



# Modern Slavery Statement 2023/24

June 2024



**BT Group**



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## 1. Introduction

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.

This is BT Group's ninth annual Modern Slavery Statement, developed in consultation with colleagues and relevant companies we own or control and published in accordance with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. This statement relates to the financial year ended 31st March 2024.

[Read our previous statements.](#)

## 2. Organisation structure and supply chains

BT Group operates as a single business, made up of different organisational units. We have three customer-facing lines of business: Consumer, Business and Openreach. They are supported by our internal service units, Digital and Networks. Openreach is a legally separate, wholly owned subsidiary of BT Group. In the Group we employ around 94,000 colleagues, approximately 74,000 of these are in the UK.

We buy a vast range of things, from network and IT hardware to corporate clothing and waste disposal services. Some of the products and services we buy we use in our own business (like those needed for running our offices) and some we use as part of what we sell to our customers (like networking equipment, mobile devices, and software).

We buy from approximately 9,000 direct suppliers in over 100 countries. We spent £14.7 billion with our suppliers this year. Of this, approximately 70% was with 100 key suppliers and over 90% was with suppliers based in low-risk countries. 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.

## 3. Governance

We work to make sure our policies, governance and due diligence processes take account of human rights risks so that we can properly manage and mitigate them.

Our Responsible Business Committee, a committee of the BT Group plc Board, agrees our human rights and responsible tech strategy and monitors progress on it. Human rights risks, including those related to modern slavery, are integrated into our risk management framework.

Our executive management-led Responsible Tech Steering Group is chaired by our Group Corporate Affairs Director, who has delegated authority from the Chief Executive for decisions about human rights risks. The Steering Group's remit is to guide strategic direction, stay on top of emerging trends and drive consistency in decision-making across the business, and to make sure we develop, use, buy and sell technology in a way that benefits people and minimises harms.

Day-to-day, our Responsible Tech and Human Rights Team works on integrating the United Nations Guiding Principles for Business and Human Rights into our business, including training, and supporting the colleagues who bring our human rights policy to life across the Group.

## 4. Policies in relation to slavery and human trafficking

Our policies set expectations of how we – and everyone who works on our behalf – will work to prevent modern slavery. We are guided by the United Nations Guiding Principles on Business and Human Rights, and our commitment to the United Nations Global Compact.

Policies relevant to modern slavery and human trafficking:

1. Being trusted: our code
2. Human Rights Policy
3. Sourcing with Human Dignity
4. Recruitment Policy
5. Anti-corruption and Bribery

[Read more about our policies.](#)

## 5. Due diligence

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

- Understanding our risks and uncovering opportunities to combat modern slavery by talking to experts.
- Assessing where the risks are in our business and supply chains.
- Developing and applying anti-slavery measures through policy, training and collaboration.

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

One mechanism we use to monitor compliance with, and the effectiveness of, our modern slavery requirements is by encouraging colleagues to raise any concerns about suspected non-compliance with our Responsible Tech and Human Rights Team or our Ethics Team – or via our Speak Up hotline, which is also open to third parties.

As part of our ongoing due diligence in the supply chain, we conduct on-site assessments to help us understand how well a supplier has implemented our policies and standards and what the impact has been on their workers. If we spot that a supplier needs to make improvements, we'll work with them to address any problems.

### Case study: Worker Voice

Worker Voice aims to promote employee participation, engagement, and collaboration while our Speak Up channel primarily serves as a mechanism for reporting concerns or grievances. Utilising technology to deploy Worker Voice solutions and directly engage with workers is a widely used tool for conducting supply chain due diligence.

At BT Group, we recognise the immense value of Worker Voice in pinpointing intricate challenges like modern slavery, harassment, and discrimination, which is often difficult to identify in conventional on-site assessments.

This year, in partnership with Labor Solutions, we launched a Worker Voice pilot in six sites across China, Taiwan and Vietnam and reached 1,476 people working in our supply chain. Overall, survey respondents spoke highly of their experiences at work. We did identify potential risks relating to the payment of recruitment fees at one site. We engaged with the site to agree a corrective action plan and will be following up to validate implementation of improvements in 2024/25.

[Read more about our approach to due diligence.](#)

## 6. Risk assessment

We believe our highest risk areas for modern slavery and human trafficking are related to:

- 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.
- Manufacture of network equipment.

