

Bulletin 28 | July 2025 BT Commitments Monitoring

BT Commitments Monitoring

The Audit and Risk Committee is the BT Group Board Committee responsible for monitoring BT Group's performance in delivering the Commitments and the supporting Governance Protocol.

The Audit and Risk Committee is supported by the Commitments Assurance Office (the CAO). Further information about the Audit and Risk Committee and the CAO can be found here.

Key Topics

BARC annual review

The Committee was provided with the draft of the BARC Annual Review 2024-25 for review. Under its terms of reference (paragraph 9.4-9.5), the BARC will produce an annual review of Commitments compliance activity, which – when complete - will be published on the BT Group website. The BARC expects to publish the finalised report in August.

BT Group Strategy Refresh

The Committee heard from the Director of the CAO on the CAO's evaluation of the consistency of the BT Group Strategy Refresh project with the Commitments. The CAO concluded that there were no Commitments issues to highlight, and that the Strategy Refresh does not pose risk to Openreach's strategic independence.

Review of Building Closures programme

The Committee was pleased to hear further updates from the CAO on the recent 'temperature check' of the Building Closures programme with key stakeholders from both Group and Openreach, which reviewed whether Commitments risks continue to be effectively managed. This review found that governance put in place to ensure appropriate independence of Openreach strategic decision making in respect of key parameters, whilst maintaining BT Group oversight and escalation routes, has worked well with no concerns

identified. Information sharing is carefully managed, and key controls are in place. The CAO therefore does not propose to do any deeper review of the programme at this stage.

Training

The Committee heard from the Director of the CAO on tailored Commitments training provided as part of the induction process to Rima Qureshi who joined as Independent Non-Executive Director; Tom Meakin, Chief Strategy & Change Officer; Claire Gillies, CEO of Consumer; and Jon James, CEO of Business.

Regular reporting

The Committee was updated on the Medium-Term Plan (MTP 25) financial planning and strategy development processes. Overall, the governance and process continue to be well embedded despite recent organisational changes. The CAO will be reviewing the monitoring process ahead of MTP 26 to ensure the Commitments remain front of mind.

Commitments Cases – Breaches

The Committee considered the following case:

CAO-53- Potential serious non-conformance of Openreach's Equal Treatment policy

On 13th May 2025, an internal email promoting EE colleague products was sent to staff, including approximately 6,000 Openreach colleagues. The email concluded by asking staff to become 'brand advocates' for EE. On 16 May, a correction email was sent to Openreach colleagues reinforcing that all Openreach customers should be treated equally and reminding them that it was not appropriate to advocate for EE.

The CAO recommended that this be classified as a serious non-conformance with the Commitments. The investigation identified that existing systems and controls designed to manage commitments risks by ensuring appropriate Openreach sign-off of corporate communications intended for Openreach staff were not used. The incident goes against the spirit of the commitments, as it gives the perception of a disregard by BT Group for Openreach's obligation to treat all customers equally (albeit unintentional). The BARC agreed with the recommendation that this be considered a serious non-conformance.

Our next meeting

September 2025

Commitments Assurance Office, July 2025