

Global reporting initiative (GRI)

BT's Digital impact and sustainability report 2018/19 has been prepared in accordance with the GRI standards: Core option

We've used the SDG Compass tool to map our response and increase transparency. GRI/Global Goals mapping is based on analysis available [here](#).


ISO 26000 'Guidance on social responsibility' provides a guidance framework to help businesses and organisations operate in a socially responsible way.

This is the ninth year that we have cross-referenced our report to the core subjects and issues of the guidance.

We're signatories to the Climate Disclosure Standards Board (CDSB) statement on fiduciary duty and climate change disclosure. We're committed to producing and using climate change-related information in mainstream corporate reporting as a matter of fiduciary duty.







We report on our material environmental impacts and performance on an annual basis in our Annual Report and our Digital impact and sustainability report. These reports aim to serve different stakeholder groups – the Annual Report, investors, analysts and shareholders – the Digital impact and sustainability report addresses a wider audience, including customers, employees, suppliers and society.







We aim not to duplicate information unnecessarily so have provided this index showing how and where our environmental and natural capital reporting meets the principles and requirements of the CDSB Framework (June 2015).

Disclosure number	Disclosure title	Where reported	SDG	ISO26000 clause	CDSB Framework
102-1	Name of the organisation	BT Group plc			
102-2	Activities, brands, products, and services	We own three retail brands: BT, EE and Plusnet. We also own the Openreach brand which serves communications providers. We develop and sell communications products and services and build and operate networks that are an essential part of modern lives, businesses and communities			
102-3	Location of the headquarters	London (UK)			
102-4	Location of operations	We're one of the world's leading communications services companies. We're based in the UK but we serve customers in 180 countries			
102-5	Ownership and legal form	BT Group plc is the listed holding company for the BT group of companies. Its shares are listed on the London Stock Exchange, and on the New York Stock Exchange in the form of American Depositary Shares			
102-6	Markets served	Group businesses AR – Market context, page 8			
102-7	Scale of the organisation	AR – Our business model, page 12		6.2.3 Decision-making processes and structures	
102-8	Information on employees and other workers	AR – People, page 22 DIS – BT people data in our download centre		6.4.3 Employment and employment relationships	
102-9	Supply chain	AR – Suppliers, page 27 DIS – Sourcing with human dignity, page 14			
102-10	Significant changes to the organisation and our supply chain	AR – Creating a simplified, leaner and more agile business, page 20			

Key: AR – BT Group plc [Annual Report](#)

DIS – BT's [Digital impact and sustainability report 2018/19](#)





Disclosure number	Disclosure title	Where reported	SDG	ISO26000 clause	CDSB Framework
102-11	Precautionary principle or approach	Our environmental policy sets out our approach		6.2.3 Decision-making processes and structures	REQ-02: Policy, strategy and targets
102-12	External initiatives	We are a signatory to the UN Global Compact principles and we're actively contributing to the UN Sustainable Development Goals DIS – Championing human and digital rights, page 13		6.2.3 Decision-making processes and structures	REQ-02: Policy, strategy and targets
102-13	Membership of associations	DIS – memberships are covered throughout our report – for example; National Centre for Computing Education page 08, Tech Against Trafficking page 15, Global Network Initiative page 16, RE100 page 21, Responsible Business Alliance, page 15		6.2.3 Decision-making processes and structures	
102-14	Statement from senior decision-maker	DIS – Introduction from our Chairman and Chief Executive, page 2		6.2.3 Decision-making processes and structures	REQ-01: Governance REQ-02: Policy, strategy and targets REQ-06: Outlook
102-15	Key impacts, risks, and opportunities	AR – Our principal risks and uncertainties, page 46 DIS – Our priorities, page 4		6.2.3 Decision-making processes and structures	REQ-03: Risks and opportunities REQ-04: Sources of environmental impact
102-16	Values, principles, standards and norms of behaviour	The BT Way – our ethics code			REQ-01: Governance REQ-02: Policy, strategy and targets
102-17	Mechanisms for advice and concerns about ethics	DIS – Doing business ethically, page 28 Speak up is BT's confidential independent managed hotline			
102-18	Governance structure	Our Board DIS (Appendixes) – Governance, page 1		6.2.3 Decision-making processes and structures	REQ-01: Governance
102-19	Delegating authority	DIS (Appendixes) – Governance, page 1		6.2.3 Decision-making processes and structures	REQ-01: Governance
102-20	Executive-level responsibility for economic, environmental and social topics	DIS (Appendixes) – Governance, page 1		6.2.3 Decision-making processes and structures	REQ-01: Governance
102-21	Consulting stakeholders on economic, environmental and social topics	AR – Our stakeholders, page 22 DIS (Appendixes) – Governance – Listening to our stakeholders, page 2		6.8.3 Community involvement	REQ-01: Governance
102-22	Composition of the highest governance body and its committees	AR – Governance, page 55 DIS (Appendixes) – Governance, page 1 Our Board	 	6.2.3 Decision-making processes and structures 6.3.7 Discrimination and vulnerable groups	
102-23	Chair of the highest governance body	The roles of the Chairman and Chief Executive are separate and we judged our Chairman to be independent at the time of his appointment		6.2.3 Decision-making processes and structures	