Buyers follow a consistent procurement sourcing process, using a step-by-step guide to make sure they ask the right questions and review relevant information at each stage of the process.

Our self-assessment questionnaires flag potential risks at the earliest stage when we're qualifying prospective suppliers. We ask questions to understand where we're buying the product or service from, what it is that we're buying, and the employment terms of the workforces (for example, whether there are migrant workers being employed, who we know can be more vulnerable to risks of modern slavery).

We use digital tools to understand the changing risk profile of our suppliers, which allow us to monitor suppliers in real time. The tools can provide specific information on disruptions to suppliers who are concentrated in regions impacted by geopolitical crisis or natural disasters, which could increase the risk of modern slavery. We also gather insights on worldwide macro trends, including indicators that could increase the risk of modern slavery in our supply chain.

[Read more about our approach to risk assessment.](#)

## 7. Training on modern slavery and trafficking

Everyone who works for us must complete training on our ethics code ([Being trusted: our code](#)) and our anti-corruption and bribery policy when they join the company. This is repeated every year. The code and the accompanying training (Doing the right thing. For good.) makes clear that we don't tolerate modern slavery.

We provide the teams most likely to come across modern slavery with additional training. For example, when buyers who work closely with suppliers join BT Group, there is training available on modern slavery to help them spot the signs of forced labour, learn how to report concerns, and to understand how it affects our business.

## 8. Our progress this year

Modern slavery is a complex and often hidden risk. We use the following performance indicators to monitor and report on the effectiveness of our policies and procedures in this area.

### Performance indicators

| Key performance indicator (KPI)                                                                                        | Reason for KPI                                                                                                             | 2022/23            | 2023/24 |
|------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|--------------------|---------|
| Number of on-site supplier assessments this year (including remote audits and third party <a href="#">JAC</a> audits). | We investigate practices that could result in modern slavery through our on-site supplier assessments.                     | 28 (plus 2 remote) | 45      |
| Number of concerns identified through on-site supplier assessments which indicate potential forced labour.             | By monitoring the number of issues identified, we can better adapt our policies and procedures.                            | 2                  | 0       |
| Percentage of colleagues who completed the 'Being trusted: our code' training.                                         | By monitoring completion, we can track employee understanding of 'Being trusted: our code', which includes modern slavery. | 95%                | 99%     |
| Number of reports to our Speak Up hotline related to modern slavery concerns.                                          | By monitoring the number of issues identified, we can better adapt our policies and procedures.                            | 2                  | 0       |

### Our progress this year

| What we said we'd do this year                                                                                                                    | Did we do it?                                                                                                                                                                        | What we're going to do next year                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Continue our operational support, funding and promotion of the UK Modern Slavery Helpline. Read more about our partnership <a href="#">here</a> . | Yes. We continued our operational support, funding and promotion of the UK Modern Slavery Helpline.                                                                                  | Continue our operational support, funding and promotion of the UK Modern Slavery Helpline. |
| Pilot the use of mobile technology to get direct feedback from supply chain workers.                                                              | Yes. We deployed a digital worker voice solution to six sites in our supply chain across China, Taiwan and Vietnam.                                                                  | Expand the use of technology to strengthen due diligence in our supply chain.              |
| Issue responsible recruitment guidance to high-risk tier 1 suppliers identified through our mobile technology pilot.                              | No. We identified one site in our pilot with a particular risk relating to recruitment fees. We engaged directly with this site to agree a corrective action plan with the supplier. |                                                                                            |

## Sign off

This Statement describes the activities that BT Group has undertaken in the financial year 2023/24 to prevent modern slavery in our business operations and supply chain.

The boards of directors for the following companies have approved this statement:

- British Telecommunications plc
- BT Australasia Pty Limited\*
- BT Global Services
- Communication Network Services Ltd
- EE Limited
- Mainline Digital Communications Limited
- Openreach Limited
- Plusnet plc

They all delegated authority to Allison Kirkby to sign this statement on their behalf.

A handwritten signature in black ink, appearing to read 'Allison K.', with a large circular flourish underneath.

Allison Kirkby, Chief Executive

BT Group plc

Signed 04 June 2024 following board approvals in April and May 2024

\*BT Australasia Pty Limited does not have any owned or controlled entities.



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