



# Modern Slavery Statement 2021

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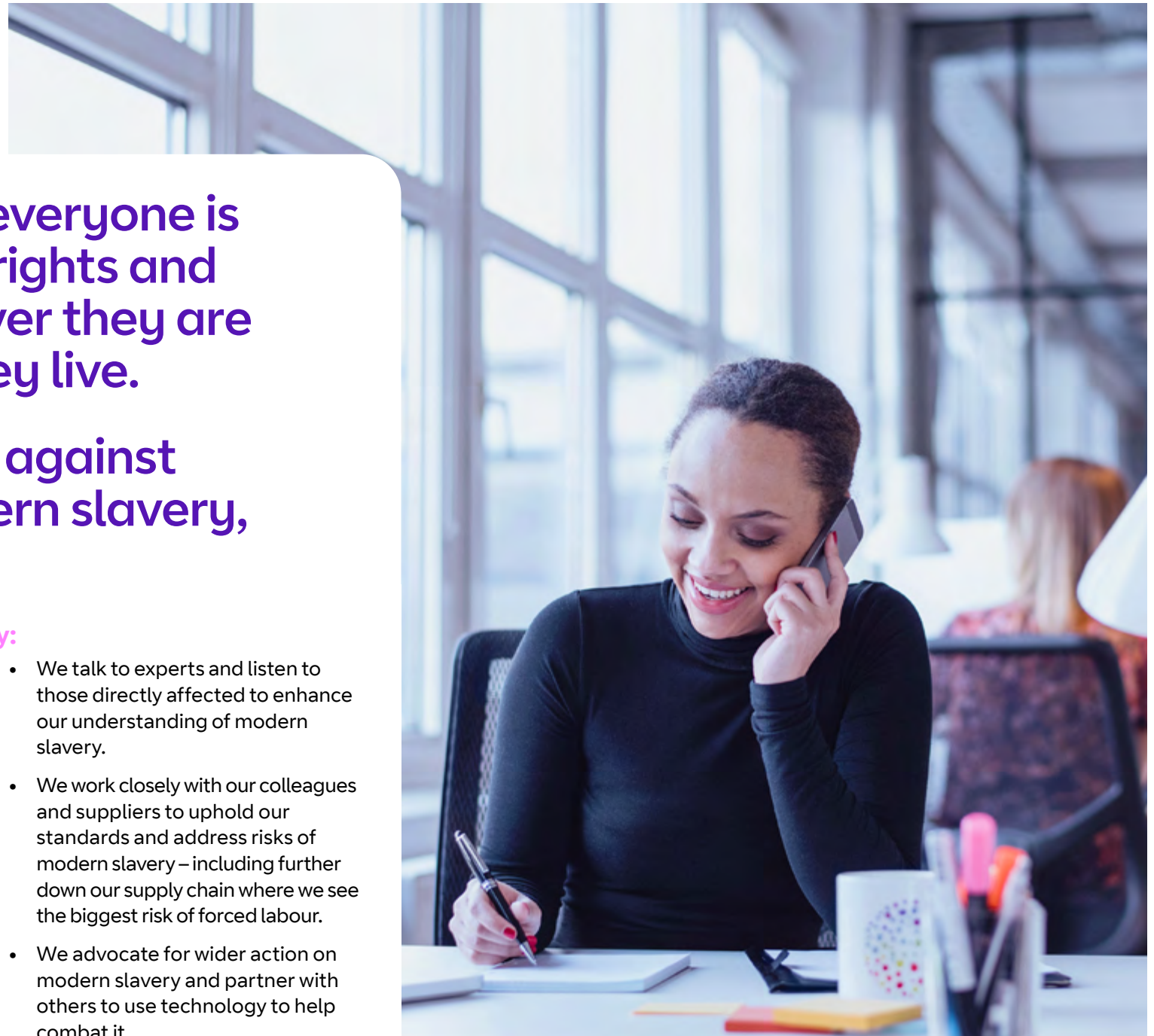
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**We believe that everyone is entitled to basic rights and freedoms, whoever they are and wherever they live.**

**That's why we're against all forms of modern slavery, everywhere.**

**How we combat modern slavery:**

- We're committed to being a responsible business and to respecting human rights.
- We make it clear that 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 colleagues and suppliers to uphold our standards and address risks of modern slavery – including further down our supply chain where we see the biggest risk of forced labour.
- We advocate for wider action on modern slavery and partner with others to use technology to help combat it.





## What we've done this year, at a glance...

### With suppliers

- Strengthened our risk assessment and due diligence processes for suppliers.
- Used machine learning techniques to improve our visibility and simplify the complexity of managing supply chain risks for all BT, EE and Plusnet branded products.
- Provided free online training to high-risk suppliers to help them understand and mitigate risks of forced labour in their own supply chains.

### With colleagues

- Developed a new responsible tech strategy and principles to ensure we develop, use, buy and sell technology in a way that benefits people and minimises harms, including risks of modern slavery.
- Strengthened our governance of human rights and integrated human rights risks into our updated corporate risk management framework.

- Refreshed our interactive training on modern slavery for 81% of colleagues in key procurement roles.

### With partners and policymakers

- Worked with Tech Against Trafficking to advance the role of technology in combatting modern slavery and publish a report on the use of technology to fight human trafficking.
- Partnered with Unseen to help the Modern Slavery Helpline run round-the-clock and research how access to mobile services can support slavery survivors.
- Supported the new Modern Slavery & Human Rights Policy & Evidence Centre on research priorities for modern slavery in global supply chains.

# About us

**We're one of the world's leading communications services companies.  
Based in the UK, with the ability to serve customers in over 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 in over 14m households 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.

We keep around 1.2m UK and Republic of Ireland business and public sector organisations connected. We also provide network propositions and services to more than 1,400 UK communications providers.

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

## **Our group 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 and Openreach. The customer-facing units are supported by internal corporate units: Technology and Corporate functions including procurement and property management. In addition, we launched our new Digital unit on 1st April 2021. It's responsible for pushing forward our own digital transformation – and rapidly developing and delivering innovative solutions and outcomes for customers.

