POST OFFICE LIMITED

COMPLIANCE FRAMEWORK



INDEX

```
[HYPERLINK \1 "P1"]
1.
    [HYPERLINK \1 "P1"]
2.
         [HYPERLINK \1 "P4"] [HYPERLINK \1 "P4"]
                     [ HYPERLINK \1 "P5" ]
        HYPERLINK \1 "P5" ]
        3b. [ HYPERLINK \1 "P6" ]
                                                     Γ
        HYPERLINK \1 "P6" ]
              [ HYPERLINK \1 "P7" ] [HYPERLINK \1
         Зс.
        "P7"]
        3d. [ HYPERLINK \1 "P8" ]
        HYPERLINK \1 "P8" ]
        [ HYPERLINK \1 "P9" ]
4.
    [HYPERLINK \1 "P9"]
5. [ HYPERLINK \1 "P10" ]
                                        [ HYPERLINK
\1 "P10" ]
        [HYPERLINK \1 "P11"]
6.
    [ HYPERLINK \1 "P11" ]
APPENDIX [ HYPERLINK \1 "P12" ]
                                                Γ
HYPERLINK \1 "P12" ]
```

1. Introduction [HYPERLINK \1 "P3"]

Compliance with Post Office Limited's legislative and regulatory obligations is vital and something that everyone must do wherever they work in this Business. In an environment of greater transparency, mobilised customer scrutiny and

increasingly proactive regulators, any failure to comply with our legal and regulatory requirements could have a significant impact, both in terms of financial implications and reputational damage.

The Post Office is enormously proud of the trust our customers have in our brand and in order to retain that trust, we must adhere to robust policies and procedures that demonstrate our commitment to fulfill the following obligations:

Conduct its business with integrity
Operate with due skill, care and diligence
Observe proper standards
Be transparent in all business dealings
Treat our customers fairly
Provide adequate protection to customers
Deal with all regulators in an open and honest way

It is therefore important that we all understand the implications of these legislative and regulatory obligations as we go about our day-to-day work. Everybody has a duty to comply with these as they apply to their job or area of responsibility.

This document has been designed as a source of reference for all the areas of legislation and regulation that Post Office Limited is governed by, especially those relating to our higher profile regulators such as Ofcom, Postcomm, Financial Services Authority (FSA) and Her Majesty's Revenue & Customs (HMRC). The primary purpose of this document is to clearly state the allocation of ownership between Post Office Limited's directors and each of the regulatory and legislative obligations that Post Office Limited is subject to.

| | | | GRO | | | 0 | r | | | C | RO | |]. | |
|------|------|------|------|--------|------|------|-----|------|-------|-----|-------|--------|----------|------|
| Offi | ce, | ple | ase | conta | act | Keit | h I | Wool | lard | in | the | first | instance | e on |
| docu | ment | ., c | r or | n how | we | mana | .ge | comp | oliar | nce | with | nin th | ne Post | |
| For | furt | her | ini | format | cion | on | an | y of | the | sec | ctior | ns in | this | |
| | | | | | | | | | | | | | | |

GRO

Alan Cook Managing Director

2. Compliance Framework Controls & Responsibilities [HYPERLINK \1 "P3"]

The Compliance Framework lays out all areas of the Post Office's legislative and regulatory responsibilities.

It is important that each identified owner is aware of their responsibilities for ensuring appropriate controls are in place (as detailed below), to ensure that compliance with Post Office's legislative and regulatory requirements is possible:-

Integrity and ethics

- Post Office brand is not compromised including the People's Post Office advertising campaign
- Fairer, Easier, Better principles are fully deployed and supported throughout Post Office

Management philosophy and attitude:

- Monitoring systems are in place to assess compliance and remedial actions are taken where necessary
- Legal Services are used for advice on non-compliance
- Implications of new or emerging legislation and regulation are identified, evaluated and responded to in a timely manner.

Organisational structure:

• All relevant managers and non-managers are kept informed of changes to compliance requirements

Authority and responsibility:

- Legal Services are fully consulted in the development of new products, business processes and projects
- Business change process is fully utilised as a tool to drive and manage compliance
- Suppliers and clients understand their role in meeting legislative and regulatory requirements.

HR and competence of personnel:

- Employees understand their role in meeting legislative and regulatory requirements
- There is sufficient resource to manage and monitor compliance requirements.

Operating policies and procedures:

- Operating procedures are designed to meet the requirements of legislation and regulation together with the appropriate Post Office Ltd or Group policies
- Supporting policies in place (Royal Mail Group & Post Office Ltd) are accessible, communicated and applied across all areas of the Business.

