

The Way We Work

BT's Business Practices

As at October 2013



The Way We Work: Our Business Practices

Our Values:

Personal

We come across as human beings. We show we understand and care. We respond to what our customers want.

Simple

We're straightforward and easy to deal with. We make complex things clear.

Brilliant

We're ingenious. We lead the way in creating new things. Whatever we do, we do it really well.

The Way We Work sets out our business practices and our values – the behaviour we expect from all BT people.

Follow The Way We Work and our values and do what's right.

If in doubt, ask. Act quickly if you are worried.

Statement from the Chief Executive

We believe in the power of communication to make a better world.

We bring together the best networks and technology with the expertise of our people. Making connections, creating new possibilities. This way business can grow, communities can flourish, and individuals can get more out of life. That's the difference we make, every day.

We do this responsibly and sustainably. We act with integrity, work ethically and live by our values. Our business standards and our people policies are grounded in these principles.

Acting with integrity and working ethically make good business sense. It also helps us to work together across the world. Ethics is not just about preventing criminal or corrupt behaviour, although that is vitally important. Behaving ethically should be part of everything that we do.

Our reputation strengthens each time we stick to our business principles. This might mean that we have to reject potential new business if it looks as though it would force us to compromise our principles. A tough call but one that BT people should make if it's appropriate.

If you are not sure what the right thing to do would be in any given situation – just ask. Have the courage to speak up if you are concerned that any activities conflict with our way of working. Act quickly if you are worried.

This document sets out The Way We Work at BT. Your personal actions make a difference. Together, we make BT a place where we're proud to work.

After all, it's our BT.

Gavin Patterson

Finding what you need

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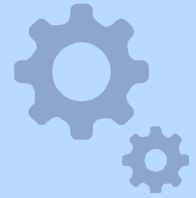
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The Way We Work: What it means



The Way We Work sets out how we do business at BT.

It applies to you and everyone else who works for BT around the world, in everything we do.

Follow The Way We Work and behave in line with it and our values.

We also expect third parties, such as contractors, suppliers and agents, to follow it in all their dealings with or on behalf of BT.

Sometimes things are complicated. Be clear that:

- if a local law conflicts with a policy in The Way We Work and requires a higher standard you must comply with the law
- if a local custom or policy conflicts with The Way We Work and sets a lower standard, follow The Way We Work.

The Way We Work sets out our business principles and standards. It doesn't cover every BT policy that puts our business principles and standards into practice.

You're responsible for:

- understanding and following the law and details of BT policies relevant to your work area, role and any people that you manage
- undertaking the mandatory training that we put in place so that you can understand and follow our business principles and standards
- raising any suspected violations of the law, The Way We Work, or any other BT policy. For BT people we've included links to the intranet to help you access further information and advice on where to get help. Your local laws may impact how you do this.

The consequences of not following The Way We Work can be very serious – including damage to our reputation, significant fines and penalties, and even criminal liability for you, your manager(s) and/or BT. If you work for BT and you don't comply with The Way We Work, we will investigate fully and may take appropriate disciplinary action, up to and including dismissal.

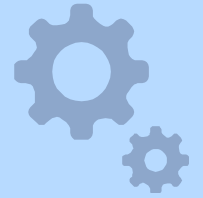
We can't cover everything in The Way We Work and in some situations you'll have to use your judgement on the most appropriate course of action. If in doubt, ask.

On page 17, you'll find guidance on resolving conflicts and where to go to get further advice.

There's a section about how to report any concerns (page 10). If you think you or anyone else may be breaking The Way We Work, the law or any BT policy, please speak up.

(Note: the hyperlinks in this document are intended to direct BT people to locations in the document, or our corporate intranet – they are disabled in external versions of the document)

BT's business principles



Everyone who works with BT should act with integrity, work ethically and live the BT values. Our business standards and people policies are grounded in these principles.

Acting with integrity

This means holding ourselves to our business principles and standards. Integrity matters because we naturally want to do the right thing. Integrity also makes good business sense for BT. It gives people confidence in our business, which helps us to keep growing and make a healthy return for our shareholders over the long term.

Acting with integrity helps us to work together across the world. It also helps us make our planning and implementation more effective, pre-empt problems and build stronger relationships with all our stakeholders.

Working ethically

The principles in The Way We Work are here to make sure everyone who works for BT lives up to the same high standards. At the same time, they're designed to respect local customs and traditions. As a company we always want to do the right thing – but that's not always straightforward. Sometimes we have to make difficult decisions, balancing complex and conflicting issues and interests. We believe in being transparent, open and honest in all the ways we report our performance: financially, environmentally and socially.

We must be ready to justify our actions and explain ourselves to the people our decisions affect.

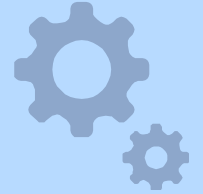
Living our values

Our values are at the heart of the way we do things at BT. They sum up what we all have in common, and spell out the behaviours we expect from each other. All BT people must consider the values alongside the other business principles in The Way We Work and ask: 'Is what I am doing in line with the way we do things at BT?'

**Personal
Simple
Brilliant**

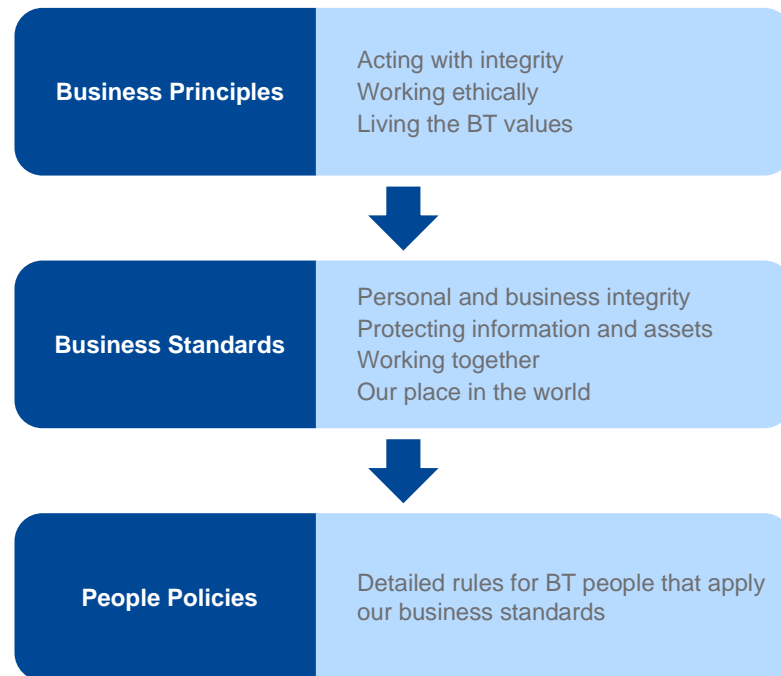
Living the values through
the decisions we make

BT's business standards



How does it all fit together?