You'll find details of our [company structure](#) on our website. BT Group plc (BT) is the listed holding company for the BT Group of companies. British Telecommunications plc is a wholly owned subsidiary of BT Group plc and encompasses virtually all businesses and assets of the BT Group.

We conduct all of our commercial activity through BT and its subsidiaries. These companies must stick to our ethics code – The BT Way and use our centralised procurement and recruitment policies and processes. For details of our subsidiaries in scope of this statement and their locations, see [page 27](#).

## **Our workforce**

We have 99,700 employees working in 44 countries.

Around 81% of our colleagues are in the UK, where we're one of the largest employers. Outside the UK, our colleagues are employed by local BT Group subsidiaries (though many have a reporting or management line into UK-based colleagues).

We work with around 1,700 agency people. They help us with peaks and troughs in our workflow, mainly in supply chain, customer-facing and specialist roles.

## **Our suppliers**

We buy from around 11,500 direct suppliers in nearly 100 countries. We spent £13.1 billion with our suppliers, 71% of which was with 100 suppliers and 96% 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. Less than 10,000 of our suppliers sell to us on an ad hoc basis – 'off the shelf' items or localised services, which are supplies not customised

specifically for us. These include office supplies, stationery, postal, and courier 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 or software).

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.

# Our approach

## Policies

Our policies 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
<a href="#">The BT Way</a>	<ul style="list-style-type: none"> <li>• Our ethics code.</li> <li>• Sets out our values and explains how to behave.</li> <li>• Available in 14 languages.</li> <li>• Applies to all BT colleagues globally and all those acting on our behalf.</li> </ul>	<ul style="list-style-type: none"> <li>• International Bill of Human Rights.</li> <li>• United Nations Guiding Principles on Business and Human Rights.</li> <li>• United Nations Global Compact.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Gives a case study and a link to watch a short <a href="#">video</a> we made on spotting the signs of modern slavery.</li> <li>• Points people to our human rights team, our <a href="#">Speak Up</a> hotline and the UK <a href="#">Modern Slavery Helpline</a> if they need support.</li> </ul>
<a href="#">Human Rights Policy</a>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Describes our commitment to responsible sourcing of minerals and to identify, and remove, conflict minerals from our supply chain. Applies to all our colleagues globally and all those acting on our behalf.</li> </ul>	<ul style="list-style-type: none"> <li>• International Bill of Human Rights.</li> <li>• International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.</li> <li>• United Nations Guiding Principles on Business and Human Rights.</li> <li>• OECD Due Diligence Guidance for Responsible Mineral Supply Chains.</li> </ul>	<ul style="list-style-type: none"> <li>• Reaffirms our commitment to prevent modern slavery and human trafficking in our business operations and supply chains.</li> <li>• 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.</li> <li>• Sets out our aim to use tantalum, tin, tungsten, gold and cobalt from responsible sources and work with our suppliers to perform appropriate due diligence to identify, and remove, conflict minerals from our supply chain.</li> </ul>
<a href="#">Sourcing with Human Dignity</a>	<ul style="list-style-type: none"> <li>• Sets our standards for a fair and ethical workplace, where workers are treated with dignity and respect.</li> <li>• Applies to all our suppliers and their supply chains, globally.</li> <li>• Available in ten languages and accessible to 99% of our Tier 1 (direct) suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights.</li> <li>• International Labour Organisation (ILO) conventions.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

Policies	Scope	Refers to...	Relevance to modern slavery
Recruitment (internal policy, not public)	<ul style="list-style-type: none"> <li>• Sets out our principles for recruiting responsibly.</li> <li>• Applies to colleagues in the UK on permanent or fixed-term contracts, except for Plusnet and Mainline colleagues.</li> </ul>	<ul style="list-style-type: none"> <li>• Our ethics code – The BT Way.</li> <li>• Aligned with the Employer Pays Principle.</li> </ul>	<p>Explicitly states that:</p> <ul style="list-style-type: none"> <li>• Modern slavery is not acceptable in our own operations nor in the operations of those who work with us or on our behalf.</li> <li>• 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 our colleagues. A referral doesn't carry any weight in the fair selection process.</li> </ul>
<a href="#">Anti-Corruption &amp; Bribery</a>	<ul style="list-style-type: none"> <li>• Sets out our zero-tolerance approach and procedures to prevent and detect bribery and corruption.</li> </ul>	<ul style="list-style-type: none"> <li>• Our ethics code – The BT Way.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>



## Governance

Our Digital Impact & Sustainability Committee (DISC), a committee of the BT Group Board, governs and directs the strategy of our human rights and modern slavery programme. The corporate affairs director has formal authority for decisions about human rights risks and leads our responsible tech steering group, which drives consistency in decision-making across the business through the application of our responsible tech principles.

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.

### This year...

The DISC reviewed progress on our human rights programmes and the introduction of our forward-looking, principles-based approach to responsible tech. The group discussed how human rights are protected in our operations and supply chain, including supporting efforts to tackle modern slavery.

We developed a new responsible tech strategy and principles – supported by our new responsible tech steering group – to ensure that we consistently develop, use, buy and sell technology in a way that benefits people and minimises harms, including modern slavery.

We strengthened our governance of human rights following a review and recommendations from Business for Social Responsibility (BSR).

Our chief executive has formally delegated authority for decisions about human rights risks to our corporate affairs director, who chairs the new responsible tech steering group. We also integrated human rights risks into our updated corporate risk management framework.



# Risk assessment and due diligence

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

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

This means we're working closely with our colleagues, our suppliers and our stakeholders to continuously improve our approach in a way that 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 – and to embed our new responsible tech principles across the business.

## This year...

We reviewed our recruitment policies globally to support our 'no fees' approach (see [page 19](#)).

We updated our supplier risk assessment processes (see [page 13](#)).



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## Highest risk areas

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
  - the manufacturing of network equipment.
-



### Common risk factors

Our highest risk areas share two common risks: high-risk countries and low-skilled 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.

In high-risk countries, low-skilled jobs are often filled by migrant workers. They are particularly vulnerable as they mainly rely on labour agents to secure jobs prior to travel. Recruitment often happens away from the place of work, and outside of the country the worker will be working in. And when they arrive, migrant workers are often dislocated

from their cultural community and in a country where their native language may not be spoken. This makes it easier for exploitative labour agents to deceive them about job conditions.

