



BT plc Modern Slavery Statement

2018/19



We believe that everyone is entitled to basic rights and freedoms, whoever they are and wherever they live. That's why we're against all forms of modern slavery, everywhere. They have no place in our operations. And that goes for those companies and people who work with us and on our behalf too, wherever they are in the world.

Our approach to combating modern slavery

- We're committed to being a responsible business and to respecting human rights
- Modern slavery is not acceptable in our own operations or in those companies who work with us or on our behalf
- We only want to work with people who choose to work freely, who have rights to equal opportunity, freedom of association and collective bargaining
- We talk to experts and listen to those directly affected to enhance our understanding of modern slavery
- We work closely with our people and suppliers to uphold our standards and to address the risks of modern slavery
- Our main risk is in the supply chains of our direct suppliers, where forced labour amongst low-skilled workers in high-risk countries can hide

What we've done this year at a glance

- Launched the **Tech Against Trafficking** coalition
- Launched **an app supporting the Modern Slavery Helpline**
- Helped the **Modern Slavery Helpline** to run round-the-clock
- Developed a digital platform to **support a UK workplace scheme for modern slavery survivors**
- Launched our overarching **human rights policy** with online training
- **Delivered training** on forced labour to key teams
- Updated our **ethics code training** to include more detail on modern slavery
- **Translated our supplier standard** on labour rights into nine more languages
- Began **mapping the supply chain** for two Consumer products
- Benchmarked our approach to **on-site risk assessments**
- Reviewed our approach to **sourcing conflict minerals**

About us

We're one of the world's leading communications services companies. Based in the UK, we serve customers in 180 countries.

We build and maintain communications networks in the UK and around the world. We develop products and services that run over those networks. And then we sell them to consumers, businesses and the public sector.

We sell fixed-voice, broadband, mobile, and TV products and services to consumers across the UK. For business customers,

we offer communications services ranging from phone and broadband services through to complex managed networks, IT solutions and cybersecurity protection that stretches around the globe.

Our services underpin many public sector services and in the UK and Ireland we help other communications providers to serve their own customers.

You can find out more about us [here](#).

Our company structure

Our organisational structure reflects the different customer groups to which we provide communications products and services via our customer-facing units: Consumer, Enterprise, Global Services and Openreach. The customer-facing units are supported by an internal service unit, Technology, and corporate units including procurement and property management. You'll find details of our [company structure](#) on our website. BT Group plc is the listed holding company for the BT group of companies.

British Telecommunications plc (BT) is a wholly-owned subsidiary of BT Group plc and encompasses virtually all businesses and assets of the BT group.

For details of our subsidiaries and their locations, see our [Annual Report](#).

We conduct all of our commercial activity through BT plc and its subsidiaries. These group companies must stick to our code of ethics and use our centralised procurement and recruitment policies and processes.

Our people

We have 106,700 employees working in 60 countries.

Around 79 per cent of our people are in the UK, where we're one of the largest employers. Outside the UK, our people are employed by local BT Group subsidiaries (though many have a reporting or management line into UK-based people).

We work with around 2,100 agency people. They help us with peaks and troughs in our workflow, mainly in customer-facing and specialist roles.

This year ...

- We converted just under 1,400 agency workers to permanent staff, 800 of whom were in contact centres
- Excluding acquisitions, we hired almost 16,000 people (12,300 in the UK)

We consult extensively with unions (the Communications Workers Union and Prospect, in the UK), works councils and employee representatives to make sure we maintain a healthy and positive relationship with our people.

Our suppliers

We buy from around 16,000 suppliers in nearly 100 countries.

96 per cent of what we spend is with suppliers based in low-risk countries.

We buy a vast range of things from network and IT hardware to corporate clothing and waste disposal services. Nearly 13,000 of our suppliers sell to us on an ad hoc basis – 'off the shelf' items or localised services, which are supplies not made specifically for us. These include office supplies, stationery, postal, and courier services.

Some of these products and services we use in our own business (like catering) and some we use as part of what we sell to our customers (like IT equipment). We don't make things ourselves so we don't own any factories or manufacturing facilities, nor do we handle raw materials – we rely on our suppliers to do that for us.

This year ...