BT's business standards apply our business principles. We've set them out here and everyone who works for and on behalf of BT worldwide must follow them. Our people policies set out the detailed rules for BT people that apply our business standards.



Our business standards

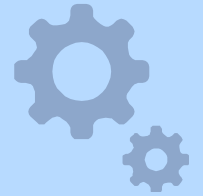
Personal and business integrity

- following the law (Page 14): We follow the law, our licensing/authorisation obligations and any other regulations
- bribery and corruption (Page 15): We don't tolerate bribery of any kind
- conflicts of interest (Page 17): We avoid an interest or situation that conflicts, or may appear to conflict, with our duty to BT.

Protecting information and assets

- information and data (Page 21): We aim to protect the confidential and private details of our company, people and customers
- our assets (Page 25): We protect our brand and our physical, financial and intellectual assets
- managing risks (Page 27): We manage the risks to our business and consider risk when we're making decisions.

BT's business standards (cont.)



Working together

- getting work done in the right way (Page 30): We respect each other. We want a work environment which helps each of us to achieve more. We enjoy working in a diverse organisation and benefit from looking at things in a different way. We treat everyone equally and don't tolerate any kind of harassment or prejudice. We make BT a place where we're proud to work
- human rights (Page 32): We respect the dignity, liberty and equality of everyone we work with. Our policies and procedures are based on the United Nations' Universal Declaration of Human Rights
- communications (Page 34): We aim to be truthful, helpful and accurate in everything we write or say. We speak honestly and listen
- honouring commitments (Page 35): We don't make promises we know we can't deliver; we always get proper authorisation before making any important commitments
- competing fairly (Page 36): We compete vigorously but fairly, being honest and trustworthy in all our dealings.

Our place in the world

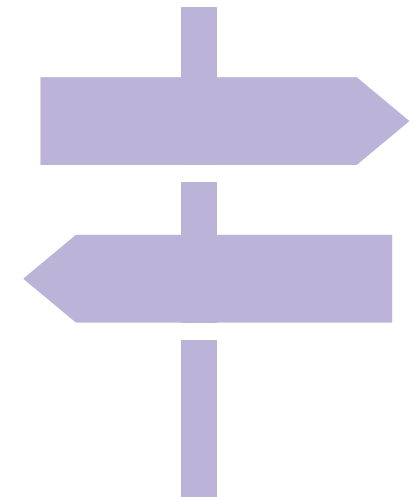
- looking after health and safety (Page 38): We care about and protect our people and others who could be affected by our activities and we look after their health, safety and wellbeing
- the environment (Page 40): We are committed to the prevention of pollution and minimising the impact on the environment of our operations globally
- political contributions (Page 42): We don't make contributions to any political party, to the campaign of any candidate for elected office, or in support of any elected official.

Where to go

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Getting advice



Reporting concerns



Although BT has a good reputation for doing business ethically, we can never be complacent. As part of our drive to make sure we maintain the highest standards, we have 'Speak Up': a free, confidential hotline that anyone who works for BT can call, whatever country they work in. You'll find the number for your country from the link below.

Most of the time, the best way to deal with a problem is to talk to your line manager, or contact the [Ethics team](#) (or at ethics@bt.com if you are outside BT). HR issues should be flagged to your line manager. However, there are some instances where contacting the '[Speak Up](#)' hotline is the best and/or safest way to raise a sensitive ethical issue with someone who isn't connected to your team.

There are a number of ways to report an issue. You can speak to a real person about it, or leave a secure voicemail instead. Or you can leave a message online. We know it takes courage to speak up. We'll do whatever we can to support and protect you. We will not permit anyone to retaliate against you for reporting

your concerns in good faith. If someone tries to deter you from speaking up, that's a disciplinary offence. We'll deal with it seriously – including dismissal, if appropriate – at any level of our organisation.

For more information, visit the [confidential hotline website](#).

Special cases

There are some countries we work in where:

- leaving anonymous hotline messages isn't allowed
- you have to try to resolve things locally (for example, with your line manager) before you call the '[Speak Up](#)' hotline
- you can only report certain kinds of issues to the [hotline](#) – like accounting fraud, bribery and environmental offences.

Before you dial: check the [confidential hotline](#) webpage for details of the phone number to call in your country, and any special instructions.

Getting advice



If there's anything in this document that you don't understand or want to know more about:

- check [The Way We Work](#) website
- look at your local people policies and procedures on the intranet
- talk to your line manager or someone close to your business
- contact the [Ethics team](#). (If you don't work at BT you can contact them at ethics@bt.com).
- phone one of our helplines:
 - Security: 0800 321 999 (UK): +44 1908 641 100 (out of the UK)
 - Procurement and supply chain: +44 (0)1977 592270
 - Contact [ASK HR](#) or Peopleline: 0800 731 4747 (UK) or +44 1908 358 888 (out of the UK) or
- or contact '[Speak Up](#)', our confidential hotline if you want to report any concerns.

Not sure what to do? Sometimes it isn't clear. Ask yourself:

'Is it in line with our values and The Way We Work?'

'Would I be happy reading about it in the newspapers?'

'Is it legal?'

'Am I comfortable with this decision?'

'Could I explain my decision to my colleagues or to my family?'

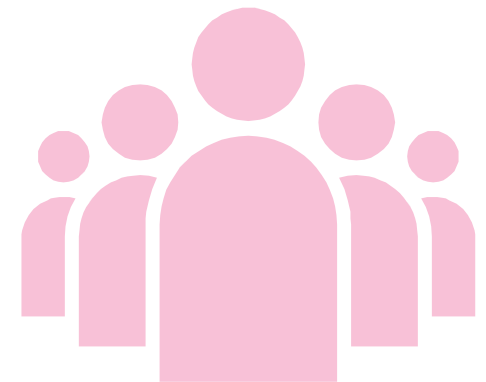
Personal and business integrity

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Following the law

Bribery and corruption

Conflicts of interest



Following the law



We follow the law, our licensing/authorisation obligations and any other regulations.

Following the law is the foundation on which our ethical standards are built. We are honest and respectful. We always respect and obey the laws, rules and regulations of the cities, states, and countries we operate in. You must abide by local laws. There might also be laws that apply internationally (e.g. the 2010 UK Bribery Act or the US Foreign and Corrupt Practices Act) or licence requirements that apply. As a global company, BT needs to be careful about where it trades and who it trades with. This includes complying with embargoes and sanctions which have been imposed on certain countries or groups of countries, or individuals.

