

Associated Group Risk Category: Legal Compliance

Associated Policy: Legal Compliance

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

Adherence: [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.

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.

The prevention, detection and reporting of bribery and other forms of corruption (including extortion and blackmail) are the responsibility of all those working for, or on behalf of, BT. You must avoid any activity that might lead to, or be perceived as, a breach of this Standard.

2 Rules

There are some rules that you must follow.

2.1 You must:

1. Always act with integrity and within the law;

2. 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;
3. 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;
4. Register any gifts and hospitality on the [gifts and hospitality system](#) in advance if they are above the country registration thresholds;
5. Register any third-party sales incentives and market development funds with [Ethics and Compliance](#) in advance for approval.
6. 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);
7. 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;
8. 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 2 [ABC Guidance](#)] which are prohibited under UK law) or any event of blackmail or extortion [see page 5 [ABC Guidance](#)] to [Ethics and Compliance](#)

2.2 You, or someone acting on your behalf, must not:

1. 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;
2. 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;
3. 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;
4. 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;
5. Give political donations, they are prohibited;

6. Give, promise to give, or offer, charitable donations or sponsorships with the expectation or hope that a business advantage will be improperly received;
7. 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;
8. Facilitate tax evasion. Please see BT's [tax evasion policy](#) for more information;
9. Threaten or retaliate against another who has refused to commit a bribery offence or who has raised concerns under this Standard;
10. 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 and Sponsorship Standard](#);
5. [Conflicts of Interest Standard and Guidance](#).

4 Record-keeping

1. 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;
2. 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;
3. 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;
4. For more information, please see BT's [Information Retention Policy](#).

5 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](#).