- We spent £13.4 billion with our suppliers, 67 per cent of which was with 100 suppliers



Our policies

We have a number of policies in place to set expectations of how we – and everyone who works on our behalf – will work to prevent modern slavery.

Policies	Scope	Refers to...	Relevance to modern slavery
The BT Way	This is our code of ethics. It sets out our values and explains how to behave. Available in 14 languages, it applies to all BT people globally and all those acting on our behalf.	- International Bill of Human Rights - United Nations Guiding Principles on Business and Human Rights - United Nations Global Compact	It covers our respect for human rights (including our requirements on working conditions) and is explicit that modern slavery is never acceptable in our own operations nor those who work with us or on our behalf. It also points people to our human rights team, our Speak Up hotline or the UK Modern Slavery Helpline if they're not sure about what's the right thing to do.
Human Rights	New this year, this pulls together our existing policies on human rights into one place, covering our potential impacts on human rights, and what we do to address these. It applies to all BT people globally and all those acting on our behalf.	- International Bill of Human Rights - International Labour Organisation's Declaration on Fundamental Principles and Rights at Work - United Nations Guiding Principles on Business and Human Rights	This policy reaffirms our commitment to prevent modern slavery and human trafficking in our business operations and supply chains. It makes clear that we only want to work with people who choose to work freely, with rights to equal opportunity, freedom of association, and collective bargaining. As part of the development of our policy, and with the help of a law firm, we assessed our human rights impact in the UK and in key countries outside the UK. We looked at potential impacts on our employees and our UK procurement processes.
Sourcing with Human Dignity	This sets our standards for a fair and ethical workplace, where workers are treated with dignity and respect. It applies to all our suppliers and supply chains, globally.	- Universal Declaration of Human Rights - International Labour Organisation (ILO) conventions	This details our expectations of freely chosen employment, prevention of underage workers, working hours, wages and benefits, humane treatment, non-discrimination, freedom of association, collective bargaining, and health and safety.
Recruitment (internal policy, not public)	Our principles for recruiting responsibly. It applies to all BT people in the UK on permanent or fixed-term contracts.	- Refers to our code of ethics - Aligned with the Employer Pays Principle	We won't charge recruitment fees either directly or indirectly to candidates as part of the recruitment process, and we extend this to our 'Refer a Friend' recruitment programme, which considers applications from people known to employees. A referral in itself doesn't carry any weight in the fair selection process.
Anti-Corruption & Bribery	Sets out our zero-tolerance approach and procedures to prevent and detect bribery and corruption.	Refers to our code of ethics.	Highlights 'red flags' that are also potential indicators of modern slavery, such as cash payments; unusual payments to be made in a third country or to a third party; or any close family, personal or business ties that a third party or partner has with government officials.
Conflict Minerals	Describes the appropriate due diligence steps to identify, and remove, conflict minerals from our supply chain. Applies to all BT people globally, and all those acting on BT's behalf.	United States Dodd-Frank Wall Street Reform and Consumer Protection Act 2010.	Minerals are used to produce tantalum, tin, tungsten and gold, and these metals can be found in electronic devices. These minerals may be mined using forced and child labour in war-torn or politically unstable areas, such as the Democratic Republic of Congo (DRC). The proceeds of sale of those minerals may fund conflict and further human rights violations.

Governance

Our Digital Impact & Sustainability Committee oversees governance of our human rights policy and modern slavery programme. As a sub-committee of the BT Board, they also provide oversight and direction to support our efforts on human rights and modern slavery.

This year ...

- The committee reviewed our progress on modern slavery four times

Day-to-day, our human rights team works on integrating the UN Guiding Principles for Business and Human Rights into our business, including training and supporting the people who bring our human rights policy to life across the company.

This year ...

- We appointed a full-time employee to lead and co-ordinate our modern slavery initiatives, working closely with our Procurement, Human Resources and other teams across our business, as well as with our external stakeholders

Monitoring compliance and effectiveness

To check that our people understand and comply with our policies we engage with trade unions and operate a number of works councils.

People can also tell us what they're thinking by contributing to employee representative forums. Twice a year, we encourage people to use our anonymous 'Your Say' employee survey to let us know about their own experience of working with us.

This year ...