We are legally required to comply with sanctions and embargoes across the world. Failing to comply with these sanctions or embargoes may expose BT and you personally to severe criminal and administrative penalties, as well as reputational damage to our brand.

Who to ask

Although you're not expected to know the detail of every law, rule and regulation, you are expected to know enough so that you can judge when to seek advice. If you've got any questions about the laws that affect your work, get in touch with [BT Legal](#).

Report it

If you work for BT and you think you, a colleague, or someone else connected to BT may have broken the law, report it to your line manager, [BT Legal](#), [BT Security](#) or to our [confidential hotline](#).

Questions and answers

- Q** The local laws in my country contradict what it says in [The Way We Work](#). Which one is right?
- A** The law comes first. If a local law conflicts with a policy in [The Way We Work](#) and requires a higher standard you must comply with the law. If you think there's a conflict, ask [BT Legal](#).

- Q** Who's legally responsible if I break the law while I'm doing my job?
- A** It could be you, or BT, or both, and it could lead to civil and criminal charges. If you're in doubt, talk to [BT Legal](#) before you do anything you think might break the law. If you do break the law while you're at work we may also take disciplinary measures.
- Q** What if a customer asks me to do something that would mean bending the regulations a little?
- A** Look for another way to help them. For example, in the UK, the Ofcom authorisation regime gives us the freedom to do business within certain limits. Having integrity means respecting those limits. If you're not sure how to handle a situation, talk to your line manager or get advice from [Regulatory Affairs](#) or [BT Legal](#).

Bribery and corruption



We don't tolerate bribery of any kind.

What is bribery?

BT has zero tolerance of bribery. If you make, authorise, seek or accept any kind of offer, gift, kickback or payment to get or keep an unfair advantage, that's bribery. It doesn't have to involve money.

The UK, the US and many other countries have laws against bribery in both the public and private sectors. Laws such as the 2010 UK Bribery Act and the US Foreign Corrupt Practices Act have worldwide scope and apply to BT wherever we do business.

We also have our own anti-corruption and bribery policy. As someone who works for BT, it's your responsibility to read, know and comply with this policy which applies worldwide. Here is a [link](#) to the policy and guidance on The Way We Work intranet site.

Corruption can take many forms and we can't list them all. But watch out for:

- abnormal cash payments
- lavish gifts being received
- unexpected or illogical decisions accepting projects or contracts
- the unusually smooth process of cases where someone does not have the expected level of knowledge or expertise
- bypassing normal tendering or contracting procedures
- company procedures, financial controls or guidelines not being followed. If you break anti-corruption laws, you could bring criminal or civil penalties on yourself, BT or our partners. If there's anything you're unsure about, contact the [Ethics team](#) or [BT Legal](#).

Giving and receiving gifts and hospitality

We never offer or accept gifts, payments or hospitality to encourage or reward a decision.

Gifts and hospitality can be a normal and healthy part of building business relationships. They're only a problem if they're meant to influence our decision-making, give us an unfair advantage over our competitors, or limit our customer's right to choose freely. Different cultures have different attitudes about what is or isn't acceptable. As an international business, we need to respect these differences, while staying true to our principles.

We have a [gifts and hospitality policy](#) to help you work out what is or isn't appropriate.

Every time you give or receive a gift or hospitality of any kind, you must follow the policy. You must not give or receive a gift or hospitality if it is intended to influence you or the person receiving it and you must not give or receive lavish or extravagant gifts and hospitality which is, or may be seen to be, inappropriate in the circumstances.

Gifts and hospitality above certain [limits](#) must be registered for approval.

Bribery and corruption (cont.)



Who to ask

If you've got any questions about bribery and corruption, ask your line manager or contact the [Ethics team](#). (If you don't work at BT contact the team on ethics@bt.com).

Report it

If you work for BT, any time you're facing an ethical issue:

- report it to your line manager, the [Ethics team](#) or our [confidential hotline](#) as soon as you can
- record all the details
- ask the [Ethics team](#) before you decide what to do.

If you have any reason to suspect that someone who works for or on behalf of BT might be taking part in bribery or corruption, however small, you must speak up. Act quickly if you are worried.

Questions and answers

- Q** I've got all the right papers in order, but customs are holding things up. I think a small tip would help speed things up. Is that ok?
- A** No, that's a bribe. Although some jurisdictions allow so called 'facilitation payments', we don't. They're also illegal under the 2010 UK Bribery Act which applies to BT all over the world.
- Q** We have a business partner who often invites BT executives to dinners and events that would be considered lavish in some countries – but it's perfectly normal here. There doesn't seem to be any hidden motives or expectations behind it, just to build a good relationship. What do I do?
- A** The best thing to do is ask the [Ethics team](#). We don't want to offend, but we don't want to give anyone the wrong impression either. Appearances count, even if you're sure there's no hidden agenda. Gifts and hospitality should be transparent and proportionate. If in doubt, politely decline.

Remember to register and get approval in advance for the gift or hospitality if it is above the registration threshold.

- Q** In our new start-up venture, market share counts. For a payment, I can win a contract. Without it, we'll lose the work. If I let this go, won't I be putting our business and my career on the line?
- A** Making a payment would break the law as well as our anti-corruption and bribery policy. It would also undermine your integrity and damage BT's reputation. No contract, however big, justifies breaking the law or The Way We Work. Ethical business is the only business we are interested in. We'll stand by anyone who refuses to offer or receive a payment, gift or favour – even if means losing a deal.

Conflicts of interest



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 them.

What is a conflict of interest?

A conflict of interest is any situation where your loyalties might appear to be at odds with your duties to BT.

It could be a conflict between BT's interests and your own personal interest. If a personal interest interferes, or even appears to interfere, with your duties to BT then a conflict of interest may arise. Conflicts of interest may also be financial, such as a significant shareholding in a competitor of BT or working for a competitor or supplier of BT or having another job which causes your BT work to suffer; or non-financial, such as a conflict arising out of close family and/or other personal relationships.

If you are not sure if you have a conflict, ask yourself:

- Does it affect how you do your job for BT? If others knew about the interest or relationship, could they question your ability to do your 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 hit the newspaper headlines?
- What are the wider implications for BT as a whole?
- Does your role/the external interest influence you in any way? Might others think your role/interest could influence you – even if it doesn't?

Declaring your interest

We expect everyone who works for BT to be unbiased and upfront, whatever part or level of our organisation you work in. You must not use your position at BT (or any inside information)

for your personal gain, or in a way that could damage our business – or even give people reason to believe that you might.