3a. Map of Accountabilities - How we sell products & services (by Director) [HYPERLINK \1 "P3"]

| ET Responsibilit Y | Regulator | Legislative / Regulatory Area | Sub Area (if applicable) | Supporting statutes / regulations | RM Group Policy | Post Office Limited Policy |
|--|---|---|--------------------------------|--|---|--|
| Peter Corbett Finance Director | [HYPERLINK "http://www.o fcom.org.uk/"] [HYPERLINK "http://www.h mrc.gov.uk/ml r/"] [HYPERLINK "http://www.f sa.gov.uk/"] | Product Sales | | Financial Services & Markets Act Proceeds of Crime Act Consumer Credit Act VAT Act Communications Act | R1 Regulation F22 Taxation S2 Criminal Investigation & Prosecution Policy | Money Laundering Policy |
| Paula Vennells Network Director | [HYPERLINK "http://www.p ostcomm.gov.u k/"] | [HYPERLINK "ftp://ftp.r oyalmail.com /Downloads/p ublic/ctf/rm g/Royal_Mail _Licence_25 May2006.pd f"] | Relating to Mails Integrity | [HYPERLINK "ftp://ftp.royalmail.com/Download s/public/ctf/rmg/Royal_Mail_Licen ce_25 May2006.pdf"] Mails Integrity - Postcomm Postal Services Act | G19 Management of the relationship with Postcomm [HYPERLINK "http://iplatform-sp.intranet.point/sites/Compliance-library/Published Documents/Shared Documents/4447 RM Comp bk A5_6.pdf"] [HYPERLINK "http://www.royalmailgroup.com/portal/rmg/jump1?catId=23200529&mediaId=23200532"] | [HYPERLINK "http://ip latform.in tranet.poi nt/rmg/pol /Informati on/Policie s+and+Guid elines/Mai ls+Integri ty+Policy+ Documents. htm"] |

| | | | Relating to protection of 3 rd party interests | [HYPERLINK "ftp://ftp.royalmail.com/Download s/public/ctf/rmg/Royal_Mail_Licen ce_25 May2006.pdf"] | [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/Compliance/Con dition+10/"] [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/Compliance/"] | |
|--|--|--|---|---|--|--|
| | [HYPERLINK "http://www.c ompetition- commission.or g.uk/"] | Competition | Promotion of Competition | Enterprise Act (Subpostmaster Relationships) | [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/Compliance/"] | [HYPERLINK "http://ip latform.in tranet.poi nt/rmg/pol /Informati on/Policie s+and+Guid elines/Res trictions+ Policy.htm "] |
| Gary Hockey Morley Marketing Director | [HYPERLINK "http://www.p ostcomm.gov.u k/"] | [HYPERLINK "ftp://ftp.r oyalmail.com /Downloads/p ublic/ctf/rm g/Royal_Mail _Licence_25 May2006.pd f"] | Relating to Access | [HYPERLINK "ftp://ftp.royalmail.com/Download s/public/ctf/rmg/Royal_Mail_Licen ce_25 May2006.pdf"] | [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/Compliance/Policies/"] | |
| | [HYPERLINK "http://www.c ompetition-commission.org.uk/"] | Competition | Promotion of Competition | Competition Act / Law (Post Office Limited Products) | G2 Benchmarking & Exchanging information with outside organisations G4 Competition Law Compliance | |
| | | Intellectual Property | | Copyrights & Related Rights Databases Act Trademarks Act | IP1 Intellectual Property G29 Observing copyright when using external sources of information | |

| ET Responsibilit Y | Regulator | Legislative / Regulatory Area | Sub Area (if applicable) | Supporting statutes / regulations | RM Group Policy | Post Office Limited Policy |
|--|--|--|--------------------------|--|---|-------------------------------------|
| Gary Hockey Morley Marketing Director | [HYPERLINK "http://www.t radingstandar ds.gov.uk/"] [HYPERLINK "http://www.o ft.gov.uk/"] | Product Sales | Fairness in Trading | Unfair Contract Terms Act (client and customer contracts) Unfair Terms in Consumer Contract Regulations Disability Discrimination Act (products) Sale and Supply of Goods Act Supply of Goods (implied terms) Act Trade Description Act Consumer Protection Act Control of Misleading Advertisements Act | G4 Competition Law Compliance (including G4a & G4b) G5 Conflicts of Interest G16 Insider Dealing G18 Mergers & Associations G21 Corporate Governance of Subsidiary, Associate & Joint Venture Companies (including G21a & G21b) G23 Creation of new subsidiaries & Joint Venture Companies [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/Compliance/Car tel+News+Story.htm"] | |

