

# Conflict Minerals Policy

August 2016

**BT's Business Principles, The Way We Work, requires that:**

We respect the dignity, liberty and equality of everyone we work with.

We work with all our suppliers and their suppliers to make sure they meet our 'Sourcing with Human Dignity' standard.



## Scope

This policy applies to all BT people globally, and to all those acting on BT's behalf. All third parties doing business with BT or acting on our behalf must follow this policy.

## Aims

We respect the dignity, liberty and equality of everyone we work with. At BT we advocate the importance of sustainability, health and safety and environmental standards in our supply chain. Our policy and procedure are based on BT's Sourcing with Human Dignity Standard, which incorporates principles from the United Nation's Universal Declaration of Human Rights.

The minerals used to produce tantalum, tin, tungsten and gold, metals which can be found in electronic devices, are often mined in war-torn or politically unstable areas such as the Democratic Republic of Congo (DRC) and in some instances fund conflict, insurgency and human rights violations. They are known as "conflict minerals". We view activities which could lead or contribute to human rights violations and the support of armed conflict as unacceptable.

In BT we therefore:

- Aim to use tantalum, tin, tungsten and gold from responsible sources (including those within the DRC region), and work with our suppliers to perform appropriate due diligence to identify, and remove, conflict minerals from our supply chain.
- Carry out due diligence, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, with relevant suppliers, by asking them to complete the CFSI's Conflict Minerals Reporting Template. This includes asking the supplier to state whether the minerals in scope are used in their products, list the smelters used and provide information on their own policy and due diligence with their suppliers.
- Follow laws and reporting requirements which apply to BT and which relate to the use of conflict minerals.
- Reserve the right to terminate a contract where the supplier fails to comply with the obligations in the conflict minerals clause.

## Guiding principles

### **BT employees must:**

- follow BT's due diligence procedures and controls for the use of minerals in BT products which may potentially be viewed as conflict minerals

- Immediately report to your line manager, the Ethics team, or the confidential hotline ('Speak Up') any concern where you think that conflict minerals may be in BT's supply chain.

### **BT suppliers must:**

- follow BT's procedures and controls for the use of minerals in BT products which may potentially be viewed as conflict minerals
- contact your BT Procurement representative immediately if you have any concerns that conflict minerals may be in your supply chain
- respond to BT's requests for information about the potential use of conflict minerals in the products you supply to BT.

## **Related policies**

[The Way We Work](#)

## **Policy owner**

**Ethics and Compliance Team**  
BT Governance and Compliance

## **Review**

August 2016