



# SUPPLIER CHARTER

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**Associated Group Risk Category:** Supply Management

**Associated Policy:** Supply Management

## Applicability:

This Charter applies to all Suppliers that supply goods, software, or services to BT, including Openreach, EE, and Plusnet, and to Supplier Personnel working for, with, or on behalf of BT.

## Additional Information:

Suppliers must adhere to BT's Supplier Charter with no exceptions, regardless of the type or value of business undertaken with BT.

## Objective of this document:

BT is committed to maintaining the highest ethical standards and behaviours in everything it does and expects all Suppliers working for, with, or on behalf of BT to do the right thing and make the right choices. This Supplier Charter sets out the minimum standards of behaviour and practices required from Suppliers and their supply chains.

This Charter supports BT's commitment by establishing clear expectations for supplier conduct across integrity, responsible operations, respect for people, and ongoing compliance. It provides a consistent framework to help Suppliers understand BT's requirements, communicate them through their own supply chains, and maintain appropriate records, controls, and escalation routes to demonstrate compliance.

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# 1 Key Principles

BT's Supplier Charter is guided by the following key principles, which set out the outcomes BT expects Suppliers to achieve and the behaviours required to support ethical, responsible, and sustainable business relationships.

## Welcome

BT Group ("BT"<sup>1</sup>) is one of the world's leading communication services companies. Our purpose is as simple as it is ambitious: **we connect for good**.

We're committed to maintaining the highest ethical standards and behaviours in everything we do, and we expect everyone working for, with, or on behalf of BT to do the right thing and make the right choices. We don't tolerate improper business conduct of any sort.

BT with support from our suppliers plays an important role in delivering against UN Sustainable Development Goals.

The Supplier understands that it and its Supplier Personnel are required to follow BT's Code. Further details can be found [here](#).

This BT Supplier Charter sets out the minimum standards of behaviour and practices we require from our Suppliers. This ensures everyone understands how to behave and what's expected of them. It covers three areas:

1. acting with integrity;
2. operating responsibly; and
3. respect for people.

All Suppliers to BT must adhere to BT's Supplier Charter with no exceptions, and regardless of the type and value of the business we do together. Where local law, regulation or rules impose stricter requirements than BT's Supplier Charter, Suppliers must comply with those stricter requirements.

We use these principles when we begin new supply relationships. And we monitor how our suppliers are living up to them throughout our commercial relationship. Suppliers who don't meet our ethical standards may jeopardise their business relationship with BT.

## Applicability

BT's Supplier Charter applies to all Suppliers, who supply goods, software or services to BT, including Openreach, EE and Plusnet.

In addition, we require all Suppliers to flow down the requirement to adhere to the principles set out in this Supplier Charter throughout their supply chain. This ensures there is alignment and best practice throughout the supply chain.

Additionally, Suppliers are encouraged to create and maintain a confidential hotline available to all Supplier Personnel to report any breaches of this policy by the Supplier and/or any Supplier Personnel in relation to the supply of the Goods, Software and/or Services and to promptly report to BT in writing any matters relating to BT raised by this hotline.

Where a Supplier, or any Supplier Personnel, suspects wrongdoing or has an ethical concern that relates to BT, it should raise those concerns via BT's independent, free and confidential [Speak Up](#) service.

Workers and Supplier Personnel include all persons working for the Supplier irrespective of their contractual status, including persons hired permanently, on a piece-rate, temporary or seasonal basis, on reduced work schedules, domestic or foreign migrants on a work visa, and persons in training including apprentices.

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<sup>1</sup> "BT" means BT Group plc and each Related Undertaking as listed in the BT Group plc Annual Report from time to time. For example: if your contract is with British Telecommunications plc that is the legal entity to which "BT" shall refer throughout this Supplier Charter.

## 1.1 Acting with integrity

### Anti-bribery and corruption

At BT we don't tolerate bribery or corruption in any form. We require that all people who work for, with or on behalf of BT must never make, authorise, look for, accept, or tolerate any kind of offer, gift, kickback, or payment to get or keep an unfair advantage. This applies equally to dealing with public officials anywhere in the world and to private sector commercial relationships. Suppliers must not make or offer facilitation payments in any circumstances.