3b. Map of Accountabilities - How we operate (by Director) [HYPERLINK \1 "P3"]

| ET Responsibilit | Regulator | Legislative / Regulatory | Sub Area (if applicable) | Supporting statutes / regulations | RM Group Policy | Post Office Limited |
|--|-----------|--------------------------|--------------------------|--|---|--|
| Responsibilit y Debbie Moore HR Director | | Area Data & Information | applicable) | [HYPERLINK "http://iplatform.intranet.point/r mg/pol/Information/Policies+and+Gu idelines/Freedom+of+Information+Ac t.htm"] Document Retention Act Computer Misuse Act Official Secrets Act Welsh Language Act Public Interest Disclosure Act | G30 Freedom of Information G6 Document Retention (including G6a & G6b) G12 Welsh Language P6 Use of Information & Information Systems G7 Employee Disclosure (Whistleblowing) | Policy [HYPERLINK "http://ipl atform.intr anet.point/ rmg/Service s/HR+Help/P ost+Office+ Ltd/Policy/ Employee_Di sclosure_Po licy.htm"] [HYPERLINK "http://ipl atform.intr anet.point/ rmg/pol/Inf ormation/Po licies+and+ Guidelines/ Welsh+Langu |
| | | | | | | age+Guideli nes.htm"] |

| ET | Regulator | Legislative / | Sub Area (if | Supporting statutes / regulations | RM Group Policy | Post Office |
|----------------|-----------|---------------|--------------|-----------------------------------|-----------------|-------------|
| Responsibility | | Regulatory | applicable) | | | Limited |
| 1000 C | | Area | | | | Policy |

| Debbie Moore | Employment | Terms & | Unfair Contract Terms Act | G3 Code of Business | [HYPERLINK |
|--------------|------------|------------|------------------------------------|---------------------|-------------|
| HR Director | | Conditions | (employment contracts) | Standards | "http://ipl |
| | | | Fixed Term Workers Directive | | atform.intr |
| | | | Employment Act | | anet.point/ |
| | | | | | rmg/Service |
| | | | | | s/HR+Help/P |
| | | | | | ost+Office+ |
| | | | | | Ltd/Policy/ |
| | | | | | Recruitment |
| | | | | | _Policy.htm |
| | | | | | <u>"</u>] |
| | | | | | [HYPERLINK |
| | | | | | "http://ipl |
| | | | | | atform.intr |
| | | | | | anet.point/ |
| | | | | | rmg/Service |
| | | | | | s/HR+Help/P |
| | | | | | ost+Office+ |
| | | | | | Ltd/Policy/ |
| | | | | | Flexible_Wo |
| | | | | | rking_Polic |
| | | | | | y.htm"] |
| | | Relations | Employment Relations Act | | [HYPERLINK |
| | | | Trade Union & Labour Relations Act | | "http://ipl |
| | | | TUPE Regulations | | atform.intr |
| | | | | | anet.point/ |
| | | | | | rmg/Service |
| | | | | | s/HR+Help/P |
| | | | | | ost+Office+ |
| | | | | | Ltd/Industr |
| | | | | | ial_Relatio |
| | | | | | ns.htm"] |

| | | Discrimination | Equality Act Race Relations Act [HYPERLINK "http://iplatform.intranet.point/rmg/pol/Information/Policies+and+Guidelines/Disability+Discrimination+Act.htm"] Human Rights Act Protection from Harassment Act Sex Discrimination Act Equal Pay Act Employment Equality (Age) Regulations National Minimum Wage Act 1998 (National Minimum Wage Regulations 1999) | P5 Equal Opportunities - Diversity & Inclusion Valuing Diversity Policy v1.1 | [HYPERLINK "http://ipl atform.intr anet.point/ rmg/Service s/HR+Help/P ost+Office+ Ltd/Policy/ Harassment_ and_Bullyin g_Policy.ht m"] |
|--|--|--|--|--|--|
| Gary Hockey Morley Marketing Director Mike Young Operations Director | Data & Information Data & Information | Client Contracts Purchasing Contracts | Public Records Act Public Records Act | CS9 Acceptable Partnerships with Trusted Third Parties F6 Liability in Purchasing Contracts | |
| | Data & Information | | Information Security | S1 Information Security S10 Clear Desk Policy S16 Third Party Access Policy T3 Royal Mail Anti Virus | [HYPERLINK "http://ipl atform.intr anet.point/ rmg/pol/Inf ormation/Po licies+and+ Guidelines/ Clear+Desk+ policy.htm" l [HYPERLINK "http://ipl atform.intr anet.point/ rmg/pol/Inf ormation/Po licies+and+ Guidelines/ Information +Security+P olicy.htm" l |

