Modern Slavery Statement 2024/25

June 2025



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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 tenth annual Modern Slavery Statement. We've developed it in consultation with colleagues and relevant companies we own or control and are publishing it in accordance with the UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018. It relates to the financial year ending 31st March 2025.

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're 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 over 87,000 colleagues, with almost 67,000 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 we need for running our offices) and some we use as part of what we sell to customers (like networking equipment, mobile devices, and software).

We buy from around 9,000 direct suppliers in more than 90 countries. We spent £17 billion with our suppliers this year. Of this, roughly 80% was with 100 key suppliers and more than 95% 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. We integrate human rights risks – like those around modern slavery – into our risk management framework.

Our Group General Counsel, Director of Regulatory Affairs and Company Secretary, an executive committee member, oversees our modern slavery approach. They also have delegated authority from the Chief Executive for decisions about all human rights risks.

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, with things like training and supporting colleagues who bring our human rights policy to life across the Group. They also stay on top of emerging trends and drive consistent decision-making across the business. This helps us develop, use, buy and sell technology in a way that benefits people and minimises harms.

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

- understanding our risks and finding chances 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 keep improving our approach in a way that respects human rights.

One way we monitor how well our modern slavery approach is working is to encourage colleagues to raise concerns about suspected problems. They can do that 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 supply chain due diligence, we do on-site assessments to help us understand how well suppliers have implemented our policies and standards and how it's affected their workers. If we spot that a supplier needs to improve, 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.

We recognise the immense value of Worker Voice in pinpointing intricate challenges like modern slavery, harassment, and discrimination. (Because they're often difficult to identify in conventional on-site assessments or desktop reviews.)

This year, working with Labor Solutions we expanded our Worker Voice programme to four new sites in China and Vietnam – directly reaching more than 1,700 people working in our supply chain. Overall, survey respondents reported positive experiences. We did identify risks around their experience of being recruited, including lack of contracts, personal documents being held and fees being paid for jobs.

We've agreed corrective action plans with all the sites and we're prioritising due diligence work on recruitment agencies in 2025/26.

Read more about our approach to due diligence.

6. Risk assessment

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

- our supply chain including the companies who sell 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
- · network equipment manufacturing.

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

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

We use digital tools to understand the changing risk profile of our suppliers and monitor them in real time. The tools can give specific information on disruptions to suppliers in regions affected by geopolitical crises or natural disasters, which could raise the risk of modern slavery. We also get insights on worldwide macro trends that might raise 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 does training on our ethics code (<u>Being trusted: our code</u>) and our anti-corruption and bribery policy when they join. This is repeated every year. The code and training (Doing the right thing. For good.) makes clear that we don't tolerate modern slavery.

We provide teams most likely to come across modern slavery with additional training. For example, when buyers who work closely with suppliers join BT Group, training on modern slavery can help them spot the signs of forced labour, learn how to report concerns and 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 how effective our policies and procedures are in this area.

Performance indicators

Key performance indicator (KPI)	Reason for KPI	2023/24	2024/25
Number of on-site supplier assessments this year (including remote audits and third-party <u>JAC</u> audits).	We investigate practices that might lead to modern slavery through on-site supplier assessments.	45	42
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.	0	0
Percentage of colleagues who completed the 'Being trusted: our code' training.	By monitoring completions, we track colleagues' understanding of 'Being trusted: our code', which includes modern slavery.	99%	98%
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.	0	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.	Yes. We continued operationally supporting, funding and promoting the UK Modern Slavery Helpline.	Continue operationally supporting, funding and promoting the UK Modern Slavery Helpline.
Expand the use of technology to strengthen due diligence in our supply chain.	Yes. We deployed a digital Worker Voice solution to four sites in our supply chain in China and Vietnam.	Continue expanding the use of technology to strengthen due diligence in our supply chain.

Sign off

This Statement describes the activities that BT Group has undertaken in the financial year 2024/25 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.

Allison Kirkby, Chief Executive

BT Group plc

Signed 06 June 2025 following board approvals in April and May 2025 $\,$

^{*}BT Australasia Pty Limited does not have any owned or controlled entities.

June 2025 Find out more at bt.com/about

Offices worldwide

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