

# BT Anti-Corruption and Bribery Policy

October 2017

**BT's Code of Conduct, The Way We Work, requires that:**

We don't tolerate bribery of any kind.

We never offer or accept gifts, payments or hospitality to encourage or reward a decision.



## Scope

This policy applies to all BT people globally, and to all those acting on BT's behalf. All third parties doing business with BT or acting on our behalf must follow this policy and put in place procedures to prevent and detect bribery and corruption.

## Aims

BT has zero tolerance of bribery and corruption. BT people, as well as others acting on BT's behalf must understand and comply with BT's zero-tolerance approach to bribery and corruption anywhere we operate.

## Guiding principles

There is no place for bribery and corruption in our business.

### Bribery and corruption

- If you make, authorise, seek or accept any kind of offer, gift, kickback, illicit payment or facilitation payment to get or keep an unfair advantage, that's bribery. It doesn't have to involve money.
- If you offer, promise or give something intending to influence someone's behaviour or actions, this is bribery. It is also bribery if you do it indirectly via any third party such as consultants, contractors, agents, sponsors or joint venture partners, advisors, customers, or suppliers.
- Don't use BT funds for any unlawful, improper or unethical purpose.
- Take care when you are dealing with government or public officials as laws are strict and your actions could be misinterpreted. We must never offer, promise or give anything of value with the aim of influencing any government or public official in their work. This includes facilitation payments or "grease payments" such as payments to speed up the performance of routine governmental actions.
- Even if you offer or are offered a bribe which isn't accepted or if you promise or are promised something which is never delivered, this is unacceptable.

### Gifts and hospitality

- Don't offer or accept gifts, payment or hospitality to encourage or reward a decision.
- We have a [gifts and hospitality policy](#) which makes it clear what is and isn't appropriate.

### Charitable donations and sponsorship

- You must not use charitable donations or sponsorship as a way of concealing a bribe. All charitable or community donations and sponsorships by BT must be in line with our [Charity & Community policy](#).

## Keeping records

- Our record keeping must be accurate and transparent. If you are responsible for keeping records make sure that they accurately reflect and are a fair presentation of the activities they record and reflect the nature and purpose of the activity. This includes records relating to gifts and hospitality, charitable and political contributions, pre-approval documents and checks of third parties.
- Follow BT's [Information Retention Policy](#).

## Responsibility

- As a BT person or someone acting on BT's behalf, you are expected to conduct company business following the highest professional and ethical standards and in line with the applicable country laws under which BT does business.
- We are all individually responsible for reading, knowing and complying with this policy and The Way We Work, BT's Code of Conduct. If you are a line manager then it is your responsibility to make sure that each member of your team has access to the guidance and completes the training they need so that they understand and follow this policy.
- Breaches of this policy can result in BT taking disciplinary action and could lead to dismissal in serious cases. Bribery is also subject to laws and controls worldwide and there are serious penalties for anyone, or any company, breaking these laws including unlimited fines and imprisonment.

## Procedures/processes

### Bribery and corruption

- Don't make payments in cash, bonds, securities or anything similar. Always make payments by wire transfer or cheque to a bank account which is in the name of the person or their representative and which is in the country where they regularly provide services to BT.
- If you are appointing a third party to work for BT follow the correct process. Procurement is responsible for appointing suppliers. We also have a separate procedure for [appointing agents](#).

### Reporting concerns

- If you are approached and asked to pay a bribe, including facilitation payments, or are offered a bribe, or you think another BT person or third party may be offering or offered a bribe or be involved in any corrupt behaviour, then report or discuss this with your line manager and notify [BT Compliance](#) (email address for external use: [ethics@bt.com](mailto:ethics@bt.com)).
- There may be some instances where you want to raise a sensitive ethical issue with someone who isn't connected to your team. Our [Speak Up Hotline](#) is always available for you to leave a message in person, by voicemail or on line. There are some countries where special rules apply so check the [Speak Up Hotline](#) webpage for details in your country and any special instructions.

- We know it takes courage to speak up. We'll do whatever we can to support and protect you and we won't permit anyone to retaliate against you for reporting your concerns. If someone tries to deter you from speaking up that's a disciplinary offence and we'll deal with it seriously.

## Guidance

### Bribery and corruption

Take particular care if there are any of these 'red flags' and ask for guidance from the [BT Compliance](#) team (email address for external use: [ethics@bt.com](mailto:ethics@bt.com)):

- Any close family, personal or business ties that a third party or partner has with government officials
- A history of corruption in the country or business sector
- A request for a cash payment
- Requests for commissions substantially above the normal rate
- Unusual payment arrangement such as payments to be made in a third country or to a third party
- Requests for us to pay expenses which are unusual or vague
- Invoices which are too high or non-standard
- Where a third party refuses to agree to take action where a payment is corrupt

You can find more anti-corruption and bribery guidance with examples of potential red flag situations on the [Group Ethics & Compliance website](#).

Follow these links to find guidance on how to respond to a request for a [facilitation payment](#) or the payment of a bribe under duress ([blackmail and extortion](#)).

## Related policies

[The Way We Work](#)

[Gifts and Hospitality policy](#)

[Agents procedure](#)

[Charity & Community Policy](#)

[Information Retention policy](#)

[Conflicts of Interest policy](#)

(Note: the hyperlinks in this document are intended to direct BT people to locations in the document, or our corporate intranet – they are disabled in external versions of the document)

## Policy owner

**Ethics & Compliance Team,**  
BT Governance and Compliance

## Review

**October 2018**