- We improved overall employee engagement, up from 74 per cent last year to 77 per cent
- Our employees' perception of our ethical performance stood at 86 per cent, up from 83 per cent last year

Employees can also raise concerns about policy non-compliance with our human rights team, our ethics team

or our Speak Up hotline – see page 7 for details.

Our Sourcing with Human Dignity standard is in all our direct supplier contracts: we require them to cascade these to their direct suppliers, and so on. Our procurement team regularly review supplier performance and any changes in the modern slavery risk profile of the supplier. Any concerns or non-compliance triggers a risk assessment and potential improvement actions – see page 7 for details.

We monitor the performance of our suppliers' actions by using qualitative and quantitative indicators to check they're being effective. If they're off track, we help them correct their course and check they've put things right.

We talk about our other performance indicators throughout this document. You can read a summary of the key performance indicators (KPIs) we'll be tracking next year on page 12.

Risk assessment and due diligence

We want to reduce the risk of modern slavery in our own operations and help our suppliers and customers do the same. We're doing this by:

1. Understanding our risks and uncovering opportunities to combat modern slavery by talking to experts and listening to people who are directly affected
2. Assessing where the risks and opportunities are in our business and supply chains
3. Developing and applying anti-slavery measures to reduce risks and seize opportunities through policy, training, collaboration and technology solutions

This means we're working closely with our people, our suppliers and our stakeholders to continuously improve our approach in a way which respects human rights.

Writing policies is the easy part: we're working hard to make sure that what we say in those policies happens in practice.

Before the Modern Slavery Act 2015 took effect, we conducted a risk assessment which identified our highest risk areas for modern slavery and human trafficking. We found they're in our:

- supply chain, with the companies selling their products or services to our direct suppliers
- construction and engineering services for our infrastructure
- guarding and monitoring services for our properties and infrastructure
- catering and cleaning services used in our business
- the manufacturing of network equipment

Common risk factors

These areas share two common risks: high-risk countries and low-skill workers.

If workers for a supplier are highly skilled, they're generally at a lower risk of modern slavery and human trafficking. That's because they're more likely to be in demand, and are in a better position to make informed and independent choices about where they work and who for.

The flipside also holds true: the risk of modern slavery and human trafficking is higher for people in low-skilled jobs.

As independent experts, Business for Social Responsibility (BSR) checked our risk assessment approach to make sure our assumptions and findings were correct. Their overall assessment was positive, recognising that 'the overall filtering system you have is robust, practical, and aligned with best practices at other tech and non-tech companies'.

Conflict minerals

Minerals used in manufacturing electronic equipment is a long standing area of high risk.

We're particularly concerned about the risks of forced and child labour in mining minerals (mainly the 3TG metals: tin, tantalum, tungsten and gold) from the Democratic Republic of the Congo and neighbouring countries where the rule of law is weakened by conflict and civil war.

When we check for these 'conflict' minerals with our suppliers, we use the Conflict-Free Sourcing Initiative template.

We disclose the results [here](#) to comply with the US Dodd-Frank Act and our Securities Exchange Commission (SEC) obligations.

Recruiting our people

We're determined to reduce the risk of fostering modern slavery right from the start of our recruitment process.

As you'd expect, the performance standards for our recruitment teams insist that they must stick to our recruitment policy. This policy includes not charging fees to people joining BT. We wouldn't expect our external recruitment agents to charge recruitment fees either.

External agencies go through the same procurement processes we apply to our supply chain. All recruitment agents have to contract with us on our standard procurement terms, including our Sourcing with Human Dignity standard. We have regular review meetings with them, which cover any concerns about agency staff.

How does our recruitment process work?

We log all our job vacancies on an online system, updating the system at appropriate sign-off levels as we progress through the process. Each job application has to pass through all of the system gateways, including sign-off by the appropriate manager and the HR specialist overseeing that vacancy, before we can make the decision to employ someone.

At that point, the system will generate an employment contract.

The final stage of the recruitment process includes a 'right to work' check, where we check the candidate's references and verify their right-to-work status. This gives us a final layer of verification so we can be confident that our recruitment team are following our procedures.

Outside the UK local entities employ our workforce, though many have a reporting or management line into UK-based or Global people. That creates further checks and balances to make sure we treat our people consistently, fairly, and equally, wherever they are.