Who to ask

You can't always avoid conflicts, but even if it's only a potential problem you should tell your line manager about it right away, so you can agree how to deal with it in an open and honest way.

If you're not sure whether you've got a conflict of interest or don't want to tell your line manager, contact the [Ethics team](#). (If you don't work at BT contact the team on ethics@bt.com).

Report it

If you work for BT and think someone else in the company might have a conflict of interest, tell them or their line manager. If you think someone working for a BT supplier or a BT agent might have a conflict of interest with BT, tell your line manager.

If you don't feel that you can raise the subject with them directly, report it to the [Ethics team](#) or to [Speak Up](#), BT's confidential hotline (see '[reporting concerns](#)' for more details).

Conflicts of interest (cont.)



Questions and answers

Q I work for BT on a part-time basis in a sales role. I also work part-time for another company. What should I do?

A You should contact your line manager and register it as a potential conflict of interest for review as, for example, holding a role with a supplier or a competitor is not permitted.

Q My partner runs a small printing firm, and I'm sure they could make our leaflets or a lot less. Can I give them the contract?

A No. Imagine how it would look if people realised you had given the contract to your partner. If your partner plans to bid for BT work, you must declare your relationship right away and someone else must oversee the procurement process.

Q I'm a BT employee, but I've been seconded to a joint venture. Whose interests come first?

A 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 this Code 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. If you think your personal interest interferes or may interfere with the interests of the joint venture then you should declare this to your line manager.

Q It is not public knowledge yet, but I know from my work that now would be a good time to buy BT shares. Can I? Can I tell my family and friends?

A Absolutely not. That's called 'insider trading', and it's a very serious crime. If in doubt ask the [Ethics team](#).

Q A member of my family wants to come and work for BT, maybe even in the same department as me. Will this be a problem?

A It may be fine if local policy in the country you work in allows it and there is suitable separation between your role and the role your family member applies for. You mustn't be involved in any way in deciding who to hire – including the application and interview process. If they do join, you should make sure you're not responsible for any decisions about their job or pay, to avoid any suggestion of favouritism.

Conflicts of interest (cont.)



Q 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?

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

Q Is it OK to have a personal relationship with someone at work?

A Yes if the situation is handled sensibly, although policy varies locally. Personal relationships must not have a negative impact on the business, the working environment and other people working for BT. If you think you may have a conflict of interest then you should declare this to your line manager (or to your local HR support if your relationship is with someone in your line) and follow any local policy on this.

If you have any more questions, contact the Ethics team.

Protecting information and assets

Contents

Information and data

Our assets

Managing risks



Information and data



We aim to protect the confidential and private details of our company, people and customers.

We frequently need to use information about people to do our job – whether it's about our own colleagues, our residential customers or people data belonging to our business customers.

You should always treat such data like it was your own – keep it safe and secure and think about how you would want things to be done if your own information were involved.

Privacy and data compliance

Information about people is also known as personal data – this can be, for example, someone's name, address, telephone number, personal email address, account number, date of birth, bank account or billing information. It includes data held on BT's systems, in paper documents, emails, call recordings, USB sticks, mobile devices or other storage media. Handling personal data properly is key to building trust with both our customers and colleagues.

Personal data is seen as so important that many countries have privacy laws covering how it should be handled and protected and we must comply with these. So, make sure you can recognise what is, and what isn't, personal data; understand how you are expected to use this information in your day-to-day job and be alert to what can go wrong.

BT also handles large amounts of information given to us by businesses and public sector organisations who are our customers. Some of this information will be "personal data" described above. Some of it may not be people data but will still be very important to our business and public sector customers. So, these big customers will often tell us specifically how they want us to use and protect their data, for example in a contract using their terms and conditions. You'll need to think about what we've agreed to in the contract, as well as the general rules for working with personal data where that is involved. The section below on page 23, signing contracts with business customers, explains what you need to do.

Key points for everyone to remember when working with personal data:

- You should only collect and retain personal data for legitimate business purposes or where the law requires us to do so
 - Only collect and use as much personal data as you need for the task in hand and your job role, and no more
 - Be prepared to challenge colleagues when they ask for access to personal data – do they have the authority and a genuine business need for it?
- Where you have access to personal data it should only be used for the purposes for which it was collected
 - Don't use personal data for new or different purposes, e.g. systems testing, unless you get approval from [BT Legal](#)
 - Never discuss or disclose data to colleagues unless there is a business need to do so.

Information and data (cont.)



- Make sure all personal data we hold is accurate and kept up to date
 - Take the time to make sure you capture people's personal details correctly, e.g. when taking an order
 - Mistakes can be costly and make us look unprofessional
 - Always take the opportunity to check customer contact and billing details
 - If someone says they don't want to receive direct marketing from BT make sure you update their details immediately on the BT system.
- Keep personal data safe and secure to make sure that no one can get unauthorised access to it, change, destroy or lose it
 - Follow BT Security's guidance and policies – they're there to help you do the right thing
 - Always check that someone claiming to be a customer or a colleague from elsewhere in BT is who they say they are
- Always consider what is in the data and documents you are working with and classify them properly; only share as much as you need to achieve your goal
- Remember to think carefully about where you are, and who might overhear or see what you're working on. Don't discuss confidential BT business in public places
- Before sending information outside the company, ask yourself: "Is it appropriate to send?" and "Have I protected it in line with our security policies?"
- Lock paper documents away and make use of shredders or confidential waste bins when you want to dispose of them.
- Only hold personal data as long as it's required for the original purpose for which we obtained the data, unless required by law. BT has set time limits for how long to keep data – these can be found here
 - Always ask yourself, "Do I really need to keep this data?"
 - Never store personal data on laptops, memory sticks or other storage devices for longer than is required
- Undertake regular housekeeping and delete/ destroy/shred data that is no longer required.
- Individuals can ask to see what personal data BT holds on them by making what is known in the UK as a Subject Access Request
 - It's important you know what to do when you receive such a request. More information on the UK process can be found here. If you receive a request for outside the UK, then seek advice from the Data Privacy Team.
- There are also extra rules about what is known as "sensitive personal data." Examples of this include information about someone's health, race, religious beliefs, political opinions, trade union membership, criminal record or sexuality
 - If your role requires you to handle sensitive personal data you must seek guidance from the Data Privacy Team before doing so.

Information and data (cont.)