The payment of recruitment fees by workers to obtain work is one of the most widespread factors that can contribute to situations of forced labour. In many countries and industries, it's common practice for workers – especially migrant workers – to be charged fees or to incur other costs to obtain and retain employment. These fees can include travel and accommodation costs or to cover medical checks. They may also be charged to return home after employment has concluded.

Workers may have to borrow money to pay these recruitment fees and costs. Taking on these debts can leave them vulnerable to exploitation and unable to leave their jobs until the debt is repaid, contributing to situations of forced labour.

# Training and raising awareness

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

The eLearning course for our ethics code – The BT Way includes a human rights module, which addresses modern slavery. Colleagues must 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.

Our Audit & Risk Committee has oversight of our mandatory training.

We provide the teams most likely to come across human rights issues – including colleagues involved in legal affairs, procurement and security – additional support and guidance on human rights, to help them understand how to deal with real-life scenarios that could affect human rights, including how to spot modern slavery and report it.

Buyers work closely with third parties and must complete training on our Sourcing with Human Dignity standard. We also train them in more depth on how to spot the signs of forced labour, report concerns and how it affects our business.

These training resources are also available to everyone in our business through our online Academy. We also engage colleagues more widely on modern slavery and other human rights issues through a range of channels.

## **This year...**

97% of BT colleagues completed training on our ethics code – The BT Way or the parts of the code that's relevant to them.

We provided tailored human rights training for key colleagues in our Asia, Middle East and Africa region.

We updated our training on modern slavery for our procurement colleagues and 81% took part in the training, with an overall effectiveness score of 61%, measured for the first time this year.

We promoted awareness of modern slavery through internal news articles five times this year. Topics included how tackling modern slavery connects with our purpose, our work with Tech Against Trafficking and our support for Unseen – including promoting the Modern Slavery Helpline, how to spot and report the signs of modern slavery, the challenges faced by Unseen during lockdown and how tech can help.

In March 2021, we ran a tailored forced labour awareness campaign for our colleagues in India, which had been delayed due to the extended national Covid-19 restrictions in 2020. The campaign highlighted three jobs that are more vulnerable to forced labour: security guards, catering staff and cleaners. It also celebrated the importance of these roles and signposted people to further details and training on how to spot and report concerns of forced labour.





## Monitoring compliance and effectiveness

We monitor compliance with, and the effectiveness of, our modern slavery requirements by:

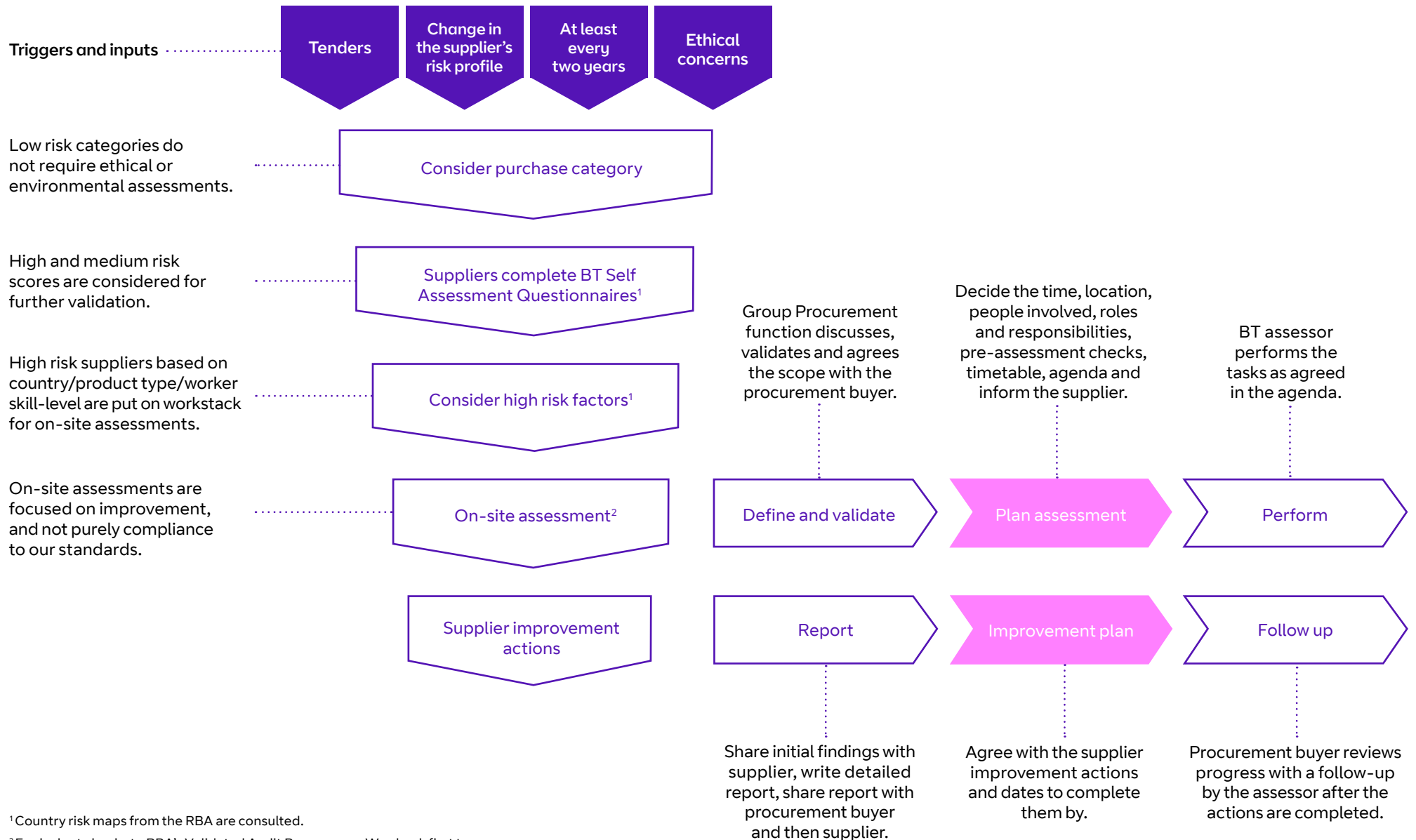
- Listening to what our colleagues have to say through regular surveys, our Colleague Board and formal engagement with employee representatives (see [page 20](#)).
- Checking our colleagues understand and comply with our key policies through mandatory training (see [page 11](#)).
- Encouraging colleagues to raise any concerns about suspected non-compliance with our human rights team or our ethics team – or via our Speak Up hotline that’s also open to third parties (see [page 21](#)).
- Regularly reviewing suppliers’ compliance with our Sourcing with Human Dignity standard and any changes in their modern slavery risk profile, and monitoring the performance of our medium and high-risk suppliers through qualitative and quantitative indicators – any concerns about non-compliance trigger a risk assessment and if they’re off track, we help them put things right and check that they do (see below).
- Setting commitments to improve each year and reporting on our progress. We talk about performance throughout this document and provide a summary of our commitments and performance indicators on [page 26](#).