### Conflicts of interest

BT considers that a conflict of interest arises in any situation where a person's loyalties or position might influence them to act in a way that is not in the best interest of BT or its customers, or that favours certain colleagues over others. At BT we compete to win fairly and expect everyone who works for, with, or on behalf of, BT to seek to avoid conflicts of interest, but where they could arise be open and upfront and Suppliers are required to declare a conflict of interest by informing the Supplier's BT Procurement contact. Further details on the policy can be found [here](#).

### Competitive behaviour and regulation

BT competes vigorously but fairly. We're honest, respectful, and trustworthy in all our dealings and we care about our customers, especially those who may be vulnerable. We believe in free markets. We respect the rights of our competitors to carry on their business, and we don't pressure or coerce our customers into choosing us over our competitors.

This means every Supplier must comply with relevant competition (antitrust) laws and any applicable regulation in all territories where they are active. Suppliers must not engage in anti-competitive behaviours or collude with their competitors or other organisations in a way which unfairly restricts competition, either on their own or BT's behalf.

### Sanctions, export controls, import obligations and legislative compliance

BT has a zero-tolerance approach to infringements of sanctions, export controls and import laws and regulations by people working for, with, or on behalf of, BT.

Accordingly, Suppliers must:

- Ensure compliance with sanctions laws and regulations;
- Ensure their operations are compliant with all relevant import/export control legislation when importing and exporting goods, software, services, or technology.
- Undertake the necessary risk assessments, planning and seek the necessary permits and authorisations to allow compliant and timely delivery of goods, software, services, or technology.
- Establish and maintain and retain sanctions due diligence and import/export records for the required period.

This requirement must be flowed down by the Supplier to all suppliers in the Supplier's supply chain, where relevant.

Suppliers must comply with all applicable laws and regulations applicable to its Goods, Software and Services. For example, in relation to supply of Goods, and the regulations related to UKCA and EU CE, Suppliers must provide an appropriate Declaration of Conformity, apply the conformity assessment mark to any product, maintain compliance systems and be able to demonstrate a satisfactory record of compliance with laws and regulations in the conduct of their business.

### Safeguarding information and respecting confidentiality

BT protects its technology, intellectual property, and commercially sensitive and confidential information from unauthorised access, use and disclosure and BT recognise our suppliers have an important role to play. We do not seek or use commercially sensitive or confidential information from other organisations except where this has been obtained in compliance with all applicable laws and ethical behaviour.

Suppliers must ensure that they keep any information that they receive about BT, its people and its customers secure, and report any issues to BT as soon as they are known.

Upon termination or expiry of a Supplier's dealings with BT, all data and BT items entrusted to the Supplier must be returned to BT. Throughout the course of dealings with BT, secure systems and processes must be in place to manage Supplier Personnel access to any BT or BT-related systems

## Preventing the facilitation of tax evasion

BT doesn't tolerate any type of financial misconduct including fraud, tax evasion, facilitation of tax evasion or money laundering.

Suppliers must comply with all local, country and other applicable tax laws and regulations. Suppliers should be alert to someone asking them to act outside normal processes where there is reason to suspect that it relates to tax evasion. Suppliers must ensure that all invoices and contractual documentation provide a true and accurate reflection of the agreed commercial situation. There is no excuse for the inclusion of any false or misleading information.

This requirement must be flowed down by the Supplier to all suppliers in the Supplier's supply chain, where relevant.

## Accurate business records

BT ensures that we keep accurate and complete business records, and we don't tolerate financial misconduct of any type.

We require Suppliers to maintain complete and accurate records of their own business transactions, and to ensure that they operate the necessary financial controls to manage the risk of financial misconduct arising in their own business and supply chains.

## Political support and engagement

BT doesn't support or make donations (in cash or kind) to any political party, to the campaign of any candidate for elected office, or in support of any elected official. We respect the right of our people to personally support political activities as long as those activities are not related to BT. We're also committed to acting in compliance with all applicable laws and behaving ethically in our interactions with governments, agencies and their representatives.

