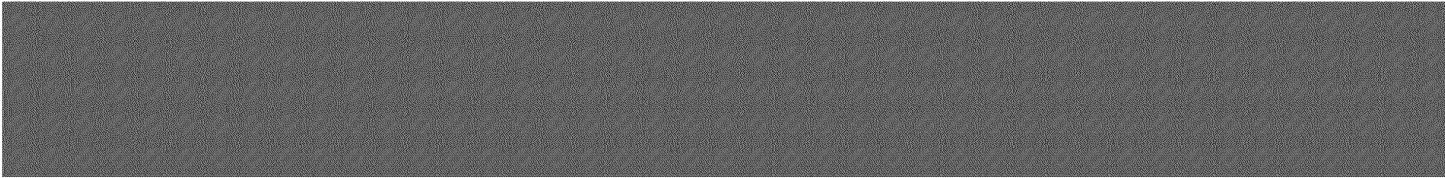


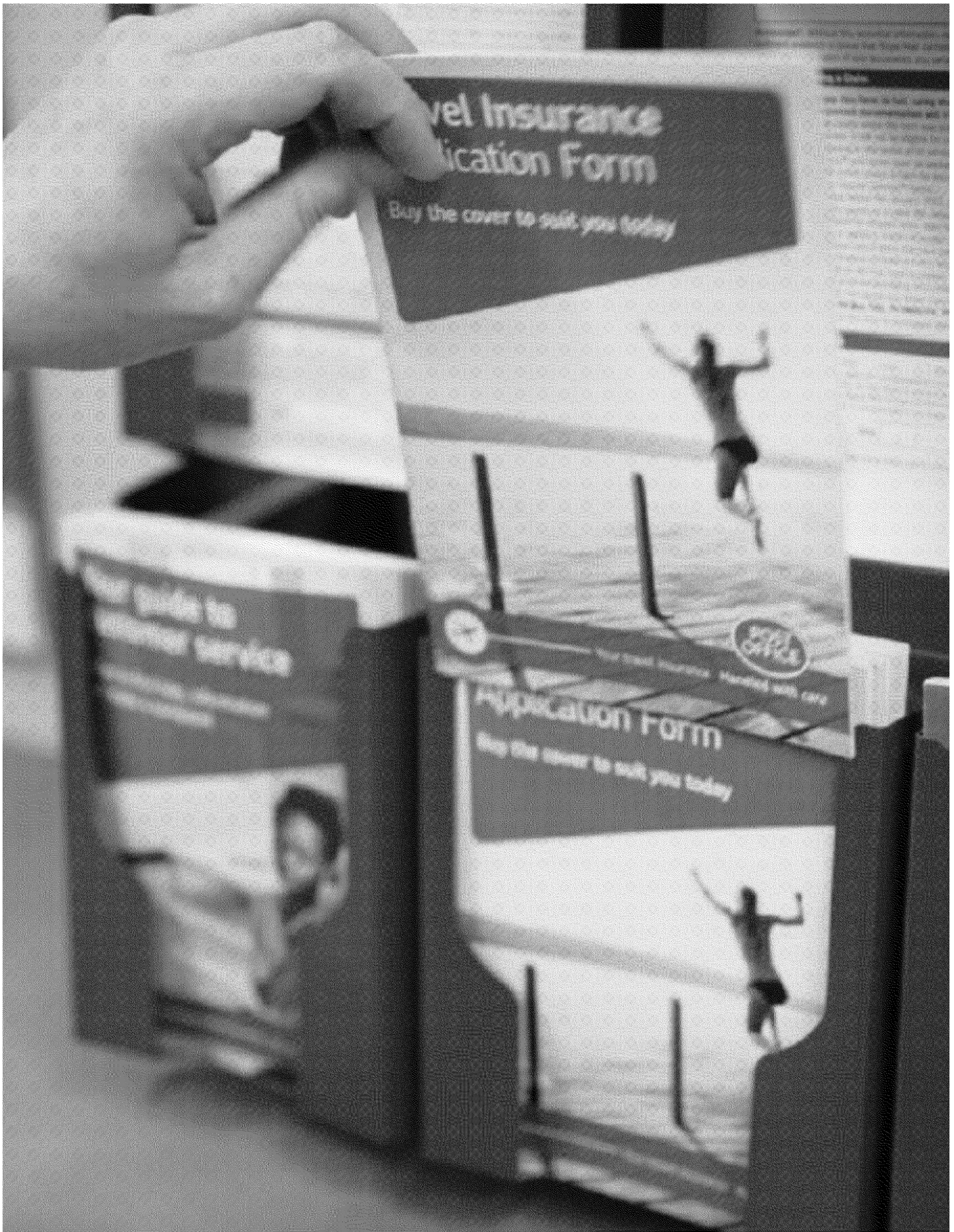


Code of Business Standards

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Foreword by our chief executive

Dear Post Office Colleagues,

Post Office is unique – a commercial business delivering an important social purpose. We believe in the importance of connecting communities and enhancing the powerful role they play in all our lives. We stay true to this commitment by meeting customer needs through carefully designed, high quality products, and maintaining an unrivalled local presence across the UK.

Generations of hard work and honest achievement have made Post Office a name that elicits trust. This is due in no small part to an unwavering commitment to ethical behaviour and doing the right things in the right way. This commitment and integrity is critical to achieving great business performance.

Our Code of Business Standards sets out our enduring commitment to ethical behaviour and ensures our policies and processes are relevant and appropriate to today's dynamic operating and regulatory environment. Regardless of the challenges that arise in achieving our ambitions, our commitment to how we do business is unwavering.

I expect everyone at Post Office to read this document carefully and to think about how it applies to their work. Consider how your behaviours, actions and decisions may affect others, including customers and colleagues.

The way that we conduct business has never been more important. Thank you for your trust in Post Office. And, most importantly, thank you for your commitment to ensure our customers and the communities we serve continue to place their trust in us.

The signature of Paula Vennells is enclosed in a dashed rectangular box. The letters 'GRO' are prominently displayed in a large, bold, black sans-serif font.

Paula Vennells

Our heritage and values

Post Office has thrived at the heart of communities across the UK for over 370 years.