Disclosure number	Disclosure title	Where reported	SDG	ISO26000 clause	CDSB Framework
102-24	Nomination and selecting the highest governance body	AR – Nominations Committee, page 66		6.2.3 Decision-making processes and structures	
102-25	Conflicts of interest	AR – Power to authorise conflicts, page 93		6.2.3 Decision-making processes and structures	
102-26	Role of highest governance body in setting purpose, values, and strategy	AR – The Board, page 60 DIS (Appendixes) – Governance, page 1		6.2.3 Decision-making processes and structures	REQ-01: Governance
102-27	Collective knowledge of highest governance body	AR – The Board, page 60		6.2.3 Decision-making processes and structures	
102-28	Evaluating the highest governance body's performance	AR – The Board, page 60		6.2.3 Decision-making processes and structures	
102-29	Identifying and managing economic, environmental and social impacts	AR – The Board, page 60 DIS (Appendixes) – Governance, page 1		6.2.3 Decision-making processes and structures	
102-30	Effectiveness of risk management processes	AR – Audit & Risk Committee, page 69 DIS (Appendixes) – Governance, page 1			REQ-01: Governance
102-31	Review of economic, environmental and social impacts	DIS (Appendixes) – Governance, page 1			REQ-01: Governance
102-32	Highest governance body's role in sustainability reporting	All significant announcements are reviewed by our <i>Disclosure Committee</i> for accuracy and compliance requirements DIS (Appendixes) – Governance, page 1			REQ-01: Governance
102-33	Communicating critical concerns	The DISC meets four times a year and the committee chair reports to the Board on its proceedings after each meeting DIS (Appendixes) – Governance, page 1			
102-34	Nature and number of critical concerns	DIS (Appendixes) – Governance, page 1			
102-35	Remuneration policies	AR – Report on directors' remuneration, page 73			
102-36	Process for determining remuneration	AR – Report on directors' remuneration, page 73			
102-37	Stakeholders' involvement in remuneration	As part of our policy to involve shareholders fully in the affairs of the company, our AGM gives them the opportunity to ask questions about BT's activities. We also give shareholders the opportunity to vote on every important issue by proposing a separate resolution for each			
102-40	List of stakeholder groups	DIS (Appendixes) – Listening to stakeholders, page 2			P1: Relevance and materiality
102-41	Collective bargaining agreements	AR – Pay and benefits, page 24			
102-42	Identifying and selecting stakeholders	DIS (Appendixes) – Governance, Listening to stakeholders page 2			P1: Relevance and materiality
102-43	Approach to stakeholder engagement	DIS (Appendixes) – Governance, Listening to stakeholders page 2			P1: Relevance and materiality