Suppliers must similarly undertake any lobbying activities in compliance with all applicable laws and behave ethically in all interactions with governments, their agencies and representatives

## Preventing fraud

BT has a zero tolerance to fraud either from within the company or committed against it and will take appropriate action against any known perpetrators of fraud. We require that all people who work for, with or on behalf of BT must never dishonestly make a false representation, dishonestly fail to disclose information, and not abuse a position they occupy and are expected to safeguard. Suppliers are required to comply with all applicable laws relating to fraud, directly and indirectly.

Further details on the policy can be found [here](#).

## 1.2 Operating responsibly

### Health, Safety and Environment

The following Health and Safety requirements apply to all Suppliers, their group companies and Subcontractors that provide goods or services to BT or to BT's customers.

Health, Safety and Environment (HSE) and Wellbeing are key priorities for BT and the foundations upon which we operate. The applicable legal, regulatory and other requirements set out below are the Supplier's minimum obligations. Our aim is to go beyond legal compliance in order to achieve zero avoidable harm, optimum physical and mental health and the prevention of pollution. Integral to this, Suppliers must take the necessary steps to protect the health, safety and wellbeing of their employees, contractors, customers, visitors and members of the public.

Suppliers must ensure that any goods, software or services provided to BT and its customers are safe and fit for purpose.

If there is any conflict between national laws and any Supplier obligations in this Charter, the Supplier must comply with the standard that promotes the higher level of protection.

Further details on the policy can be found [here](#).

### Contractual Requirements

Suppliers must immediately report to BT any breaches of this Charter. Where BT considers it appropriate, it will work collaboratively with the Supplier to implement remedial actions. However, BT will also take action, which may include terminating any agreement with the Supplier, for example if the Supplier is unwilling to make appropriate changes requested by BT.

The Supplier warrants that all information relating to this Charter (including responses to any questionnaires) that it provided to BT before entering into a contract with BT was, and continues to be, true and complete. If any aspect of such information no longer remains true in any material respect during the term of the Supplier's contract, the Supplier will promptly submit to BT a written update to such information so that the information remains true and accurate in all material respects.

### Compliance

Suppliers must comply with all local, country and other applicable laws and regulations relating to health and safety. Suppliers must maintain compliance systems and be able to demonstrate a satisfactory record of compliance with laws and regulations in the conduct of their business.

All permits, licences and registrations required to deliver the scope of work must be obtained and maintained by the Supplier. Suppliers must fulfil their operational and reporting requirements.

### Continual Improvement

Suppliers are required to establish and maintain a management system or programme that encourages continual improvement in health and safety and integrate principles of occupational safety and health into their management system:

### Health & Safety Contractor Rules

BT's Health & Safety Contractor Rules set out the specific rules Suppliers must follow, including how the Supplier and its employees should conduct themselves when working for BT. Further details on the policy can be found [here](#).

Openreach Supplier Health, Safety and Environmental Mandatory Policy Requirements are available [here](#).

Suppliers and their subcontractors shall comply with all health and safety requirements specified by BT.

## Accident reporting

Accidents, incidents and near misses must be reported as soon as possible but within 24 hours to BT on: UK tel: 0800 671 345, HR Services outside the UK: +44 203 684 7021, Within the Republic of Ireland: 01 656 9016, or through their Company Representative.

Suppliers must investigate all accidents, incidents and near misses as soon as practicable and submit a report to BT within 7 days.

## Environmental Protection

BT is committed to protecting our natural environment and resources, delivering against the UN Sustainable Development Goals, achieving our Net Zero targets and our commitments to the UN Global Compact.

We require Suppliers to protect our natural environment and resources and commit to, and deliver against, the UN Sustainable Development Goals and the UN Global Compact environmental principles.

Suppliers must have an environmental policy that sets out their commitment and goals to environmental protection.

Suppliers must also have in place a suitable and appropriate Environmental Management System (EMS) such as ISO14001 to manage their environmental impacts and must conduct the necessary environmental due diligence across their own value chain, including their supply chain. Suppliers must comply with local, national, and international laws and industry standards applicable to them. All non-compliance should be reported to BT within 72 hours of discovery. BT's detailed Supplier Environmental Standard stipulates BT's requirements in more detail with which Suppliers must comply.

