CPD training (conferences, webinars and courses) to stay abreast of current best practice, which is shared and discussed with the senior management, the Executive Committee and Board.

Risk Matrix



Simplyhealth’s risk exposure is measured against the impact and likelihood of a risk occurring on an inherent (before controls) and residual (after controls) basis. Simplyhealth has a single Impact and Likelihood Matrix as part of its Enterprise Risk Management Framework for everyone to use to measure the risk exposure to the business consistently.

Opportunity Matrix



# Strategy

Simplyhealth's environmental and climate strategy is built upon five action areas. This strategy has, and continues, to focus on:

1. Minimising the impact of our print and marketing activities.
2. Digitising our customer relationships.
3. Cutting the impact of our operational waste.
4. Reducing and balancing our carbon emissions.
5. Supporting more colleagues to lead healthy, more sustainable lifestyles.

**a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.**

Simplyhealth's CCRA is evaluated against three different time horizons. These are defined as:

- Short-term (0-3 years).
- Medium-term (3-10 years).
- Long term (10-30 years).

These time horizons are expressed in the heatmap summary table as 0-3 years, 3-10 years and 10-30 years on page 69. Exposures beyond 30 years are considered to be outside the risk horizon.

Using impact and likelihood scales our risk owners, Management and Board teams assess, track and manage the identified risks. From 2022 to 2023, these risk time horizons were consolidated from four to three to bring our analysis in line with industry and framework standards and to simplify how they were operationalised internally.

**b. Describe the impact of climate-related risks and opportunities on the organisation's business, strategy and financial planning.**

As part of Simplyhealth's 2025 CCRA we have identified four physical risks, five transition risks and five opportunity areas (pages 70-77).

Overall, all risks have remained stable in the performance over the last 12 months. In forming this opinion we have taken into consideration developments in governmental and international policy, the backdrop of decarbonisation progress in the UK and the increasing prevalence of extreme weather events, reflected in the [UK's Climate Change Committee \(CCC\) 2025 Climate Progress report](#).

We note, however, that Simplyhealth's financial performance is protected against a number of the risk areas we have identified due to the flexibility of our products and pricing, and the caps that are placed on customer benefit claiming limits. Consequently, the risks continue to be low in nature though will be continuously monitored through our CCRA.

Simplyhealth's Pathway to Net Zero continues to define the overall approach the business is taking to decarbonise and limit the effects and impacts of climate change.

**c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including 2°C or lower scenario.**

In recent years, Simplyhealth have undertaken two formal scenario-based assessments. These scenarios have been chosen to help inform strategy and financial planning across the business, for example, Simplyhealth's Investment Risk Management Policy which is approved by Simplyhealth's Risk & Capital Board Committee (delegated by the Board).



**Scenario 1:**

In 2021, we wanted to determine whether there was a statistically significant correlation between past temperature changes and customer claims performance and the potential impact to Simplyhealth of a 2°C temperature increase over the medium to long term (2027-2055). While there was a weak positive relationship between claims and temperature (dental and prescription charges), the correlation was low and is not statistically significant. This was also the case against different customer age bands.

The 2°C temperature increase assessment scenario indicated a £571k potential impact which could be mitigated by the reasonable application of premium increases to limit our CLR (Claims Loss Ratio).

**Scenario 2:**

In 2021, we undertook an 'early action' scenario originally proposed by our regulator, the Prudential Regulation Authority ('PRA'). This stress tested Simplyhealth's investment portfolio against an earlier transition to a Net Zero economy.

In August 2024 we revisited the stress tests covering the 'early action' and for the first time, the 'late action' scenarios. The scenarios were based on £194.6m holdings across both portfolios, assuming an instantaneous shock, with no allowances in changes in the Investment Management Agreement ('IMA') or asset reallocation. A summary is provided on page 75 (Risk T5).

As was the case in 2021, we have once again concluded that both scenarios are unlikely to cause a material impact on Simplyhealth's investments.

Materiality at Simplyhealth Group is defined as a minimum of £1m of financial impact aligned to Simplyhealth's own Risk Management Framework and associated risk appetites agreed at a Board level. Analysis was also conducted to evaluate the extent that an increase in flood risk could impact the availability of our employees, whether early or late action from the government could impact the valuation of our

investments, and the degree to which UK GDP correlates with Simplyhealth's commercial performance. In each of these scenarios, we found the organisation to be resilient to the risk presented.

Overall, following Simplyhealth's 2025 CCRA, which takes into consideration other additional climate-related risk areas relating to the delivery of Simplyhealth's strategy, **we have concluded our strategy is resilient to climate change over the short to medium term based on the risks presented.**

Longer-term impacts will be managed before becoming a reality, for example, through adapting pricing models and product benefits. These represent some of the essential tools and instruments we can use to manage climate-related risks within our product portfolio alongside a vital solvency capital requirement via our Own Risk Solvency Assessment ('ORSA') and our Operational Resilience Self-Assessment via scenario analysis.

# Physical risks

Physical risks relate to the direct impact of frequent or more severe weather events, such as flooding, droughts and storms. Quantitative analysis has been provided in the table below, where possible.

Ref	Physical Risk Description	Business, Sector or Geography affected	0 – 3 years	3 – 10 years	10 – 30 years
P1	<b>Acute:</b> The risk that extreme weather events (including wetter/drier and hotter/colder weather), could lead to financial pressures, such as food shortages and increased energy prices, affecting supply chains, inflation and disposable consumer and corporate income, therefore impacting new business and lapse rates.	No specific demographic impacts. Applies across entire business.			
P2	<b>Acute:</b> The risk that an increase in injuries and heat/sun-related illnesses, due to more severe weather patterns, results in higher value and/or volume of claims, with health access needs changing.	Consumer & Corporate Cash plan most impacted. Denplan less relevant.			
P3	<b>Acute:</b> The risk that our office buildings are affected by floods, fire, and/or erosion, leading to decreased productivity from staff due to loss of power and/or communication channels. This also applies to our own supply chain.	Andover office building, with no other locations affected.			
P4	<b>Chronic:</b> The risk that increasingly hot, cold, dry and wetter weather, extreme weather events and reduced clean water supply affect working conditions making current <b>home working or dental practice working</b> unviable or reduce productivity, resulting in higher operational costs, increased sickness absence or loss of income.	All colleagues who work from home. Corporates and Dental practice staff also likely impacted.			

