



Post Office - Supplier Code of Conduct

We are the Post Office and there is no-one like us. From our travel and financial services, passports to postage, the Post Office network is serving communities across the UK. We have a network of more than 11,500 branches across the UK and every one of our branches is at the heart of its community.

Maintaining our reputation for ethical business integrity is absolutely vital and we need to make sure that all of our suppliers work to our values. This short supplier code provides an explanation of the standards of behaviour that we expect when working for Post Office in support of our Ways of Working. Working in **partnership** as **one team** we **deliver** amazing results.

The requirements for you as a supplier are clear - comply with legislation, follow Post Office policy and procedures (including this Code), and if ever you are asked to do anything which sits outside of these parameters then please do tell us about it.

Responsibilities

Suppliers must comply with any terms and conditions that they have agreed with Post Office, and must ensure that all activities are undertaken safely, with no detriment to the well-being of your employees, our staff or the public. All work must be undertaken with care for the environment.

You must ensure that your employees are aware of their duties and are trained and competent to undertake the tasks they are employed for, and suitably supervised where required. Suppliers should be mindful that the activities of their organisation and staff can impact not only their own reputation, but that of the Post Office too. We expect suppliers at all times to ensure that the values and the good name of the Post Office are upheld.

This Supplier Code of Conduct is not a substitute for entering into a written contract with Post Office. It is an advisory document to explain our expectations of responsible behaviour from our suppliers, and to ensure that our standards are understood.

Bribery and Corruption

Suppliers must ensure that bribery or corruption are not tolerated and strict rules for the offering or acceptance of gifts and hospitality are adhered to. You must not offer bribes, kick-backs, gifts or hospitality to a Post Office employee in an attempt to gain a commercial advantage, or to any other employee or organisation to secure an advantage on behalf of Post Office, or to any other employee or organisation to secure an advantage on behalf of Post Office. Any conflicts of interest (for example a family connection between a supplier and the Post Office) need to be disclosed immediately.

Tax Evasion and the Facilitation of Tax Evasion

Tax evasion and the facilitation of tax evasion are both a criminal offence that can be punishable with imprisonment and /or unlimited financial penalties depending on the seriousness of the offence. Suppliers must not ask or encourage a Post Office employee to engage in a relationship which could result in the reduction or diversion of any taxes from any collecting authority. Please read our GUIDANCE – Criminal Finances Act 2017 document on our website <http://corporate.postoffice.co.uk/our-suppliers>.

Human Rights

Suppliers are expected to adhere to all Human Rights legislation. Specifically, this will include no child or forced labour, threat of violence, harassment, intimidation, debt bondage, bonded labour, or compulsory overtime when providing services. Disciplinary and grievance procedures should be fair and transparent, and include the right of appeal.

Employees should be allowed to terminate employment on reasonable notice, enjoy freedom of movement, incur no hiring fees, and be paid and work hours in accordance with national regulations including applicable minimum wage legislation. Where applicable, suppliers are expected to publish their annual statement on Human Trafficking and Modern Slavery in accordance with the Modern Slavery Act 2015.

Non-Discrimination

Suppliers are expected to practice a diversity and equality agenda in line with the Post Office values - with no discrimination on race, religion and belief, disability, gender reassignment, sexual orientation, age, pregnancy /maternity or marriage and civil partnership.

Freedom of Association

Suppliers should respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable local and national laws and freedom of association and collective bargaining. Suppliers shall not interfere with or discriminate against workers choosing to belong to them. Where the right to freedom of association and collective bargaining is restricted under national law, suppliers should facilitate, not hinder, alternative means of independent and free association and bargaining.

Confidentiality

Suppliers must ensure that they respect the confidentiality of Post Office information. They must not share any confidential information unless specifically authorised to do so by Post Office, and only process Post Office Personal Data in accordance with Post Office's instructions and as required by law.

Suppliers should notify the Post Office promptly (within 24 hours) if it becomes aware of any actual, suspected or threatened unauthorised exposure, access, disclosure, Processing, use, communication, deletion, revision, reproduction or transmission of any component of Post Office Personal Data, unauthorised access or attempted access or apparent attempted access (physical or otherwise) to Post Office Personal Data or any loss of, damage to, corruption of or destruction of Post Office Personal Data (Security Incident).

The Post Office is subject to the requirements of the Freedom of Information Act (FOIA) and the Environmental Information Regulations and suppliers will be required to assist and cooperate with Post Office to enable us to comply with our information disclosure obligations.

Insurance

Suppliers must maintain policies of insurance to provide a level of cover sufficient for the work that they intend to provide, and relevant for their own legal jurisdiction and any other jurisdictions they intend to work in with Post Office. This should include all risks that may be incurred by the supplier if any Purchase Order is issued, be it electronically, verbally, written or expressed. This includes cover for death or personal injury, loss of or damage to property, and professional advice. Levels of insurance shall be set within any contract, where no contract has been issued then insurance payable will be unlimited.

No purchase order, no payment

We want our suppliers to be paid in a timely manner for the work they do in supplying Post Office with the important goods and services. Our standard terms are 30 days from receipt of a valid and accurate invoice entry onto our systems. To achieve this, we require the cooperation and assistance of suppliers to ensure that we have an efficient and controlled payment process. This includes a "No purchase order, no payment" policy.

This means that any Post Office employee placing an order with any of our suppliers must provide a valid purchase order (PO) number, and which must be quoted on all supplier invoices. Any request to change an order from a Post Office employee must be supported with a revised supplier quotation and an amended purchase order (PO) document from the Post Office. Suppliers should note that requests to change the goods or services ordered should not be accepted without this evidence.

Invoices not showing a valid PO number will be returned to the supplier for evidence of a PO, which may result in delayed payment. A PO number demonstrates to Post Office that the goods/services have been authorised by the business.

Supplier Audits

We will conduct audits of our suppliers that will look at all aspects of behaviour and legislative compliance. We will focus specifically on:

Modern Slavery - Where we would expect all suppliers to have taken steps within their organisation to:

- ensure all UK workers receive minimum wage and robust immigration checks
- map supply chains to identify where there is highest risk and exposure to modern slavery
- undertake site inspections
- provide training to employees and local suppliers on modern slavery risks and compliance
- review supplier contracts to include obligations to comply with the Modern Slavery Act 2015
- prepare a statement outlining the steps you are taking to tackle modern slavery and publish it if required to do so by the Act.

Anti-Bribery and Corruption – Where we would expect all suppliers to have taken steps to:

- have an Anti-Bribery and Corruption policy in place
- give employees awareness training in Anti-Bribery and Corruption
- operate a hospitality register to track offers and invitations
- have a method to enable staff to raise concerns if they have any suspicions.

What do I do if something isn't right?

At the Post Office, we apply a zero tolerance for unsafe working practices, discrimination, fraud, bribery, tax evasion and the facilitation of tax evasion or corruption. We have a whistleblowing policy and we encourage our staff and suppliers to raise concerns with us. If you are ever asked to be involved in anything unethical or illegal, then you must do the right thing – please "speak up". The same applies if you or your colleagues are treated unfairly while working for the Post Office. There are two ways in which suppliers can report a concern:

1. By contacting their Procurement contact or Vendor Manager or
2. By contacting the Grapevine confidential reporting service on 0345 603 4004