## Helping suppliers do the right thing

As part of their contracts with us, all our direct suppliers must comply with the requirements set out in our Sourcing with Human Dignity standard on worker rights and cascade these down their own supply chain.

We work with our suppliers to reduce their risks and improve their labour rights practices. With more than 11,000 direct suppliers in nearly 100 countries, we need to prioritise suppliers with higher risks of modern slavery and human trafficking.

# Assessing supplier risks



<sup>1</sup> Country risk maps from the RBA are consulted.

<sup>2</sup> Equivalent checks to RBA's Validated Audit Programme. We check first to see if RBA have already recorded an audit report for the site before proceeding.

# Identifying and engaging with high-risk suppliers

Our pre-qualification questionnaire flags potential risks at the earliest stage of shortlisting prospective suppliers. We base our supplier risk assessment process on guidance, resources and supplier audit reports from the Responsible Business Alliance (RBA) and our own checks.

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

We use an ethical standards questionnaire, which determines the risk level based on 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 to help us understand how well a supplier has implemented our 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, among 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. These conversations give us an insight into working conditions from the workers' perspective 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 any problems. Typical recommendations for improvements include drawing up process documents for their employees, tightening pre-employment security checks, educating their workers on our ethics code – 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.

We assess and follow up with all the high-risk suppliers that we purchase directly from. That's Tier 1 of our supply chain. But we're also checking standards further down the chain among suppliers that are less visible to us by focusing more assessments on indirect suppliers (our Tier 2 and below) in high-risk categories and countries, including the supply chain of suppliers that provide services to us, such as engineering and call centre services.

## This year...

Covid-19 lockdowns and travel restrictions meant we carried out fewer on-site assessments of high risk suppliers than planned – 28 in total – plus 5 remote assessments via videocall. All of these assessments were in China; 14 with Tier 1 suppliers, 18 with Tier 2 suppliers and one with a Tier 3 supplier.

These assessments identified 18 suppliers requiring improvement and 13 of these showed indicators of potential forced labour – likely as a result of Covid-19 – such as excessive working hours or overtime. We worked with the relevant suppliers to agree improvement plans and we will continue to monitor their implementation.

We reviewed our supplier self-assessment risk questionnaires to check we're asking the most relevant questions to identify our modern slavery risks. We've updated questions to include more focus on recruitment through labour agents, where workers can be more vulnerable to risks of modern slavery. We also increased the number of countries considered high risk for human rights issues from 145 to 165, to align with the RBA risk maps.

Of the 64 self-assessments received this year by suppliers under new or

renewed contracts, 46 were identified as high or medium risk. We followed up with them to request more information and to decide whether we need to take any further action. The remaining 18 were low risk requiring no further risk mitigation.

# Case study

## Allegations of forced labour in China

In March 2020, a credible report alleged over 80 global brands – including 17 of our direct suppliers – were linked to forced labour in China. We contacted all our direct suppliers named in the report, asking them to investigate and report back to us. We've made it clear in all communications that forced labour is never acceptable in our own operations or those of our suppliers. We've encouraged those suppliers to work collaboratively with the RBA or other ethical trade associations to engage with governments, business groups and relevant stakeholder groups to investigate these issues fully.

Through independent assessments, the RBA and its member companies have been conducting due diligence related to the report findings, including site-level assessments. Explicit forced labour indicators were not identified at visited worksites, however there were related risks identified with the recruitment and employment of migrant workers and vocational students in some cases. Collectively, the RBA and its members are following up on these findings to ensure RBA Code of Conduct compliance.

We'll continue to engage with our direct suppliers on the steps they're taking to address these risks. If we're not satisfied that a supplier is doing enough, ultimately we may stop working with them. To gain a deeper understanding of the risks in our supply chain, we're also applying artificial intelligence to provide greater visibility of the locations of our suppliers.

## Looking deeper into our supply chain

Around 27% of everything we spend with our suppliers is on electronic equipment, a high-risk category when it comes to forced labour. In this 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 do this is through the RBA, which gives us and other members access to in-depth assessments of shared suppliers, particularly in the lower tiers of our supply chain.

We tend to find our direct suppliers are supportive of our efforts. As we dig deeper into our supply chain, our leverage and ability to influence them wanes. This is particularly the case in Tiers 3 and 4 – where we don't have a direct contractual relationship and where suppliers are often concerned

about disclosing commercially sensitive information.

The Ethical Trade Initiative acknowledges that mapping supply chains is a resource and time intensive process that may not be possible, but we are continuing to make progress on mapping ours.

### This year...

- Our on-site assessments continue to show no increase in forced labour risks between the different tiers but some common challenges, such as excessive working hours, exist and we're working with relevant suppliers to drive improvement.
- We used artificial intelligence (AI) to map supply chains associated with all BT, EE and Plusnet products down to Tier 4 to identify risks – including risks of modern slavery – and improve supply chain visibility (see case study).



## Case study

### Harnessing the power of AI to map our supply chain

We source our branded products from 11 direct suppliers, but the component parts come from around 600 unique suppliers, some of which play a role at multiple levels of our supply chain.

