

Charitable Donations and Sponsorships Policy

January 2017

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 any 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.

BT's Charitable Donations and Sponsorships policy is a key part of BT's anti-bribery & corruption programme.



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

BT has zero tolerance of bribery and corruption. BT people, as well as others acting on BT's behalf must understand and comply with BT's zero-tolerance approach to bribery and corruption anywhere we operate.

Charitable donations and sponsorships must be in line with our [Purposeful Business Shared Value Policy](#) and reflect our commitment to ethical business.

Guiding principles

Charitable donations or sponsorships should not be aimed at or result in any inappropriate or hidden commercial or direct return to BT. The motive and benefits should always be transparent and in line with our [Purposeful Business Shared Value Policy](#).

What is a charitable/community donation?

A charitable or community donation might be a cash contribution, or it could be the giving of 'in kind' support such as the supply of kit or network capacity, employee volunteering* or any other services to a charity or organisation running a charitable or community programme. An example is the work that BT does for local schools in the UK, donating computer equipment.

What is a charitable/community sponsorship?

Charitable or community sponsorships typically involve the payment of a fee or 'in kind' support to a charity or not-for-profit organisation in return for the on-going rights to an association with an activity, item, person, organisation or property. An example is sponsorship of the BT Sport Relief Challenges where there is an agreed partnership with a charity for a sponsorship. Charity law usually requires BT to enter into a contract with the organisation (further details are below).

This policy does not apply to:

- Commercial sponsorships, where BT sponsors an organisation and the primary purpose is to promote the BT brand on commercial terms for the benefit of both parties, e.g. BT's sponsorship of the London 2012 Games, or conferences and exhibitions. You can see more about this at [BT Group sponsorship policy](#).
- Personal donations or sponsorship by employees, i.e. those which do not use BT funds, for example sponsoring a colleague in a charity event. Individual volunteering carried out by BT employees is also not covered, unless it is done in work hours, on behalf of BT.

You must:

- Think about how your proposed donation or sponsorship relationship fits with BT's brand goals and Better Future strategy and Policy and make sure

there is no actual or perceived inappropriate or hidden link between the proposal and any of BT's current or future business gains.

- Be transparent about the rationale and motive for your proposed donation or sponsorship, including declaring any expected benefits for BT
- Follow the procedure for registering and getting approval of charitable donations and sponsorships and complete the registration process honestly and accurately.

You must not:

- Offer or make a donation/sponsorship in a hidden or behind the scenes manner, without declaration or transparency. This is particularly important if the offer is linked to a bid, tender, contract renewal or prospective business relationship as this could be perceived as a bribe or dishonest inducement. . If you think there may be any link between the proposed donation/sponsorship and existing or potential business for BT, you must [register](#) this with the Ethics team for prior approval.
- Use an intermediary to offer or make any donation/sponsorship between BT and a charity (with the exception of official processors of donations, such as payroll giving donations and Gift Aid). If you are proposing funding via an intermediary, for example a donation to a UK charity for distribution to an NGO working outside the UK, you should register for prior approval from the Ethics and Charities teams using the online [registration system](#);
- Offer or make any donation/sponsorship which could be linked to a political party, to the campaign of any candidate for elected office or in support of any elected official;
- Offer or make a donation/sponsorship to organisations not registered as a charity without getting approval first from BT's Ethics team;
- Offer or make a donation/sponsorship to organisations that discriminate on the basis of race, ethnicity, nationality, religion, gender, sexual orientation, age or disability;
- Offer or make a donation/sponsorship to any organisation which is in legal or financial conflict with BT, or which does not share our approach towards ethical standards. .

Responsibility:

- As a BT person or someone acting on BT's behalf, you are expected to conduct company business following the highest professional and ethical standards and in line with the applicable country laws under which BT does business.
- We are all individually responsible for reading, knowing and complying with this policy, including all other relevant policies, specified at the end of this document
- Breaches of this policy can result in BT taking disciplinary action against you and could lead to dismissal in serious cases, in line with BT's disciplinary policies. There are laws and controls worldwide which seek to prevent bribery and there are serious penalties for anyone, or any company, breaking these laws including unlimited fines and imprisonment.

Procedures/processes

- Get approval from your line manager and give a record to Finance (having also obtained their approval) for **all** donations and sponsorships covered by this policy. Each LoB should keep a log of all donations/sponsorships for audit purposes.
- Where donations and sponsorships are above £1000 as well as getting line manager approval, you should register them for approval by the Ethics and CSR teams.
- Where you make a series of donations or sponsorship payments to the same 3rd party, with a cumulative value above £1,000 you must register the overall value for approval.
- To register, visit the [Charitable Donations & Sponsorships webpage](#) and click 'register'. Please ensure you attach a copy of the budget holder's approval and any agreement you intend to make with the Charity.
- Make sure that any tax benefits to BT as a result of a charitable donation or sponsorship are correctly and transparently recorded; for further details contact [Group Tax](#).
- Volunteering does not need to be registered on the Gifts and Hospitality Register; however it must be approved by the [volunteering team](#).
- Where a contract is needed (for sponsorship agreements with a charity) please contact the Better Futures team for guidance.

Guidance

- You can find further guidance on charitable donations and sponsorships, including other related areas such as public officials and political expenditure, in the [Gifts and Hospitality guidance](#).

Related policies

[The Way We Work](#)

[Anti-Corruption and Bribery policy](#)

[Gifts and Hospitality policy](#)

[Purposeful Business Shared Value Policy](#)

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Review

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