| | | Employment | | Private Security Act | | |
|--|-----------|-------------------------------------|---|---|--|--|
| | | Procurement | | Public Procurement Regulations Unfair Contract Terms Act (re: procurement contracts) VAT Act (purchasing) Sale & Supply of Goods Act (re: purchasing) Public Records Act (re: purchasing) | F1 Authority to Requisition, Procure & Pay F2 Procurement Policy [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/How2Buy/3Buy" | |
| ET Responsibility | Regulator | Legislative / Regulatory Area | Sub Area (if applicable) | Supporting statutes / regulations | RM Group Policy | Post Office Limited Policy |
| David Glynn Sales Director | | Data & Information | Sales & Direct Channels | Data Protection Act | G13 Data Protection Act T15 Intranet Exploitation | [HYPERLINK "http://ipl atform.intr anet.point/ rmg/Service s/HR+Help/P ost+Office+ Ltd/Policy/ Data_Protec tion_Act.ht m"] |
| Royal Mail Company Secretary's Office | | Other | | Highways Act Environment Protection Act | G17 Royal Mail Environmental Policy [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/CSR+Environmen t/CSR+Environment.ht m"] | - |
| | | | Property related legislation (Managed at Group Level) Vehicle related legislation (Managed at Group Level) | Town & Country Planning Act Property Act Land Registration Act Landlord & Tenants Act Occupiers Liability Act Road Safety Act Goods Vehicle (licensing of operators) Act | | |

| Managed at Group | Pensions Act | F21 Pensions Policy | |
|------------------|-----------------------------------|---------------------|--|
| Level | Occupational Pensions Regulations | (Finance) | |
| | Companies Act | | |
| | Income & Corporation Taxes Act | | |
| | Employers Liability (compulsory | | |
| | insurance) Act | | |

3c. Map of Accountabilities - How we sell products & services (by legislative & regulatory area) [HYPERLINK \1 "P3"]

| Legislative / Regulatory Area | Regulator | Responsibil ity | Sub Area (if applicable) | Supporting statutes / regulations | RM Group Policy | Post Office Limited Policy |
|-------------------------------------|--|---|--------------------------|---|---|----------------------------------|
| Product Sales | [HYPERLINK "http://www.ofcom.org.uk/"] | Peter Corbett Finance Director | | Financial Services & Markets Act Proceeds of Crime Act Consumer Credit Act VAT Act Communications Act | R1 Regulation F22 Taxation S2 Criminal Investigation & Prosecution Policy | Money Laundering Policy |

| .hr k/r [H "ht .fs /" [H "ht .tr nda uk/ | HYPERLINK http://www fsa.gov.uk HYPERLINK http://www fradingsta hards.gov. hyperlink http://www fradingsta hards.gov. hyperlink http://www http://www | Gary Hockey Morley Marketing Director | Fairness in Trading | Unfair Contract Terms Act (client and customer contracts) Unfair Terms in Consumer Contract Regulations Disability Discrimination Act (products) Sale and Supply of Goods Act Supply of Goods (implied terms) Act Trade Description Act Consumer Protection Act Control of Misleading Advertisements Act | G4 Competition Law Compliance (including G4a & G4b) G5 Conflicts of Interest G16 Insider Dealing G18 Mergers & Associations G21 Corporate Governance of Subsidiary, Associate & Joint Venture Companies (including G21a & G21b) G23 Creation of new subsidiaries & Joint Venture Companies [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/Compliance/Car tel+News+Story.htm"] | |
|--|--|--|--------------------------|--|---|---|
| "ht .co n- | HYPERLINK attp://www competitio commission. ag.uk/"] | Paula Vennells Network Director Gary Hockey Morley Marketing Director | Promotion of Competition | Enterprise Act (Subpostmaster Relationships) Competition Act / Law (Post Office Limited Products) | [HYPERLINK "http://iplatform.in tranet.point/rmg/Ser vices/Compliance/"] G2 Benchmarking & Exchanging information with outside organisations G4 Competition Law Compliance | [HYPERLINK "http://ipl atform.intr anet.point/ rmg/pol/Inf ormation/Po licies+and+ Guidelines/ Restriction s+Policy.ht m"] |