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Disclosure number	Disclosure title	Where reported	SDG	ISO26000 clause	CDSB Framework
102-44	Key topics and concerns raised	DIS (Appendixes) – Governance, Listening to stakeholders page 2			P1: Relevance and materiality
102-45	Entities included in consolidated financial statements	The group financial statements consolidate the financial statements of BT Group plc and its subsidiaries, and include its share of the results of associates and joint ventures using the equity method of accounting			REQ-07: Organisational boundary
102-46	Defining the report content and topic boundaries	DIS – Our priorities, page 4, and DIS (Our methodology) – Our reporting methodology in the download centre			P1: Relevance and materiality
102-47	List of material topics	DIS (Appendixes), Governance, Identifying material issues, page 3			P1: Relevance and materiality
102-48	Restatements of information	DIS (Our methodology) – Our reporting methodology in the download centre			REQ-10: Restatements
102-49	Changes to reporting	DIS (Our methodology) – Our reporting methodology in the download centre			
102-50	Reporting period	DIS (Our methodology) – Our reporting methodology in the download centre			REQ-09: Reporting period
102-51	Date of most recent report	DIS (Our methodology) – Our reporting methodology in the download centre			
102-52	Reporting cycle	DIS (Our methodology) – Our reporting methodology in the download centre			REQ-09: Reporting period
102-53	Contact point for questions regarding the report	DIS (Our methodology) – Our reporting methodology in the download centre			
102-54	Claims of reporting in accordance with the GRI standards	BT's Digital impact and sustainability report 2018/19 has been prepared in accordance with the GRI standards: Core option			REQ-08: Reporting policies
102-55	GRI Context Index	DIS (Appendixes) – environmental and social reporting indexes			REQ-08: Reporting policies
102-56	External assurance	BT's Digital impact and sustainability report 2018/19 is assured to AA1000AS, 2008 by LRQA. DIS (Appendixes) – LRQA assurance statement			

This material references GRI 201 to GRI 206 (2016) economic standards. The following standards have not been identified as material: 202, 204

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clauses	CDSB Framework
201	Economic performance GRI 103: Management approach	The BT Group plc Annual Report covers our economic performance and governance			
201-1	Direct economic value generated and distributed	AR – Financial statements, page 109 The Economic Impact of BT Group plc in the UK (2018)		6.8.3 Community involvement 6.8.7 Wealth and income creation 6.8.9 Social investment	
201-2	Financial implications and other risks and opportunities due to climate change	AR – Service interruption, page 51 DIS – Adapting to climate change, page 24, and Managing environmental impacts, page 26		6.5.5 Climate change mitigation and adaptation	REQ-03: Risks and opportunities
201-3	Defined benefit plan obligations and other retirement plans	AR – Retirement benefit plans, page 146			
201-4	Financial assistance received from government	AR – Government grants, page 121			
203	Indirect economic impacts GRI 103: Management approach	We undertake independent studies to better understand our indirect impacts, in particular from our network investments Openreach report (2018), The Impact of High-Speed Broadband for Communities , and The Economic Impact of BT Group plc in the UK (2018)			
203-1	Infrastructure investments and services supported	AR – Capital expenditure, page 37		6.3.9 Economic, social and cultural rights 6.7.8 Access to essential services 6.8.3 Community involvement 6.8.6 Technology development and access 6.8.7 Wealth and income creation 6.8.9 Social investment	
203-2	Significant indirect economic impacts	Our research papers on this subject can be found here , see Openreach report (2018), The Impact of High-Speed Broadband for Communities , and The Economic Impact of BT Group plc in the UK (2018)		6.3.9 Economic, social and cultural rights 6.6.6 Promoting social responsibility in the value chain 6.6.7 Respect for property rights 6.8.5 Employment creation and skills development 6.8.7 Wealth and income creation 6.8.9 Social investment	
































Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clauses	CDSB Framework
205	Anti-corruption GRI 103: Management approach	We do not tolerate bribery or corruption in any form Anti-corruption and bribery policy AR – Audit & Risk Committee, page 69 DIS – Doing business ethically, page 28			
205-1	Operations assessed for risks related to corruption	AR – Ethical culture, page 49 DIS – Targeting bribery and corruption, page 28		6.6.3 Anti-corruption	
205-2	Communication and training about anti-corruption policies and procedures	DIS – Doing business ethically, page 28		6.6.3 Anti-corruption	
205-3	Confirmed incidents of corruption and actions taken	DIS – Acting on improper behaviour, page 28		6.6.3 Anti-corruption	
206	Anti-competitive behaviour GRI 103: Management approach	We compete vigorously but fairly, being honest, respectful and trustworthy in all our dealings The BT Way – our ethics code			
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	AR – Communications industry regulation, page 46		6.6.5 Fair competition 6.6.7 Respect for property rights	

