Once people join us, we give them plenty of support, education and training.

If they don't behave ethically at work we'll consider taking disciplinary action against them, which ultimately could lead to dismissal. We disciplined 231 employees in the UK as a result of ethical misconduct this year, and 98 left the company. The most common issues concerned inappropriate use of company vehicles; none of the issues had anything to do with modern slavery.

We listen to what people say

We encourage our people to tell us what they're thinking.

Our company-wide employee survey includes questions asking whether they feel comfortable to speak out and raise risks at BT.

We work hard to create a culture where anyone who is worried about an ethical issue feels confident they can speak up about it, even if they're only harbouring a suspicion. They can report their concerns on the phone or online through our independent Speak Up service, anonymously if they prefer (subject to local laws). We emphasise that all reports are confidential and people don't need to have evidence to raise a concern. It's open to employees, contractors and suppliers.

We're constantly looking for areas where we may have to do more to raise awareness or share any recurring themes that crop up.

This year ...

- 525 people raised concerns about a range of ethical issues, 9 per cent more than last year
- We took further action on 29 per cent of the cases we closed, including a mix of disciplinary action, coaching or training, and improvements to our policies or procedures

We found that the rest of the cases were unsubstantiated, duplications or follow-ups of existing cases. We redirected some to more appropriate channels.

We help our suppliers do the right thing

We work with our suppliers to reduce their risks and improve their labour rights practices, but with around 16,000 direct suppliers in nearly 100 countries we need to prioritise suppliers with higher risks of modern slavery and human trafficking.

We've based our supplier risk assessment process on guidance, resources and supplier audit reports from the Responsible Business Alliance (RBA), EcoVadis and our own checks.

We don't just assess the risks of potential suppliers before we enter a contract with them. We re-assess them at least every two years during the contract and at any time before that if we have concerns.

We start by sending an ethical standards questionnaire to suppliers of higher and medium risk products and services. Their responses help us assess the risk level of a product or service. Of course, we also factor in where we're buying the product or service from, what it is that we're buying, and the skill levels of the workers involved in its production or supply.

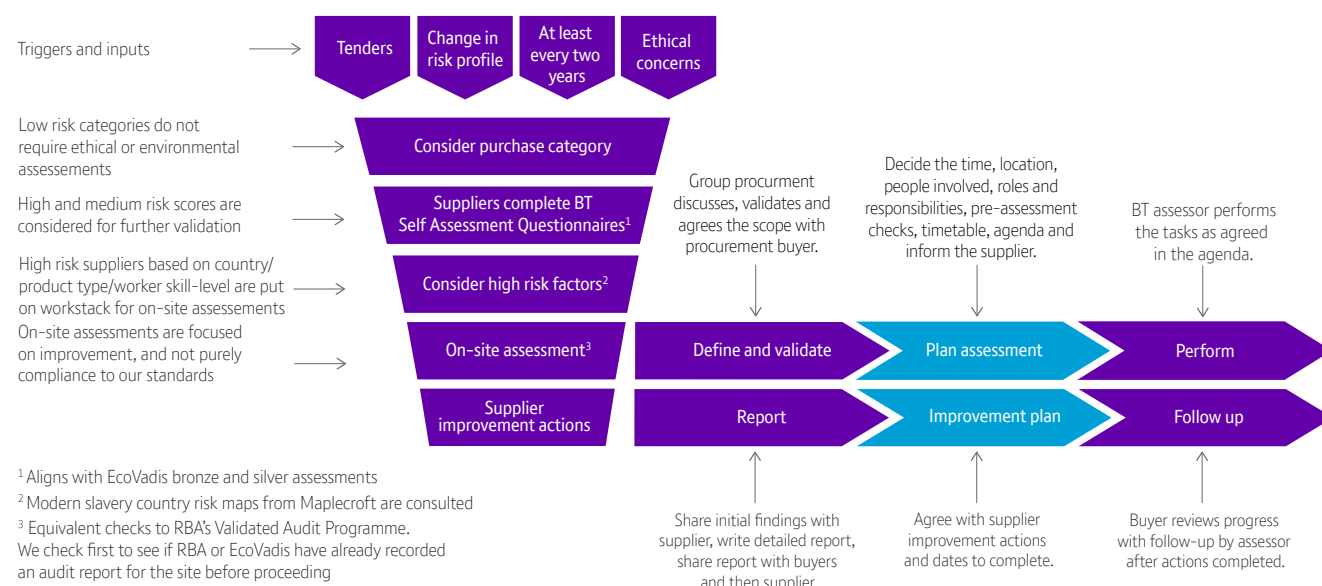
This information determines what we do next. It could be as simple as a phone interview to clarify some minor concerns. Or we might arrange a more detailed on-site assessment with one of our assessors.