Justification	Potential impact on organisation's business, strategy and financial planning	Actions undertaken and steps to manage or mitigate	Metrics and targets, where relevant
Recent global droughts, wetter/colder weather, forest fires and flash flooding have demonstrated that climate change is already having a significant impact on the UK and global economy. The impact of this will likely be increased costs of food and energy, or access to other seasonal items where the production and manufacture has been disrupted. This will add further financial pressure to UK consumers, who are already facing significant financial challenges. The UK Autumn Budget 2025, is expected to focus on boosting productivity and addressing the growing pressure on the UK's finances.	Increased costs of living could put additional pressure on consumers and corporates, with a reduction in expected new business and increased lapse rates.  Changes in Government spending and priorities also risk exacerbating this, for example, changes in eligibility for Winter Fuel Payments, particularly where colder and wetter weather will impact vulnerable communities.  During 2025, we have also seen an increase in debt/arrears related applications via our Customer Financial Hardship Fund.  <b>Scenario:</b> In August 2024, a comparison of UK GDP data and Healthplan and Denplan new business/lapse rates demonstrated no strong correlation.	<b>Actions undertaken in last 12 months:</b> 1. Increased lobbying and policy programme activity with an emphasis on businesses providing workplace healthcare (in turn reversing the UK sickness epidemic, and also mitigating against the risk of consumer affordability challenges). 2. Assessment of Customer Financial Hardship Fund demographic data to better understand areas of support required. 3. Pricing Strategy 2025 undertaken with deeper exploration of the financial impact of climate change.	N/A
Climate risk should be a consideration in product design due to health risk and assumed increased demand on healthcare services.  This could include: <ul style="list-style-type: none"> <li>Higher out-of-pocket healthcare costs (due to increased illness, delayed access to NHS services and reliance on private care).</li> <li>Lost productivity and income (from health-related illnesses, respiratory conditions from poor air quality, or mental health challenges).</li> <li>Rising costs of prevention and adaptation (including UV protection, air filtration and healthier food choices).</li> </ul>	As our business model is shifting to a whole of workforce proposition and on-demand services, our Pricing Strategy 2025 has been updated to reflect the opportunities now available through our partner services to address changing health needs through a preventative lens, for example: <ul style="list-style-type: none"> <li>MySkinDoctor, Scan.com and Randox for diagnostic services;</li> <li>EyeMed for preventative eye care; and</li> <li>Spectrum.Life and HeathHero for GP services and mental health support.</li> </ul> All now have climate-related considerations for future healthcare needs.	<b>Actions undertaken in last 12 months:</b> 1. Pricing Strategy 2025 undertaken with deeper exploration of on-demand partner services and climate-related considerations for future healthcare needs.  <b>Additional steps to manage or mitigate:</b> 1. Continue to use existing product insight to identify new areas of health need associated with climate change and prioritise within annual product roadmap. 2. Continue to ensure existing product design takes a preventative approach to advice and guidance e.g. skin, allergy testing.	N/A
Whilst Andover is close to a river and therefore at some risk, homeworking offers mitigation, as does the use of cloud-based technologies.  It is also possible the costs associated with insuring our fixed assets may increase.	Significant investments in technology infrastructure have already been made to mitigate many risks.  Simplyhealth has spent £43.2k on Insurance Premiums in 2025.  <b>Scenario:</b> Simplyhealth has spent £43.2k on Insurance Premiums in 2025. An indicative 20% insurance premium uplift to account for increased climate change risk would account for a £8.6k increase based on a 'like for like' basis.  <b>Scenario:</b> As part of Simplyhealth's 2025/26 Operational Resilience Programme a number of severe, yet plausible events are assessed. In 2025, we simulated a fire in our Andover building rendering our Print and Mail inaccessible. We concluded that this would not lead to an impact tolerance breach, however the indirect effects would see service level agreements adversely impacted.	<b>Actions undertaken in last 12 months:</b> 1. Ensured office building insurance remains fit for purpose via standard renewal. 2. Updated Vendor Management Framework during selection of new Tier 1 suppliers incorporating an assessment of climate-related risks to operations and progress.  <b>Additional steps to manage or mitigate:</b> 3. Continue to ensure hybrid/smart working is in place to mitigate disruption to key operations and services.	No. and % of Suppliers 'engaged' as part of Simplyhealth's Scope 3 emissions reductions.  No. and % of Suppliers 'submitting primary data' as part of Simplyhealth's Scope 3 emissions reductions.
In January 2024, the Flood Defence Enquiry published its 'Resilience to flooding' report to UK Government. It cited there were 5.7m properties in England (2022-23) at risk of flooding and that 200k of the 'highest risk' properties would now not be protected as part of the Government's capital investment in flood defences, which is also behind plan/target.  Longer term, in 2022 <a href="#">The IPPC forecast</a> that by 2100 global sea levels could rise by 1.1m. As an example, using this projection the 2050 <a href="#">Climate Change City Index</a> , calculated in London the absence of a new Thames flood defence system past 2070 would displace 23% of London's population (2m people).  A <a href="#">current ONS Working Paper</a> , of the impact of hot days (28 degrees +) on productivity in the UK, with the average loss between 1998 and 2021 estimated at £1.2 billion per year with adaptation.	<b>Scenario:</b> Relating to loss of productivity, we have modelled two potential impact views based on 2025 (Q2F) people & payroll costs and a 20% productivity reduction based on annual costs. These impacts range from £7.2m (sunk costs) to £11.2m (to bridge the productivity gap). This could include colleagues who are unable to work in homes due to health and safety working conditions, such as high or low temperatures and/or wetter weather or flood scenarios.  Both figures include an indicative 0.8% future annual productivity improvement, including continued investment in new technologies and automation as part of our technology and digital roadmap. When aggregated over multiple years, all are helping to mitigate this risk over the short to medium term and so it is not considered material to Simplyhealth.  <b>Scenario:</b> In August 2024 we undertook a scenario assessment to understand the flood risk relating to colleague homeworking locations. The results indicated in the event of an England wide extreme flood event, the majority of colleague homes would be unaffected. Only nine homes identified as within the 'low risk' category.	<b>Actions undertaken in last 12 months:</b> 1. Continued to roll out new technologies e.g., AI to mitigate this risk. 2. Continued to automate claims and key processes with due consideration of the impact to colleagues. 3. Launched a £1,500 EV incentive for company car drivers to switch from hybrid to EV to provide practical support and lower emissions.  <b>Additional steps to manage or mitigate:</b> 1. Activate 10 new green employee benefits in 10 years (part of 'Pathway to Net Zero) to provide the practical support colleagues may need to invest in, and benefit from, improved home working conditions.	No. of green employee benefits available.  % colleagues in engaging with new green colleague benefits.

# Transition risks

Transition risks relate to changes driven by a move towards a less polluting, green economy. They incorporate aspects of policy, regulation, reputation and market orientated changes. Quantitative analysis has been provided in the table below, where possible.

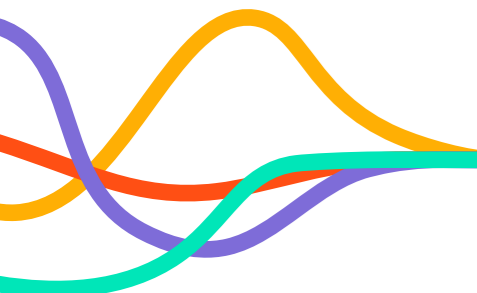
Ref	Physical Risk Description	Business, Sector or Geography affected	0 – 3 years	3 – 10 years	10 – 30 years
T1	<b>Policy &amp; regulation:</b> The risk that early action through increased Government and Regulatory changes to UK policies, accelerate Net Zero targets, which disrupt organisations and global supply chains, for example, Dental practices close.	Corporates and Dental practices impacted. Consumer less relevant.			
T2	<b>Policy &amp; regulation:</b> The risk that our current assets (including buildings and vehicles) become obsolete due to non-conformance with government requirements.	One owned & operational office building. Business fleet and grey fleet could be affected.			
T3	<b>Reputational:</b> The risk that our client and customer preferences shift in favour of more climate-centric organisations and we do not keep up with changing customer attitudes and best practice.	Company-wide including new Simplyhealth Venture Capital.			