We are one of the country's most trusted brands and we take our commitment to provide essential services very seriously. We are the UK's largest retail network and provide unrivalled access to banking and financial services, with more branches than all the UK's banks and building societies put together.

We are committed to doing business the right way. That means we act lawfully. It also means that how we conduct ourselves is more than just a matter of policy and law; it's a reflection of our core values: Care, Challenge and Commit. By aligning our behaviours to our core values, we help maintain the trust and support of our customers, shareholders, communities and others with whom we work.

"We are committed to doing business the right way. That means we act lawfully. It also means that how we conduct ourselves is more than just a matter of policy and law"

Introducing the Code

Our Code of Business Standards defines how we operate.

In developing the Code of Business Standards, we have drawn inspiration from our heritage and values as well as the law. It is intended to guide the way we behave and give us standards to measure ourselves. It sets out what people can expect when working for and with Post Office. It is designed to provide guidance and support in making decisions and carrying out work in a way that is compatible with our values, policies and processes and the law. As the legal and regulatory environments evolve, the Code will adapt to accommodate such changes.

By consistently adhering to this Code we will continue to foster and strengthen a culture that will help us to continue to be a business to be proud of – a **'Great place to work'** that is **'Simpler to run'** and **'Better for customers'**.

Observing the Code

Everyone employed by Post Office is required to adhere to the Code; they are expected to operate in line with it and the corresponding Group Policies.

