



Anti-Bribery and Corruption Standard

Associated Group Risk Category: Legal Compliance

Associated Policy: Legal Compliance

Applicability: This Standard applies to everyone working for, or on behalf of, BT.

Additional Information: [Being trusted: our code](#), Group Policies, and Standards are mandatory. You should read this Standard and if you do not understand any element of it, you should contact Group [Ethics and Compliance](#). Any non-compliance may lead to disciplinary action, which could include dismissal. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Standard.

Objective of this document: To set out BT's zero tolerance to bribery and corruption and the rules that you must follow to prevent bribery and corruption.

Standard contents

Contents	Page
1	BT's position on anti-bribery and corruption 2
2	Our rules 3
3	Other related topics 5
4	Record-keeping 6
5	Following the law 7
6	Speak Up about your concerns 8
Appendix A	Key Control Detail 9

1 BT's position on anti-bribery and corruption

At BT, we take a zero-tolerance approach to bribery and corruption (including extortion and blackmail). We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We implement and enforce effective systems to prevent, detect and respond to bribery and corruption risks.

1.1 What are bribery and corruption?

Bribery is giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. Corruption is the abuse of entrusted power or position for inappropriate private gain and can include extortion and blackmail.

1.2 Responsibilities

BT prohibits all bribery and corruption (including blackmail and extortion), including conduct you may not consider to be bribery or corruption, or even improper, but fits the legal definition. You must ensure that you read, understand and comply with this Standard.

2 Our rules

There are some rules that you must follow:

2.1 What must you do?

- Always act with integrity and within the law;
- Consider the risk of bribery and corruption in any contract which you enter into, and with any third party that you engage, and take appropriate action to mitigate such risks, taking advice from [Ethics and Compliance](#) on the mitigation actions where necessary;
- Get approval from [Ethics and Compliance](#) for any [High Risk Third Parties](#) (including, but not limited to, sales agents, lobbyists, visa and customs agents, logistics providers, importers of record, resellers, distributors or consultants) before they can do work on BT's behalf;
- Register any gifts and hospitality on the [gifts and hospitality system](#) in advance if they are above the country registration thresholds;
- Register any third-party sales incentives and market development funds with [Ethics and Compliance](#) in advance for approval.
- Register any conflicts of interest you have on the [Register of Interests](#) (this includes significant shareholdings (above 1%) in other companies, outside directorships or similar fiduciary positions such as trustee of a charity, and internal interests such as personal relationships which might lead to a conflict of interest or a perceived conflict of interest when performing your duties for BT);
- Follow [all relevant procurement rules](#) on supplier due diligence and selection. This is to determine that the choice of supplier is made fairly and that the supplier is financially stable, with the right qualifications for the work they are doing for BT, that they have an appropriate reputation ethically and legally and that any payments to such suppliers are objectively justifiable and not above acceptable market rates for the work that they are doing for BT;
- Immediately report any suspected bribery or corruption incident, including where you have been asked to pay a bribe or have been offered a bribe, including facilitation payments [see page 3 [ABC Guidance](#)] which are prohibited under UK law) or any event of blackmail or extortion [see page 6 [ABC Guidance](#)] to [Ethics and Compliance](#)

2.2 What must you, or someone acting on your behalf, not do?

- Give, promise to give, or offer, either directly or through a third party, a payment (including a facilitation payment), gift or hospitality or other thing of value (including but not limited to job opportunities for friend or family members, sponsorship of marketing events or educational events or other advantages) with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

- Give or accept a gift or hospitality (or other thing of value as outlined above) during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- Request, agree to receive or accept, either directly or through a third party, a payment, gift or hospitality (or other thing of value) from a third party that you know, or suspect is offered with the expectation that it will improperly obtain a business advantage for a party outside of BT;
- Give, promise to give, or offer, either directly or through a third party, a payment, gift or hospitality (or other thing of value) to a public official or representative with the expectation or hope that a business advantage will be received. This prohibition applies regardless of whether this is to facilitate or expedite a routine procedure;
- Give political donations, they are prohibited;
- Give, promise to give, or offer, charitable donations or sponsorships with the expectation or hope that a business advantage will be improperly received;
- Make payments in cash (or cash equivalents) unless absolutely necessary. If possible, take advice from [Ethics and Compliance](#) before making any cash payments. If you cannot take advice and a cash payment is unavoidable, you must obtain a receipt. If this is not possible, then you must report the cash payment to [Ethics and Compliance](#) as soon as possible after the payment is made;
- Facilitate tax evasion. Please see the Tax Risk Standard [insert link] for more information;
- Threaten or retaliate against another who has refused to commit a bribery offence or who has raised concerns under this Standard;
- Engage in any activity that might lead to a breach, or a perceived breach, of this Standard.

3 Other related topics

There are a number of topics which are related to the risks of bribery and corruption. They form part of our programme to prevent, detect and respond to these risks. Additional guidance is available for all of the following:

1. [Anti-Bribery and Corruption Guidance](#);
2. Gifts and Hospitality [Standard](#) and [Guidance](#);
3. [High Risk Third Parties Standard](#);
4. [Charitable Donations Standard](#);
5. Conflicts of Interest [Standard](#) and [Guidance](#).

