

Being trusted: our code

Doing the right thing. For good.

Our code is our guide to what's right, and what's not, at BT Group, read more [here](#).

Explore our 10 promises:

We always put wellbeing and safety first	04
We are trusted with our finances	05
We compete to win fairly	06
We create standout customer experiences	07
We don't cut corners	08
We keep information safe	09
We love our planet	10
We speak up	11
We support, respect and appreciate each other	12
We take a responsible approach to tech	13

A little bit more about our code.

Every day we're trusted by businesses, governments, and millions of people to keep them connected. When a business is as integral to daily life as ours, we have a responsibility to make it a force for good.

Right across BT Group we want to build a culture where everyone feels welcome and safe to be themselves at work. This is not only part of our duty of care to everyone who works here – we also believe it's crucial to our growth and our performance.

Our colleagues and customers trust us to do the right thing. Our values, our code and our policies don't have all the answers, but they provide us with a shared understanding, guiding us in everything we do.

Doing the right thing. For good.

Is it for me?

- Yes. Every single one of us, including our subsidiaries, joint ventures, and contractors, should have the same high standard.
- In the event of a conflict between our code or policies and any local laws, the local laws apply. Where our code or policies impose a higher standard or more onerous requirement than local laws, the requirements of our code and policies apply.
- Our code and policies may be further supported by additional and mandatory procedures, guidance notes, requirements, and local policies. You can find them in the “More information/help” section of our code.

How we get it right

- We're all accountable for our actions.
- We lead by example – we always have the highest standards of integrity and professionalism.
- We think about how our decisions and actions affect those around us and make sure everyone has the help and support they need.
- We create an environment where everyone feels safe to speak up, treating those who do with fairness and without prejudice.
- We're open to ideas or concerns – always listening and acting on these.
- We all have access to our code and our policies.
- We complete our mandatory learning.

Additionally, how leaders get it right:

- By embodying our leadership standards
- By casting the right shadow, and leading by example in following our code and policies
- By making sure their teams get regular updates on how to live by our promises – our resources page can help leaders do this.

Still got questions?

- Not a problem, get in touch with the [Group Ethics and Compliance team](#).



**We always
put wellbeing
and safety
first**

Here are our principles:

- We care about our health, safety and wellbeing and understand how much focus and attention is needed to make sure we're all able to thrive and be our best at work. This means keeping our workplaces clean, safe and somewhere we feel happy and proud to work.
- We're serious about health and safety, and take no shortcuts when it comes to keeping safe at work. We're vigilant, looking out for each other and the safety of those around us like contractors, customers, the public, and those sharing our workspaces.
- We remember that work has proven benefits for health, and health has proven benefits for work, so we provide lots of information, resources and guidance to help all of us live as healthily as we can.

How to get it right

- Head to the wellbeing pages on the intranet and make use of all the resources available that can support our physical and mental wellbeing.
- We share the responsibility for maintaining a safe environment for everyone impacted by our work. When we notice something in the workplace that doesn't look or feel safe, we tell someone. Get in touch with a colleague in health and safety, your line manager or your union safety rep if you have any concerns about safety at work.
- Be kind to yourself. And never let work get in the way of that. Eat well, get some exercise and find time for fresh air. Everyone's wellbeing is valued and supported.



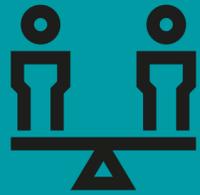
We are trusted with our finances

Here are our principles:

- We provide customers with accurate bills that are easy to understand.
- We use our money, assets and resources carefully and we maintain up to date and accurate records of our transactions and accounts, with tight financial controls. We report the company's financial position clearly, accurately and on time.
- We do not tolerate fraud, money laundering, tax evasion or any other financial crime.

How to get it right

- We are honest about our spending for company purposes whether that's personal expenses, spend with suppliers, or our own internal costs on a project.
- We are responsible with the use of the company's assets and never use the company's money or resources for private personal purposes, and we treat the company's money and resources as carefully as if they were our own.
- We follow strict international financial, governance and accounting standards to record and report our finances. Our financial systems, processes and controls are set up to look after our finances properly and protect the company's assets. We run these systems, processes and controls in an honest, timely and appropriate way, so that the financial information of the company is accurate and up to date.
- Our systems include controls that prevent us from being exposed to financial crimes such as fraud, money laundering, tax evasion or bribery and whether they involve colleagues, customers or third parties, we report all suspected financial irregularities to our finance and security teams so that they can be investigated.



