



# Modern Slavery Statement 2022/23



**BT Group**



# Contents

1. [Introduction](#)
2. [Organisation structure and supply chains](#)
3. [Governance](#)
4. [Policies in relation to slavery and human trafficking](#)
5. [Due diligence](#)
6. [Risk assessment](#)
7. [Training on modern slavery and trafficking](#)
8. [Our progress this year](#)

## 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 eighth annual Modern Slavery Statement, developed in consultation with colleagues and relevant companies we own or control and published in accordance with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act. This statement relates to the financial year ended 31st March 2023.

[Read our previous statements.](#)

## 2. Organisation structure and supply chains

BT Group comprises of customer-facing units (CFUs), technology units (TUs) and corporate units (CUs). Openreach is a CFU but manages its business separately to meet regulatory requirements. In the rest of the Group, we have an integrated operating model that shares common assets like our mobile network, technology, colleagues and brands – helping us efficiently deliver the best outcomes for our customers. In the Group we employ around 100,000 colleagues in 42 countries. Around 80,000 of these are in the UK.

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

We buy from more than 10,000 direct suppliers in nearly 100 countries. We spent £15.5 billion with our suppliers this year. Of this, almost 70% was with 100 key suppliers and around 90% 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 Digital Impact & Sustainability Committee (DISC), a committee of the BT Group plc Board, agrees our human rights and responsible tech strategy and monitors progress on it. Human rights risks, including those related to modern slavery, are integrated into our risk management framework.

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

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

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

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

Policies relevant to modern slavery and human trafficking:

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

[Read more about our policies.](#)

## 5. Due diligence

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

- Understanding our risks and uncovering opportunities to combat modern slavery by talking to experts.
- Assessing where the risks are in our business and supply chains.
- Developing and applying anti-slavery measures through policy, training and collaboration.
- This means we're working closely with colleagues, suppliers, and stakeholders to continuously improve our approach in a way that respects human rights.

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

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

### Case study: Speak Up

Being trusted: our code, sets out the principles of how we expect our people, and anyone who represents or works with us, to behave, do business and connect for good. If colleagues or suppliers need help with something they see, hear or experience at work that doesn't seem to fit with our code we make it easy to talk to someone about it.

This year, a BT Group colleague raised a concern through our Speak Up channel of potential migrant worker exploitation in our UK supply chain. We immediately reported the concern to the relevant legal agencies including the Gangmasters and Labour Licensing Authority (GLAA). On review the GLAA concluded they did not need to take further action. To ensure we fully understand the concerns raised by our colleague we are actively working with Unseen, a UK based charity dedicated to fighting Modern Slavery and Human Trafficking to conduct an on-site investigation. Once we have the findings of the investigation, we will use them to inform what we need to do next.

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

## 6. Risk assessment

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

- Our supply chain, with the companies selling their products or services to our direct suppliers.
- Construction and engineering services for our infrastructure.
- Guarding and monitoring services for our properties and infrastructure.
- Catering and cleaning services used in our business.
- Manufacture of network equipment.

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

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

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

### Case Study: Risk Simulation Event

This year we brought together procurement colleagues from across the world to participate in an Environmental, Social and Governance (ESG) risk simulation event. The purpose of the session was to explore the impact of disruptive events to the supply chain.

One fictional scenario the teams explored was the use of forced labour in a particular country. They used digital tools to understand the exposure of BT Group to the event and plan specific follow-up actions with suppliers to address the issues.

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

## 7. Training on modern slavery and trafficking

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

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

## 8. Our progress this year

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

### Performance indicators

Key performance indicator (KPI)	Reason for KPI	2021/22	2022/23
Number of onsite supplier assessments this year (including remote audits and 3rd party JAC audits).	We investigate practices that could result in modern slavery through our onsite supplier assessments.	31 (plus 3 remote)	28 (plus 2 remote)
Number of concerns identified with suppliers which indicate potential forced labour.	By monitoring the number of issues identified, we can better adapt our policies and procedures.	4	2
Percentage of colleagues who completed the 'Being trusted: our code' training.	By monitoring completion, we can track employee understanding of 'Being trusted: our code', which includes modern slavery.	80%	95%
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	2

### Our progress this year

What we said we'd do this year	Did we do it?	What we're going to do next year
Strengthen and clarify our 'No Fees' recruitment policy wording globally.	Yes. This year we included an explicit requirement that no fees are charged either directly or indirectly to candidates.	N/a
Enhance our recruitment processes to double-check that new joiners did not pay any recruitment fees.	Yes. We integrated our strengthened policy into the recruitment process to ensure new joiners did not pay any recruitment fees.	N/a
Continue our operational support, funding and promotion of the UK Modern Slavery Helpline and smart- phone app. Read more about our partnership <a href="#">here</a> .	Partial. We continued our operational support, funding and promotion of the UK Modern Slavery Helpline. We handed over the smartphone app to Unseen for their ongoing management.	Continue our operational support, funding and promotion of the UK Modern Slavery Helpline.
Pilot the use of mobile technology to get direct feedback from supply chain workers.	Ongoing. We have partnered with a provider and identified suppliers to launch the pilot with. Covid-19 in China has delayed launch.	Pilot the use of mobile technology to get direct feedback from supply chain workers.
Issue responsible recruitment guidance to high-risk tier 1 suppliers	No. This year we prioritised setting up our mobile technology pilot. We will use the findings of this pilot to share targeted guidance on responsible recruitment next year.	Issue responsible recruitment guidance to high-risk suppliers identified through our mobile technology pilot.

## Sign off

This Statement describes the activities that BT Group has undertaken in the financial year 2022/23 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
- Communications Network Services (UK)
- EE Limited
- 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 25 May 2023 following board approvals in April and May 2023

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



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Offices worldwide



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