



# Our standard on registering interests and conflicts

Policy Owner: Jo Morgan (Group Ethics and Compliance)

Review: February 2021

This applies to \*everyone working for or on behalf of BT.

## What we believe

Our people should always act in BT's best interests and not their own. We avoid an interest or situation that conflicts, or may appear to conflict, with our duty to BT. If they can't be avoided; we declare them and resolve or manage them to BT's satisfaction. Our people, and all those acting on BT's behalf worldwide, need to understand and stick to that wherever they are. All third parties doing business with us or acting on our behalf also have to follow this policy.

## Why this matters

Working ethically is important for us. We do business transparently, unclouded by private interests or divided loyalties. When it comes to ethics, we think about the letter and the spirit of our approach. After all, our reputation is at stake. The consequences of any wrongdoing can be significant – for individuals, our customers as well as the company.

BT and EE are both authorised and regulated by the Financial Conduct Authority (FCA). FCA Principle 8 states that an authorised firm must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client.

## Our principles

- A conflict of interest is any situation where your loyalties are or might appear to be at odds with your duties to BT or our customers.
- We must be open and transparent in our business dealings and [register](#) all personal interests that may have the potential to conflict with our BT duties.
- You must act at all times in BT's and our customer's best interests and to exercise sound judgment unclouded by private interests or divided loyalties.
- You must avoid situations where you, or BT, could be open to suspicion of dishonesty or favouritism or lack of transparency, or which conflicts or appears to conflict with your duty to BT.

- You should declare your interests by registering them with Group Ethics and Compliance on the [Register of Interests](#).
- If you are not sure if your outside interests overlap with your BT role register them anyway. By declaring our interests we can ensure that we are transparent in our business dealings. Group Ethics and Compliance reviews each registration and provides advice and guidance, so that you can avoid any potential problems, or just give you assurance that you have done the right thing.
- We've given examples to help you to recognise conflicts of interest and explain how you should make a submission to the Register of Interests in the [Registering Interests and Conflicts Guidance](#).

## 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. You could also get in trouble with the law.

## 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 have any questions about this policy ask the [Ethics and Compliance team](#).

## To find out how to apply this policy, please read:

[Registering Interests and Conflicts Guidance](#)

Publication Date: February 2020

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Issue: 04