



Our policy on conflicts of interest

Policy Version: 2

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Publication: March 2019

Review: March 2020

This applies to all suppliers to any BT group company

What we believe

Our suppliers should always act ethically and avoid an interest or situation that conflicts, or may appear to conflict, with their work for BT. If they can't be avoided; they should declare them and resolve them to BT's satisfaction. Our suppliers need to understand and 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 severe – for individuals as well as the company.

Our principles

- We should be open and transparent in our business dealings and declare all personal interests that have the potential to conflict with any activities we carry out for BT.
- A conflict of interest is any situation where your loyalties are or might appear to be at odds with the activities you carry out for BT.
- You should 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 the activities you carry out for BT.
- You should declare your interests by registering them with BT Ethics and Compliance on their [Register of Interests](#).

- If you are not sure if your outside interests overlap with the activities you carry out for BT register them anyway. By declaring your interests you can ensure that you are transparent in your business dealings. BT Ethics and Compliance review each registration and provide advice and guidance, so that you can avoid any potential problems, or just give you assurance that you have done the right thing.

Guidance

Below we provide examples of situations where conflicts of interest could arise. This list is not exhaustive.

- A close personal or family relationship with a BT employee working on the same BT project. For example, a manager from your company working on a BT project may have a family member who works for BT and is responsible for processing your invoices or allocating you tasks.
- A supplier or their people acting in a way which causes or appears to cause BT people to have a conflict of interest. For example, offering BT people gifts and hospitality who are involved in active commercial negotiations with you.
- A supplier or their people acting in a way which misrepresents their relationship with BT.

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.

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 those working with BT 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 speak to the [Ethics and Compliance Team](#).