Depending on which job you do, you may also need to consider the following

- There are strict rules about moving personal data between countries and, for example, sending it outside the European Economic Area. These rules can apply even where someone in one country can only access data on a system located in another country – that will still be a transfer of data
 - Always seek advice from your legal or compliance team if you believe you'll be transferring personal data or allowing access between countries
 - Make sure you've understood the rules that apply to what you're doing and that appropriate contractual and security safeguards are in place.
- When we sign contracts with business customers they may have specific requirements about how their data, including personal data, is handled.
 - Ensure you understand how the customer wants us to handle their data

- Always document any data requirements agreed with the customer in the contract; seek appropriate legal and compliance advice in these situations
- Confirm, before a contract is agreed, that we are actually able to deliver the service in line with the customer's data requirements
- Our products, systems and processes must manage data in line with customer requirements throughout the life of the contract
- When contracting with suppliers/sub contractors, make them aware of customer data requirements, specify them in our contracts and check on a regular basis that they are being delivered.

Who to ask

Check that you know where to go to get expert advice. Remember BT has a [Data Privacy Team](#) who can help you get it right when handling personal data. The data protection coordinators for your part of BT are shown on the [Legal, Governance and Compliance intranet site](#).

You can read more about our approach to data privacy on the intranet site, along with BT's data protection policy and the BT employee privacy policy [here](#).

Report it

If we get things wrong involving personal data the consequences can be very serious. BT's reputation could be seriously damaged and BT might face legal action or fines from the authorities. We risk losing the trust of our customers; and ultimately losing their business. For employees, any deliberate or negligent actions could result in disciplinary action and, in the worst cases, prosecution.

If you become aware of a personal data breach, no matter how insignificant it may seem, you must report it within 24 hours to the BT Security Control Centre on 0800 321 999 or +44(0)1908 641 100 or via email at security@bt.com. BT's data breach reporting policy is available on the [intranet site](#).

Information and data (cont.)



Questions and answers

Q I'm holding data about people who are BT customers but I'm not actually doing anything with it. Is it covered by Data Protection rules?

A When you capture, obtain, store, hold, access, disclose or destroy data about people (customers or employees) you must comply with the BT Group Data Protection policy. As data protection laws exist in Europe, Asia Pacific and the Americas, you must check that you're complying with the local law as well and seek guidance from the BT experts.

Additionally, you should ask yourself whether you really need to continue holding this data if you have no use for it. You should keep data in line with the time limits in the BT Group [Data Retention policy and schedules](#) and also make sure you apply BT's information security standards.

Q A business customer wants BT to commit to certain data handling requirements and restrictions with regard to their data, is this possible?

A Customers frequently want restrictions governing what we can do, where we can do it, how we can do it and who can be involved in handling their data. They may also want to give a very wide meaning to the term 'customer data'. BT can accommodate such requests where we are actually able to deliver the restrictions the business customer is asking for; and where including them in their contract with BT has received the appropriate sign off. You should seek advice from the appropriate BT contact where you need to. For further information please read the [principles and guidelines](#).

Q I've heard that sales advisers often get asked by their friends for customer information like phone numbers and addresses. Can they give this information out?

A No. This is a serious crime as well as a major breach of BT Group Data Protection Policy. Any such unauthorised disclosure of customer or employee data will be subject to disciplinary action, including dismissal.

Our assets



We protect our brand and our physical, financial and intellectual assets.

Each of us is personally responsible for protecting BT's assets – whether it's our equipment, property and information or knowledge and ideas. That includes keeping proper records of any resources we use and following our security policies.

Theft, carelessness, waste, damaging or misusing property and deliberately changing records have a direct impact on BT's profitability. We must not misuse the intranet or the internet. All BT's assets must be used for legitimate BT purposes. BT may access and monitor computer files and electronic communications stored on our company servers, computers and other electronic devices. We do this for maintenance, business purposes or to meet our legal obligations. And we do it in line with our privacy and data protection policies and the law.

We don't act fraudulently, deceive people or make false claims.

Who to ask

If you are based in the UK and have experienced a security incident or require advice on whether an incident should be reported, please contact the BT Security Control Centre (SCC) on 0800 321999.

If you prefer not to contact the SCC by phone, you can get in touch via their [website](#) or by emailing security@bt.com. If you are not based in the UK, please call +44 (0)1908 641100.

Report it

Any suspected incident of fraud or theft should be immediately reported on the above numbers or to the [confidential hotline](#).

Respecting our brand

The BT brand, including the Connected World symbol, is one of our most valuable assets. A strong brand is essential for long-term success in the fast-changing and highly competitive markets we operate in. It weakens our ability to compete if our products, services or communications are off-brand or we use our

logo the wrong way. The same goes for bad press or publicity. This includes the use of social media sites such as Facebook or Twitter. Comments on social media sites believed to be private may often be seen by others. You should think very carefully before posting comments that may inadvertently damage the BT brand.

As a responsible business, we respect the intellectual property of other businesses in the same way.

Our assets (cont.)



Questions and answers

Q Physical assets are things like buildings, computers and cars. What are intellectual assets?

A Intellectual assets covers more than you might think. They include our know how, inventions and the names of our products and services; the physical design of our products and software; our engineering drawings, artwork and written materials; confidential information about everything from our processes and business plans to customer details and launch dates. Some of these things are legally protected by patents, trademark registrations, design registrations or copyright – either on paper, on computers or the intranet. Intellectual assets are often worth far more to a business than its physical assets. You can help protect them by being careful about how you use them and who you share them with.

Q Why is our brand so important? Is it really an ‘asset’?

A Yes. The BT brand is one of our most valuable assets, but its value can go up or down depending on how the world sees us. That’s why it’s so important for each of us to protect it.

Managing risks



We manage the risks to our business, and consider risk when we're making decisions.

The way a business manages its risks is critical to its success. Effective risk management creates stability, contributes to profit, protects our reputation and also enables BT to take advantage of opportunities.

We have an Enterprise Risk Management (ERM) policy and framework which is designed to help our Group as a whole, as well as each Line of Business, to manage all categories of risks consistently (commercial, financial, operational, legal and others).

We manage our risks in line with our appetite for risk, and what we believe to be BT's best commercial interests. Our people must think about risks in their day-to-day jobs. Think about the risks and implications of your actions and advice. Be accountable for them and the impact they have on colleagues, communities and the business.

Who to ask

Have a look at the [BT Enterprise Risk Management](#) intranet pages if you want to know more or talk to a member of the Group Risk Management team.

Report it

If you are worried about a risk then speak to your line manager.

Questions and answers

Q What counts as a risk?

A Any uncertainty that might threaten our ability to achieve our objectives. This could be something occurring inside our business, or an external factor that could impact on our objectives.

Q Why do we need risk management?

A Our stakeholders expect us to manage our risks effectively and responsibly. Good risk management:

- helps us to achieve our objectives
- keeps our organisation (and stakeholders) safe
- gives us the confidence to be more ambitious
- enables us to meet our corporate governance requirements.