As we look deeper into our supply chain, this complexity, and our lower level of direct influence, makes it challenging to accurately identify and address human rights risks – including risks associated with modern slavery. By gaining more visibility of the lower tiers of our supply chain, we have more leverage to work through our Tier 1 and 2 suppliers to reduce these risks.

This year, we harnessed the power of AI to map the supply chains for all BT, EE and Plusnet branded products. The initial findings revealed nearly 1,800 supplier relationships across Tiers 2,3 and 4, with some suppliers appearing over 20 times.

A traditional product mapping process might take months and involve many supplier surveys, desktop research and use of personal networks to gather and analyse confidential data, providing a limited one-off snapshot of a product's supply chain. By contrast, a data-driven AI process can discover large volumes of publicly available data on many products, analyse complex networks of supply, and identify different suppliers and their locations. Using this approach, it becomes feasible to keep supplier visibility up to date over time and continually identify new relationships.

There are limitations to the accuracy of the findings, as public information is not always up-to-date and language translations are not perfect, so it's important to validate the findings. But we see AI as an important tool to identify potential risks areas for further investigation and will continue to use these techniques in future.



# Giving suppliers free online training

We provide our suppliers with free access to online training, created and hosted by the RBA. The e-learning course helps suppliers recognise and prevent forced labour, alongside other issues like working hours, health and safety management systems and environmental protection.

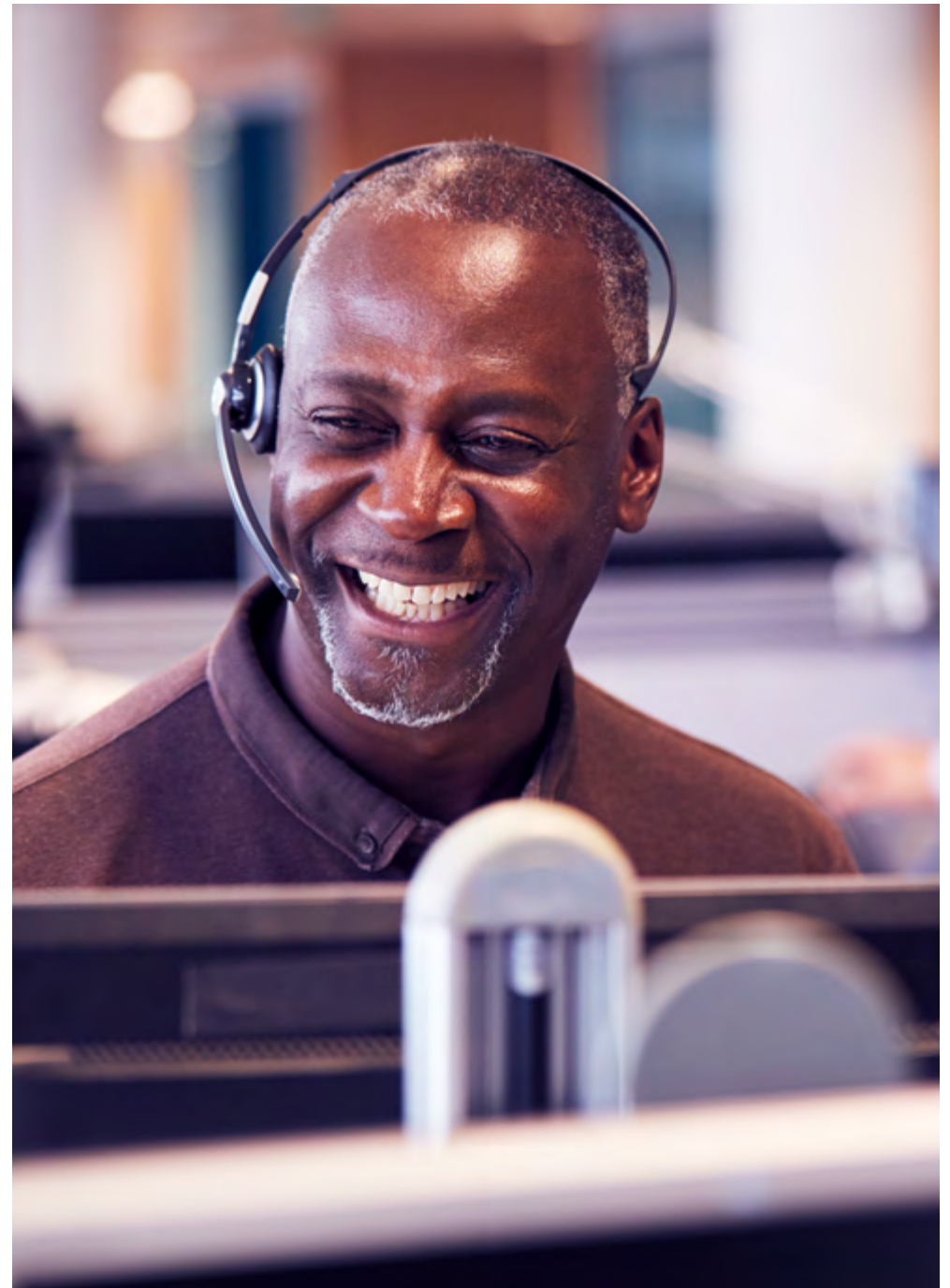
We're initially targeting our high-risk suppliers, asking them to complete the training modules on recognising and preventing forced labour, hours of work, health and safety, and environmental protection. These are available in English and Chinese Mandarin.

We'll continue to coach and support our direct suppliers on:

- practical improvement plans when we identify concerns (see [page 12](#))
- coaching them to manage risks with their suppliers
- completing our online training.

## **This year...**

13% of suppliers asked to do the RBA training since it launched in March 2020 have either completed all modules or are in progress to do so. The Covid-19 pandemic contributed to the slow uptake and next year we plan to put more focussed effort with our suppliers for improvements.





## Tackling conflict minerals

Mining the minerals and metals used in manufacturing electronic equipment is an area of high risk. We're particularly concerned about the risks of forced and child labour in mining related to tin, tantalum, tungsten, gold and cobalt from the Democratic Republic of the Congo and neighbouring countries where the rule of law is weakened by conflict and civil war.