Justification	Potential impact on organisation's business, strategy and financial planning	Actions undertaken and steps to manage or mitigate	Metrics and targets, where relevant
<p>Simplyhealth is proactively driving an ESG agenda, including achieving B Corp recertification status, and targeting a 'Pathway to Net Zero'.</p> <p>With sustainability a strategic priority, we expect to limit future impact, as we continue to scan the policy and regulatory landscape, ensuring readiness.</p> <p>However, some risk remains due to the potential pressure exerted on the UK government (and therefore businesses) for further accelerated action as UK/global targets are anticipated to be missed.</p>	<p>Additional investments already planned may be needed earlier to satisfy emerging regulation, for example, investments in renewable onsite energy for offices, EV fleet and wider travel policies, or home working practices.</p> <p>Additional resource may be required to better assess disruption risks through our Supply Chain and to put mitigants into place. This has not yet been defined.</p>	<p><b>Actions undertaken in last 12 months:</b> N/A</p>	N/A
<p>The Climate Change Committee has called for all light-duty vehicles sold to be fully battery-electric vehicles by 2032 at the latest, despite the UK Government's lightening of key Net Zero policies in 2023.</p> <p>From the end of 2023, 100% of Simplyhealth's sales fleet are now hybrid or EV, which demonstrates we are transitioning in line with internal targets; however, we now need to accelerate progress to deliver our 100% EV fleet target by 2030 to reduce any risk. We also have one heavy-duty diesel vehicle (events van) that will be operational until 2027.</p> <p>More significant impacts could arise should our one office building become obsolete/devalued, through underinvestment in a green estate.</p>	<p>Continued investments in existing building facilities and fleet are already part of the estate roadmap (business cases already in place).</p> <p>Additional investments may be required for a transition to zero emissions fleet by 2030 (if we decided to incentivise e.g., fund home charging installation).</p> <p>Grey fleet could be affected and may require financial investments/incentives or increased annual travel budgets.</p> <p>We anticipate having time to invest in any buildings over the medium to long-term, mitigating the risk of them becoming obsolete.</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>Installation of new Heating, Ventilation and Air Conditioning (HVAC) c.£400k investment in Anton House.</li> </ol> <p><b>Additional steps to manage or mitigate:</b></p> <ol style="list-style-type: none"> <li>Deliver against our 'Pathway to Net Zero' goals, implementing emission reduction investments, Net Zero Fleet and updates to company travel policy.</li> </ol>	Net Zero Fleet by 2030.
<p>There is a shift towards existing and new corporate clients, brokers and partners requesting climate change/ESG-related information in due diligence.</p> <p>There is also a shift towards Millennials, Gen Z and Gen Alpha consumers changing their purchasing behaviour, preferring brands who can better demonstrate their positive impact on society.</p> <p>Overall, whilst our ESG initiatives are expected to reduce the risk to Simplyhealth, failing to demonstrate climate-centricity may lead to deselection when competing with other climate-centric organisations.</p>	<p>Inflation and the current economic uncertainty are almost certainly inducing a general global 'affordability over sustainability' behavioural trend.</p> <p>In October 2024, in <a href="#">Deloitte's Sustainable Consumer Survey</a>, supported this view as they reported a growing awareness of the climate emergency as a major driver of changing consumer behaviour, however UK consumers have to make a trade-off between managing higher prices and making sustainable lifestyle choices.</p> <p>In June 2025, McKinsey's global research into the '<a href="#">State of the Consumer 2025</a>' also highlighted in advanced global markets, consumers remain concerned about rising prices and inflation, but despite this uncertainty, they keep spending with expectations of value and convenience, meaning unexpected trade-offs across categories.</p> <p>However, the corporate landscape continues to evolve particularly through supply chains, where expectations around climate action are increasing, for example, <a href="#">Asda tying financial rates for suppliers to decarbonisation</a> and ESG reporting and performance (voluntary scheme launched in Sept 2024).</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>ESG/sustainability updates are now included as standard within corporate/broker 'Quarterly Business Review' updates and meetings.</li> <li>Submitted for B Corp recertification for 2025 assessment.</li> <li>Delivered <a href="#">Simplyhealth's second Annual Sustainability Report</a> (April 2024), designed primarily with a corporate audience in mind, but both shared with all key stakeholders.</li> <li>New 'Force for Good' question introduced as part of brand tracking activity, to build a better picture.</li> <li>Recent Investment Portfolio transfers and updates to help manage reputational risk (if details requested by third parties).</li> </ol>	<p>B Corp score uplift by a minimum of six points (from 91.9 to 97.9) from 2022 vs 2025.</p> <p>In November 2025, B Lab UK confirmed our recertified B Corp score of 108.4.</p>

Transition Risks  
Continued

Ref	Physical Risk Description	Business, Sector or Geography affected	0 – 3 years	3 – 10 years	10 – 30 years
T4	<b>Market:</b> The risk that our investment portfolio declines due to unmitigated climate risk concentrations.	Company-wide including new Simplyhealth Venture Capital.			
T5	<b>Reputational:</b> The risk that our own appetite may prevent us from providing services to, or procuring services from, or investing in, certain corporate groups/partners whose business practices pose a reputational risk from a climate-centricity perspective.	Corporate and Denplan new business and existing business. Simplyhealth Venture Capital Investments.			

Justification	Potential impact on organisation’s business, strategy and financial planning	Actions undertaken and steps to manage or mitigate	Metrics and targets, where relevant
<p>It’s possible that an instantaneous shock to Simplyhealth’s investment portfolio could occur due to future global events, with no allowance for changes in IMA, asset reallocation, etc. This future climatic environment could impact the value of funds held.</p> <p>At the end of December 2025, Simplyhealth’s investment portfolio totalled £214m, across two funds.</p> <p>We continue to monitor our investment portfolio against the market average environmental credentials in accordance with our risk appetite, with ESG ratings forming a key part of investment manager reporting and discussions.</p>	<p><b>Scenario:</b> In August 2024, we evaluated the Early Action and Late Action scenarios originally proposed by the Prudential Regulation Authority (PRA) across our Investment Portfolio. They are recommended to be repeated every three years, or when considering/making material changes.</p> <p>The scenarios supported the view that both portfolios (M&amp;G and Schroders) or scenarios applied are <b>unlikely to cause a material impact</b> on Simplyhealth.</p> <p>We consider that the 2025 changes to the Schroders Fund would likely lead to a more positive scenario result overall, with both funds being dynamically managed and currently reporting green ratings against all ESG metrics (equal to or ahead of benchmark).</p> <p>As a result, we have taken the decision not to re-run the investment climate scenarios in 2025, as we would not expect a material change across the portfolio following the 2024 assessment.</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>Pimco portfolio transferred to M&amp;G Sustainable TRCI Fund. This includes investments with lower scope 1 and 2 WACI and higher weighted average MSCI ESG score than the investment universe of global corporate bonds.</li> <li>Schroders portfolio sustainability criteria updated within IMA to allow our investment manager to fund companies transitioning to a cleaner energy mix.</li> </ol>	<p><b>Green investments within investment portfolio</b> - 50% our portfolio should benchmark above the average portfolio for our investment partners. If below the benchmark this will flag out of appetite (Reported in Monthly Risk Appetite as a Strategic risk).</p>
<p>With additional and emerging reporting frameworks and public disclosures comes additional external scrutiny.</p> <p>Simplyhealth do not procure services from, or partner with any organisations who do not align with our purpose or values.</p> <p>However, clearer and well-defined corporate policies will need to be developed to ensure we are confident and consistent with who we also provide services to (our corporate clients) and any potential PR and financial impacts.</p> <p>This is also something that B Corp are beginning to take a closer interest in and stance on as part of their new standards. As an example, in July 2024, <b>four brand agencies had their B Corp status removed</b> for their role in advertising for high-carbon clients, including Shell.</p>	<p>We are not aware of any corporate clients that currently present a high risk to Simplyhealth, due to a lack of climate-centricity.</p> <p>As part of our B Corp recertification during 2025, using the B Lab ‘controversial industries’ guidance, we explored the sectors that we serve (corporate clients) and the weighting of these sectors to our overall annual revenue.</p> <p>While it would be an easy decision to not serve ‘controversial industries’, consideration must also be given to our purpose and position of providing access to healthcare for all in UK, without exclusions.</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>ESG High Risk Corporate reviewed and shared with ExCo and ESG Committee.</li> </ol> <p><b>Additional steps to manage or mitigate:</b></p> <ol style="list-style-type: none"> <li>New ESG policy to be developed to direct new business pipelines, broker relationships, ventures investments and media partners when considering high-risk or controversial topics or industries.</li> </ol>	N/A