As a Post Office colleague, you are required to:

- Read and understand the Code of Business Standards and work-related policies and incorporate them into your work and behaviours
- Complete all mandatory training on time
- Report potential unlawful behaviour or breaches of the Code or company policies
- Cooperate fully with company investigations
- Never victimise colleagues for 'calling it out'
- Ask questions when you're unsure

All line managers have access to the My HR Help service which supports managers with team management queries. Visit www.myhrhelp.co.uk

NOTE

Please be aware that any breach of this Code may be dealt with under our Conduct Code, and that gross misconduct could result in your dismissal.

Our brand

Our brand experience, for employees, customers, partners and stakeholders is shaped by our core values of **Care, Challenge and Commit**.

We make that happen by having a set of straightforward business behaviours which inform the way we do things, and we use them as a guide to improve our people processes including recruitment, learning and development, talent and performance management. In short, it's how we do things to deliver our brand commitment to customers.

Customer excellence

Our customers are at the heart of everything we do.

We all know what it feels like to experience good and poor customer service. We need to ensure that we deliver great service for all customers, every time they interact with us. The more we understand our customers and their expectations, and put ourselves in their shoes, the easier it will be to provide consistently great service.

How do we demonstrate our commitment to customer excellence?

- By listening to them and understanding their needs and expectations
- By communicating respectfully, leaving out the jargon, providing them with the best service and products that meet their needs
- By always thinking about them and not the process
- By keeping it simple and straightforward to reach us – in branch, online, mobile

Our people

With a diverse range of backgrounds, talents and perspectives, Post Office is in a unique position to understand our customer needs.

At Post Office, we differentiate ourselves through the dedication of our people. Our rich and diverse cultures and experiences help us make connections with our customers and sustains the continued success of our brand. To maintain this, we treat each other with respect, even when our differences may set us apart.

We aspire to provide a positive work environment. This means that regardless of our differences, we can work without fear of discrimination, harassment or victimisation. Employment decisions – whether they be related to hiring, promotions, transfers or terminations – are based on merit, equity and fairness.

Business behaviours

Our behaviours are based on our core values of Care, Challenge and Commit.

We care by always thinking customer

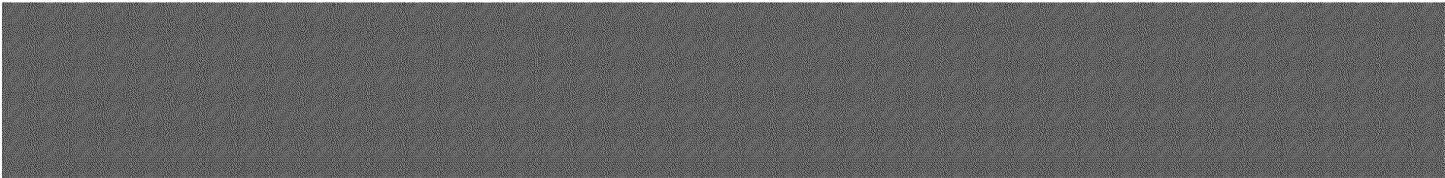
Care is the cornerstone of our business. It means valuing people and their time and putting our customers first. It means making it personal; listening and understanding; being guided by our conscience and expertise; and keeping our word. In short, it means doing right by people. This is what sets us apart.

We strive to make things ever better through honest challenge

Challenge conventions, challenge complexity, challenge competitors, challenge on behalf of our customers, challenge each other, challenge yourself. We've been passed the baton of this great institution. It's up to every one of us to drive it forward and create change for a successful future.

We commit to decisive delivery

We don't just work for Post Office, we are Post Office, and we're all responsible for its commercial success. The road ahead is exciting, but not easy. If each and every one of us invests all our energy, creativity and passion, we can achieve amazing things. You can find out more about these behaviours and what they mean, in [Our Post Office](#).



Personal behaviours

NOTE

If you have a concern about bullying and harassment, you can speak to your line manager or refer to the Dignity at Work

We expect high standards of personal behaviour at work.

Behaviour which damages service to customers, or the reputation or efficiency of Post Office, is unacceptable. This extends to poor attendance, lateness, dishonesty, drunkenness, use of illegal substances, and violent or disorderly behaviour or abusive language.