We require all our direct suppliers to comply with our contractual Sourcing with Human Dignity standard on worker rights and to cascade them down their own supply chain. On-site assessments help us understand how well the supplier has implemented the standards and what the impact has been on their workers.

We also expect our suppliers to promote our Speak Up hotline or equivalent local grievance mechanism to their workers so they can raise complaints and concerns in confidence. We check this is happening by talking one-to-one with a handful of workers during on-site assessments. This gives us a worker's honest perspective on their working conditions and gives them an opportunity to raise any concerns they may have.

If we spot that the supplier needs to make improvements, we'll work with them to address the problems. Typical recommendations for improvements include drawing up process documents for their employees, tightening pre-employment security checks, educating their workers on The BT Way, and paying better attention to health and safety. We report and monitor progress of any improvement actions through regular review meetings and further on-site assessments.

Assessing supplier risks



What we've done this year, digging into the detail...

We launched Tech Against Trafficking

This year ...

We co-founded the Tech Against Trafficking coalition with Microsoft, Nokia and anti-trafficking experts in July 2018. Since then, Amazon, AT&T, Salesforce.org and Vodafone have also come on-board.

We've been working together to understand the challenges and opportunities that technology presents in helping to bring an end to modern slavery. The initiative came together following a **summit** we sponsored in June 2017, where international experts explored the role of technology in tackling modern slavery.

So far, we've mapped many of the ways that tech's already combatting slavery around the world, identifying over 200 solutions. We'll continue to analyse the findings and build the

map to identify more, assessing each solution to determine the potential to scale up their impact. Next year we're planning to push progress on the high-potential solutions.

We shared our **findings** and announced our plans at an international conference hosted by the Organisation for Cooperation and Security in Europe. The 19th Alliance against Trafficking in Persons event brought together representatives of 57 States. The agenda focussed on using technology to combat trafficking in human beings.

We spoke on the final panel about the value of partnerships in combating human trafficking. And we supported Unseen in demoing the Unseen app to **conference** delegates in a side event.



We helped the Modern Slavery Helpline to run round-the-clock

We think helplines should play a bigger role in tackling modern slavery. Low public awareness of the signs of slavery and knowing what to do when you spot it are key challenges in tackling modern slavery. That's why, in October 2016, we set up the UK's Modern Slavery **Helpline** (08000 121 700) with Unseen, a UK charity focusing on tackling modern slavery. The helpline's open round-the-clock, every day of the year.

If people suspect someone is a victim of modern slavery, or they're a victim themselves, they can call the helpline to report their suspicions. It also gives the public, statutory agencies and businesses information and support.

Since launch, people have called it over 14,000 times, identifying more than 13,800 potential victims.

This year ...

- The Modern Slavery Helpline received 7,721 contacts – a rise of 47 per cent on last year – indicating more than 5,900 potential victims

We worked with Unseen to create a short **video** when we launched the helpline to explain the signs of modern slavery and to help promote the helpline. The video has had 9,600 views.

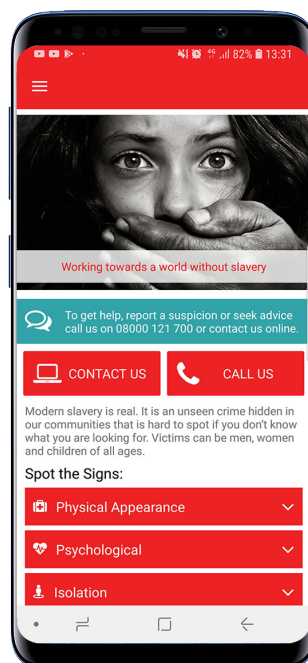
We launched the Unseen smartphone app

But we wanted to do more to help, so we worked with Unseen to co-design, develop and deliver a **smartphone app** to extend the reach of the UK's Modern Slavery Helpline. The free-to-download app gives you tips on how to spot the signs of slavery and makes it easy to report suspected cases to the helpline.