Further details on the standard can be found [here](#).

BT shall have the right to conduct environmental audits on the Suppliers' facilities, as well as relevant Subcontractors, operations, and records. The Supplier will provide the necessary access and information in a timely manner and must not unreasonably delay or interfere with BT's right to conduct an effective audit.

## Conflict Minerals and Critical Raw Materials

BT is committed to the responsible sourcing of minerals and critical raw materials used to provide our products and services.

The sourcing of certain minerals and critical raw materials can be a significant human rights risk and/or cause significant environmental damage. Suppliers must ensure their minerals and critical raw materials are sourced responsibly and that their supply chains do not help to fund armed conflict or other illegal practices and/or cause environmental degradation.

Suppliers must only provide BT with products made from materials, including constituent minerals, that are sourced responsibly. *Suppliers must adopt and implement the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)*. Suppliers must provide supporting data on their mineral supply chain upon request. Where a material's chain of custody is categorised as "indeterminable" or unknown, the Supplier must either commit to obtaining the necessary certifications or phase out the use of that material.

## Operational Resilience

Operational Resilience is defined as the ability to prevent, adapt, respond to, and learn from operational disruption. Business Continuity and Crisis Management is a subset of Operational Resilience, defined as activities and outcomes that will collectively reduce the likelihood, duration, and impact, of a serious disruption.

Business Continuity Management (BCM) is a crucial part of running a successful and responsible company and helps manage the risks and protects the interests of our key stakeholders, reputation, brand and value creating activities, by ensuring the business and services it delivers can continue in the event of a disruption.

BT expects Suppliers to have a robust process in place (ISO22301 or equivalent) that covers the products or services offered to BT to ensure that key Supplier activities have been risk assessed, weaknesses planned for with workable mitigations and that these have been tested.

## Supplier Use of AI and Software Developers – Gen AI Technology

Artificial intelligence (AI) and Generative Artificial Intelligence (Gen-AI) technology represent a great opportunity to BT. As we use these tools, it is critical we embrace them responsibly.

BT is extending access to Gen-AI tools to our suppliers, contractors and sub-contractors, particularly where they work alongside our full-time employees developing software and code.

All Suppliers, contractors and sub-contractors must make sure they understand the risks set out in BT's *Policy for Software Developer using Gen-AI Technology* and follow its requirements. This Policy sets out mandatory rules applicable to the use of Gen-AI tools across BT.

Suppliers must comply with this Policy when using Gen-AI tools for or on behalf of BT. Non-compliance may lead to legal action and termination of our relationship.

In addition, all Suppliers using non-BT-provided AI tools in the delivery of products and services to BT must familiarise themselves and comply with BT's [Supplier Use of AI Policy](#). This Policy sets out the expectations and guardrails around the use of AI which BT requires from our Suppliers.

Further details on the policies can be found [here](#).

## BT Supplier Security Requirements (BTSSR)

BT operates at the highest security standards, working in line with Industry Standards and Legal & Regulatory requirements. Suppliers providing services to BT must comply with industry standard security frameworks to ensure the security of the services they provide to us and to protect our systems, networks and Information.

The BTSSR comprise different levels of complexity and security requirements according to the type of work and the level of Supplier access to information, systems and physical access to BT property. BT will assess and advise the Supplier of the applicable requirements in relation to the context of the Supplier's activities.

The Supplier is required to comply with the applicable requirements of the BTSSR.

Further details on the policies can be found [here](#).

## Third Party Pre-Employment Checks

Suppliers must ensure that employees they and their subcontractors recruit are subject to appropriate pre-employment checks as outlined in BT's Third-Party Pre-Employment Check Policy.

For further information, please refer to the Third-Party Pre-Employment Checks policy available [here](#).

Dealing with no further appeals process. If agreement cannot be reached the contract may be terminated in line with the existing contractual terms. All disagreements should be sent to [IR35contractorcare@bt.com](mailto:IR35contractorcare@bt.com)

## Accessibility

At BT we are committed to ensuring the products and services we procure meet the needs of all users, customers, and colleagues, including those with disabilities.