# Opportunities related to climate change

The following five opportunities have been identified deriving from the proactive management of the financial risk and changing societal and business landscape associated with climate change.

Ref	Physical Risk Description	Business, Sector or Geography affected	0 – 3 years	3 – 10 years	10 – 30 years
O1	The opportunity to strengthen our governance, build our reputation and satisfy new business tenders around climate action following the attainment of B Corp status, by exploring the potential for future accreditations or standards, e.g., ISO14001.	Company-wide including new Simplyhealth Venture Capital.			
O2	The opportunity to collaborate with new and different stakeholders more deeply within our communities, charities, corporate partners and suppliers, in alignment with our purpose and B-Corp status to further accelerate our own climate impacts.	Company-wide including new Simplyhealth Venture Capital.			
O3	The opportunity for cost reductions and general efficiencies as a result of delivering our 'Pathway to Net Zero' plan and goals.	Company-wide including new Simplyhealth Venture Capital.			
O4	The opportunity that our Net Zero goals require us to innovate, with the innovation having a positive impact on the business as a whole.	Company-wide including new Simplyhealth Venture Capital.			
O5	The opportunity that our ESG (and approach to climate action) principles, reputation and ambition improve our ability to attract and retain staff.	All colleagues (current & future).			

Justification	Potential impact on organisation's business, strategy and financial planning	Actions undertaken and steps to manage or mitigate	Metrics and targets, where relevant
<p>Increasingly new business (corporate) tenders require Simplyhealth to demonstrate our governance, standards and track history in addressing climate change within our own operations and supply chain, demonstrating alignment with our purpose and values (and specially the links between decarbonisation and health benefits).</p> <p>As an example, in Sept 2021 the NHS England Public Board approved a <a href="#">supplier net zero roadmap</a>. Recently updated, from April 2027 all NHS suppliers will need to publicly report targets, emissions and a Carbon Reduction Plan (currently a +£5m contract worth).</p>	<p>Simplyhealth will continue to scan the changing 'supplier' landscape, adopting voluntary disclosures ahead of mandatory/regulatory adoption.</p> <p>Application costs for any additional accreditations and standards is minimal, and continued consolidation of frameworks is expected.</p> <p>Resource required to investigate, assemble evidence and maintain accreditations or standards could be significant (within ESG team and across wider business).</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>Third party external limited assurance obtained over selected in scope environmental metrics within <a href="#">2024 Annual Sustainability Report</a>.</li> <li>Continued to engage with large corporate and brokers about changing ESG supplier expectations, particularly in healthcare.</li> </ol> <p>NB: In 2025, we took the decision to allow our FSC accreditation to lapse due to positive progress made in paper reductions.</p> <p><b>Additional steps to manage or mitigate:</b></p> <ol style="list-style-type: none"> <li>Maintain third party external limited assurance over selected in scope environmental metrics within 2025 Annual Sustainability Report.</li> </ol>	N/A
<p>We recognise that climate change, cannot be solved alone or in isolation. Through proactive collaboration with the right stakeholders we can accelerate our climate impacts and additionally support others to do the same, ensuring a just transition (no-one gets left behind).</p>	<p>Re-contracting with existing, or sourcing new suppliers.</p> <p>Investment in Supplier Engagement Programme (and tools to support) to reduce Scope 3 emissions.</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>New collaboration with the Woodland Trust to accelerate digital adoption and increase tree planting.</li> <li>Recontracting with MBA (Tier 1 Supplier) to include ESG deliverables with timescales as part of new contract.</li> </ol>	Go Digital campaign results (email addresses & correlating donation incentive).
<p>Material benefits include digital adoption resulting in less paper (c £1m per annum), printing and postage costs, and subsequently lower operational cost through reduced headcount and overall efficiencies through automation.</p> <p>Additionally, switching to onsite renewable energy sources and electric vehicles may have a long-term impact on our overheads (after initial investment payback periods).</p>	<p>Initial financial investments in new technology, for example, solar panels for Anton House would cost c.£120k with an estimated 5-year payback period depending on annual wholesale energy prices.</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>Paperless &amp; Digital Adoption Programme (in partnership with the Woodland Trust).</li> <li>Estates &amp; Fleet Strategy developed for building use and investments.</li> <li>Installation of new Heating, Ventilation and Air Conditioning (HVAC) c.£400k investment in Anton House.</li> </ol> <p><b>Additional steps to manage or mitigate:</b></p> <ol style="list-style-type: none"> <li>Review opportunities to consolidate similar suppliers upon renewal, providing efficiencies and higher purchasing power to influence emission reductions.</li> </ol>	<p>% corporates/ consumers digitally serving.</p> <p>% of customer email addresses held (Denplan &amp; Simplyhealth).</p>
<p>Product innovation will be critical to addressing some of the climate risks identified. These innovations could see Simplyhealth and Denplan lead the market and benefit from commercial advantage.</p>	<p>Investments may be required to understand research, test and trial new product innovations and measure impacts/ outcomes.</p> <p>We anticipate this can be achieved within the annual product development planning and budgeting cycles.</p>	<p><b>Actions undertaken in last 12 months:</b></p> <p>N/A</p> <p><b>Additional steps to manage or mitigate:</b></p> <ol style="list-style-type: none"> <li>Formalise and deliver a climate education programme to help build colleague understanding, ownership, innovation and action.</li> </ol>	% of climate literate colleagues.
<p>According <a href="#">Deloitte's 2024 Gen Z and Millennial Report</a>, climate change and environmental sustainability concerns are increasingly driving workplace behaviours for Gen Zs and millennials, with more than 40% in each group reporting that they have left jobs, or plan to in the future, over climate concerns. 86% of Gen Z and 89% millennials reported that having a sense of purpose is important to overall job satisfaction and wellbeing.</p> <p>By making our position clear and demonstrating clear climate action we make ourselves a more attractive employer.</p>	<p>Nil – can be actioned within existing employer brand and employee experience investments.</p>	<p><b>Actions undertaken in last 12 months:</b></p> <ol style="list-style-type: none"> <li>Employer Branding materials have been updated to ensure alignment with new corporate brand and ESG as a differentiator – see <a href="#">careers pages</a>.</li> <li>Increased storytelling posts across social media channels to provide greater insight into ESG and life at Simplyhealth.</li> </ol> <p><b>Additional steps to manage or mitigate:</b></p> <ol style="list-style-type: none"> <li>Expand existing measures to better understand sustainability as a driver for colleague attraction and retention at Simplyhealth (e.g. Chatterbox survey question).</li> </ol>	