Q How much risk should a business have?

A Every business has to take some risk to make profit

The important thing is to take sensible risks and manage those risks in the right way. We have to manage all risks carefully as our appetite for risk, the law and our commercial position change over time. We need to be free to take calculated risks. The idea is to take rewarding risks, not avoid all risk.

Managing risks (cont.)



Q I have identified a risk and I am not sure how we are managing it. Who should I speak to?

A In the first instance your line manager should be aware of the risk management process, but failing that you can contact your line of business risk champion, or the Group Risk Management team.

Q I've thought of a risk, and I think we might need insurance. Who should I speak to?

A Talk to Group Insurance and Risk Financing for help and advice. They're responsible for arranging any insurance within BT.

Working together

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Getting work done in the right way



We respect each other. We want a work environment which helps each of us to achieve more. We enjoy working in a diverse organisation and benefit from looking at things in a different way. We treat everyone equally and do not tolerate any kind of harassment or prejudice.

We make BT a place where we're proud to work.

General behaviour

We will only be truly successful if people respect their colleagues. Obstructive behaviour, fighting, harassment (racial, sexual or of any other kind) and abusive language are unacceptable, as is deliberately performing work below the required standard.

Deception and dishonesty

We always act honestly, fairly and openly.

Timekeeping and attendance

If you work for BT, you must attend for work and record your attendance as required for your job and follow our procedures if you are going to be away from work for any reason or late.

Fairness and equality in the treatment of others

BT values and welcomes diversity. We will not treat anybody at BT differently to anybody else because of their race; sex; religion/beliefs; disability; marital or civil partnership status; age; maternity or paternity status; sexual orientation; gender identity; gender expression; caring responsibilities, or any other class of person protected by laws in your country.

Also, we won't put people at a disadvantage by making conditions or requirements we can't justify. In working together, as one team, we must all show sensitivity and respect for others' feelings, cultures and individual diversity.

We want BT to be a place where everyone feels free to make their own unique contribution. We've worked hard to create a culture that's fair and inclusive, and we'll continue to do so.

It is not just about respecting each other, but our customers, suppliers and partners. We expect our managers to lead by example and root out prejudice wherever they find it.

Bullying and harassment

We don't tolerate any form of bullying or harassment against our people – not just during working hours but any time they are doing something connected to BT.

Getting work done in the right way (cont.)



Everyone in BT must

- encourage the people they work with to treat all colleagues with respect
- take personal responsibility for making sure that people are respected at all times
- help put a stop to bullying or harassment at work and step in when they see or hear of bullying or harassment. We want a work environment where everyone has the opportunity to succeed. We have people policies setting out the rules to enable us to get the work done and to help us to work together across the world.

Who to ask

BT people can find local people policies and procedures on the intranet. Or you can talk to your line manager. The Peopleline on 0800 731 4747 (UK) or +44 1908 358 888 (international) or [ASK HR](#) can also help with people queries.

Report it

Most of the time, the best way to deal with a problem is to talk to your line manager. If you don't want to talk to your line manager then speak to your HR business partner.

Questions and answers

Q What does diversity have to do with making a profit

A Diversity makes sound business sense. To be a world leader, we have to be innovative, creative and able to see things from different perspectives. We also include the greatest range of talented people if we respect everyone's contribution – regardless of gender, race, age, physical ability, religion, sexuality or culture. We need to extend the same courtesy and respect to our customers, whatever their cultural background or personal beliefs.

Q Someone I work with is being harassed by someone higher up. I feel like I should report it, but I don't want to get into trouble. What should I do?

A Don't ignore it. We need to root out this kind of behaviour. Tell your line manager. Or if you're not comfortable doing that, tell your HR business partner. Don't worry, they'll keep it confidential. You won't get into trouble for doing what you genuinely believe is best.

Q I understand that we must respect diversity and that we don't tolerate any form of bullying and harassment but what other behaviour is disrespectful?

A If we referenced every type of unacceptable behaviour, it would be a very long list indeed. Here's some obvious examples though: fighting, harassment and abusive language, deliberately performing work below the required standard; not following procedures if you're going to be away from work or late; dressing inappropriately. BT employees must follow all of the relevant people policies and procedures.

Q What happens if I don't behave as expected?

A If your behaviour doesn't live up to our required standards then, if you're a BT employee, we may take disciplinary action.

Respect for human rights



We respect the dignity, liberty and equality of everyone we work with. Our policies and procedures are based on the United Nations' universal declaration of human rights, which sets "a common standard of achievement for all peoples and all nations."

Our commitment

Our commitment, as an original signatory to the United Nations Global Compact principles, is to embrace, support and respect human rights and ensure we're not complicit in human rights abuses. We are committed to implementing the UN Guiding Principles on Business and Human Rights. Although all human rights are equally important and respected, some of these are at greater risk of abuse as a result of our business activities. In particular, working conditions throughout our supply chain, how we safeguard information and the complex issues surrounding freedom of expression and privacy are higher risk areas which we give special attention to.

Working conditions

We don't use or accept forced, bonded or involuntary prison labour. We don't demand or hold on to deposits or identity papers for our workers, or deal with businesses that do. We only work with people who choose to work freely. We respect their rights to equal opportunities, freedom of association and collective bargaining. We don't use child labour and we demand the same of our suppliers and their suppliers. If we discover any child labour in our supply chain during an audit, we'll take immediate action to put a stop to it, with the child's best interests in mind.

We work with all our suppliers and their suppliers to make sure they meet our 'sourcing with human dignity' standard. You can read the standard on the [Procurement intranet](#).

Safeguarding information

BT's security policies have been designed to align with the security controls in ISO27001 and ISO27002, the international code of practice for information security management. We regularly train our people on how to achieve the highest

levels of information security for all the data we access, process and share through the course of our business activities. We recognise that human error represents the greatest data security risk so we give utmost importance to training, raising awareness and ensuring strict compliance. We also offer customers products and services which help prevent inadvertent access to illegal or inappropriate content, such as giving families the tools to control what their children can see on the internet and television.

Who to ask

If you have any questions e-mail: sourcingwithhumandignity@bt.com

Report it

If you are concerned that BT or any of our suppliers or agents may be breaking our commitments on human rights, please speak to your line manager or contact the [Ethics team](#) (if you don't work at BT contact the team on ethics@bt.com).

Respect for human rights (cont.)



Questions and answers

- Q** What if the local customs in my country go against our policy?
- A** The universal declaration of human rights is meant to apply everywhere and our people policies aim to respect everyone's human rights. However, in practice, following them is not always straightforward, especially when there are strong local cultural, social or religious traditions that contradict it. If you think there's a conflict, you should get advice from your line manager.