Maintaining our standards means we:

- Conduct ourselves appropriately and professionally
- Act as an ambassador for the company
- Operate within the law
- Do not bring Post Office into disrepute
- Do not claim money for hours you did not work, a journey you did not make or an expense you did not incur
- Do not use inside information about a company transaction for personal profit

Post Office operates a **zero tolerance** to any form of discrimination, including based on:

- Race
- Colour
- Religion or faith
- Age
- Sexual orientation, gender, or gender identity expression
- National origin, geographical or demographic background
- Pregnancy or maternity
- Any other classification protected by UK law

We should all demonstrate:

- Honesty and integrity
- Efficiency and reliability
- Punctuality and good attendance
- A smart and clean appearance – and where uniform is provided by Post Office, it should be worn as intended
- A credible image to the public

We do not tolerate any form of bullying or harassment, whether written, verbal, visual or physical, including:

Valuing diversity and inclusion

We want our people to reflect the diversity of the communities in which we live and work, and the customers we serve.

We celebrate the diversity of our workforce and the communities we serve by embracing diversity and inclusion and creating policies which actively promote working without fear of discrimination.

Everyone working for Post Office has a responsibility to:

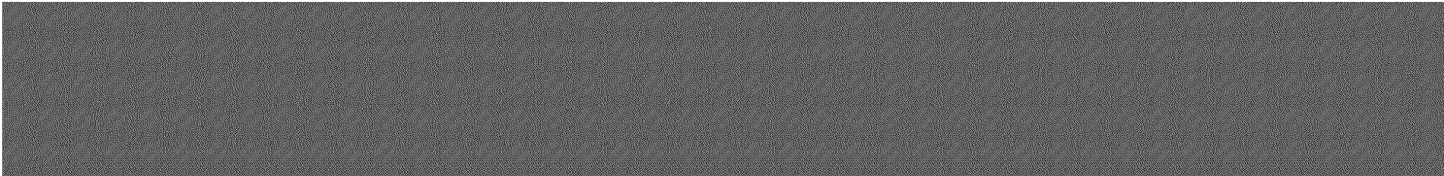
- Promote a professional and positive work environment
- Promote a culture of inclusivity where differences are accepted, valued and celebrated
- Inform their line manager of any instances of apparent discrimination or any perceived problem in relation to employment
- Comply with, and promote Post Office policy and procedures with regard to diversity and inclusion. You can view our **Equality, Diversity and Inclusion Policy**, [here](#)

We actively support:

- Flexible working practices, which you can read more about [here](#)
- Women in Leadership Programme to support and nurture female talent
- Post Office Prism: a network of lesbian, gay, bisexual and transgender (LGBT) colleagues and their allies. The group supports and celebrates the Post Office LGBT community and provides advice and guidance to our business on inclusivity and diversity
- Disability Confident Group: a network of Post Office colleagues with disabilities and colleagues who want to support them. The group provides support and advice and helps the business do the very best it can for employees with disabilities

Language:

The common language of business should be English (English or Welsh in Wales). However, so long as it doesn't jeopardise the job or health and safety of colleagues or members of the public and doesn't deliberately exclude people, colleagues should be able to communicate in their own language, within reason.



Creating and maintaining a safe and healthy place of work

*“We support
and encourage
our people and*

We strive to work as safely as possible.

Everybody has the right to work in a safe and healthy environment. We will fulfil our promises without compromising the safety of our customers, colleagues, suppliers, and all those affected by our activities.

Pursuing this aim reflects the high value we place on our employees, and all those touched by our business activities:

- We ensure that the health and safety responsibilities of our employees, including managers, are clearly defined, allocated and understood
- We encourage and help all managers and employees to carry out their responsibilities through effective health and safety management systems, with safe premises, equipment and processes
- We improve our employees' capability to manage and work safely, through coaching and training.
- We support and encourage our people and unions to get involved in the health and safety performance of our business
- We support and encourage our people and unions to get involved in pursuing a healthy and safe way of living and working
- We monitor and review how well we put our health and safety policies into practice

We are all responsible for health and safety. It is an employer's duty to protect the health, safety and welfare of their employees and other people who might be affected by their business. A full copy of the Health and Safety policy, and all associated policies, can be found on the [Health and Safety intranet site](#).