# Risk management



Throughout the year, risk owners are challenged to consider climate risks appropriately, ensuring any emerging and additional risks are identified and escalated. This is achieved through regular Management level discussions with the Deputy Chief Risk Officer and ESG Lead. Climate-related scenarios are also used in Management-level training workshops to help teams and individuals across Simplyhealth to suitably identify, understand and assess climate-related risks and opportunities.

Our Subject Matter Experts challenge risk owners, present any new insight and share best practice.

Climate risks are defined as any financial, physical and transitional risk to the business and its stakeholders associated with the transition to a Net Zero economy.

Climate-related risks are then reviewed and assessed on a six-monthly basis by risk owners. As part of our annual CCRA approach these risks are consolidated and reviewed on at least an annual basis at the Group Finance Committee, ESG Committee and Risk & Capital Board Committee to ensure consideration of both operational and financial/commercial impacts, in line with Simplyhealth's Risk Management Framework.

Simplyhealth's Head of Compliance is responsible for scanning the regulatory landscape and regularly produces and shares updates on emerging regulatory requirements and consultation papers.

Simplyhealth's journey to becoming a Net Zero business has already begun, and we continue to take steps as part of our 'Pathway to Net Zero' plan to drive forward further improvements aligned with our published goals and KPIs (see ESG KPIs on pages 82 - 85).

The risks identified to date are non-material over the short to medium term. They are consequently accepted based on their non-material impact, except the risk of early action to accelerate Net Zero targets, which is being mitigated through our strategy to reach Scope 1 and 2 Net Zero emissions by 2030. Longer-term impacts will be managed before becoming a reality, for example, through adapting pricing models and product benefits. These represent some of the essential tools and instruments we can use to manage climate-related risks within our product portfolio. Changes to risk profile warranting further action are evaluated on an annual basis through Management and Board-level committees.

Climate-related risks are categorised under the 'Climate Change and ESG' subcategory in Simplyhealth's overall Risk Management Framework (see pages 47 - 50 of Simplyhealth's 2025 Annual Report and Accounts). Risk owners assess, review and report against these risks on a six-monthly basis.

The ESG Committee oversees relevant ESG-focused management information. As part of this, the Board remain committed to maintaining 'green investments', and there is a risk appetite in place for this.

All risks have been assessed in line with the defined criteria for evaluating emerging risks. If a risk were to be estimated to be material and outside of appetite, steps will be taken to agree on mitigating actions to bring the risk exposure set by the Board to within need. The strategy deployed to reduce the risk would depend on the nature of the risk itself, how the business and stakeholders were impacted, and the financial investment and operational requirements.



# Metrics and targets

**a. Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.**

Since 2019, Simplyhealth has been developing its data and reporting mechanisms to provide a baseline for performance, through which we set realistic and stretching goals for the future.

ESG-focused management information is reported at the ESG Committee in the form of a suite of ESG KPIs (see pages 82-85), including our progress on minimising the impact of our print and marketing activities, cutting the result of our operational waste, reducing and balancing our carbon emissions, and supporting more colleagues in making more sustainable choices.

Many of the ESG KPIs have been identified and are being tracked because of the direct link to one or more risks and/or opportunities we have identified. For example, transition risk two relates directly to our targets 2.3 and 2.4 to invest in our company car fleet to achieve zero emissions, to reduce the risk related to obsolete assets.

Additionally, our investments are also benchmarked by Investment Managers, providing a cross-industry view and forming part of our metrics and targets. At the present time, Simplyhealth does not have any targets or measures relating to internal carbon prices and/or taxes.

**b. Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 GHG emissions, and the related risks.**

Simplyhealth's GHG emissions are included in our 2025 Annual Report and Accounts (pages 34 - 35) and pages 54-55 of this report. Full Scope 1 and 2 breakdowns are provided, and all of Scope 3, excluding investments. We intend to include these in future disclosures following the Weighted Average Carbon Intensity ('WACI') where data and methodologies allow. These disclosures include all metrics and associated methodologies as evidence of our consistency with this disclosure recommendation. Further details are available on page 86-91 of this report.

These emissions are independently calculated and assessed by Carbon Footprint Ltd, using government recognised conversion factors and the dual reporting methodology for assurances around the estimation of likely error based on error analysis to identify any uncertainty in calculations. This information is also used to fulfil our SECR ('Streamlined Energy and Carbon Reporting') and B Corp certification obligations.

**c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.**

Simplyhealth's approach to setting metrics and targets has been informed and influenced by:

- an overall ambition to deliver a Net Zero economy

- best practice such as the TCFD Metrics and Targets Guidance and Science-based Targets initiative ('SBTi').

- the risks and opportunities identified and being managed through Simplyhealth's Annual Climate Change Risk Assessment.

- the five action areas described within our environmental and climate strategy (see TCFD Strategy section) that are embedded within Simplyhealth's business plan.

In addition to the targets set out in the ESG KPIs we maintain a risk appetite for Climate Change and ESG, and maintain external certifications, which includes Simplyhealth's carbon neutral plus status.

Carbon neutral plus status is defined by Carbon Footprint Ltd where the carbon emissions caused by a business are balanced out, or improved, by funding an equivalent amount of carbon savings elsewhere in the world (offsetting), in addition to measuring and reducing the carbon footprint the business has direct control over.

Simplyhealth uses Carbon Footprint Ltd to manage its carbon offsets.

Carbon Footprint Ltd is certified under the Quality Assurance Standard ('QAS'). The QAS independently reviews Carbon Footprint Ltd's carbon offsetting to a rigorous 40-point plan annually.



