

# Gifts and Hospitality Policy

November 2016

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

We don't tolerate bribery of any kind.

We never offer or accept gifts, payments or hospitality to encourage or reward a decision.

We avoid an interest or situation that conflicts, or may appear to conflict, with our duty to BT. If they can't be avoided; we declare them and resolve them.

## 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

Gifts and hospitality are often an appropriate part of a working relationship but BT people must not offer or receive gifts and hospitality to improperly influence a business decision or to create a feeling of obligation.

You must follow the rules on gifts and hospitality. You have personal responsibility for doing so and if you do not, then we may take disciplinary action. You may also be breaking the law which could lead to fines or penalties for you and BT.

## Guiding principles

### **You must:**

- follow the procedures for registering and getting approval of gifts and hospitality and complete the registration process honestly and accurately. You should get approval from your line manager in advance for all gifts and hospitality which must be registered.
- take particular care offering or receiving gifts and hospitality to public officials as this is a higher risk area and actions could be misinterpreted leading to possible breach of the law or bad publicity for BT

### **You must not:**

- give or receive a gift or hospitality if it is intended to influence you or the person receiving it

- give or receive lavish or extravagant gifts or hospitality which is, or may be seen to be, inappropriate in the circumstances. Think about whether a competitor or the press would consider it appropriate, reasonable and proportionate
- give or receive gifts or hospitality if either you or the other person are involved in on-going commercial negotiations or could influence the decision
- offer any gifts or hospitality where you know it would be wrong for the person to accept
- break any laws or regulations. If you give a gift to someone in another country then it must not break either your country's or the other country's laws and regulations
- give or receive a gift of cash or shares
- ask for a gift or give someone a gift that they have asked for

## Procedures/processes

- For gifts and hospitality above certain limits you must get approval from your line manager and then register for approval in advance of the G&H taking place. The thresholds for registration vary by country and can be found here. There are also maximum values allowed for gifts and these vary by country.
- You should register unexpected gifts and hospitality which you've received and accepted as soon as possible after the event if it is above the registration thresholds
- If you decline hospitality or refuse a gift then you do not need to register it. However if you have any concerns, or if the offer is one of several made in the context of an existing business or potential business relationship, please register the details for transparency.
- You must also register marketing events for prior approval if the value of hospitality is above the threshold for registration.
- Please click here to access the Gifts and Hospitality registration system

## Guidance

### What is a Gift?

- A gift is something given as a present to another person. Gifts are often given as part of culturally significant festivals or celebrations, such as mooncakes at the Mid-Autumn Festival or Christmas presents.

### What is Hospitality?

- Hospitality is where BT entertains guests, typically to enhance business relationships. Common examples of hospitality include: meals, events at a BT Corporate Box; or a sporting event.
- For an event to be hospitality it must be hosted by a BT person or an agreed BT representative. Events that are not hosted must be registered as gifts for prior approval.
- An event should be registered as hospitality if external guests (non-BT people) are being entertained. A BT person can be defined as: an employee of BT or one of its subsidiary companies; or someone directly contracted to work for BT.
- You can find further guidance on the policy here

## Related policies

[The Way We Work](#)

[Anti-corruption and Bribery policy](#)

[Charitable donations and sponsorship policy](#)

(Note: the hyperlinks in this document are intended to direct BT people to locations in the document, or our corporate intranet – they are disabled in external versions of the document)

## Policy owner

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## Review

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