Health and wellbeing

We seek to enable colleagues to achieve a positive balance between their work and their lives outside of work.

We take health and wellbeing seriously. That's why we work hard to promote a positive

wellbeing culture and provide a range of services to help all our people stay mentally and physically healthy.

What we offer:

- Lifestyle online for colleagues and their families – to support our people to stay fit and healthy
- Monthly health and wellbeing campaigns, helping to raise awareness of what we offer and how our people can stay healthy
- Health checks – a rolling programme using kiosks and mobile kit
- HELP employee assistance programme for colleagues – partners and managers can provide advice and guidance on a variety of topics in full confidence.
- OH Assist Managers Portal provides advice and guidance for managing health and wellbeing
- Occupational Health Referral Portal for managers to request support for their teams during challenging times
- Training for colleagues to raise awareness on specific issues relating to health, safety and wellbeing
- My HR provides expert advice and guidance for all managers on any HR related issue. Visit www.myHRhelp.co.uk for more information

Protecting the environment

Everyone has a part to play in reducing our environmental impact.

Post Office promotes initiatives that save on the resources we use. We recognise that our business

activities and policies have an impact on the environment and we are committed to taking account of the environmental and ethical effects of our policies in our planning and operations.

In standards of design and cleanliness, we recognise our responsibility to ensure that our premises are a credit to the communities in which they are situated.

We aim to reduce our environmental impact through:

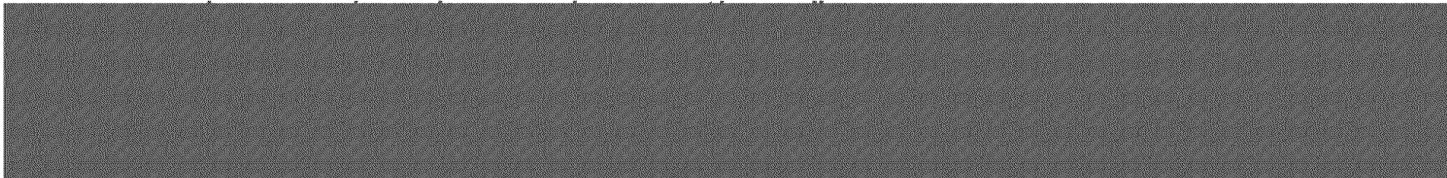
- Reduction in the use of water
- Efficient use of energy and a reduction in our CO₂ emissions
- Reduction in waste to landfill and maximising recycling opportunities
- The use of sustainable materials

Use of alcohol, tobacco and illegal drugs

Possession or use of alcohol or illegal drugs while on Post Office premises or while conducting company business is prohibited.

The exception is that during business dinners and events, or in designated areas, we may provide and drink alcohol in moderation, where permitted by law. Smoking (including vaping and e-cigarettes) is not allowed on company premises.

“We recognise that our business activities and policies have an impact on the environment, and we are committed to taking account of the environmental and ethical effects of our policies



Use of computers, internet, phones and email

The security of our information and IT systems is critical.

Many colleagues will have access to Post Office systems, information and devices such as laptops and mobile phones. It's really important that anyone who accesses them knows how to keep them secure by following the requirements in the [Acceptable Use](#) policy. For example, these devices must

not be left unattended in public areas, screens must always be locked when not in use, and the use of privacy screens should be adopted when working in public areas.

Failure to comply with the [Acceptable Use](#) policy can carry profound consequences for Post Office and individuals. Breaches of the policy or the law may lead to disciplinary action up to and including dismissal.