We compete to win fairly

Here are our principles:

- We operate in a competitive market. We compete to win but not at any cost. We always behave with integrity and fairness and in accordance with the rules. We talk about our own strengths rather than competitors' weaknesses. We take pride in being honest and trusted in all our dealings, avoiding conflicts of interest where possible, and we insist anyone working on our behalf has the same high standards as we do.
- We ensure that customers know about the benefits of our unique products and support customers to make informed decisions about the products and services they receive from us, especially when they are vulnerable.
- We don't tolerate bribery or corruption in any form, and we don't breach sanctions or other trade controls.

How to get it right

- We follow all guidance to treat our customers fairly whilst competing to win. This includes staying true to our Commitments to Ofcom and the requirements of the Financial Conduct Authority.
- If we're talking about, or making comparisons to our competitors, we don't use our opinion as fact. We stick to accurate, truthful data from verified independent sources to demonstrate the qualities of our products.
- We avoid potential conflicts of interest where we can, and where we can't we register them so they can be managed carefully. These can include working with family members, business interests outside of BT, or getting a mate to do some work for BT. We register any gifts or hospitality we give, or receive, and any sponsorships or other charitable donations we provide.
- We follow our controls on supplying our goods, services and technology from one country to another.
- We engage our partners and suppliers with care and proactively manage these relationships to build strong partnerships based on shared values.



We create standout customer experiences

Here are our principles:

- We treat every single customer, whether an individual or an organisation, as they'd like to be treated to provide differentiated products and services that are second to none.
- We make everything straightforward and easy for our customers, keeping their needs uppermost in our minds.
- We deliver brilliant technologies, products and services for our customers to give every one of them standout customer experiences which only we can provide due to our unique capabilities, technologies and expertise.



How to get it right

- We build our teams to be representative of the customers we serve everyday. This makes us broader in our thinking and in tune with our customers' day to day lives. It's this personal and responsive understanding that helps us listen. The more we listen, the better we are.
- It's our empathy with our customers that helps us build winning products and services with simplicity. This means making everything straightforward and easy to use and to do that we need to make it simple. Simpler to join us and simpler to stay with us. We strive to be the best and we take time to view our services from our customers' perspective to know we're getting this right.
- We're obsessed with the opportunities we have to deliver connected technologies and digital services in order to truly connect for good. Our quality standards, delivery and refusal to accept anything less than brilliant drives us every day.





We don't cut corners

Here are our principles:

- We are the leader of quality, both in what we do and how we do it. We build and operate our products, services and internal processes with security, integrity and in line with industry best practices, to provide excellence for our customers. This is how we build trusted relationships. We don't wait until something goes wrong – when something isn't right, we fix it. If there's a better way to do something, we'll find it.
- We're proud of the high benchmarks we work to across our business, but we're not complacent – we constantly seek to learn, develop and improve. It's this approach that keeps us at the top of our game and ahead of the competition, agile and able to move at speed, without sacrificing quality or the trust of our customers and partners.
- We're smart with risk. We understand and manage risks well which enables us to take more of the right risks at the right time. We are not afraid to be bold, but we're never reckless. We think through our decisions, take the right advice, and always think before we act.

How to get it right

- We're fearless in our approach to create, test and learn in order to deliver standout experiences for our customers, colleagues and other stakeholders that help us to win. And we get this right by combining our knowledge and imagination with a focus on the standards everyone expects from us.
- Where quality measures don't exist, it's our responsibility to define them and grow them. We do this quickly and painlessly, removing unnecessary process that slows us down.
- We collaborate. Pushing for a culture where we can be our best, share ideas, deliver new solutions and learn from each other to build on the standards we set and the speed we can deliver, and where we never compromise our honesty and integrity.



We keep information safe

Here are our principles:

- We actively protect the customer information we hold – everything from details of contracts and customer interactions to email addresses and bank details. Our customers trust us with their data, and we take this responsibility seriously. We keep the data safe, secure, private and confidential.
- We also need to hold personal and sensitive information about each other. We keep this private, confidential, safe and secure, and we share it only when we need to.
- We understand information about our company can also be very sensitive – transactions, sales figures, new products or services etc. We don't want it to get into the wrong hands, so we keep it confidential, safe and secure.

How to get it right

- We familiarise ourselves with the privacy principles. They describe best practice and make sure we operate within data privacy laws.
- Legally, we must report any suspected data breach immediately.
- We work to the highest standards around security when we handle personal information. It's important to have the right controls in place to help us do this. That's why we only use our business email address when we share any information connected to our work and we never share our log in details for any of our systems.
- We keep our physical premises safe and secure by wearing our passes, challenging anyone who isn't wearing one, and never sharing our passes with anyone else.