4 Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments (including facilitation payments), or providing any other thing of value, but especially those to third parties;

You must declare and keep a written record of all gifts or hospitality given or received, which will be subject to review by your management, [Ethics and Compliance](#), Internal Audit and External Audit;

You must submit all expense claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure. All accounts, invoices and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness;

For more information, please see the Data and Information Policy and Data Privacy Standard and associated Data Retention Schedule.

5 Following the law

This Standard requires compliance with all applicable laws on bribery and corruption, including, but not limited to, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010. There are serious penalties for anyone, or any company, breaking these laws including unlimited fines and imprisonment. In the event of conflict between our rules in this Standard and local laws, the stricter rule applies.

6 Speak Up about your concerns

If you are worried you've spotted something unethical, or something that makes you feel uneasy at work, do the right thing and contact [Speak Up](#).

Speak Up is a safe and confidential way for you to help protect yourself, BT and live our values. Don't rely on someone else, get in touch yourself. We can't act on your concerns if we don't know about them. For further information on Speak Up, please see the [Speak Up intranet pages](#).

If you are a BT employee and have any questions about this Standard, speak to the [Ethics and Compliance Team](#).

Appendix A Key Control Detail

Key Control Title	Control Objective	Detailed Control Activity
Training and Communication	<p>To ensure that BT people and those that work with BT know and understand that bribery and corruption are not tolerated.</p> <p>To ensure that BT people and those that work with BT know, understand, and follow our procedures to prevent bribery and corruption.</p>	<p>All BT people complete Being trusted: Our Code training.</p> <p>Targeted training delivered by RCA deployed teams and ABC team to higher risk communities identified by bottom-up risk assessment.</p> <p>All HRTPs have equivalent ABC policies and training in place to BT's. Where they do not have training, they complete BT training.</p> <p>Regular drumbeat of ABC communications - communications plan managed by Group Ethics and Compliance.</p> <p>Frequency: Continual</p>
HRTP approval and in-life management	<p>To ensure that we know who we are doing business with, what they do for us, the risk they pose, and that they are reputable, at on-boarding and in-life.</p>	<p>Individuals within the business units identify any high risk third parties that they want to use and follow the mandated Group Ethics and Compliance HRTP approval and in-life management processes.</p> <p>This includes:</p> <ul style="list-style-type: none"> - Risk assessment - Due diligence - Time bound approval - Contract clause - In-life checklist - In-life screening <p>Frequency: Continual</p>
Donations, Sponsorships and Marketing Funds	<p>To ensure that marketing funds, donations or sponsorships are not used to conceal a bribe or to inappropriately influence the recipient or affiliated</p>	<p>All charitable donations must be registered and pre-approved</p> <p>Political donations are prohibited</p>

	individuals (including public officials).	Marketing funds and sponsorships must be registered and pre-approved Frequency: Continual
JV's, Business Partnerships and Acquisitions	To ensure that we know who we are doing business with, and that they are reputable, at on-boarding and in-life.	Majority owned JVs and Subsidiaries adopt BT's zero tolerance to bribery and corruption and implement BT's ABC control framework. The ABC team support the Corporate Governance teams in the creation of Board Resolutions. Minority owned JVs 20%+ commit to a zero tolerance to bribery and corruption through a Board resolution. Due diligence prior to completion of M&A activity. Frequency: Continual
Gifts and Hospitality	To ensure that G&H given and received are in line with BT policy and do not inappropriately influence.	ALL G&H must be pre-approved by the Line Manager All G&H over the country registration threshold must be registered and approved in advance on the G&H system. CFU/CU G&H approver monitors compliance and reviews all registrations that route for manual review. Frequency: Continual
Conflicts of Interest	To ensure that BT people avoid conflicts of interest and where they cannot resolve them to BT's satisfaction. To ensure that BT people act in BT's best interests and not their own. To ensure that BT is transparent in its business dealings and BT people do not seek to gain inappropriate advantage through personal relationships.	All outside interests should be registered that overlap / have the potential to overlap / or could be perceived to overlap in any way with an individual's duties for BT. ABC team review all registered interests and provide mitigation advice and guidance. Pre-employment checks carried out by HR and the hiring manager. Frequency: Continual
Sales Incentives and Reward	To ensure that sales incentives and reward do not have unintended	All sales incentive schemes involving third parties must be registered and approved in advance. This includes third parties providing incentives to BT and BT providing

	consequences and influence unethical behaviour.	<p>incentives to third parties. CFU Finance review and approve the registered sales incentives and pass the completed approval form to Group Ethics and Compliance.</p> <p>For pay and bonus the following controls operate:</p> <ul style="list-style-type: none"> - BT Group HR Director approval of documented pay principles. - CFU Reward Director Approves that pay plans are aligned with principles. - CFU Reward Director monitors and approves payments that reach a defined threshold (200% achievement or £100k) and top pay-outs. - Annual benchmarking of salary ranges. - On-Target bonus levels are fixed and any changes require HR Director Reward & Pensions approval. - ExCo approval of any changes to the bonus scheme. RemCo oversight. - Clawback and malus arrangements. <p>Frequency: Continual</p>
Win New Business ABC Check	To identify high ABC risk sales transactions and ensure that they are appropriately reviewed and approved.	<p>CFU to ensure that only approved ABC H RTP's are used for indirect sales opportunities that are in scope of the ABC H RTP Standard.</p> <p>Frequency: Continual</p>

Version Control

Version	Approval Date	Reason for Change
1.0	15 March 2022	Updated to new Standards template
1.1	31 October 2022	Hyperlinks updated