How did we come up with the idea for the app?

Every year we challenge our employees to come up with a business idea to improve the lives of our customers. We call this tournament the Challenge Cup. This year, a team worked with Unseen to design and develop the app. They tested it with Openreach field engineers, using their feedback to refine the design before launching in the public app stores.

Endorsed by the National Police Chiefs Council, many police forces are now using the Unseen app to help them in their work. We also promoted the helpline and the Unseen app to thousands of Londoners using the animated Infoband on top of the BT Tower.



We've identified and engaged with our at-risk suppliers

We identified 368 high and medium risk suppliers this year, and followed up with all of them within a three-month period to request more information and to decide whether we need to take any further action.

We followed up 53 with on-site assessments: 33 with Tier 1 (direct) suppliers and 20 with Tier 2 suppliers.

Location	High-risk supplier on-site assessments
China, Taiwan and Hong Kong	24
India	20
UK and Europe	6
South East Asia	2
Others	1
Total	53

This year, our engagement with our Tier 1 suppliers-of-concern demonstrated a need for them to improve their own supply chain assessment processes. We found that these Tier 1 suppliers must push improvements in respecting human rights and combatting modern slavery within their suppliers (our Tier 2).

Of course, we'll continue to help these Tier 1 suppliers get to grips with the weaknesses in their own supply chains. And our priority next year is to focus on lower-tier suppliers in high-risk categories.

We'll also introduce another pre-qualification questionnaire at the earliest stage of shortlisting potential suppliers. This will ask all potential suppliers (not just medium and high-risk suppliers) about specific vulnerabilities to modern slavery, flagging potential risks or early-warning signs before we decide to shortlist a supplier for our more detailed supplier risk assessment.

Mapping our DECT phone's supply chains

Around 27 per cent of everything we spend with our suppliers is on electronic equipment. In a complex, multi-layered supply chain one of our biggest challenges is how we assess companies beyond our Tier 1 (direct) suppliers. We're not alone in this: it's common for many companies in our sector. One way we're trying to understand this better is by mapping the supply chains of some of our products, including the DECT phone.

We've traced the components of the DECT phone as far back down the supply chain as Tier 4. We're now planning to do on-site risk assessments of some of these Tier 4 suppliers to better understand the potential risks.

Whilst our direct suppliers are supportive, as we dig deeper down the supply chain our leverage wains. Being able to influence disclosure in Tiers 3 and 4 – where we don't have a direct contractual relationship and where suppliers are concerned about disclosing commercially sensitive information – becomes increasingly tricky.

A report by Ergon Associates and the Ethical Trade Initiative confirms these challenges exist across sectors:

'Where a company sits at the top of a supply chain, perhaps several tiers removed from the production of raw materials or ingredients, it will be harder to map all suppliers immediately. To address this, companies should, where practical, work systematically and progressively to build a complete picture of their supply chain.'

Note that supply chain mapping can be a resource- and time-intensive process for individual companies and may not be possible to complete in its entirety.'

We'll review our approach in the light of these challenges, while continuing to map and assess the risks of the supply chains of our DECT and Smart Hub consumer products.



- Tier 1: Direct supplier in China
- Tier 2: Electronics manufacturers & sub-assemblers – 8 in total (7 suppliers in China, 1 in Israel)
- Tier 3: Component suppliers – 21 in total (19 suppliers in China, 1 in Taiwan, 1 in South Korea)
- Tier 4: Suppliers of materials sourced from many different commodities and raw materials (8 suppliers so far in China, Taiwan and Hong Kong)

We've translated our expectations into local languages

Our Sourcing with Human Dignity standard lays out the behaviours we expect from our suppliers.

And now we've made it easier for them to understand what we need them to do by translating it into nine languages other

than English: Dutch, French, German, Italian, Korean, Mandarin, Portuguese, Russian and Spanish.

The standard is now accessible to 99 per cent of our Tier 1 (direct) suppliers.