It's vital that all our suppliers understand accessibility and disability and are confident in making their products accessible and adjusting for disabled users who may need them.

We are [Disability Confident Leaders](#) and have signed the [Business Disability Forum's Accessibility Technology Charter](#). This is our public commitment to ensuring everything we procure is accessible and we want our suppliers to support us in this ambition.

Further details on the policies can be found [here](#).

## Contractors and tax – UK Only

BT's policy is not to engage directly with Personal Service Companies unless under exceptional circumstances approved by Group Tax.

BT will apply HM Revenue & Customs guidance when dealing with Off payroll working assessments. Suppliers will have 10 Business Days from the determination being issued to raise any query and BT will respond according to UK legislative timescales. BT's outcome from the disagreement process will be final

## Digital Accessibility Info for Vendor

At EE, BT and Plusnet we want everyone to be able to access and interact with our websites and apps.

We work towards increasing the accessibility and usability of all our online communications by complying with level AA of the World Wide Web Consortium ([W3C](#)) Web Content Accessibility Guidelines latest published version ([WCAG](#)) as a minimum.

WCAG is the international standard that aims to make digital content accessible to everyone, regardless of any differences such as disabilities, technological access, language and geographic location.

## 1.3 Respect for people

### Human rights

At BT we believe everyone is entitled to basic rights and freedoms, whoever they are and wherever they live.

BT's Supplier Charter reflects our commitment to the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the UN Global Compact. We support the OECD Guidelines for Multinational Enterprises. Suppliers are expected to commit to the same.

Suppliers must ensure that they only engage with employees, agents, intermediaries, consultants, representatives, distributors, teaming partners, contractors, suppliers, consortia, joint venture partners and other third parties who comply with the law and meet a high ethical standard. Suppliers will conduct due diligence to ensure full compliance with legal requirements and this Supplier Charter.

Suppliers will comply with the following requirements:

1. Freely chosen employment:  
Employment is accepted and work is conducted on a voluntary basis.  
Work is conducted on the basis of freely agreed and documented terms of employment in a form understood by the Supplier Personnel.
2. Prevention of underage workers:  
All Supplier Personnel are of an appropriate legal age and young workers are protected.
3. Working hours:  
Working hours for all Supplier Personnel are in accordance with local legal requirements and do not exceed 60 hours per week.
4. Wages and Benefits:  
All workers are paid a fair wage which meets or exceeds legal minimum standards.
5. Humane treatment:  
All Supplier Personnel are free from harassment and abuse. No worker is subject to any physical, sexual, psychological or verbal harassment, abuse or other forms of intimidation.
6. Non-discrimination:  
All Supplier Personnel are treated equally and with respect and dignity without any form of discrimination. Particular attention is paid to the rights of worker most at risk of discrimination.
7. Freedom of association & collective bargaining:  
All Supplier Personnel are free to exercise their right to form and / or join trade unions and to bargain collectively.
8. Health and safety:  
All Supplier Personnel operate in a safe and healthy work environment that identifies and reduced risks to prevent accidents, injuries and illnesses.

Suppliers will listen carefully to concerns from their workers<sup>2</sup> and the communities in which they operate and take appropriate steps to remediate.

BT's full expectations from Suppliers are included in our Human Rights Policy and Sourcing with Human Dignity Standards. Further details on the policy can be found [here](#).

### Privacy and Data Protection

BT is committed to being the UK's most trusted connector of people, devices and machines, and as such we expect Suppliers to have adequate processes in place to safeguard personal data and privacy, and to ensure that it is processed lawfully). Suppliers must safeguard confidential information and comply with all applicable laws relating to

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<sup>2</sup> The terms "worker" and "Supplier Personnel" shall, in addition to any other relevant definition in a Supplier's contract, include all persons working directly or indirectly for the supplier and at the supplier premises irrespective of their contractual status, including persons hired permanently, on a piece-rate, temporary or seasonal basis, on reduced work schedules, domestic or foreign migrants on a work visa, and persons in training including apprentices

personal data and privacy protection, as they apply to customers, consumers, and employees. Suppliers must complete and be able to evidence Privacy Impact Assessments, and Transfer Impact Assessments where appropriate, in relation to all work undertaken for BT. Suppliers must have in place and be able to evidence appropriate Technical and Organisational Measures for ensuring the security of processing of all personal data. Suppliers must report any unauthorised disclosure of personal data or other breach of data protection laws without undue delay to BT, and within minimum contractual reporting periods. Suppliers must respect their employees' right to privacy, avoid inappropriate surveillance, and only process personal data where there is a lawful basis to do so.