Communications



We aim to be truthful, helpful and accurate in everything we write or say. We speak honestly and listen.

What is communication?

We communicate with each other at work and with our suppliers and our customers. Communications are what we write or say and how we listen. Using social media is also a form of communication.

We are a communications company so people expect the highest standards of communication from us. Through effective communication we will build trust in BT so that people support us, buy from us and want to work for us.

Good communication means not just talking, but listening too. It is vital we listen to all our stakeholders, and are open with our customers, shareholders, colleagues and business partners.

Ultimately, we are what people think we are. Their opinions shape how we do business. To get them to open up to us, we need to be honest, respectful and straightforward with

them. We have to earn and deserve their trust and respect.

Who to ask

BT people can contact [Group Communications](#) for more advice or take a look at their web site.

Report it

If you are concerned about any communications then speak to your line manager or [Group Communications](#).

Questions and answers

- Q** That's fine on paper, but it's a bit naive in real life. What about advertising or sales, where you have to persuade people?
- A** There are plenty of good reasons for people to choose BT: quality, value for money, service, reputation. You don't have to mislead someone to sell them something. If you do, we risk losing their trust and respect for good. Remember, one of the biggest assets in advertising and sales is brand and reputation. Focus on the positives and sell our products and services on their merits.
- Q** We can't be totally open with confidential or commercially sensitive information, can we?
- A** You're right. Obviously, there are some things it would be irresponsible of us to reveal – for example someone's personal details or our business plans. We have a responsibility to our customers and colleagues not to share their personal information. We also have a responsibility to our shareholders to protect our intellectual assets.
- Q** What sort of communications are inappropriate?
- A** Some examples are derogatory comments about BT; BT employees, competitors, third parties, partners or suppliers. In the context of BT's business; harassment/bullying; speculating or commenting on confidential or sensitive company information.

Commitments



We don't make promises we know we can't deliver; and we always get proper authorisation before making any important commitments.

If you work for BT whenever you make a decision, commitment or business agreement as an individual, you're doing so on behalf of BT as a whole. People trust us because of our long track record of keeping our promises. If we break that trust, it reflects badly on our whole business.

Who decides what in BT?

At BT we believe in making it easy to get things done and empowering people to act. BT people should be clear about the decision making rights within their role and should feel empowered and trusted to exercise these rights.

However in a company the size of BT, there are some decisions we can't make as individuals – because we don't have the authority within our roles, or need to get approval from other people.

Getting the correct internal approval is important. This ensures we involve the right people with the right expertise and experience at the right time. We each have a 'delegated authority' that covers the type of decisions we can make on behalf of BT. With that authority comes a duty to involve anyone else who might share the responsibility for our decision, and record all the details properly. You must not make decisions that bind BT if you do not have authority to do so.

Who to ask

Speak to your line manager if you are not sure whether you are allowed to make a decision.

Report it

If you think you or someone else has taken a decision without having authority to do so then speak up. Your line manager is the best person to contact.

Questions and answers

- Q** I'm making some decisions in my department that feel quite significant. How do I know whether I have the delegated authority to make them?
- A** In many cases this will be covered by the BT [Delegations of Authority](#). Your job description might also hold the answer. If not, then your line manager or finance manager will know. If you're buying something, Procurement can help. Remember to check what your specific responsibilities are – it might be part of someone else's job to be involved in these decisions.
- Q** There seems to be a lot of unnecessary bureaucracy and red tape I have to go through to get things approved. After the first time, can't we skip some of that?
- A** We put procedures in place to protect our business. But we don't want bureaucracy in BT. Talk to your manager about how to improve the system. In the meantime, stick to the way we do things now.

Competing fairly



We compete vigorously but fairly, being honest, respectful and trustworthy in all our dealings.

There's nothing wrong with using every resource we have to gain a competitive edge: our people, our knowledge, our experience. But we must act ethically and in line with our values and the law. We believe in free markets. That means we respect the rights of our competitors to carry on their business, and we don't pressure or coerce our customers into choosing us over our competitors. Although competition and fair trading laws vary from country to country, more and more are bringing in laws to stop one competitor undermining or sabotaging another. We should stay true to that principle and follow any additional laws calling for more stringent obligations in a particular country.

Who to ask

Ask your line manager if you want help. Or you can contact the [Ethics team](#).

Report it

Speak up if you are worried about possible breaches of competition or fair trading laws. Contact your line manager or the [Ethics team](#). You can also contact the [confidential hotline](#). Check the web page for details of the phone number to call in your country and any special instructions.

Questions and answers

- Q** One of our competitors suggested we agree to avoid each other's customers and territories. Is that OK?
- A** No. It's illegal in most countries and even discussing it is unethical. You should report the conversation to your line manager right away. If you don't, you and BT could end up facing fines or even criminal charges.
- Q** One of our suppliers is also a customer and a competitor. Are there any limits on how we can work together?
- A** In theory, no. Collaboration is part of the telecommunications business. Some

companies are our customers, suppliers and partners. That's not necessarily a problem, but they need to be handled sensitively. For example, one part of the relationship shouldn't depend on another. You also need to take extra care over what information you share – especially on pricing and costs.

- Q** I overheard some very interesting information about a competitor while I was on the train. Can I use it?
- A** There's nothing wrong with collecting information about our competitors – as long as it's passed on freely and openly. Don't do anything underhand, like eavesdrop or lie about who you are or what you do. That's dishonest and goes against our principles. Contact the [Ethics team](#) if you are worried.
- Q** Is it OK to put out misleading information about competitors on the internet?
- A** No. Never. You can put out facts about our competitors on our websites, as long as they're accurate and relevant. However, we'd rather talk about our own strengths than talk about our competitors.

Our place in the world

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Health and safety



We care about and protect our people; and we look after their health, safety and wellbeing.

Wherever we do business, we will do our very best to make sure that:

- The way we do business doesn't injure or cause damage to anyone
- Our people are protected at work and are provided with the necessary information, instruction, training and equipment to carry out their work safely
- Our ways of working promote the proven benefit of work on health and we provide information and support allowing informed choices about the adoption of health promoting behaviours. We have a legal obligation to protect anyone who might be affected by our business. We also recognise that the better we care for our people, the more engaged and motivated they are to do their job to the best of their ability.

Who to ask

The Health and Safety handbook and the Health and Wellbeing section of the BT Intranet gives guidance to BT people. If you have specific health and safety concerns about your job you should discuss them with your line manager in the first instance.