# Appendix 2 – ESG KPIs

## Environmental

Ref	Aspiration & KPI	Definition	Results							Targets	
			2019	2020	2021	2022	2023	2024	2025	2025	2030
<b>1. Reduce the impact of our operational office waste</b>											
1.1	Reduce total operational waste tonnage	% reduction of operational office waste against baseline	95.7t	-	-22.8% (73.855t)	-45% (53.349t)	-73.8% (24.993t)	-76.3% (22.606t)	-85.4% (13.955t)	-75%	-80%
1.2	Reduce % operational waste to energy recovery	% reduction of operational office waste (absolute)	54%	-	69% (53.57t)	46% (24.979t)	13.2% (3.482t)	22.5% (5.103t)	30% (5.124t) Includes non operational waste	25%	5%
1.3	Increase % waste to recycling	Absolute % operational, recycling rate, per year against overall operational waste total	46%	-	31% (23.74t)	51% (27.582t)	86.7% (22.789t)	77.4% (17.503t)	70% (12.036t) Includes non operational waste	80%	96%
<b>2. Reduce and balance our GHG emissions</b>											
2.1	Decrease Scope 1 and 2 GHG emissions	GHG emissions (Market-based) - actual annual figure provided with % reduction on baseline	516.44 tCO <sub>2</sub> e	295.08 tCO <sub>2</sub> e (-42.3)	287.50 tCO <sub>2</sub> e (-43.3)	292.47 tCO <sub>2</sub> e (-43.3%)	221.46 tCO <sub>2</sub> e (-57.1%)	107.14 tCO <sub>2</sub> e (-79.3%)	52.73 tCO <sub>2</sub> e (-89.8%)	-75% (129.11 tCO <sub>2</sub> e)	-95% (25 tCO <sub>2</sub> e)
2.2	Decrease Scope 3 GHG emissions*	GHG emissions (Market-based) - actual annual figure provided with % reduction on baseline	6,658.29 tCO <sub>2</sub> e	6,364.82 tCO <sub>2</sub> e (-4.41%)	6,769.54 tCO <sub>2</sub> e (+1.67%)	6,438.97 tCO <sub>2</sub> e (-3.29%)	6,013.22 tCO <sub>2</sub> e (-9.68%)	5,677.79 tCO <sub>2</sub> e (-14.73%)	5,368.43 tCO <sub>2</sub> e (-19.4%)	-	-50% (3,329.14 tCO <sub>2</sub> e)
2.3	Increase % of hybrid or EV company cars	% of hybrid and EV company cars, per year against overall company cars in use	0	-	80%	81%	100%**	100%**	100%**	-	-
2.4	Increase % of zero emissions company cars**	% EV company cars, per year against overall company cars in use	0	-	5%	8%	11%	7.3%	15.9%	-	-100%
<b>3. Reduce our total water consumption</b>											
3.1	Reduce our total water consumption	Actual annual figure provided, with a % reduction on baseline	-	3,740 m <sup>3</sup>	-	-10.1% (3,362 m <sup>3</sup> )	-75.2% (924 m <sup>3</sup> )	-77.7% (831 m <sup>3</sup> )	-75.9% (902.3 m <sup>3</sup> )	-65%	-70%

\*Excludes Investments  
 \*\*Excludes one diesel Event's team van and hire cars.

## Social

Ref	Aspiration & KPI	Definition	Results							Targets	
			2019	2020	2021	2022	2023	2024	2025	2025	2030
<b>1. Create the same opportunities and experience for everyone, delivering a more diverse workforce</b>											
1.1	Attract, develop, and promote women	% of women in leadership roles (L1-3)	41%	-	37%	33%	35%	40%	27.3%	50%	50%
1.2	Attract, develop, and promote women	% of women in all roles	67%	-	66%	67%	66.7%	66.8%	67.1%	-	-
1.3	A recognised leading employer of young adults (18-24)	% 18-24-year-olds employed against total Simplyhealth population	-	14%	7%	7%	4.8%	3.2%	3.3%	15%	-
<b>2. To be acknowledged by both colleagues and partners, as a healthy workplace</b>											
2.1	Improving colleague engagement in wellbeing initiatives and programme	Annual All Together Healthier Wellbeing Survey participation	-	-	75%	60%	71%	70%	61%	78%	80%
<b>3. Promote learning opportunities creating the conditions to embed a learning culture</b>											
3.1	% of colleagues completing Continued Professional Development ('CPD') achieved yearly	Mandatory 15hrs of IDD annually	-	-	96%	81%	90.5%	93.9%	95%	100%	100%
3.2	Improved engagement in apprenticeships	Rebased in 2023 from % of Levy Pot spend to % of colleagues undertaking apprenticeships (based on overall headcount)	-	33%	42%	28%	3.1%	1.9%	2.3%	4%	5%
<b>4. To be acknowledged by both colleagues and partners, as a healthy workplace</b>											
4.1	Increase total colleagues hours dedicated to volunteering	No. of volunteering hours during core working hours, per year	-	-	360* hrs	1,001 hrs	1,509 hrs	1,191 hrs	3,714 hrs		7,000 hrs (1,000 days)
4.2	% of colleagues volunteering	Unique colleagues volunteering per year	-	-	6.8%	14.7%	15%	18.5%	55.3%	50%	50%
4.3	Increase total colleagues donations and fundraising for charities	Amount fundraised by colleagues (without matched funding)	-	-	£36,475	£43,638	£49,081	£75,059	£84,871	£100,000	£100,000
4.4	Increase total match funding per year from Simplyhealth	Gave As You Earn ('GAYE') payroll	-	-	£15,577	£15,905	£14,492	£14,191	£14,520		£50,000 combined
4.5	Increase total match funding per year from Simplyhealth	Match funding for colleagues, corporates and Dental practices	-	-	-	£16,193	£17,734	£33,531	£29,962		

## Social (continued)

Ref	Aspiration & KPI	Definition	Results							Targets	
			2019	2020	2021	2022	2023	2024	2025	2025	2030
<b>5. Improve reach, impact and health outcomes through our Corporate Giving programme</b>											
5.1	Deliver our publicly committed annual donations (£1m per year)	Total amount donated to charities or charitable causes	£800k	£1m	£900k	£504k	£1.05m	£1.02m	£1.17m	£1m	£1m
5.2	Increase the % of colleagues participating in match funding	Based on monthly average of colleagues donating via GAYE	-	10.2%	-	9.4%	9.2%	9.2%	9.3%	10%	15%
<b>6. Deliver a progressive wellbeing programme that improves workforce health outcomes, which enables our colleagues to live their best lives</b>											
6.1	% Colleagues rating annual wellbeing programme as 'good/excellent'	Annual All Together Healthier Wellbeing programme experiences	-	63%	57%	60%	92%	95%	97%	90%	90%
6.2	% Colleagues who agree our annual wellbeing programme provided them with the info/tools that positively impacted their wellbeing	Annual All Together Healthier Wellbeing programme experiences	-	-	57%	87%	90%	89%	92%	90%	90%
6.3	% Colleagues engaging with comprehensive, yearly calendar of health and wellbeing events	Annual All Together Healthier Wellbeing programme engagement	-	-	46%	71%	63%	68%	79%	76%	80%

\*Covid impact year  
**Bold**= Baseline year

All 2025 colleague percentages are calculated against our 28 December 2025 headcount of 817 unless stated otherwise.

# Appendix 3 Our approach to GHG emissions reporting

## Carbon reporting boundary

For our operational boundary, we report against all relevant Scope 1, Scope 2 and Scope 3 emissions, with the sole exception of Financed Investments (such as Venture Capital investments, reserves and pensions invested), which we intend to disclose in future reporting years.

The following Scope 3 categories are not relevant to be reported by Simplyhealth Group Limited:

- Processing of sold products.
- Use of sold products.
- End of life treatment of sold products.
- Downstream leased assets.
- Franchises.

Simplyhealth Group Limited's reporting period runs from 1 January to 31 December every year, with a 2019 baseline year.

## Methodology (Standards and guidance)

To provide an additional layer of governance, our 2025 GHG emissions have been independently calculated by Carbon Footprint Ltd following the GHG Protocol Corporate Accounting and Reporting Standards and Guidance including the Corporate and Value Chain Standard, Scope 2 Guidance and Scope 3 Calculation Guidance. We also follow the UK Government's Guidance on Streamlined Energy and Carbon Reporting ('SECR').