## Inclusion

In BT we always treat each other with the highest levels of dignity and respect, making it a place where we're proud to work. We want **everyone** who works for, with, or provides services to, or on behalf of, BT to feel able to be themselves and we expect our Supplier's to understand and acknowledge [BT's Inclusion Strategy](#).

We're resolute that there is no place for discrimination, bullying or harassment, at any stage of employment in our supply chains. This extends to language and behaviours and the use of social media, includes all forms of physical, verbal, or psychological abuse. We take a zero-tolerance approach when we learn of behaviours that fall short of our standards and require our Suppliers and those working for BT to do the same.

As a minimum, we require all Suppliers to meet the legal requirements in relation to equality in every locality in which we, or they, operate. Suppliers must have in place (and to

robustly monitor compliance with and progress against) clear inclusion and diversity policies, programmes and initiatives that accelerate the pace of change for inclusion. Suppliers must also have in place clear anti-bullying and harassment policies and procedures in place which encourage the reporting of incidents and ensure complaints of harassment and/or discrimination of any nature are taken seriously, investigated and proportionate action taken. This includes action around incidences of retaliation.

We also require that Suppliers take steps to make sure their services, products and policies do not have an adverse impact on people or result in inequality.

All products, services, websites, content, and communications must adhere to applicable law with respect to web content and accessibility.

We value working with partners and Suppliers who have the same vision and standards, and we encourage businesses who employ people in the UK to sign up to the UK Government's Disability Confident Scheme.

## Responsible Closure

Prior to implementing any restructuring / reorganisation or closure involving dismissal of workers, Suppliers must implement a process involving reviewing viable alternatives and setting out a retrenchment plan to reduce the adverse impacts of retrenchment on workers. The retrenchment plan will be based on the principle of non-discrimination and will reflect consultation with workers and their organisations. Suppliers will comply with all applicable legal and contractual requirements. Suppliers will pay workers all salary, notice period pay and any other redundancy payments to which workers are entitled by law, e.g. seniority payments.

## 2 Our Approach

BT's approach is to communicate the Supplier Charter clearly, require Suppliers to flow down relevant requirements through their own supply chains, monitor compliance throughout the commercial relationship, and respond appropriately where requirements are not met.

### Communicating BT's Supplier Charter

As a Supplier to BT, you must make BT's Supplier Charter available to your employees (and those working on your behalf as part of your commercial relationship with BT) in the business language of your organisation.

### BT Supplier Invoicing and Payments Policy

BT's Payment and Invoicing Policy apply to all Suppliers doing business with BT or acting on behalf of BT. Supplier must ensure that each invoice is a valid tax invoice for the purpose of the Transaction Tax legislation, as per the applicable country laws.

Note: BT operates on a No-PO-No-Pay principle. A Supplier is not permitted to commence work without a valid and BT-approved Purchase Order (PO).

Further details on the policy can be found [here](#).

### Payment Card Data Security Standards

The Supplier shall adhere to all PCI DSS requirements, submit annual compliance attestations, and cooperate with BT in conducting security assessments. Supplier is responsible for the protection of Account Data, ensuring that any subcontractors comply with PCI DSS standards, and promptly addressing any instances of non-compliance or security breaches.

Further details on the policy can be found [here](#).

### Living up to BT's Supplier Charter

We expect all our Suppliers to live up to every aspect of BT's Supplier Charter.