To help protect our systems and information, you should:

- Classify information in line with our classification standard, as set out in our [Information Classification Standard](#)
- Use complex passwords to protect your access
- Only open emails when you know who they are from and don't click on unknown links or open unexpected attachments
- Don't store Post Office data directly onto your personal devices
- Don't use your Post Office email address or password for accessing third party services such as LinkedIn. Use a different password
- Don't become a victim: if you think an offer is too good, it probably is!
- Only use approved data storage areas, such as one drive. Don't sign up for cloud storage services such as Dropbox
- Never click on links to go to a website where you expect to log on – always go to the website directly
- Safeguard confidential information against abuse or unauthorised disclosure, and comply with laws protecting personal data. See the [Protecting Personal Data policy](#) for more information

If you become aware of any information security issue or incident you should always report it to the IT Helpdesk on **GRO** or email [postofficeservices@postoffice.co.uk](#) **GRO**

Further information can be found on the [Information Protection and Assurance](#) team intranet site. The Acceptable Use policy can be found on the intranet.

Social media

Digital and social media is a key part of modern life.

New digital technologies can help us engage actively with our customers. We can promote what we do and draw on innovative ideas. However, with these benefits comes greater responsibility.

As more colleagues can access the internet at work both on personal and official devices, it is important that we maintain the highest levels of propriety at all times. We must always act in a way that does not compromise the trust and confidence of our customers or the standards of behaviour expected of us.

Colleagues are free to use social and other digital media in their own time. Social media is a public forum and the boundaries between professional and personal can become blurred – so it's important that we exercise particular care to ensure:

- Post Office brands or logos are not used or altered without prior permission
- Copyright and fair usage laws and restrictions are respected and observed
- Social media is not used to offend, harass or bully people
- We must not disclose official information relating to clients, partners or suppliers without the prior authority of the business
- You must not appear to be endorsing any product or service (including retweeting comments)

The simple rule to remember is that the principles covering the use of social and other digital media in both work, and in a personal capacity, are the same as those contained in this Code of Business Standards and company policies that apply for any other activity.

Engaging with the media

Where a colleague is asked to make a comment about Post Office in a published form external to the business, such as a newspaper, magazine, journal, radio, television or a website, they must direct the request to our Press Office. They can be contacted on [pressoffice@postoffice.co.uk](#) or [GRO](#).

Political activity

Colleagues have the right to participate as an individual in political activities.

However, these activities are conducted as an individual and not as a representative of Post Office. Post Office is a politically neutral organisation and our reputation must not be compromised by your interest, affiliation or activities to a political party's pressure groups or other causes.

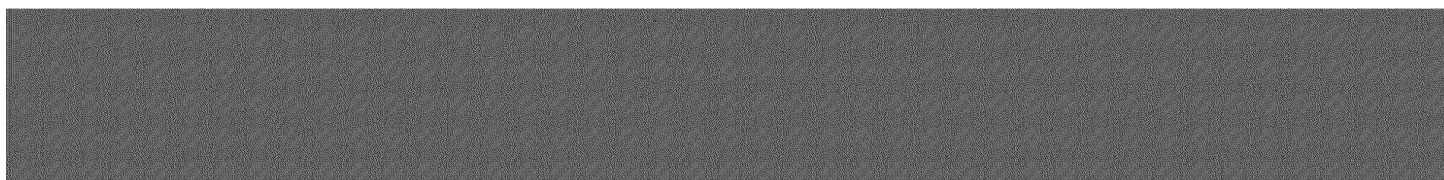
Conflicts of interest

We ensure that information received during our business dealings is not used inappropriately for corporate or personal gain, or any other purpose except that for which it is given.

If you feel that you might have a potential conflict of interest as per the [Conflict of Interests](#) Policy, inform your line manager and seek their advice if you are unsure. Be open and frank about any outside activity or business you are involved in which may conflict with Post Office or your duties as an employee.

