



Gifts and Hospitality Standard

Associated Group Risk Category: Legal 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 Gifts and Hospitality.

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1 BT's position on gifts and hospitality

Gifts and hospitality may be an appropriate part of a working relationship. However, BT people must not offer, give or receive gifts or hospitality that may, or appear to, improperly influence a business decision.

1.1 What are gifts and hospitality?

A gift is something given as a present to another person outside of BT. Gifts may be given as part of culturally significant festivals or celebrations, like Diwali, Eid, Hannukah, or Christmas but can occur at any time.

Hospitality is when we entertain third party guests, or a third party entertains BT people. Some examples of hospitality may include meals, events at a corporate box or going to a sporting event. Third parties are people who do not work for BT.

2 BT's position on gifts and hospitality

Working ethically and within the law is very important to BT. The consequences of any wrongdoing, or apparent wrongdoing, can be significant for individuals as well as the company both from a legal and reputational perspective. Our Standard is designed to help you, and BT, demonstrate compliance with [Being trusted: our code](#), the law and regulations.

3 Rules

3.1 You must

- Consider the appropriateness of the gift or hospitality being given or received, having due regard to the [limits](#) and the business purpose of the gift or hospitality. Once you are content that the gift or hospitality to be given or received is appropriate you must get prior approval from your line manager;
- If the gift or hospitality is above the [country registration thresholds](#), register it on the [gifts and hospitality system](#) in advance. The current registration thresholds for the UK are £25 for gifts and £100 for hospitality for the private sector and £15 for gifts and £25 for hospitality for public officials. These thresholds vary by country so please check your [local thresholds](#);
- When completing the registration, do this honestly and accurately, making sure that you cover the total (or estimated) cost of any gifts or hospitality provided or received. Please note that you must include all elements of any hospitality, for example, drinks and a meal prior to a sporting or cultural event must be recorded as one event with the total (or estimated) cost declared. We should always try to avoid offering travel or accommodation as part of the hospitality however if travel and accommodation are to be offered the value of these must always be included in the total value offered to the recipient;
- Have a completed registration before proceeding with offering or receiving gifts or hospitality. In most instances, the approval will be immediate but certain risk factors will require a manual review by the [Ethics and Compliance team](#). In particular, high value gifts or hospitality or gifts or hospitality being provided to a public official (including an employee of a state-owned company) will require the approval of the Group Director of Ethics and Compliance (or their delegate) so please allow sufficient time for proper review by this team (at least 72 hours) in case external checks are required;
- Where the gift or hospitality is part of a marketing or sponsored event, register your guest's hospitality on the [gifts and hospitality system](#) in advance. Marketing and Brand teams will require the gifts and hospitality registration number and, where required, evidence of approval from the [Ethics and Compliance](#) from you before providing event tickets;
- [Register](#) unexpected gifts and hospitality which you've received and accepted as soon as possible after the event if it is above the registration thresholds;
- [Register](#) the details for transparency of any declined hospitality or gift if it exceeds £500 in value, or you have concern about the offer in the context of an existing or potential business relationship;
- Register all speaker opportunity requests, charitable and community donations on the [gifts and hospitality system](#) using the appropriate form;
- Use the [gifts and hospitality system](#) to register any events where a US government official is present; and
- Gain approval from both [Ethics and Compliance](#) and your CFU Finance Team for any sales incentives for third parties (i.e. non-BT people).

3.2 You, or someone acting on your behalf, must not:

- Give or receive a gift or hospitality if it is intended to, or appears to, influence you or the person receiving it;
- Give or receive lavish gifts or hospitality which is, or may be seen to be, inappropriate in the circumstances. If you need advice on what is an appropriate level of gift or hospitality please contact [Ethics and Compliance](#);
- Give or receive repeat hospitality to a person who has had hospitality in excess of £500 within a period of 9 months;
- Give or receive gifts or hospitality if either you or the other person are involved in ongoing commercial negotiations, or which could influence a company decision or negotiation in any way;
- Offer any gifts or hospitality where you know it would be wrong for the person to accept, or where they would be unable to reciprocate for example, where it may be against their organisation's rules or the law;
- Break any laws or regulations. If you give a gift or hospitality to someone in another country, then it must not break the laws and regulations of either country;
- Give or receive a gift of cash (or cash equivalent such as vouchers) or shares;
- Ask for a gift, or give someone a gift that they have requested;
- Give or receive any gifts and hospitality as part of a political cause; and
- Exchange personal gifts or hospitality (i.e. gifts or hospitality which you pay for personally) with a BT customer or supplier that could improperly influence a business decision and create a conflict of interest. Please refer to the [Conflicts of Interest](#) pages for further information.

We give further advice on how to apply the rules set out in this Standard in our [Gifts and Hospitality Guidance](#).

4 Who's responsible?

All of us. It's up to everyone to read, understand and stick to this Standard and [Being trusted: our code](#). Breaching this Standard can lead to disciplinary action and in serious cases, dismissal. You could also cause significant damage to BT and break laws such as the UK Bribery Act (and other equivalents) which often have extra-territorial reach.

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](#).

Appendix A Key Control Detail

Key Control Title	Control Objective	Detailed Control Activity
Training and Communications	<p>To ensure that BT people and those that work with BT know and understand that bribery and corruption are not tolerated.</p> <p>To ensure that BT people and those that work with BT know, understand, and follow our procedures to prevent bribery and corruption.</p>	<p>All BT people complete Being trusted: Our Code training. Targeted training delivered by RCA deployed teams and ABC team to higher risk communities identified by bottom-up risk assessment.</p> <p>All HRTPs have equivalent ABC policies and training in place to BT's. Where they do not have training, they complete BT training.</p> <p>Regular drumbeat of ABC communications - communications plan managed by Group Ethics and Compliance.</p> <p>Frequency: Continual</p>
Donations, Sponsorships and Marketing Funds	<p>To ensure that marketing funds, donations or sponsorships are not used to conceal a bribe or to inappropriately influence the recipient or affiliated individuals (including public officials).</p>	<p>All charitable donations must be registered and pre-approved</p> <p>Political donations are prohibited</p> <p>Marketing funds and sponsorships must be registered and pre-approved</p> <p>Frequency: Continual</p>
Gifts and Hospitality	<p>To ensure that G&H given and received are in line with</p>	<p>ALL G&H must be pre-approved by the Line Manager</p> <p>All G&H over the country registration threshold must be registered and approved in advance on the G&H system.</p>

	BT policy and do not inappropriately influence.	CFU/CU G&H approver monitors compliance and reviews all registrations that route for manual review. Frequency: Continual
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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