We take compliance with BT's Supplier Charter very seriously and may seek at any time to confirm that it is being followed:

- BT reserves the right to audit Supplier conduct against compliance with BT's Supplier Charter. We expect that Suppliers will keep records to demonstrate compliance with both the letter and the spirit of BT's Supplier Charter. BT may request access to that documentation at any time. BT may also seek access to the Supplier or the Supplier's sites for audit purposes.
- The Supplier must immediately notify both its primary BT main contact and BT Security Control Centre (SCC) in the event that the Supplier becomes aware of any incident that might give rise to:
  - a breach affecting the security of BT data entrusted to the Supplier, or BT assets; or
  - a situation where access to BT systems has been or might be compromised.

In the UK - phone 0800 389 0399

Outside the UK - phone +44 207 388 3354

- If BT believes a material breach of the principles and requirements set out in BT's Supplier Charter has occurred, BT reserves the right in accordance with the terms of a Supplier's contract with BT to terminate that contract.
- Suppliers must ensure their own supply chain is fully aware of BT's expectations and include the principles for doing business as set out in BT's Supplier Charter as part of their own supply chain management activities.

## Supplier ethical concerns: speaking up

We expect Suppliers to enable their employees or anyone that is working for them to raise concerns confidentially without fear of retaliation. Suppliers should also regularly make their employees and anyone who is working for them directly or indirectly aware of BT's Speak Up service and make sure those details are permanently available at the place where people work. The Speak Up service is BT's independent, free and confidential channel that anyone who works for, with, or on behalf of, BT can use, whatever country they are in. Concerns can be raised either online or via telephone. Concerns can also be raised online and anonymously if people prefer, subject to local law.

Further information on BT's Speak Up service can be found [here](#).

## Use of BT's brands

BT's brands are very valuable assets, and significant investment has been made in protecting our trademark rights and other intellectual property rights in these brands.

Nothing in this Charter gives a Supplier the right to use or reference the BT brands.

Suppliers must have contractual rights, and BT's specific written authorisation from the relevant BT Brand team, in order to use or reference BT's brands.

Where the Supplier's Contract does not contain such permissions, the Supplier should contact the BT Brand Helpdesk at the following email address: [brand.helpdesk@bt.com](mailto:brand.helpdesk@bt.com).

BT has sole discretion over whether it chooses to grant the Supplier permission to use/reference its brands and the extent of the permission granted.

Where BT agrees to grant a Supplier with rights to reference or use the BT brand, the Supplier will also be provided with, and must comply with, BT's brand guidelines.

## BT Supply Chain

BT Supply Chain oversees the receipt, storage, and distribution of goods for all BT Group companies, as well as some external customers. This is achieved through our dedicated operations teams and strategic supply chain partners.

BT procures services and products on a large scale, with significant volumes of products moving through our business daily. It is crucial that all products entering and moving through BT's supply chain are handled safely, securely, and efficiently.

Suppliers managing goods on behalf of BT, or delivering goods to us, must comply with all current legislation.

Additionally, it is essential that all consignments arrive in the specified BT format to avoid delays in the receipt and payment processes.

Further details on the policy can be found [here](#).

Any exceptions to the processes and requirements outlined in the policy document must be agreed upon with the document owner.

### 3 Roles and Responsibilities

| Role                   | Role Description                                                                                                                                                                                        |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Charter Owner          | Provides executive accountability for the Supplier Charter, including approval of material changes and overall alignment with BT's supply management expectations.                                      |
| Charter Manager        | Maintains the Charter, coordinates review cycles, supports implementation, and manages updates to ensure the document remains current and usable.                                                       |
| Supplier               | Complies with the Supplier Charter, communicates relevant requirements to Supplier Personnel and its supply chain, maintains evidence of compliance, and promptly escalates breaches or concerns to BT. |
| BT Procurement Contact | Acts as the primary BT contact for supplier engagement, supports communication of requirements, and escalates supplier issues or concerns where appropriate.                                            |

# Appendix A      Version Control

BT’s Supplier Charter will be reviewed on a regular basis and updated as necessary. We will communicate changes to our Suppliers for review and compliance.

| Version   | Approval Date  | Reason for Change             |
|-----------|----------------|-------------------------------|
| Version 1 | April 2025     | Supplier Charter implemented. |
| Version 2 | July 2025      | Document updated.             |
| Version 3 | September 2026 | Template updated.             |