We've benchmarked our approach with the RBA

We reviewed our approach to on-site assessment against the RBA's Validated Audit Programme approach. We're aligned and with no gaps. We've used examples from the Stronger Together initiative to guide our approach, too.



Responsible Business Alliance

Formerly the Electronic Industry Citizenship Coalition

Affiliate Member

Together with the RBA we reviewed our approach to sourcing conflict minerals against industry standards. The RBA confirmed that our process to check the risks of conflict minerals entering into our supply chain was consistent with other strong management processes in place. They suggested we increase our focus on following up with our suppliers about mitigating risks.

We helped survivors move into safe work

This year ...

- We funded the development of a digital platform to support Bright Future, a programme started by a fellow member of the Home Office's Business Against Slavery Forum, the Co-op Group. The programme aims to help survivors of human trafficking and modern slavery find work

City Hearts, the charity operating the scheme, will be able to use the new digital platform to post opportunities and match suitable candidates against jobs across the UK. The platform will launch next year.

We also offered our expertise, and Work Ready resources, to help develop workplace skills for Unseen to use in their support of survivors. We're working with them to explore how best to meet the needs of survivors.

We collaborated with experts

While there's always more we can do in our own business and supply chain, working with others helps to address systemic issues that lead to modern slavery. And we don't know everything – we need advice, guidance, and insight from the experts.

So we regularly attend external events, sharing our views and experiences, and learning from other organisations and experts.

This year ...

- We got involved in over 30 events to discuss modern slavery
- We're also members of regular working groups addressing modern slavery issues:
- Responsible Labour Initiative and Responsible Minerals Initiative within the RBA
 - Business Against Slavery Forum hosted by the Home Office
 - Human Rights Working Group hosted by BSR

Training our people and raising awareness

Everyone who works for us has to complete training on The BT Way (our ethics code) and our anti-corruption and bribery policy when they start.

The eLearning course for The BT Way now includes a human rights module, which addresses modern slavery. Employees have to repeat that training every year, and we monitor the number who've done it through our eLearning platform. We send reminders to anyone who's due to do their training.

This year ...

- 99.7 per cent of BT people have done the training
- This excludes those on maternity, paternity or long-term sick leave or other extenuating circumstances. Our Audit and Risk Committees and Regional Governance Committees monitor – at least quarterly – how we're performing against our mandatory training targets.

This year ...

- We provided eLearning training on human rights, including modern slavery, to support our peoples' understanding of the human rights policy we launched this year

It's available to everyone in BT. We're monitoring who completes the training; we'll report this in our Statement next year.

Procurement and recruitment training

All our procurement buyers have to complete training on our Sourcing with Human Dignity standard.

We trained our procurement and BT Facilities Services recruitment teams in more depth on what modern slavery and human trafficking is, how to spot the signs, and how it affects our business. We emphasised the 'Employer Pays Principle': that no worker should pay to work for us. We've shown them the practical steps they can take in their day-to-day jobs to prevent it in our business and supply chain.

This year ...

- Our human rights and procurement leads on modern slavery delivered an hour-long training to share cases studies and answer questions

Last year, anti-slavery charity Unseen ran the initial hour-long training session. Both training courses are available to replay for everyone in our business through our online Academy platform.

Legal, regulatory and compliance training

Last year we also trained our legal, regulatory and compliance community on modern slavery and human trafficking. Their work crosses the whole spectrum of what we do globally. By training this community, we're embedding modern slavery and human trafficking awareness into everything we do.

And we promoted awareness of modern slavery through BT News articles three times this year, which included links to the Modern Slavery Helpline, the Unseen app and our video on how to spot the signs of modern slavery.

How do we know our training is hitting the spot?

This year ...

- To review the effectiveness of our training, we checked for awareness and understanding of the modern slavery risks we face by sending a 'bite-sized' training email directly to over 18,000 employees with a simple multiple choice question about identifying forced labour conditions

Teams included human resources, legal, compliance, recruitment, procurement and sales.

It wasn't compulsory to respond but more people did this year. The response rates, now similar to other bite-sized training emails on more established topics, increased 6 per cent from the bite-sized training email we sent in January 2018.

Over 68 per cent of people who responded this year correctly identified potential situations of forced labour, demonstrating that overall our people are becoming more familiar with this topic.