| | | | | | 1 | |
|----------------|------------------------------------|-------------|-----------------|------------------------------------|----------------------|-------------|
| Intellectual | | Gary Hockey | | Copyrights & Related Rights | IP1 Intellectual | |
| Property | | Morley | | Databases Act | Property | |
| | | Marketing | | Trademarks Act | G29 Observing | |
| | | Director | | | copyright when using | |
| | | | | | external sources of | |
| | | | | | information | |
| | | | | | IIIIOIMACION | |
| Legislative / | Regulator | Responsibil | Sub Area (if | Supporting statutes / regulations | RM Group Policy | Post Office |
| Regulatory | 1.09424002 | ity | applicable) | supporting southers , regulations | in oromb rorred | Limited |
| Area | | Log | applicable | | | Policy |
| | | D = 1 = | D-1-time to | [IIVDEDI TNI/ | G10 Management of | |
| [HYPERLINK | (A) bita torribuscular and control | Paula | Relating to | [HYPERLINK | G19 Management of | [HYPERLINK |
| "ftp://ftp.roy | [HYPERLINK | Vennells | Mails Integrity | "ftp://ftp.royalmail.com/Downloads | the relationship | "http://ipl |
| almail.com/Dow | "http://www | Network | | /public/ctf/rmg/Royal_Mail_Licence | with Postcomm | atform.intr |
| nloads/public/ | .postcomm.q | Director | | _25 May2006.pdf"] | [HYPERLINK | anet.point/ |
| ctf/rmg/Royal | ov.uk/"] | | | Mails Integrity - Postcomm | "http://iplatform- | rmg/pol/Inf |
| Mail Licence 2 | ov.uk/" | | | Postal Services Act | sp.intranet.point/si | ormation/Po |
| 5 – – | | | | | tes/Compliance- | licies+and+ |
| May 2006.pdf" | | | | | library/Published | Guidelines/ |
| 11dy2000.pdf | | | | | Documents/Shared | Mails+Integ |
| 1 | | | | | Documents/4447 RM | |
| | | | | | | rity+Policy |
| | | | | | Comp bk A5_6.pdf"] | +Documents. |
| | | | | | [HYPERLINK | htm"] |
| | | | | | "http://www.royalmai | |
| | | | | | lgroup.com/portal/rm | |
| | | | | | g/jump1?catId=232005 | |
| | | | | | 29&mediaId=23200532" | |
| | | | | | 1 | |
| | | | Relating to | HYPERLINK | HYPERLINK | |
| | | | protection of | "ftp://ftp.royalmail.com/Downloads | "http://iplatform.in | |
| | | | | | | |
| | | | 3rd party | /public/ctf/rmg/Royal_Mail_Licence | tranet.point/rmg/Ser | |
| | | | interests | _25 May2006.pdf"] | vices/Compliance/Con | |
| | | | | | dition+10/"] | |
| | | | | | | |
| | | | | | [HYPERLINK | |
| | | | | | "http://iplatform.in | |
| | | | | | tranet.point/rmg/Ser | |
| | | | | | vices/Compliance/"] | |
| | | | | | | |
| | | Gary Hockey | | | | |
| | | Morley | Relating to | HYPERLINK | HYPERLINK | |
| | | Marketing | Access | "ftp://ftp.royalmail.com/Downloads | "http://iplatform.in | |
| | | | Access | | | |
| | | Director | | /public/ctf/rmg/Royal_Mail_Licence | tranet.point/rmg/Ser | |
| | | | | _25 May2006.pdf"] | vices/Compliance/Pol | |
| | | | | | icies/"] | |
| | | | | | | |

3d. Map of Accountabilities - How we operate (by legislative & regulatory area) [HYPERLINK \1 "P3"]

| Legislative / H | Regulator ET | Sub Area (if | Supporting | statutes / re | gulations RM | Group Policy | Post Office |
|-----------------|--------------|-------------------|------------|---------------|--------------|--------------|-------------|
| Regulatory | Responsi | .bili applicable) | | | | | Limited |
| Area | ty | | | | | | Policy |