This material references GRI 301 to GRI 308 (2016) environmental standards. The following standards have not been identified as material: 304

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
301	Materials GRI 103: Management approach	Our group-wide environmental policy and environmental management systems (EMS) help us minimise our impacts, manage risks and comply with relevant regulations. Our environmental management governance group (EMGG) oversees the management of environmental risk across our business. Product stewardship is an aspect of our EMS			
301-1	Materials used by weight or volume	Information unavailable – We source products and equipment from more than 16,000 direct suppliers in 100 countries AR Strategic sourcing, page 21	 	6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact
301-2	Recycled input materials used	Information unavailable – We source products and equipment from more than 16,000 direct suppliers in 100 countries AR Strategic sourcing, page 21	 	6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact
301-3	Reclaimed products and their packaging materials	DIS – Reducing impacts from using our products, page 23, and DIS – Supporting a circular economy, page 25	 	6.5.4 Sustainable resource use 6.7.5 Sustainable consumption	REQ-04: Sources of environmental impact
302	Energy GRI 103: Management approach	Our group-wide environmental policy and environmental management systems (EMS) help us minimise our impacts, manage risks and comply with relevant regulations. Our environmental management governance group (EMGG) oversees the management of environmental risk across our business. Energy use is an aspect of our EMS We do not measure energy use outside our operational boundaries, however we encourage our suppliers to seek energy efficiencies in their operations and the products they supply us			
302-1	Energy consumption within the organisation	AR – Cutting our emissions and energy use, page 26 DIS – Reducing our emissions, page 20, and Environmental data in our download centre	   	6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact
302-2	Energy consumption outside of the organisation	Information not available – we do not measure energy use outside our operations. DIS – Partnering with suppliers to cut our emissions, page 22	   	6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact
302-3	Energy intensity	Not applicable – We don't report energy intensity, however we're investigating an appropriate normalising metric to help drive our energy reduction activities	   		REQ-04: Sources of environmental impact
302-4	Reduction of energy consumption	AR – Cutting our emissions and energy use, page 26 DIS – Reducing our emissions, page 20, and Environmental data in our download centre	   	6.5.4 Sustainable resource use	REQ-05: Performance and comparative analysis
302-5	Reductions in energy requirements of products and services	DIS – Partnering with suppliers to cut our emissions, page 22	   	6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact
303	Water GRI 103: Management approach	Our group-wide environmental policy and environmental management systems (EMS) help us minimise our impacts, manage risks and comply with relevant regulations. Our environmental management governance group (EMGG) oversees the management of environmental risk across our business. Water use is an aspect of our EMS We report on water use for our UK operations only: outside the UK most of our operational sites are fully managed by landlords			
303-1	Water withdrawal by source	DIS – Managing environmental impacts, page 26, and Environmental data in our download centre		6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact













