



# Our standard on conflicts of interest

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

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## Introduction

### What's this standard about?

In this standard, we explain in more detail how to make sure you're always following our policy on conflicts of interest. There are situations where your personal interests may overlap with your BT role, so we've tried to explain clearly how to recognise them and what you should do.

# 1 How do I identify a potential conflict of interest?

When thinking about your interests, ask yourself the following questions:

- Will it affect how you do your job for BT? If others knew about the interest or relationship, could they question your ability to do the job with the loyalty, integrity and impartiality it requires?
- Could it cause embarrassment if anyone found out about your other interest?
- How would you/your manager feel if this appeared in the newspaper headlines?
- What are the wider implications for BT as a whole?
- Will your external interest influence you in any way? Might others think your role/interest could influence you – even if it doesn't?

If you answer yes to any of the questions or think that there would be wider implications for BT, or it may cause embarrassment you need to let us know about it.

## 1.1 Situations you should tell us about

Below we provide examples of situations where you should make a submission to the [Register of Interests](#). This list is not exhaustive, if in doubt you should register your interests for transparency.

### Outside employment

- Any outside business activity
- Being a Director of another company or organisation.

### Family and friends interests

- Recruiting or managing a relative or partner
- A close personal or family relationship with a senior manager of a competitor or supplier.
- Working in the same department as your partner or close relative.

### Material financial interest

- Recruiting an individual due to their political connections, which you intend to unfairly leverage for BT's benefit
- Where you have a personal interest with a supplier, customer or competitor which could influence your decisions at work.
- Having a material shareholding in a competitor or supplier of BT (but not where the shareholding is part of an investment trust or pension plan managed by others). If you're unsure if your interest is material consult the Ethics and Compliance Team.
- Your BT role involves managing a supplier relationship with a company in which a close relative or partner has a financial, business or employment involvement.

## 1.2 Conflict of interest scenarios

We have set out some scenarios that you might find helpful when thinking about these issues.

**A family member of a BT employee wants to work for BT, maybe in the same office as them. Will this be a problem?**

It may be acceptable if local policy in the country you work in allows it and there is suitable separation between the BT employee's role and the role their family member applies for. The BT employee should not have any involvement in decisions regarding the post they have applied for - including the application and interview process. If they do join, both parties should ensure that they are not responsible for any decisions regarding their family member's job or pay so as to avoid any suggestion of favouritism or nepotism.

**A customer has a relative who wants to work for BT, they ask me to help their relative find a job. Will this be a problem?**

You can notify them of externally advertised vacancies, but you must not get involved in the recruitment process. The standard recruitment process must be followed and the best candidate for the role selected. The customer's relative must not be given any special treatment. If in any doubt please contact the Ethics and Compliance Team.

If following an open and fair selection process the customer's relative is employed by BT, they must not be given any special treatment, and must not work in a role where they can influence any decisions relating to the customer.

**As well as the role I have applied for at BT, I own a small company that manufactures specialist equipment. Will this be a problem?**

Maybe, if running your own business or having another job outside BT conflicts with BT's interests as it causes your BT work to suffer: or where your other role is with a company which is a supplier to BT or is in competition with BT, then this is a conflict of interest and must be resolved.

Outside occupations and affiliations can create conflicts with your work at BT if any relate to a third-party organisation that is a competitor, customer or supplier of goods or services to BT (also included is a third-party organisation that is actively seeking to become any one of the above with BT). You must declare them on BT's register of interests.

**My partner runs a small printing firm that I am sure could make our leaflets at a much reduced price. Can I give them the contract?**

No. Imagine how it would look if people realised that you had given the contract to your partner. If your partner is to bid for BT work, you must declare this relationship right away and avoid any involvement in the procurement process.

**I am a BT employee who has been seconded to a joint venture. In whose interests should I work?**

Hopefully, there would not be a conflict of interest between BT and a joint venture. Your personal professional integrity should be the most important thing at all times and you must always comply with The Way We Work and BT's anti-corruption and bribery policy.

However, you have a responsibility to the joint venture for the period that you work for them and if you think you have a personal interest that interferes or may interfere with the interests of the joint venture then you should declare this to your line manager and submit this to BT's register of interests.

**I have come across some information that is not yet public. This makes it clear that now would be a good time to buy BT shares. Can I tell my family and friends?**

No. Absolutely not. That's called insider trading and it's a very serious crime. You must be very careful with information you gain through your work not to contravene these laws. If in doubt ask the Ethics and Compliance Team.

## 2 Registering your interests

We recommend that all interests are registered. If you are not sure if your outside interests overlap with your BT role register them anyway. By declaring our interests we can ensure we are transparent in our business dealings.

### 2.1 How to register your interests

- If you have, or think you might have, a conflict of interest you should discuss it straight away with your Line Manager and declare it on the [Register of Interests](#). If you do not feel able, or if it's not appropriate to contact your Line Manager directly, you can just declare it on the Register of Interests.
- You should submit all potential conflicts of interest on the [Register of Interests](#), even if after discussion with your line manager you do not think it is a problem. We should register for transparency anyway.
- Group Ethics and Compliance will review your declaration and come back to you and if appropriate your Line Manager. If they think further action is required they will give you guidance relevant to your situation.
- If you are a Director of a BT entity there are additional requirements for the declaration of conflicts at the start of each meeting – please refer to the [Director Portal](#) site for further information.

### 2.2 What you should do if someone you manage has a potential conflict of interest

You should first discuss the matter with the person making the declaration and gather all the facts available. You should then determine if you think it is a potential conflict of interest.

If you decide it is a conflict of interest you need to ensure that it is promptly resolved or suitable safeguards are put in place to effectively manage the situation. You and the person declaring their interest should regularly review the situation.

Line Managers should ensure that all interests that their team have declared to them are added to BT's [Register of Interests](#). The Ethics team will review the registration and give you help and advice or just assurance that you've taken the right steps.

### 2.3 What you should do if you think someone else has a conflict of interest

If you think someone might have a conflict of interest you should ask them if they have discussed it with their Line Manager and declared it on BT's [Register of Interests](#). If you do not feel comfortable doing this you should contact their Line Manager directly and discuss your concerns with them.

If you do not feel able or it is not appropriate to contact your colleague or their Line Manager directly, you should contact the confidential [Speak-Up hotline](#).

### 3 Where you can go for help or advice

For further guidance on any subjects discussed within this standard, please [ask us a question](#), or report any concerns via the [Speak Up hotline](#)



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