| Health & | | Debbie Moore | Procedural | Health & Cafatra at Wards Nat | D/ Haalth C Cafeter | 1 |
|----------|-------------|--------------|------------|--|---------------------|---------------|
| | | | | Health & Safety at Work Act | P4 Health & Safety | [III/DEDITAM |
| Safety | | HR Director | aspects | Employers Liability Act | | [HYPERLINK |
| | | | | Offices, shops & Premises Act | | "https://ww |
| | | | | RIDDOR regulations | | w.postoffic |
| | | | | Occupiers Liability Act | | eintranet.c |
| | | | | H&S Information for Employees | | o.uk/teams/ |
| | | | | regulations | | usemanual.a |
| | | | | Working Time Directive | | sp"] |
| | | | | Six Pack Regulations | | |
| | | | | Management of H&S at work | | [HYPERLINK |
| | [HYPERLINK | | | Display Screen Equipment | | "http://ipl |
| | "http://www | | | Provision & use of work | | atform.intr |
| | .hse.gov.uk | | | related equipment | | anet.point/ |
| | /index.htm" | | | Workplace health, safety & | | rmg/pol/Inf |
| | 1 | | | welfare | | ormation/Po |
| | 1 | | | Personal protective equipment | | licies+and+ |
| | | | | at work | | Guidelines/ |
| | | | | Manual handling | | Hostage+Pol |
| | | | | | | icy.htm"] |
| | | | Premises | Fire Precautions Act | P4 Health & Safety | |
| | | | aspects | H&S First Aid regulations | F8 Fire Safety | [HYPERLINK |
| | | | | Electricity at Work regulations | G14 Disabled | "https://ww |
| | | | | Control of Substances hazardous to | Customers | w.postoffic |
| | | | | health regulations | | eintranet.c |
| | | | | Control of Asbestos at work | | o.uk/teams/ |
| | | | | regulations | | usemanual.a |
| | | | | Health Act 2006 | | sp"] |
| | | | | Disability Discrimination Act | | |
| | | | | (access to premises) | | [HYPERLINK |
| | | | | Noise at Work regulations | | "http://ipl |
| | | | | | | atform.intr |
| | | | | | | anet.point/ |
| | | | | | | rmg/pol/Inf |
| | | | | | | ormation/Po |
| | | | | | | licies+and+ |
| | | | | | | Guidelines/ |
| | | | | | | Suspect+pac |
| | | | | | | kages+intro |
| | | | | | | .htm"] |

| Data & | | [HYPERLINK | G30 Freedom of | [HYPERLINK |
|-------------|--|-------------------------------------|---------------------|-------------|
| Information | | "http://iplatform.intranet.point/rm | Information | "http://ipl |
| | | g/pol/Information/Policies+and+Guid | G6 Document | atform.intr |
| | | elines/Freedom+of+Information+Act.h | Retention | anet.point/ |
| | | tm"] | (including G6a & | rmg/Service |
| | | Document Retention Act | G6b) | s/HR+Help/P |
| | | Computer Misuse Act | G12 Welsh Language | ost+Office+ |
| | | Official Secrets Act | P6 Use of | Ltd/Policy/ |
| | | Welsh Language Act | Information & | Employee_Di |
| | | Public Interest Disclosure Act | Information Systems | sclosure_Po |
| | | | G7 Employee | licy.htm"] |
| | | | Disclosure | [HYPERLINK |
| | | | (Whistleblowing) | "http://ipl |
| | | | | atform.intr |
| | | | | anet.point/ |
| | | | | rmg/pol/Inf |
| | | | | ormation/Po |
| | | | | licies+and+ |
| | | | | Guidelines/ |
| | | | | Welsh+Langu |
| | | | | age+Guideli |
| | | | | nes.htm"] |

| Legislative / Regulatory Area | Regulato r | ET Responsibility | Sub Area (if applicable) | Supporting statutes / regulations | RM Group Policy | Post Office Limited Policy |
|-------------------------------------|---------------|--|----------------------------|-----------------------------------|--|--|
| Data & Information | | Gary Hockey Morley Marketing Director | Client Contracts | Public Records Act | CS9 Acceptable Partnerships with Trusted Third Parties | |
| | | David Glynn Sales Director | Sales & Direct Channels | Data Protection Act | G13 Data Protection Act T15 Intranet Exploitation | [HYPERLINK "http://ipl atform.intr anet.point/ rmg/Service s/HR+Help/P ost+Office+ Ltd/Policy/ Data_Protec tion_Act.ht m"] |
| | | Mike Young | Purchasing Contracts | Public Records Act | F6 Liability in | |
| | | Operations | CONCLACES | | Purchasing Contracts | |

| Director | Information Security | S1 Information Security S10 Clear Desk Policy S16 Third Party Access Policy T3 Royal Mail Anti Virus | [HYPERLINK "http://ipl atform.intr anet.point/ rmg/pol/Inf ormation/Po licies+and+ Guidelines/ Clear+Desk+ policy.htm" l [HYPERLINK "http://ipl atform.intr anet.point/ rmg/pol/Inf ormation/Po licies+and+ Guidelines/ Information |
|----------|---|---|---|
| | | | +Security+P olicy.htm" |
| | Private Security Act | | |
| | Public Procurement Regulations Unfair Contract Terms Act (re: procurement contracts) VAT Act (purchasing) Sale & Supply of Goods Act (re: purchasing) Public Records Act (re: purchasing) | Fl Authority to Requisition, Procure & Pay F2 Procurement Policy [HYPERLINK "http://iplatform.intr anet.point/rmg/Service s/How2Buy/3Buy"] | |

