

Conflicts of Interest Standard

Associated Group Risk Category: Legal and Regulatory Compliance

Associated Policy: Legal Compliance

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

Additional Information: [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 rules regarding conflicts of interest.

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1 BT's position on conflicts of interest

We avoid situations that conflicts, or may appear to conflict, with our duty to BT. This is commonly referred to as a conflict of interest. If a conflict of interest can't be avoided, then we [register](#) them and resolve them to BT's satisfaction.

1.1 What is a conflict of interest?

A conflict of interest is any situation where your own personal position might influence you to act in a way that is not in the best interests of BT or its customers, or that favours certain colleagues over others.

A conflict of interest can arise from a personal, or family, relationship, an outside position or occupation, or a material financial interest in a customer or supplier of BT. A conflict of interest can also develop when close relationships with customers or suppliers exist over a long period and develop into friendships and objectivity is no longer possible. For more detailed guidance on identifying conflicts of interest, please read our [Conflicts of Interest Guidance](#).

2 Why this matters

Working ethically is important to us. We are committed to acting transparently, fairly and with integrity in all our business dealings and relationships internally and externally wherever we operate. When it comes to ethics, we think about the letter and the spirit of our approach. We want to ensure that all business decisions are made in the best interests of BT.

3 Rules

You must:

- Act with impartiality, independence and maintain appropriate standards of integrity and transparency in all your business relationships;
- Act at all times in BT's best interests and treat customers fairly;
- Never use your authority or position for personal gain;
- Try to avoid situations which conflict, or could appear to conflict, with your duty to BT;
- Where possible and practical, inform your line manager of any conflict of interest, or potential or perceived conflict of interest
- Disclose any conflict of interest, or a potential or perceived conflict of interest, if you cannot avoid the conflict, on the [Compliance Register](#) as soon as you become aware of it. This will enable [Ethics and Compliance](#) to review the conflict and advise you accordingly on how to mitigate or eradicate the conflict;
- Act in accordance with any guidance from Ethics and Compliance or your line manager to mitigate, or eradicate, any conflict of interest.

4 Guidance

We've provided some examples to help you to recognise conflicts of interest and explain how you should make a submission on the [Compliance Register](#) in the [Conflicts of Interest Guidance](#).

5 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](#).

Version Control

| Version | Approval Date | Reason for Change |
|---------|------------------|--|
| 1.0 | 15 March 2022 | Updated to new Standards template |
| 1.1 | 31 October 2022 | Hyperlinks updated |
| 1.2 | 02 October 2024 | Review and update owner |
| 1.3 | 07 February 2025 | Compliance Register and related process updates. |
| 1.4 | 03 March 2025 | Hyperlinks updated |