We are a member of the [Responsible Minerals Initiative \(RMI\)](#) and follow their guidance when engaging our suppliers.

Our human rights policy describes how we prevent raw materials associated with the risk of funding armed conflict – or with other issues such as working conditions and child labour – from being used in our products.

### **This year...**

BT Group plc is no longer registered with the United States Securities and Exchange Commission and therefore we are no longer obliged to file a Conflict Minerals Disclosure to the United States Securities and Exchange Commission. Instead, we are reporting key data here in our Modern Slavery Statement. We issued questionnaires to 47 direct (Tier 1) suppliers of BT branded products that we contract to manufacture – 89% of them responded. Our procurement and compliance teams analysed the responses and found that:

- 36% were able to say their product was conflict free
- 14% did not use gold, tin, tantalum, tungsten in the product
- 71% had received responses from over 75% of their suppliers.

Where supplier responses identified smelters, we checked the names of smelters against the RMI's list of Conformant Smelters & Refiners. Overall, our analysis suggests an improvement in the due diligence processes that our suppliers have implemented.

We used the RMI's Cobalt Reporting Template for the second year. Nearly half of the suppliers replied that cobalt is not used in their products and for those that do, half responded that they have a publicly available policy on cobalt and survey their suppliers on cobalt use.

The percentage of suppliers who received survey responses from over 75% of their suppliers increased this year to 37%, up from 13% last year.



## Recruiting and listening to colleagues

We're determined to reduce the risk of modern slavery in our business right from the start through our recruitment process. 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 (see [page 21](#)).

### Recruiting colleagues

We support the Employer Pays Principle of not charging fees to colleagues joining BT. We also prohibit our external recruitment agents from charging recruitment fees. These fees can be significant and indicate forced labour, when a person is forced to work to pay off this debt.

We log our job vacancies on an online system, updating the system at appropriate sign-off levels as we progress through the process. Each job application must pass through 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.

External agencies go through the same procurement processes we apply to our supply chain. All recruitment agents must 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.

Outside the UK, our local entities are responsible for recruitment. Many have a reporting or management line into UK-based or Global colleagues that creates further checks and

balances to make sure we treat our colleagues consistently, fairly and equally, wherever they are.

### This year...

- Excluding acquisitions, we hired almost 8,500 colleagues (6,500 in the UK).
- We converted just over 300 agency workers to permanent staff.
- We conducted a review of recruitment policies and are working to align policy wordings to ensure clarity and consistency of our no fees position globally.
- We updated the new joiner checklist in our Asia, Middle East and Africa region with a new question asking if they were asked to pay any recruitment fees. So far, we've not received an affirmative response to this question, but if we do it will trigger an investigation with the BT recruitment team and human rights team. Next year, we will update the checklists in our other regions.

# Listening to what our colleagues have to say

We ask colleagues to tell us about their experience of working with us, including how they think we're doing on ethics, through our company-wide anonymous 'Your Say' survey.

Our Colleague Board gives them a louder voice at the table. It's chaired by our chief executive. Isabel Hudson, as our designated non-executive director for workforce engagement, is a member and it is attended by our HR director and general counsel. Twelve colleagues from across the business sit on the Colleague Board, which meets at least four times a year to share ideas, discuss and provide feedback on key issues. Isabel Hudson updates the BT Group Board on feedback from the Colleague Board.

We also consult extensively with unions (including 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 colleagues.

## This year...

- Our overall employee engagement score was 80%, up from 79% last year.
- 93% of colleagues feel we do business ethically (the same high score as last year).





## Encouraging colleagues to speak up

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 only have a suspicion. Our regular 'Your Say' surveys include questions asking whether colleagues feel comfortable to speak out and raise risks at BT.

Colleagues can report issues or ask questions through our Tell Us intranet page. Our independently-run Speak Up helpline is there for colleagues, contractors, agency workers and suppliers anywhere in the world. Anyone can use the helpline to report concerns confidentially, and anonymously where local laws allow. We emphasise that all reports are confidential and people don't need to have evidence to raise a concern.

We review every concern raised and investigate further whenever we're given enough detail to do so. Follow up actions can include coaching or training, disciplinary procedures, or improvements to our policies or practices.

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

### This year...

- We updated our ethics code – The BT Way, including strengthening the content on speaking up, non-retaliation and ethical decision-making.
- We added more detail to our Speak Up guidance. It now includes types of concerns people

can raise and explains how we get to the root cause of any issues.

- 86% of colleagues responding to the latest Your Say survey agreed they feel able to speak up (the same as last year) and 84% agreed they feel comfortable raising risks in BT (compared with 85% last year).
- 491 people raised concerns about a range of ethical issues, 17% less than last year. The Covid-19 pandemic caused a delay to some investigations that needed site visits. The number of reports fell during the first UK lockdown, but rose again later in the year.
- We took further action on 35% of the cases we closed. The rest were unsubstantiated, duplications, follow-ups to existing cases, or

redirected to more appropriate reporting channels. None of the cases reported related to modern slavery.

- We disciplined 178 colleagues in the UK as a result of ethical misconduct this year, and 76 left the company. The most common issues related to inappropriate use of company vehicles and falsification of records. None of these issues had anything to do with modern slavery.

## Working with partners and policymakers

We partner with others to support the use of technology to tackle modern slavery, and advocate for policymakers to take wider action to prevent modern slavery in the UK and around the world.

### Partnering to support anti-trafficking tech solutions

Digital technology offers a powerful tool to help combat modern slavery, but isn't yet fulfilling its potential. That's why we co-founded the Tech Against Trafficking (TAT) coalition in 2018. Together with other tech companies and global experts, we're working to address the challenges and opportunities technology presents in helping to bring an end to modern slavery.