| Employment | Debbie Moore | Terms & Conditions | Unfair Contract Terms Act | G3 Code of Business | [HYPERLINK |
|------------|--------------|--------------------|--------------------------------|---------------------|----------------|
| | HR Director | | (employment contracts) | Standards | "http://ipl |
| | | | Fixed Term Workers Directive | | atform.intr |
| | | | Employment Act | | anet.point/ |
| | | | | | rmg/Service |
| | | | | | s/HR+Help/P |
| | | | | | ost+Office+ |
| | | | | | Ltd/Policy/ |
| | | | | | Recruitment |
| | | | | | _Policy.htm |
| | | | | | "] |
| | | | | | [HYPERLINK |
| | | | | | "http://ipl |
| | | | | | atform.intr |
| | | | | | anet.point/ |
| | | | | | rmg/Service |
| | | | | | s/HR+Help/P |
| | | | | | ost+Office+ |
| | | | | | Ltd/Policy/ |
| | | | | | Flexible_Wo |
| | | | | | rking_Polic |
| | | | | | y.htm"] |
| | | Relations | Employment Relations Act | | [HYPERLINK |
| | | | Trade Union & Labour Relations | | "http://ipl |
| | | | Act | | atform.intr |
| | | | TUPE Regulations | | anet.point/ |
| | | | | | rmg/Service |
| | | | | | s/HR+Help/P |
| | | | | | ost+Office+ |
| | | | | | Ltd/Industr |
| | | | | | ial_Relatio |
| | | | | | ns.htm"] |

| | | | Discrimination | Equality Act Race Relations Act [HYPERLINK "http://iplatform.intranet.point /rmg/pol/Information/Policies+an d+Guidelines/Disability+Discrimi nation+Act.htm"] Human Rights Act Protection from Harassment Act Sex Discrimination Act Equal Pay Act Employment Equality (Age) Regulations National Minimum Wage Act 1998 (National Minimum Wage Regulations 1999) | P5 Equal Opportunities - Diversity & Inclusion Valuing Diversity Policy v1.1 | [HYPERLINK "http://ipl atform.intr anet.point/ rmg/Service s/HR+Help/P ost+Office+ Ltd/Policy/ Harassment_ and_Bullyin g_Policy.ht m"] |
|--------------------------------------|---------------|--|--|---|---|---|
| Legislative / Regulatory Area | Regulato r | ET Responsibility | Sub Area (if applicable) | Supporting statutes / regulations | RM Group Policy | Post Office Limited Policy |
| Other (Managed at Group Level) | | Royal Mail Company Secretary's Office | | Highways Act Environment Protection Act | G17 Royal Mail Environmental Policy [HYPERLINK "http://iplatform.intr anet.point/rmg/Service s/CSR+Environment/CSR+ Environment.htm"] | |
| | | | Property related legislation (Managed at Group Level) | Town & Country Planning Act Property Act Land Registration Act Landlord & Tenants Act Occupiers Liability Act | | |
| | | | Vehicle related legislation (Managed at Group Level) | Road Safety Act Goods Vehicle (licensing of operators) Act | | |
| | | | Managed at Group Level | Pensions Act Occupational Pensions Regulations Companies Act Income & Corporation Taxes Act Employers Liability (compulsory insurance) Act | F21 Pensions Policy (Finance) | |

Note 1: This list should not be taken as definitive or exhaustive, and will need to be reviewed on an annual basis to moderate any changes to legislative and regulatory requirements.

Note 2: The Royal Mail Group Policies can be located using the following link - [HYPERLINK "http://domino.point/POLICYLI.nsf/pgFrameTickerNone?openpage&docid=BB982DF613AEF68D802571CA00299D6 E"]

4. Assurance [HYPERLINK \1 "P3"]

This compliance framework forms part of the Post Office's Governance processes.