Our assessment follows the GHG Protocol dual reporting methodology for reporting location and market-based emissions from electricity usage.

We have used the 2025 emission conversion factors published by Department for Environment, Food and Rural Affairs ('DEFRA') and the Department for Energy Security and Net Zero ('DESNZ').

## Data gathering process and methods

We use a variety of data gathering processes and methods including, but not limited to:

**Scope 1 – Company fleet emissions** are calculated from third party reports (Fleet Management Provider), where our colleagues (company car and van users) have submitted data. The reports track company car miles travelled (by fuel type and vehicle type) and for vans, the amount of fuel used in litres. For vans, we account for both personal and business fuel used as this cannot be distinguished.

**Scope 1 – Refrigerants** are calculated through once per year office service records (third party contractor).

**Scope 1 (Gas), Scope 2 (Electricity) and Scope 3 (Water) emissions** are calculated from usage, based on invoices from our utility providers. If any invoices are unavailable for monthly/quarterly billing periods, then estimates are used based on the previous year usage, for the same office location and billing period. If part of a billing period is missing (for example, days within a billed month) then estimates are made using the daily consumption for the same period.

**Scope 3 – Spend-based emissions** are calculated using the 'Spend-based screening' approach, for the following GHG categories:

- Purchased goods and services.
- Capital goods.
- Upstream leased assets.
- Upstream transportation and distribution.



For these calculations, the economic value has been used, for example, a conversion to kgCO2e/£, per Standard Industrial Classification (SIC) Code, published by DEFRA.

For reporting period 2024, we introduced the 'Hybrid' reporting approach by apportioning emissions for Simplyhealth Group Limited Tier 1 suppliers who were able to provide accurate data. For reporting period 2025, this was extended to our Tier 2 suppliers. This approach has been taken because we recognise there is a balance between using full data and more specific and accurate data, rather than sector averages.

This enables us to work in partnership with our specific suppliers to measure actual reductions associated with the most material Simplyhealth Group Limited annual spend.

In both cases, spend data includes all goods and services received for the reporting period, including those items paid for, up to and including a cut off of the 31 January (of the following year).

For the 2025 reporting period, emission calculations relating to our Tier 1 and Tier 2 suppliers (where they were able to be calculated based on the information provided by suppliers), only cover the Scope 1 and Scope 2 emissions of each supplier.

These supplier emissions currently exclude the Scope 3 upstream emissions of each supplier, as this information is not accurately captured from suppliers and calculations therefore cannot be performed. This is therefore an omission from our data and there is some inconsistency in how we have treated emissions from different Tier 1 and Tier 2 suppliers (vs spend-based).

**Scope 3 – Colleague travel emissions** are calculated from colleague expense data from our Finance system, which details the type of transport, type of fuel (where applicable) and distance travelled.

**Scope 3 – Colleague homeworking and commuting emissions** are calculated from a voluntary survey completed by colleagues every year. The data set provides information on frequency of commute, type of transport for commute and distance travelled. Additionally, colleagues confirm when working from home whether this is alone or with others. Using weekly contracted hours per colleague and the relevant conversion factors, we then extrapolate the data to account for all colleagues (given less than 100% of colleagues complete the survey). For the 2025 reporting period, we received a 57.2% survey response rate which was consistent with our 60% response rate in 2024.

**Scope 3 – Downstream transportation and distribution emissions** are calculated from the volume of paper claims posted to Simplyhealth Group Limited from our customers. A conversion factor from the Royal Mail is applied per post item.

**Scope 3 – Well to Tank emissions** are calculated using specific well to tank emissions factors from DEFRA/ DESNZ covering employee commuting, transportation and distribution (upstream, downstream and electricity), electricity, company car travel, site gas, employee-owned car travel, cash opt out car travel, rail travel, hire cars, flights, taxi travel and purchased diesel (vans).



**Scope 3 – Paper emissions** are calculated from supplier invoices and expenses recorded in total quantity of kilograms.

**Scope 3 – Waste emissions** are calculated from invoices and management information reports from our third party waste provider, detailing quantity of waste in kilograms.

**Scope 3 – Electricity transmission and distribution** is calculated from our total electricity use (kWh), with the relevant conversion factor applied.

**Assumptions**

Simplyhealth Group Limited make a number of assumptions during our emissions calculations. These include, but are not limited to:

- **Colleague commuting** – in our survey, where colleagues enter commute minutes instead of miles, we apply the following assumptions:
  - For car travel, an assumption of 60 miles per hour is applied.
  - For walking, an assumption of 6 miles per hour is applied.
  - For rail travel, an assumption of 80 miles per hour is applied.
  - If a commuting range has been provided by colleagues, the top end of this range is used.

- **Colleague homeworking** – colleagues spend the majority of their time working at home (Simplyhealth Group Limited has Smart Working Policy in place) unless they state otherwise by confirming the frequency of their travel to the office. Colleagues work 48 weeks per year, allowing for 4 weeks annual leave. Where colleagues provide a range of homeworking hours, the lower figure is used. Where colleagues provide homeworking hours much higher than 35 hours per week, these are capped at the standard Simplyhealth working hours of 35 hours per week.

- **Downstream transportation and distribution** – we are unable to track the size of receipts that customers send to us in the post with their paper claims. We therefore over-estimate with the assumption that all receipts are A4 in size. We also assume that the Royal Mail, per letter conversion used includes an envelope.

**Estimation of error**

Simplyhealth Group Limited’s assessment requires an estimation of likely error based on error analysis, to identify any uncertainty in the emissions calculations.

For the 2025 reporting period, this analysis demonstrates an overall percentage uncertainty of +/- 47%. This takes into consideration the source data used in our assessment and the error margin for each emissions source, as well as the sum of these divided by the total emissions.

**Total energy consumption**

Simplyhealth Group Limited’s energy consumption is calculated from activities and assets operated by us, in line with the Streamlined Energy and Carbon Reporting (‘SECR’) regulations, including GHG reporting. This includes an annual disclosure in kWh total covering company car travel, site gas, vans, electricity generation, employee-owned car travel, cash opt out and hire cars. See table B on page 55.

**Intensity Ratios**

Simplyhealth Group Limited’s intensity ratios are measured on a ‘per employee’ and ‘per £1m turnover (Group)’ basis. See table D on page 55.

At the end of the current reporting period, our headcount has remained stable at 817 employees, while Group turnover has decreased from £245.1m (2024) to £238.3m (2025).

**Independent Certifications**

Following an appraisal of our 2025 GHG emissions data, Simplyhealth Group Limited has been certified as a CO2e Assessed Organisation, CO2e Reduced Organisation, Carbon Neutral, and a Carbon Neutral Plus Organisation. Carbon Footprint Ltd undertook this assessment in March 2026 and it is valid for 12 months.





# Appendix 4 Our approach to charitable donations reporting

## Our charitable donation practices

Simplyhealth Group Limited has a commitment to deliver a minimum of £1m to local and national charities and/or community causes every year. These donations are delivered in line with:

- **FRS 102 (UK GAAP):** If the donation is in the form of goods or services, the fair value of the contribution is recognised as a charitable donation expense.
- **Companies Act 2006:** Charitable donations are disclosed as part of Simplyhealth's company expenses, or as a separate line item, depending on materiality. (See page 71 of 2025 Annual Report).
- **Corporation Tax Act 2010:** Charitable donations are deductible for corporate tax purposes, providing they meet the statutory conditions for 'qualifying charitable donations'.

