



Our policy on conflict minerals

Policy Version: 2

Policy Owner: Bruno Jackson (Director Compliance Operations)

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This applies to everyone working for or on behalf of BT, EE, Openreach and Plusnet.

Note: Some internal links will be disabled when viewed externally

What we believe

We view activities which could cause or contribute to human rights violations as unacceptable. We aim to use 4TG from responsible sources (including those within the DRC region), and work with our suppliers to perform appropriate due diligence to identify, and remove, Conflict Minerals from our supply chain. We follow all applicable laws in relation to Conflict Minerals.

Why this matters

Minerals are used to produce tantalum, tin, tungsten and gold (4TG), and these metals can be found in electronic devices. These minerals may be mined in war-torn or politically unstable areas, such as the Democratic Republic of Congo (DRC). The proceeds of sale of those minerals may fund conflict, insurgency and human rights violations, which is why they are called “conflict minerals”.

Our principles

- We are committed to respecting the dignity, liberty and equality of everyone we work with. At BT we advocate the importance of sustainability, health and safety, environmental standards and respect for human rights in our supply chain, as set out in our Sourcing with Human Dignity Standard.
- We support greater transparency in global supply chains and we are working with wider industry initiatives, such as the Responsible Minerals Initiative (RMI).
- We ask in-scope suppliers to identify whether any products/materials supplied to BT contain tantalum, tin, tungsten or gold. We use the RMI’s Conflict Minerals Reporting Template (CMRT) to collect Reasonable Country of Origin (RCOI) and due diligence information from suppliers on their use of conflict minerals.
- We review and analyse the supplier responses, culminating in our annual filing to the SEC.

Who’s responsible?

All of us. It’s up to everyone to read, understand and stick to this policy and The BT Way, our ethics code. Breaching this policy can lead to disciplinary action and in serious cases, dismissal.

All suppliers to BT must follow the process as set out in the Conflict Minerals Standard. There are additional processes for “In-scope suppliers”. BT reserves the right to immediately terminate a contract where the supplier fails to comply with any of the obligations set out in the Standards under ‘Additional Requirements for in-scope suppliers’.

Speaking out 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 our confidential hotline. It’s a place where our people or those working on our behalf can share any concern or suspicion about ethical or compliance misconduct. 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.

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

Suppliers can contact their procurement lead, and find more information at selling2bt.com

To find out how to apply this policy, please read: [Conflict Minerals](#)