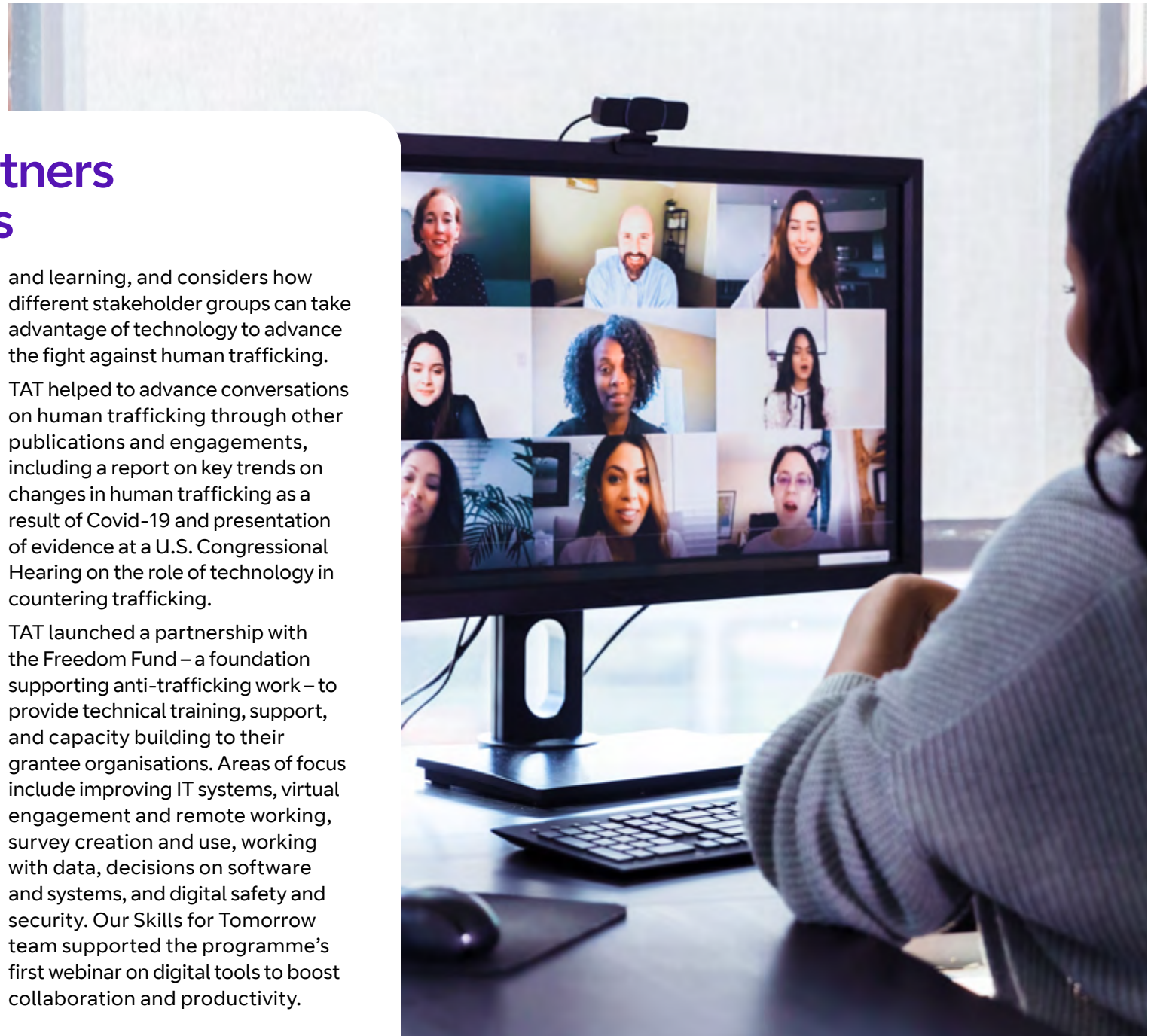
#### This year...

TAT partnered with the OSCE (the Organization for Security and Co-operation in Europe) to publish a comprehensive report on the use of technology to fight human trafficking. The report details existing solutions and strategies, summarises impacts

and learning, and considers how different stakeholder groups can take advantage of technology to advance the fight against human trafficking.

TAT helped to advance conversations on human trafficking through other publications and engagements, including a report on key trends on changes in human trafficking as a result of Covid-19 and presentation of evidence at a U.S. Congressional Hearing on the role of technology in countering trafficking.

TAT launched a partnership with the Freedom Fund – a foundation supporting anti-trafficking work – to provide technical training, support, and capacity building to their grantee organisations. Areas of focus include improving IT systems, virtual engagement and remote working, survey creation and use, working with data, decisions on software and systems, and digital safety and security. Our Skills for Tomorrow team supported the programme's first webinar on digital tools to boost collaboration and productivity.



## Supporting the modern slavery helpline

We think helplines should play a bigger role in tackling modern slavery. Low public awareness of the signs of modern slavery and knowing what to do when you spot it are key challenges in tackling modern slavery. That's why, five years ago, we set up the UK's Modern Slavery Helpline 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 or get help. It also gives the public, statutory agencies and businesses information and support.

### Modern Slavery Helpline

Call **08000 121 700** to get help, report a suspicion or seek advice or file a report online at [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)

We worked with Unseen to co-design, develop and deliver a smartphone app to extend the reach of the Helpline. The free-to-download 'Unseen' app gives users tips on how to spot the signs of modern slavery and makes it easy to report suspected cases to the Helpline. Endorsed by the National Police Chiefs Council, many police

forces are now using the Unseen app to help them in their work.

The Helpline not only provides a critical lifeline for those who need it most, it also provides crucial information that helps those combating modern slavery better understand how and where to help those affected. It a lynchpin to the UK's national response and essential in the fight against modern slavery.

Unseen also offer support services to victims of modern slavery. These are provided to individuals in safe houses or living in the community.



### This year...

- We continued to fund the Modern Slavery Helpline, providing a total of £125,000 to cover operational costs – including the costs of the Helpline's communications and IT equipment and services. This support has been particularly important given their radical reduction in external engagement and fundraising during the Covid-19 pandemic. The communications solution we provided enabled helpline staff to work remotely and keep it open throughout the pandemic, although call numbers dropped during periods of lockdown.
- From launch until the end of 2020, the Helpline has handled over 50,000 calls, emails, online reports and app submissions, indicating more than 20,000 potential victims of modern slavery. In 2020, 54% of potential victims indicated relate to situations of forced labour, across a diverse range of sectors.