## Methodology (Standards and guidance)

When calculating, reporting and disclosing our charitable and community donations, we define:

- **Donations:** The gift of money, property, or other in-kind resources to a non-profit, charity or other organisation to support social or environmental causes to advance Simplyhealth's goals and purpose of improving access to healthcare for all in the UK.
- **National donations:** Donations that deliver impacts across the UK and/or are donated to organisations that operate at a national level (even if based from a single location).

- **Local donations:** Donations that deliver impacts within a 20-mile radius of Simplyhealth's Head Office (SP10 1DE), or which support impacts across the South East region of the UK.

Charitable and community donations are delivered to:

- Registered UK charities (via the UK Charity Commission).
- Community Interest Companies ('CIC').
- Community-related groups, clubs or services.
- Individuals in the form of personal grants.

These donations take the form of:

- Direct donations for specific partnerships, services and impact projects.
- Indirect funding, for example, for dedicated resource/headcount.
- Matched funding donations in support of our colleagues (fundraising and payroll giving) and customers (fundraising).\*
- Customer Hardship Grants (with no expectation to pay anything back).\*
- Community volunteering expenses, for example, materials and equipment.
- Community fundraising expenses, for example, raffle prizes.
- Exceptional donations, for example, as a 'thank you' or to support individual/team causes, or emergency action.\*

Simplyhealth is non-affiliated/non-partisan and therefore does not make any donations to political organisations or individuals associated with such activities.

## Data gathering process and methods

At end of the reporting period, every transaction is cross referenced against a central log of charitable and community donations, maintained by Simplyhealth's ESG team. Evidence to support all donation activity, such as credit card receipts, charitable agreements and matched funding requests are stored on file by the ESG team for 3 years.

The only exception is Customer Hardship Fund applications which are deleted after 12 months from the date of application due to Data Protection, although a central log remains on file. In order to process any charitable or community donations, a second line approval is required, in line with the Delegations of Authority on payment values.

\*For these donations, we do not distinguish between national/local

# Appendix 5

## Our approach to supplier payment practice reporting

### Our supplier payment practices

Simplyhealth Group Limited has a standard supplier payment policy to pay all supplier invoices within 30 days of receipt of invoice. We take this approach to:

- **Protect our business** - Payment practices that are not in line with the Group's policy - and, in some cases, statutory requirements on supplier payment, could significantly damage our reputation and harm relationships with suppliers, and with customers who value ethical business practices.
- **Protect our suppliers** - Every year thousands of businesses experience severe administrative and financial burdens simply because they are not paid on time. Late payment is a key issue for business, especially smaller businesses, as it can adversely affect their cash flow and jeopardise their ability to trade. In the worst cases, late payment can lead to insolvency.

### Methodology (Standards and guidance)

When reporting and disclosing our supplier payment practices, our assessment follows the UK Government's Reporting on Payment Practices and Performance (Amendment) Regulations 2024: [Duty to report: guidance to reporting on payment practices and performance - GOV.UK](#)

This information must be published through an online service provided by the government and is available for the public to search: [Search for published payment practice reports - Search published payment practice reports - GOV.UK](#)

Where the above standards do not provide a methodology for a performance indicator, or their methodology is not appropriate, we apply additional methods. In summary, they include:

- **Average time taken to pay invoices (calendar days)** - this is calculated as the elapsed time between a valid invoice being inputted onto our Accounts Payable system, and the date the payment is created, +2 days to allow for the BACS payment cycle. The average is then a straightforward mean.
- **Percentage of suppliers paid within 30 days or less (average)** - this is calculated as the elapsed time between a valid invoice being input onto our Accounts Payable system, and the date the payment is created +2 days to allow for the BACS payment cycle. This calculation is based on invoice volumes.
- **Percentage of invoices paid on time (rolling 12-months)** - this is calculated based on Simplyhealth Group's standard payment terms of 30 days from receipt of invoice. The count for this metric starts on the date the invoice is received and uploaded to our Accounts Payable system. This is a daily activity performed on each working day. Where certain suppliers, for example, local suppliers, have shorter payment terms (i.e. 7 or 14 days), these are taken into account in the calculation.

### Data gathering process and methods

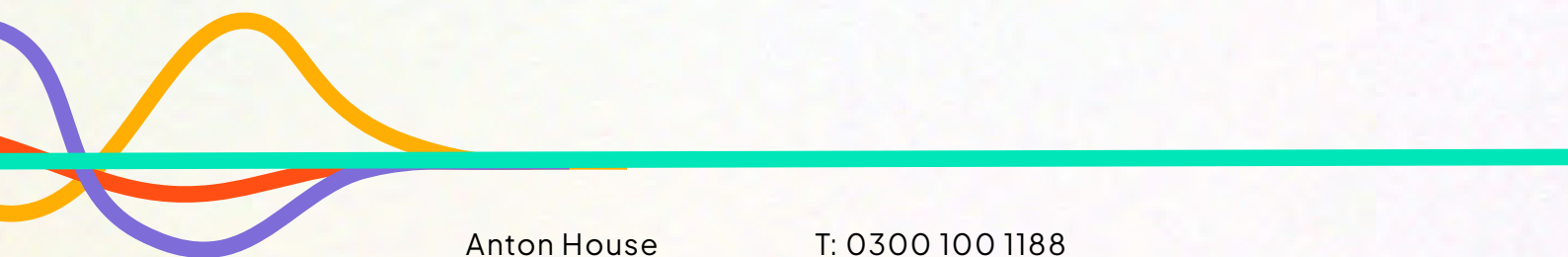
Across all supplier payment practices:

- The data extracted from our Accounts Payable system covers the period 1 January to 31 December, for the relevant reporting year, with no weightings applied.
- Valid invoices require a valid Purchase Order number and valid invoice details in line with HMRC requirements.
- Any invoices that are paid outside of our standard payment terms of 30 days, are manually checked. This may result in specific invoices being discounted within the data extraction, for example, where a legal or operational dispute is active or not resolved.

### Dispute resolution

We believe that keeping and earning the trust of our customers, and suppliers, is central to our purpose. We therefore endeavour to resolve all disputes in a fair and timely manner. Suppliers may initially raise disputes by e-mailing [accountspayable@simplyhealth.co.uk](mailto:accountspayable@simplyhealth.co.uk). Disputes are co-ordinated by Simplyhealth's central Accounts Payable team. In the first instance we will resolve disputes with negotiations between the authorised representatives of the parties. Any dispute that cannot be resolved through the Accounts Payable team can be escalated to the Head of Finance Operations & Systems and thereafter, if still unresolved, to the Group Legal team. Following resolution, invoice payments are processed on a timely basis.





Anton House  
Chantry Street  
Andover  
Hampshire  
SP10 1DE

T: 0300 100 1188  
E: [customerrelations@simplyhealth.co.uk](mailto:customerrelations@simplyhealth.co.uk)

[simplyhealth.co.uk](https://www.simplyhealth.co.uk)