Report it

We must all follow the required procedures and report incidents, injuries, unsafe situations or working practices as soon as possible.

Rules and guidance for BT people are set out in our Health and Safety handbook.

Questions and answers

- Q** Why is Health Safety and Wellbeing important in BT?
- A** Keeping our people safe and healthy is a priority for the business. Not only do we want them to remain free of injury and illnesses which can dramatically affect their quality of life, but we also recognise that health and business effectiveness are closely linked. Keeping our people safe and healthy is a

win-win situation for the business and for individuals whether at work or elsewhere.

- Q** What are we trying to achieve?
- A** We have a long term strategy to improve the overall wellbeing of the company by providing information, guidance and where necessary instruction to ensure our people are protected and work together to protect others. The company provides safe systems of work, equipment, support services and access to specialist advice which allow people to understand the way in which they need to work and the risks associated with their occupation. But we also provide information on lifestyle risks and encourage our people to make small but significant changes which can have a dramatic effect on personal health outcomes in later life.

Health and safety (cont.)



Q Why does BT have to be so involved in my safety and wellbeing?

A When we have to be prescriptive because work has to be done in a particular way or because there are risks which have to be managed using particular equipment we will be explicit about the requirements and our people must follow these defined ways of working. However there are lots of situations where individuals have choice about how they behave and what risks they are willing to take. As a company we believe that helping our people understand those risks and empowering them to make informed choices are important ways to deliver effective health safety and wellbeing for our people. We will continue to provide information, guidance and support to help them adopt the lifestyle choices and behaviours which will allow them, their family and the company to enjoy a prosperous and successful future.

Environment



We seek to maximise opportunities for the provision of services and solutions which can help to reduce negative environmental impacts, and which can provide significant environmental benefits.

We recognise that in our day-to-day operations we impact on the environment in a number of ways and we are committed to minimising the potentially harmful effects of this wherever and whenever possible. BT remains committed to making a positive contribution to the environment.

We expect everyone to follow the environmental laws and regulations that apply to them, as well as following our environment standards and commitments. Many of the commitments in BT's environmental policy affect our everyday working lives. We want to:

- consume less
- reuse, whenever we can
- recycle when we cannot reuse and use more recycled materials in our products

- design new products, services, buildings and equipment to use less energy and natural resources
- manage energy and natural resources wisely in every part of our business.

Our environmental management system, which is certified to ISO 14001 standard, is designed to make sure we live up to these commitments day to day in our own operations. Our Designing Our Tomorrow toolkit will help us create products and services that include sustainability criteria in their design. It's not just about looking after the health and safety of our people and customers, it's about sustaining the environment upon which BT, the economy, and society depend.

Who to ask

More information is available for BT people on the [Better Future](#) intranet pages.

Report it

If you want to report an environmental concern, please contact the [Ethics Team](#) (if you don't work at BT you can contact them at ethics@bt.com).

Questions and answers

- Q** How does BT measure its impact on the environment?
- A** Our environmental management system monitors and sets improvement targets for: carbon emissions, waste, transport, procurement and supply chain, fuel consumption and storage, energy use, water consumption, emissions.

It's an on going process – when we hit one target, we raise the bar even higher.

- Q** Where can I find out more?
- A** BT has been publishing externally assured environmental performance data since 1992. You can find the most recent report on our [Better Future](#) website.

Environment (cont.)



Q A lot of our products – e.g. audio conferencing – are making a positive impact on the environment by reducing travel. Why do we therefore need to worry about environmental issues?

A We can be proud that our products and services are helping to protect the environment. However, we still need to be aware of the negative impact we have and reduce it – especially when it comes to our own travel and transport, fuel use emissions and waste. We should also work to minimise the impact of our products and services. This can be done by considering, for example, the energy efficiency of our products and the sustainability of our packaging. There's more to be done, and it's something we take very seriously. We also report regularly to all our stakeholders on how we're doing in an annual Better Future report. We cannot stop until we can show we are bringing a net benefit on the environment.

Political contributions



No company in the BT Group will make contributions (including loans) to any political party, to the campaign of any candidate for elected office, or in support of any elected official.

Q A former colleague is standing as a candidate for local government and I'd like to contribute to his campaign. Is this OK? Can I offer him the use of a meeting room in a BT building so that his campaign team can meet?

A BT respects the right of its employees to personally support political activities as long as it is not associated with BT. However you shouldn't do anything which could be misinterpreted that BT is supporting the candidate so you shouldn't offer the use of a BT meeting room.

Who to ask

For more details contact the [Ethics team](#) (or at ethics@bt.com if you are outside BT).

Doing the right thing

Contents

Being accountable

Resolving conflicts: doing the right thing



Being accountable



We measure and report our performance against our own principles and communicate them clearly inside and outside BT.

Inside BT

- We expect our managers to talk about the principles and standards in The Way We Work with their team(s) and make sure everyone knows, understands and lives up to them and our values.
- We expect you to be responsible, speak up and take accountability
- If you notice behaviour that may be illegal or not in line with The Way We Work, or you're not sure what the best course of action is in a particular situation, you should report or discuss this with your manager or the appropriate department. There won't be any retaliation for reports made in good faith. You can also contact the [confidential hotline](#)
- Check the web page for details of the phone number to call in your country and any special instructions for your country

- If anyone who works for BT fails to live up to these principles and standards, we might take disciplinary action, up to and including dismissal. We'll consider each case individually, based on the specific circumstances. We expect BT people to cooperate in internal investigations of misconduct
- We have detailed policies backing these principles, measuring how well we comply with them and working with our operational managers to promote them
- Every year we review how effective our systems of internal controls are and present the results to BT's Board Audit Committee
- Our Regional Governance Committees also oversee and monitor governance and compliance in their regions and report to the BT Board Nominating and Governance Committee.

Beyond BT

- Every year, we publish our annual report and accounts, as well as reports on our environmental, technological, and social performance. For the latest reports, talk to our [Better Future team](#), or see the [responsible business site](#).

The Way We Work



Dealing with conflicting demands is rarely easy.

These questions might help you reach the right decision:

- Is it legal and are you authorised to do it?
- Is it in line with The Way We Work, our BT policies and any operational policies or procedures?
- How would you explain your decision to BT colleagues in your own or other countries?
- How would you explain your decision to your family, or in public?
- Are you comfortable with the decision? Does it conflict with your own sense of integrity?
- Would you be happy reading about the decision in the newspapers?

If you need guidance please see the section above on [Getting advice](#). Remember you can speak to your line manager, the [Ethics team](#) or our [confidential hotline](#) if you are worried.



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For more information go to The Way We Work Intranet site, or <http://www.btplc.com/TheWayWeWork/>