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Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
303-2	Water sources significantly affected by withdrawal of water	Not applicable – No water sources are significantly affected by the withdrawal of water used for cooling purposes		6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact
303-3	Water recycled and reused	Not applicable – We neither recycle nor reuse significant volumes of water at present	  	6.5.4 Sustainable resource use	REQ-04: Sources of environmental impact
305	Emissions GRI 103: Management approach	Our group-wide environmental policy and environmental management systems (EMS) help us minimise our impacts, manage risks and comply with relevant regulations. Our environmental management governance group (EMGG) oversees the management of environmental risk across our business. GHG emissions are one of the most material environmental issues to BT and our wider value chain DIS (appendix) – Environmental governance, page 5 and, Our targets in our download centre			
305-1	Direct (scope 1) GHG emissions	AR – Cutting our emissions and energy use, page 26 DIS – Reducing our emissions, page 21 and Environmental data in our download centre	    	6.5.5 Climate change mitigation and adaptation	REQ-04: Sources of environmental impact
305-2	Energy indirect (scope 2) GHG emissions	AR – Cutting our emissions and energy use, page 26 DIS – Reducing our emissions, page 21 and Environmental data in our download centre	   	6.5.5 Climate change mitigation and adaptation	REQ-04: Sources of environmental impact
305-3	Other indirect (scope 3) GHG emissions	AR – The environment, page 26 DIS – Reducing our emissions, page 20 and Environmental data in our download centre	   	6.5.5 Climate change mitigation and adaptation	REQ-04: Sources of environmental impact
305-4	GHG emissions intensity	AR – Cutting our emissions and energy use, page 26 DIS – Reducing our emissions, page 21 and Environmental data in our download centre	  	6.5.5 Climate change mitigation and adaptation	REQ-04: Sources of environmental impact
305-5	Reduction of GHG emissions	AR – Cutting our emissions and energy use, page 26 DIS – Reducing our emissions, page 21 and Environmental data in our download centre	  	6.5.5 Climate change mitigation and adaptation	REQ-05: Performance and comparative analysis
305-6	Emissions of ozone-depleting substances (ODS)	The GHG emissions related to ODS are included in our carbon emissions model. DIS – Environmental data in our download centre	  	6.5.3 Prevention of pollution	REQ-04: Sources of environmental impact
305-7	Nitrogen oxides (NO _x), sulphur oxides (SO _x), and other significant air emissions	DIS – Air pollution, page 26 DIS – Environmental data in our download centre	    	6.5.3 Prevention of pollution	REQ-04: Sources of environmental impact
306	Effluents and waste GRI 103: Management approach	Our group-wide environmental policy and EMS help us minimise our impacts, manage risks and comply with relevant regulations. Our EMGG oversees the management of environmental risk across our business Our waste governance board oversees our performance on waste management and reports to the EMGG We don't monitor or measure waste outside our operational boundaries, however we encourage our suppliers to seek efficiencies in their operations and the products they supply us DIS Appendix – Environmental management, page 5			

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
306-1	Water discharge by quality and destination	Not applicable – Less than 2% of BT properties in the UK require and have a licence or consent for these activities and measuring discharge volumes is not a requirement	   	6.5.3 Prevention of pollution	REQ-04: Sources of environmental impact
306-2	Waste by type and disposal method	DIS – Waste and recycling page 26, and Environmental data in our download centre	  	6.5.3 Prevention of pollution	REQ-04: Sources of environmental impact
306-3	Significant spills	DIS (appendix) – Managing fuel storage, page 5	   	6.5.3 Prevention of pollution	REQ-04: Sources of environmental impact
306-4	Transport of hazardous waste	Less than 1% of waste produced in the UK is classified as hazardous. We hold waste carriers licences in the UK to transport waste. DIS – Waste and recycling page 26, and Environmental data in our download centre	 	6.5.3 Prevention of pollution	REQ-04: Sources of environmental impact
306-5	Water bodies affected by water discharges and/or run-off	Not applicable – All waste water is discharged through municipal waste water systems	 	6.5.3 Prevention of pollution 6.5.6 Protection of the environment, biodiversity and restoration of natural habitat	REQ-04: Sources of environmental impact
307	Environmental compliance GRI 103: Management approach	The BT Way – our ethics code commits everyone in BT to follow the environmental laws and regulations that apply to them and our business, as well as following our environmental standards and commitments. Our Environmental Policy commits us to fulfilling all compliance obligations, both regulatory and others to which we have subscribed. Our environmental management governance group (EMGG) oversees the management of environmental risk across our business.			
307-1	Non-compliance with environmental laws and regulations	DIS (Appendix) – Managing environmental compliance, page 5, and Our targets in our download centre			
308	Supplier environmental assessment GRI 103: Management approach	Our group-wide Environmental Policy and EMS help us minimise our impacts, manage risks and comply with relevant regulations. Our EMGG oversees the management of environmental risk across our business. Procurement is one of the aspects of our EMS.			
308-1	New suppliers that were screened using environmental criteria	DIS – Sourcing with human dignity, page 14		6.6.6 Promoting social responsibility in the value chain	
308-2	Negative environmental impacts in the supply chain and actions taken	DIS – Sourcing with human dignity, page 14		6.5.4 Sustainable resource use 6.6.6 Promoting social responsibility in the value chain	REQ-02: Policy, strategy and targets REQ-03: Risks and opportunities REQ-04: Sources of environmental impact