Our training plans for next year

- We'll be reviewing the take-up and effectiveness of our human rights training
- We'll put in place mandatory training on modern slavery for key roles in procurement and other specialist teams who are most likely to need a more detailed understanding
- Our 'bite-sized' training showed that our people in the UK had higher awareness of forced labour situations than our people in India. There are clearly regional differences in how people interpret these situations, particularly around recruitment fees. We'll address this next year by training our teams in India
- We'll continue to coach and support the practical improvement plans of our direct suppliers when we identify concerns (see our risk assessment process for more details on page 7). These plans may include measures to build our suppliers' capacity to manage risks and to train their people on modern slavery
- But we want to do more, so next year we plan to provide our suppliers with free access to online training on forced labour and labour standards hosted by the RBA

Our commitments

We made a number of commitments last year and plan to do more next year to prevent modern slavery.

Who we're looking at	What we said we'd do this year	Did we do it?	What we're going to do next year	How we'll measure it (our Key Performance Indicators)
Our suppliers	- Consider translating our Sourcing with Human Dignity standard into another language - Analyse one of our products from start to finish to get better sight of our supply chain - Check our supplier assessment approach against RBA audit criteria - Use our RBA membership to assess lower tiers of our supply chain	✓ see page 9 - Partial – see page 9 ✓ see page 10 ✓ see page 7	- Provide training to high-risk suppliers with low awareness as part of any improvement plans - Explore the human rights risks of cobalt mining in our supply chains - Continue to map and assess the risks in the supply chains of two Consumer products - Prioritise our on-site risk assessments on lower-tier suppliers and high-risk categories - Improve our assessment of modern slavery risks when shortlisting potential suppliers	- Percentage of key roles in suppliers completing online training (new measure) - Number of on-site supplier assessments (53 this year) - Percentage follow-up within three months for all suppliers identified as high or medium risk (100% this year) - Number of concerns identified with suppliers which indicate potential forced labour (new measure)
Our people	- Launch new-and-improved ethics code training to better address modern slavery - Launch an overarching human rights policy across our business - Get more of our people trained on the subject - Send a teaser question out to more of our people - Look into how we can make more of the Employer Pays Principle	✓ see page 10 ✓ see page 4 ✓ see page 11 ✓ see page 11 ✓ see page 11.	- Develop and deliver mandatory training on modern slavery for key roles - Engage our people in India with a campaign to raise awareness of forced labour situations	- Percentage of key roles trained (new measure) - Effectiveness score for key-role training (new measure)
Our other stakeholders	- Launch the Modern Slavery Helpline app we've developed with Unseen - Start an industry initiative to collaborate on the challenges and opportunities for tech to help end modern slavery - Look into how we can extend our Work Ready programme to survivors of modern slavery	✓ see page 8 ✓ see page 8 ✓ see page 10	- Collaborate with high-potential tech solutions to accelerate and scale up their impact through Tech Against Trafficking - Continue our operational support, funding and promotion of the UK Modern Slavery Helpline and smartphone app	- Number of contacts to the helpline (7,721 this year) - Number of multi-stakeholder events (with a focus on modern slavery) that we engage in (34 this year)



Scope of this Statement

This is BT's fourth annual Modern Slavery Statement and covers the financial year ended 31st March 2019. You can read our previous Statements [here](#). We welcome feedback to humanrights@bt.com. The boards of directors for the following companies¹ have approved this Statement:

- British Telecommunications plc
- BT Facilities Services Ltd
- BT Fleet Ltd
- BT Global Services Ltd
- BT Lancashire Services Ltd
- BT Ltd
- BT Managed Services Ltd
- Communications Networking Services (UK)
- EE Ltd
- Openreach Limited
- Plusnet plc

They all delegated authority to Philip Jansen to sign this Statement on their behalf.

Philip Jansen
Chief Executive & Director, BT Group plc

A handwritten signature in black ink that reads "Philip Jansen".

Signed 4th July 2019 following board approvals in June 2019

¹This year there are two organisations which we will no longer report on as they have ceased to be BT subsidiaries. We sold BT Cables to an external party and we transferred the business operations of BT Business Direct Ltd to BT plc. BT Business Direct Ltd has since been liquidated.