The Board and other stakeholders will gain assurance in respect of the extent of compliance across the business and the appropriateness of controls through: -

- Periodic self assessment activities performed by identified owners
- Independent validation work, performed by Royal Mail Internal Audit & Risk Management (IARM). IARM manage the validation of critical business processes across the Royal Mail Group and Post Office's identified critical business processes include a key sub process of Regulation and Legislation.
- Activities performed by the Compliance Team (as set out in the Annual Assurance Plan)
- Monitoring by the Risk & Compliance Committee (a sub committee of the Board) as set out in the terms of reference for the committee

The self-assessment and independent validation processes referred to will be signed off by the Managing Director and reported to the Corporate Risk Management Committee. This will enable the Post Office to provide its statutory declaration on risk and control in its annual report

5. Disciplinary Statement [HYPERLINK \1 "P3"]

Compliance with legal and regulatory requirements is not optional and disciplinary measures will be applied in cases of wilful, persistent or negligent non-compliance. The Royal Mail Group Employee Disclosure (Whistleblowing) Policy (G7) and Post Office Limited Employee Disclosure Policy that allows for anyone in the Business to raise any suspected non-compliance without fear of detriment or reprisal

6. Contact [HYPERLINK \1 "P3"]

Initial contact or any questions regarding the content of the Compliance Framework should be directed to Keith Woollard (Head of Compliance).

| a | GRO | | | (| GRO | |
|------------|--------------------|-------|---|---|-----|--|
| | GRO | | - | | | |
| ₽ : | Keith.woollard GRO |) | | 7 | | |

(re: Products)

-Sale & Supply of Goods Act

POL-BSFF-0237968 0023

Appendix - Scope of framework [HYPERLINK \1 "P3"1 Appendix - Scope of framework [HYPERLINK \1 "P3"1 Note 8 - Bundle of Note 1 Bundle statutes/regulations OTHER: MANAGED AT GROUP LEVEL statutes/regulations -Town & Country Planning Act O Pensions Act / Occupational Pension -Health & Safety at Work Act -Property Act -Employers Liability (Defective -Land Registration Act O Companies Act Equipment) Act -Landlord & Tenants Act -Offices, Shops and Premises A O Income & Corporation Taxes Act -Occupiers' Liability Act ct O Employer's Liability (Compulsory -RIDDOR regulations Insurance) Act -Occupiers' Liability Act Note 9 - Bundle of O Property Related Legislation (bundle statutes/regulations -H&S Information for Employees Note 3-Bundle statutes/regulations regulations -Road Safety Act -Goods Vehicles (Licensing of -Working Time Directive -Unfair Contract Terms Act (re: employment contracts) -"Six Pack" regulations HEALTH & SAFETY -Management of Health & -Fixed Term Workers Procedural Aspects (bundle -Directive Safety at work see Note 1) -Display Screen Equipment EMPLOYMENT Building Aspects (bundle --Provision & use of work O Terms & Conditions Note 4- Bundle of see Note 2) (bundle - see Note 3) statutes/regulations Employment Relations Note 2 - Bundle of -Employment Relations Act (bundle - see Note 4) -Trade Union & Labour statutes/regulations -Fire Precautions Act O Discrimination (bundle -Relations Act INTELLECTUAL -Health & Safety (First Aid) PROPERTY see Note 5) Regulations O Copyrights & Related Rights O Private Security Act LEGISLATI -Electricity at Work Regulations Note 5- Bundle of Databases Act -Control of Substances Hazardous statutes/regulations VE to Health Regulations -Equality Act AND -Control of Asbestos at Work -Race Relations Act REGULATOR Regulations -Disability Discrimination PROCUREMENT ROYAL MAIL LICENCE CONDITIONS -Health Act 2006 Act (re: employment) Public Procurement Freedom of Information Act OBLIGATIO -Human Rights Act -Disability Discrimination Act Regulations NS Document Retention (Act) DATA & INFORMATION Data Protection Act O Public Records Act Note 6 - Bundle of COMPETITION statutes/regulations • Promotion of Competition Freedom of Information -Competition Act (bundle - see Note 6) -Enterprise Act O Document Retention (Act) Ocomputer Misuse Act PRODUCT SALES Official Secrets Act Note 7 - Bundle of Financial Services & statutes/regulations Markets Act KEY -Unfair Contract Terms Act (re: Proceeds of Crime Act O Potentially Very High Impact client & customer contracts OTHER: "BELOW THE LINE" Consumer Credit Act if Breached -Unfair Terms in Consumer Contract Unfair Contract Terms Act (re: Communications Act Potentially High Impact if Regulations procurement) Fairness in Trading -Disability Discrimination Act Breached

(bundle - see Note 7)

VAT Act

O Sale & Supply of Goods Act (re:

purchasing)

A III arbitration Track

O Potentially Medium Impact if

Breached

Document Control

| Version 1 | 18/03/2009 | Rob Bolton | Final version produced |
|-----------|------------|------------|-----------------------------|
| | | | following input from Risk & |
| | | | Assurance Manager, Head of |
| | | | Compliance & Communications |
| | | | |