*“Despite a seemingly impossible task, all Helpline operations were moved to remote working in April 2020, with the Helpline Team being set up to take calls and answer online enquiries and concerns from home, which we continue to do. This was only possible through the resiliency of the BT telephony and cloud based system the Helpline utilises.”*

Andrew Wallis OBE  
CEO, Unseen

[Modern Slavery Helpline Annual Assessment 2020](#)



## Collaborating with others

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 and people with lived experience of the issues. So we regularly attend external events, sharing our views and experiences, and learning from others.

We're also members of regular working groups addressing modern slavery issues:

- Responsible Labour Initiative and Responsible Minerals Initiative within the RBA.
- Human Rights Working Group hosted by BSR.
- Sustainable Supply Chain working group with techUK, a membership organisation for UK technologies companies.

## This year...

We got involved in 64 events to discuss modern slavery and related issues, including four speaking events. This was nearly double the number from last year, since many events went online during the Covid-19 pandemic, making them easier to attend than face-to-face events. For example, we presented our modern slavery programme to members of the GSMA as part of a primer on the topic, and we joined a roundtable on research priorities for modern slavery in global supply chains, hosted by the new [Modern Slavery & Human Rights Policy & Evidence Centre](#).

We also worked with Unseen and academic partners to research how access to mobile services can support slavery survivors (see box).

## Case study

### Supporting survivors

We worked with Unseen and academic partners on a [research study](#) to understand the potential benefits that access to mobile phone services could offer survivors of modern slavery. We donated 100 smartphones with SIMs and data allowances for survivors receiving support from Unseen in UK safe houses or living in the local community.

Findings suggest that access to this technology is an essential need of modern slavery survivors and should be considered as a feasible and necessary element of government-provided support for survivors. It provides access to language translation tools, education resources, entertainment and local community services – and could accelerate survivors' recovery towards independence.

The report of this work recommends further research in this area to build on these findings and to help inform Government support for survivors through the UK Victim Care Contract.





## Advocating for action on modern slavery

We share our experience to inform the UK Government's policy and approach on how businesses can get more engaged in addressing human trafficking and modern slavery risks.

We believe the role of technology is crucial in the fight against modern slavery and seek to influence policymakers around the world to make better use of technology.

### This year...

- We helped test the design of the Home Office's new online Modern Slavery Statement registry.
- We engaged with the UK Government on due diligence challenges and legislative measures being considered in relation to potential human rights abuses in China.

- We spoke at an online event organised by the Global Fund to End Modern Slavery, as part of a panel of experts discussing innovations in disrupting forced labour using predictive data.
- We presented our work with Tech Against Trafficking at an online conference hosted by the Organisation for Security & Cooperation in Europe – the world's largest security-oriented intergovernmental organisation. The focus of this conference was challenges and opportunities related to information technology and human trafficking.

## 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	Performance indicators	2019/20	2020/21
Our suppliers	<ul style="list-style-type: none"> <li>Strengthen our use of expert sources used in supplier risk assessments.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Expand our use of artificial intelligence to map the supply chains of direct suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of suppliers completing online training (since training launched in March 2020).</li> </ul>	7%	13%
	<ul style="list-style-type: none"> <li>Begin a phased programme to map out the supply chains of BT/EE/Plusnet branded products.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Pilot the use of mobile technology to get direct feedback from supply chain workers.</li> </ul>	<ul style="list-style-type: none"> <li>Number of on-site supplier assessments this year (plus remote assessments due to Covid-19).</li> </ul>	53	28 (plus 5 remote)
	<ul style="list-style-type: none"> <li>Bring more focus on recruitment fees and labour agents in supplier questionnaires.</li> </ul>	Yes		<ul style="list-style-type: none"> <li>Number of concerns identified with suppliers which indicate potential forced labour.</li> </ul>	25	13
Our colleagues	<ul style="list-style-type: none"> <li>Develop and deliver mandatory training on modern slavery for key roles.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Strengthen and clarify our 'No Fees' recruitment policy wording globally.</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of key roles trained.</li> </ul>	(New measure)	81%
	<ul style="list-style-type: none"> <li>Engage our people in India with a campaign to raise awareness of forced labour situations.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Enhance our recruitment processes to double-check new joiners did not pay any recruitment fees.</li> </ul>	<ul style="list-style-type: none"> <li>Effectiveness score for key roles trained.</li> </ul>	(New measure)	61%
	<ul style="list-style-type: none"> <li>Review our recruitment policies globally to see what more we could do on our 'no fees' approach.</li> </ul>	Yes				
Our partners and policymakers	<ul style="list-style-type: none"> <li>Continue our operational support, funding and promotion of the UK Modern Slavery Helpline and smartphone app.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Continue our operational support, funding and promotion of the UK Modern Slavery Helpline and smartphone app.</li> </ul>	<ul style="list-style-type: none"> <li>Number of contacts to the helpline.</li> </ul>	9,570	7,000
	<ul style="list-style-type: none"> <li>Collaborate through the Tech Against Trafficking coalition to promote best practices using tech in anti-slavery work.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Collaborate through the Tech Against Trafficking coalition to promote best practices using tech in anti-slavery work.</li> </ul>	<ul style="list-style-type: none"> <li>Number of multi-stakeholder events (with a focus on modern slavery) that we engaged in.</li> </ul>	30	64
	<ul style="list-style-type: none"> <li>Partner with Unseen on a pilot project providing mobile phone services to survivors of modern slavery in the UK.</li> </ul>	Yes				

# Scope of this statement

This is BT's sixth annual Modern Slavery Statement and covers the financial year ended 31st March 2021. You can read our previous statements [here](#). We welcome feedback to [human.rights@bt.com](mailto:human.rights@bt.com)

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

**British Telecommunications plc**

**BT Australasia Pty Limited**

**BT Global Services Ltd**

**BT Lancashire Services Ltd**

**BT Ltd**

**Communications Networking Services (UK)**

**EE Ltd**

**Mainline Digital Communications Limited**

**Openreach Limited**

**Plusnet plc**

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



**Philip Jansen**

Chief Executive  
BT Group plc

Signed 21st May following  
board approvals in May 2021.





**Offices worldwide**

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