This material references GRI 401 to GRI 419 (2016) social standards. The following standards have not been identified as material: 401, 402, 410, 411, 414, 415, 416, 417

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
403	Occupational health and safety GRI 103: Management approach	We've got a company-wide and Board-endorsed health, safety and wellbeing strategy AR – Health, safety and wellbeing, page 49 DIS – Supporting employee wellbeing, page 32			
403-1	Workers representation in formal joint management-worker health and safety committees	AR – People, page 23		6.4.6 Health and safety at work	
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	DIS – Supporting employee wellbeing, page 32 BT people data in our download centre	 	6.4.6 Health and safety at work	
403-3	Workers with high incidence or high risk of diseases related to their occupation	DIS – Supporting employee wellbeing, page 32	 	6.4.6 Health and safety at work 6.8.3 Community involvement 6.8.4 Education and culture 6.8.8 Health	
403-4	Health and safety topics covered in formal agreements with trade unions	AR – People, page 23		6.4.6 Health and safety at work	
404	Training and education GRI 103: Management approach	Everyone at BT gets the tools and training they need to do their job, build their skills and gain experience			
404-1	Average hours of training per year per employee	DIS – Building the pipeline, page 31	  	6.4.7: Human development and training in the workplace	
404-2	Programmes for upgrading employee skills and transition assistance programmes	DIS – Transforming BT, page 29		6.4.7 Human development and training in the workplace 6.8.5 Employment creation and skills development	
404-3	Percentage of employees receiving regular performance and career development reviews	DIS – Transforming BT, page 29	 	6.4.7 Human development and training in the workplace	
405	Diversity and equal opportunity GRI 103: Management approach	We have targets on gender balance at the top level of the business DIS – Attracting and developing diverse talent, page 30			

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
405-1	Diversity of governance bodies and employees	AR – Board diversity, page 67 DIS – Attracting and developing diverse talent, page 30, and BT people data in our download centre		6.3.7 Discrimination and vulnerable groups 6.3.10 Fundamental principles and rights at work 6.4.3 Employment and employment relationships	
405-2	Ratio of basic salary and remuneration of women to men	We published our second annual gender pay gap report this year		6.3.7 Discrimination and vulnerable groups 6.3.10 Fundamental principles and rights at work 6.4.3 Employment and employment relationships 6.4.4 Conditions of work and social protection	
406	Non-discrimination GRI 103: Management approach	We value and welcome diversity. We won't treat anyone differently to anyone 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 for any characteristic The BT Way – our ethics code . DIS – Embracing diversity, page 30			
406-1	Incidents of discrimination and corrective actions taken	DIS – BT people data in our download centre		6.3.6 Resolving grievances 6.3.7 Discrimination and vulnerable groups 6.3.10 Fundamental principles and rights at work 6.4.3 Employment and employment relationships	
407	Freedom of association and collective bargaining GRI 103: Management approach	Our Board committee, the <i>Digital Impact & Sustainability Committee</i> , monitor the execution of our digital impact and sustainability strategy and the company's progress on its long-term digital impact and sustainability goals and targets, including those related to human and digital rights We respect the right to freedom of association, collective bargaining and equal opportunity. Our Human Rights policy The BT Way – our ethics code Sourcing with Human Dignity			