The essential principles are:

- You must not do anything which conflicts with your duty as an employee or agent of the company, or use your official position for private advantage
- You must declare any outside employment, directorship or material shareholding, and these must not be contrary to the company's commercial interest or bring it into disrepute
- Your actions as an employee or agent at work must not be improperly influenced by any relationship (e.g. with relatives, friends, marriage, partners or membership of any social, religious or political association) or by any personal or financial consideration
- No one should exploit their personal or family relationship with any colleague for any gain including to themselves or others
- If you receive a fee from an outside source for performing a service which forms part of your official duties or takes place in business time, e.g. giving an interview or lecture, you must report it to your manager. You will normally be expected to pay the money to Post Office or to a charity connected with it
- If the service arises from your work but is not directly connected with it and is given in your own time, you



Gifts and sponsorship

"You must not accept any gift, payment or inducement that might influence (or seek to influence) your actions as

The giving and receiving of gifts must be reported and approved, and ordinarily be below £100 per person on value. Items costing £20 or less, such as pens, calendars, diaries, notepads and paperweights do not need to be reported and approved.

You can find out more by reading the [Anti-Bribery and Corruption](#) policy. This can be found on the Policies page of the intranet.

- You must obtain prior approval from your line manager before accepting or giving any gift over £20.
- You must not accept any gift, payment or inducement that might influence (or seek to influence) your action as a Post Office employee. If any such offer is made to you, you must Record full details via the online form, found [here](#)
- You must not accept cash or cash equivalent (e.g. Gift Cards)
- Equally, you must not offer any bribe or inducement to anyone else
- You must not ask for or accept sporting or charitable sponsorship from an organisation that has (or is seeking) a contract to supply the company, or is in competition with it. You must declare to your manager any plan to accept sponsorship and ask if there is any conflict

If an employee, consultant or third party working with the group acts outside of this procedure, they will be subject to disciplinary action up to and

Hospitality and entertainment

Hospitality may only be given and accepted where it has a clear and demonstrable link with a legitimate business purpose, e.g. an organised event or a meal at which business is to be discussed.

In relation to offers of hospitality, numbers on both sides should be limited to those whose presence is necessary to progress the business in hand.

Maintaining our standards means the giving and receiving of hospitality and entertainment is subject to the following rules:

- You must obtain prior approval from your line manager before accepting or giving hospitality
- The hospitality must be reasonable (not lavish or extravagant), proportionate to its purpose and must ordinarily be below £200 per person in value – if over £200 it must also be approved by your GE member.
- You must record full details of all hospitality offered or accepted via the online form found [here](#)

You should be aware of the risk that accepting any hospitality and entertainment could compromise your performance of official business, or might reasonably appear to have improperly influenced a business decision.

Use sound judgement and exercise restraint. If you are still unsure about the standards required of you, consult your manager or view the [Anti-Bribery and Corruption](#) policy; this can be found on the Policies page of the intranet.

If an employee, consultant or third party working with the group acts outside of this procedure, they will be subject to disciplinary action up to and including dismissal for gross misconduct/termination of contract.

Fraud and financial crime

We seek to comply fully with relevant legislation.

We take protecting our customers and their information extremely seriously. We invest significantly in activities to detect, deter and prevent all aspects of financial crime, either committed on Post Office, or where Post Office might be used unknowingly to facilitate such action.

- We aim to protect our customers, maintain value for our shareholders and assist society in combating crime by preventing criminals from benefiting from their activities and proceeds
- We promote high ethical standards and have a zero tolerance for circumvention of our fraud and financial crime policies
- Our colleagues are supported by mandatory training to develop their

understanding of financial crime risks including Anti-Money Laundering, Counter Terrorist Financing, Sanctions,

Politically Exposed Persons and Anti-Bribery and Corruption regulation

We operate systems and controls designed to ensure that our products and services are not abused for the purposes of laundering the proceeds of crime. Full details are available in the [Anti-Money Laundering and Counter Terrorist Financing](#) policy or the [Financial Crime](#) policy. These policies can be found on the Policies page of the intranet.