We love our planet

Here are our principles:

- For us climate change is about lasting change, and we're committed to becoming a net zero carbon emission business by 2045.
- We commit to using renewables, decarbonising our fleet and cutting our operational emissions. We'll actively care for and protect the resources that we all depend on, finding more opportunities to make a positive impact on the planet.
- Together with our customers, colleagues and suppliers, we'll work to consume less, reuse, and re-cycle wherever we can, minimising waste and disposing of it appropriately.

How to get it right

- Follow the guidance about how to drive supplier climate action, help customers cut carbon, and play your part at work and at home.
- Respect the place we work – both inside and outside, for us and our customers and for the local community we're privileged to share the space with.
- Think carefully about how in our own actions we can be kinder to the planet. Understand the commitments we've made to each other to minimise the impact we have on the planet.





We speak up

Here are our principles:

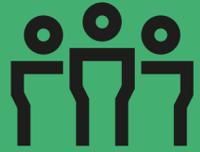
- We speak up when we have an idea, a question or a concern.
- We treat others with respect and take ideas forward, resolve concerns, or explain why if we can't. We listen to others without judgement. Everyone here has a voice.
- If anyone wants to raise a concern about anything that doesn't fit with our code we give everyone access to services that makes this process easy. Services that allow us all to speak freely and openly, without prejudice or retaliation.



How to get it right

- Be familiar with our code. It clearly spells out what we stand for as a business and we should all feel good about playing an active role in caring about our work, our customers and our communities.
- It's a given that we all want to work in a safe environment, that we care about everyone's wellbeing and that we don't allow things like bullying and exclusion in our business. That's why it's important to speak up when we see something we don't think is right, even if it doesn't directly affect us personally. The standard we walk past is the standard we accept.
- If we need any help about something we see, hear or experience at work that doesn't seem to fit with our code we make it easy to talk to someone about it. Our Speak Up channels have been set up so we can listen to each other, raise concerns and get support on specific issues we may have. We can also contact our employee representatives for further help and advice if we need to.





We support, respect and appreciate each other

Here are our principles:

- We treat each other with dignity and respect, so that everyone feels able to be themselves. We expect everyone to lead by example and to take action when they see or hear language or behaviour that doesn't meet our high expectations.
- We make sure that there is no place for discrimination, bullying or harassment and we take a zero-tolerance approach if we discover it. The high standards we set extend beyond what happens at work and include how we use social media.
- We create space for everyone to have a voice and be heard. We invite different views to open up ideas and start different conversations. And we listen to each other. Everyone is respected.

How to get it right

- We use our empathy to remain aware of others' differences, emotions and motivations and we raise any concerns about discrimination, harassment or other forms of disrespectful behaviour to our managers. We don't turn the other way if we're concerned about something.
- We each have a personal responsibility to make sure the way we talk to each other and how we behave is inclusive. From the services we provide, the products we design to the documents we create, we make sure everything is accessible. By its very nature, inclusion applies to everyone and has no connection to hierarchy or role in our business.
- When we have questions, we ask our manager first. Or we head to the diversity and inclusion pages on the intranet to find out more about our People Networks and learn about the actions we take to create a truly inclusive and welcoming environment and experience at work.



We take a responsible approach to tech

Here are our principles:

- We take a responsible approach to technology. We develop, use, buy and sell technology in a way that benefits people and minimises harms. We aim to lead the industry in this area as we take smart advantage of artificial intelligence and other innovations – adding value to the company and our stakeholders. We make sure our products are secure and always in line with our security standards.
- We always remember everyone’s inherent dignity and equality, no matter who they are or where they live – this includes our colleagues, customers and any other people impacted by us.
- We’re especially careful about respecting people’s privacy and free expression and we don’t tolerate modern slavery, child labour or other human rights abuse in any part of our operations or those of businesses we work with.

How to get it right

- We follow the UN Guiding Principles on Business and Human Rights and are guided by our own responsible tech principles in our day-to-day decisions.
- We think carefully about the impact our technology has. To help us do this well, we follow the controls and processes we have in place that make sure our suppliers don’t exploit their workers, our customers don’t misuse our products and that anything we do with people’s data is ethical and respectful of their rights.
- We design and deliver technology to empower people and improve their lives. This means that we are at the forefront of being accountable, fair and open about the use of artificial intelligence and other innovations, and the ethical challenges that they can present, from issues surrounding privacy and the misuse of analytics to the challenges of high levels of automation and what that means for personal and corporate responsibility and employment.

BT Group



Offices Worldwide

The services described in this publication are subject to availability and may be modified from time to time. Services and equipment are provided subject to British Telecommunications plc's respective standard conditions of contract. Nothing in this publication forms any part of any contract.

© British Telecommunications plc 2023. Registered office: BT Group plc
1 Braham Street, London, E1 8EE. Registered in England No. 1800000.

February 2023