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Our Modern Slavery Act transparency statement		6.3.3 Due diligence 6.3.4 Human rights risk situations 6.3.5 Avoidance of complicity 6.3.8 Civil and political rights 6.3.10 Fundamental principles and rights at work 6.4.3 Employment and employment relationships 6.4.5 Social dialogue	
408	Child labour GRI 103: Management approach	Modern slavery is an increasing global issue. It's not acceptable in our own operations nor those who work with us or on our behalf. Modern slavery includes human trafficking, forced, bonded, child or prison labour. No one should be deprived of their identity papers, nor have to pay to work with us. The BT Way – our ethics code Sourcing with Human Dignity			
408-1	Operations and suppliers at significant risk for incidents of child labour	Our Modern Slavery Act transparency statement DIS – Sourcing with human dignity, page 14	 	6.3.3 Due diligence 6.3.4 Human rights risk situations 6.3.5 Avoidance of complicity 6.3.7 Discrimination and vulnerable groups 6.3.10 Fundamental principles and rights at work	
409	Forced or compulsory labour GRI 103: Management approach	We've a long-standing policy that we don't use or accept forced, bonded or involuntary prison labour or child labour The BT Way – our ethics code Sourcing with Human Dignity			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	Our Modern Slavery Act transparency statement DIS – Sourcing with human dignity, page 14		6.3.3 Due diligence 6.3.4 Human rights risk situations 6.3.5 Avoidance of complicity 6.3.7 Discrimination and vulnerable groups 6.3.10 Fundamental principles and rights at work	
412	Human rights assessment GRI 103: Management approach	The <i>Digital Impact & Sustainability Committee</i> , a Board committee, oversees our human and digital rights programme worldwide Human rights policy			

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
412-1	Operations that have been subject to human rights reviews or impact assessments	DIS – Sourcing with human dignity, page 14		6.3.3 Due diligence 6.3.4 Human rights risk situations 6.3.5 Avoidance of complicity 6.4.3: Employment and employment relationships 6.6.6: Promoting social responsibility in the value chain	
412-2	Employee training on human rights policies or procedures	DIS – Respecting human rights in our business, page 14		6.3.3 Due diligence 6.3.5 Avoidance of complicity 6.6.6 Promoting social responsibility in the value chain	
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	DIS – Sourcing with human dignity, page 14		6.3.3 Due diligence 6.3.5 Avoidance of complicity 6.6.6 Promoting social responsibility in the value chain	
413	Local communities GRI 103: Management approach	We invest in initiatives designed to accelerate progress towards our ambitions Our <i>Digital Impact & Sustainability Committee</i> – a committee of the BT Board – oversees our progress			
413-1	Operations with local community engagement, impact assessments, and development programmes	DIS – Making digital skills our priority, page 7 DIS – Getting communities online, page 9		6.3.9 Economic, social and cultural rights 6.8.3 Community involvement 6.8.5: Employment creation and skills development 6.8.9 Social investment	
413-2	Operations with significant actual and potential negative impacts on local communities	DIS – Getting communities online, page 9		6.3.9 Economic, social and cultural rights 6.5.3 Prevention of pollution 6.5.6 Protection of the environment, biodiversity and restoration of natural habitats	
414	Supplier social assessment GRI 103: Management approach	We're steered by the UN Guiding Principles on Business and Human Rights Our supply chain initiative, Sourcing with Human Dignity, outlines a set of standards based on the United Nations Universal Declaration of Human Rights and International Labour Organisation Conventions. Our suppliers must comply with this Policy to ensure a fair and ethical workplace, where workers are treated with dignity and respect and the highest standards of human rights are upheld. Sourcing with human dignity			

Standard/ Disclosure number	Standard/Disclosure title	Management approach/where reported	SDG	ISO26000 clause	CDSB Framework
414-1	New suppliers that were screened using social criteria	DIS – Sourcing with human dignity, page 14 and Our targets		6.3.3 Due diligence 6.3.5 Avoidance of complicity 6.6.6 Promoting social responsibility in the value chain	
414-2	Negative social impacts in the supply chain and actions taken	DIS – Sourcing with human dignity, page 14			
418	Customer privacy GRI 103: Management approach	We protect our customers from online harms and safeguard their privacy and security, supporting their right to free expression. Our privacy policy Privacy and Free Expression Report 2019			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	DIS – Protecting privacy and freedom of expression, page 16		6.7.7 Consumer data protection and privacy	
419	Socioeconomic compliance GRI 103: Management approach	Our <i>Audit & Risk Committee's</i> responsibilities include reviewing the effectiveness of processes for compliance with laws, regulations and ethical codes of practice, including the company's Speak Up arrangements. AR – <i>Audit & Risk Committee</i> , page 69			
419-1	Non-compliance with laws and regulations in the social and economic area	DIS – Acting on improper behaviour, page 28, and Our targets in our download centre		6.7.6 Consumer service, support, and complaint and dispute resolution	