Risk management

Effective risk management is integral to the management of our business

Our risk management processes and practices are intended to help you make better informed decisions, increase the likelihood of meeting our strategic objectives, achieve customer excellence and safeguard our business interests. Effective risk management is demonstrated by how we behave – considering risk in everything we do – from decision-making, to operational management. We encourage people to consider and assess risks, manage them and be transparent throughout.

Modern slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

- Post Office is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing the systems and controls set out in our Modern Slavery Statement with the aim of
- ensuring that modern slavery is not taking place anywhere in our own business or in any of our supply chains
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains

is the responsibility of all Post Office employees at all levels, as well as of its directors and officers. Our Modern

Slavery statement can be found on our website [here](#).

If you witness any signs of modern slavery within our business or supply chains, you should raise your concerns via our Speak Up line on **GRO**

Consequences of non-compliance for the code of business standards

Compliance to Post Office Code and policies is not optional.

It is everyone's responsibility to follow our Code of Business Standards and the various related policies.

- Failure to comply with company policies and the law can carry profound consequences for Post Office and potentially for you
- Where non-compliance with the Code, company policies or the law has been identified in accordance with established company investigatory procedures, we will take swift and decisive action against an offending party, up to and including, the termination of individual and or third party contracts as appropriate

Post Office does not tolerate any form of retaliation against colleagues or third parties who have made reports, in good faith, of threatened, ongoing, past or suspected breaches of this Code of Business Standards

Making proper decisions and seeking help

At Post Office, we set ourselves exacting standards. All our stakeholders, and others with whom we work, have an expectation that they will be treated professionally.

Even with good judgement and the best intentions, we may not always know the most appropriate course of action to take. The Code, along with our other company policies, is designed to help us make proper decisions.

If you are faced with a dilemma, after reviewing the relevant parts of the Code, ask yourself a few questions to help make the right decision:

- Am I adhering to the Code, other policies and procedures?
- Am I being honest?
- What would others think of my actions?
- How might my decision affect others?
- Would I feel comfortable if my actions were reported in the media?

- How would my decision impact on Post Office reputation?

If you are still unsure as to the right thing to do, you should talk with your manager and discuss your questions and concerns.

We all share a responsibility to report concerns of actual or potential breaches of the Code of Business Standards, company policies and the law.

If you witness or otherwise learn about the company's standards and reputation being put at risk by unethical or even criminal behaviour, you must immediately, and without investigating, report it.

If you feel you can't talk to your own manager and want to speak to someone confidentially, please contact the Speak Up line on **GRO**. More information can be found in the Whistleblowing Policy available on the Policies page of the intranet. You can also email whistleblowing@ **GRO**

DOCUMENT CONTROL RECORD

SUMMARY			
GE Policy Sponsor	Policy Owner	Policy Implementer	Policy Approver
Group HR Director Mohinder Kang	Employee Relations and Policy Director Lee Kelly	Head of Employee Relations Janene Mellor	Group HR Director Mohinder Kang
Version	Document Review Period	Policy – effective date	Policy location
1	24 Months	08/01/2018	UK

REVISION HISTORY			
Version	Date	Changes	Approved by
2	01/10/18	Removed reference to B&H policy and included Dignity at Work	Janene Mellor
3	17/12/18	Minor amends to Gifts and Sponsorship and Hospitality and Entertainment	Sally Smith
4	08/04/19	Updated hyperlinks	Janene Mellor

DOCUMENT DISTRIBUTION STATUS			
Distribution	Mark x as appropriate	Document Sensitivity	Mark x as appropriate
Internal	x	Non-sensitive	x
External		Sensitive	

QUALITY STATEMENT	
Quality Control	Next Review Date
This document is periodically reviewed, and at least every 2 years from the last effective date. This policy has been reviewed against the latest Post Office policy standards and legislative requirements.	Jan 2020

