



GROUP POLICIES

Whistleblowing Policy

Version – V5.4

Chief Executive's Endorsement

The Post Office Group is committed to doing things correctly. Our Values and Behaviours represent the conduct we expect. This Policy supports these to help us ensure that colleagues know how to report concerns regarding wrongdoing in the public interest and that they can do so without fear of retribution.



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1. Overview

1.1. Introduction by the Policy Owner

The MLRO & Head of Financial Crime and the Group Compliance Director have overall accountability to the Board of Directors to oversee that a positive whistleblowing culture is proactively encouraged throughout Post Office and the current arrangements are challenged and assessed for areas of continuous improvement. The Policy Sponsor and Owner are accountable for the implementation of controls ensuring Post Office meets its Whistleblowing obligations. Whistleblowing is an agenda item for the Audit and Risk Committee and the Post Office Board is updated as required.

1.2. Purpose

This Policy has been established to set the minimum operating standards relating to the management of Whistleblowing throughout the Group. It is one of a set of policies¹ which provide a clear risk and governance framework and an effective system of internal control for the management of risk across the Group. Compliance with these policies supports the Group in meeting its business objectives and to balance the needs of shareholders, Staff and other stakeholders.

1.3. Core Principles

In order to encourage Whistleblowing and provide appropriate protections to Whistleblowers, the governance arrangements described in this Policy are based upon the following core principles:

- Post Office will treat Whistleblowing disclosures consistently, fairly, appropriately and professionally;
- To encourage the reporting of any concerns as soon as possible in the knowledge that Post Office will take all concerns raised seriously and investigate fully, and that the confidentiality of all individuals will be respected;
- To provide guidance as to how to raise those concerns;
- To provide Whistleblowers reassurance that all genuine concerns are raised without fear of reprisals, even if they turn out to be mistaken;
- Post Office is committed to and oversees the implementation of the Policy in line with the Group's risk appetite. The Policy and associated procedures for use by those handling whistleblowing reports (the "**Whistleblowing Procedures**") (set out in this document where relevant²) are proportionate to the risks and complexity of the Group; and
- Post Office undertakes a training and awareness program to ensure all employees are aware of the Whistleblowing policy and procedure.

If you need further information about this Policy or wish to report an issue in relation to this Policy, please contact the Policy sponsor or Policy owner.

¹ The full set of policies can be found at: <https://poluk.sharepoint.com/sites/thehub/SitePages/Key%20policies.aspx?web=1>

² The Whistleblowing Procedures will be provided internally to those handling Whistleblowing reports.

1.4. Definitions

“Employee” and **“Staff”** means an individual who has entered into or works under (or, where the employment has ceased, worked under) a contract of employment or any other relevant contract, as defined in sections 230(2) and (3) of the Employment Rights Act 1996, with Post Office or the Group or is defined as a “worker” under section 43K Employment Rights Act 1996.

“Post Office” and **“Group”** mean Post Office Limited and any wholly owned subsidiary that formally adopts this Policy.

“Whistleblowing” refers to the act of a person (the **“Whistleblower”**) making a disclosure that the Whistleblower reasonably believes is (a) in the public interest, and (b) regarding past, present or likely future wrongdoing that falls into one or more of the following categories:

- criminal offences (this may include types of financial impropriety such as fraud)
- failure to comply with an obligation set out in law (including regulatory breaches)
- miscarriages of justice
- endangering of someone’s health and safety
- damage to the environment
- covering up wrongdoing in the above categories
- a breach of the Post Office’s policies and procedures
- behaviour that harms or is likely to harm the reputation or financial well-being of the Post Office

1.5. Application

This Policy is applicable to all Staff within the Group and outlines the manner in which Post Office will encourage, receive and investigate incidents of Whistleblowing and the protections provided for Whistleblowers by law.

There are also corresponding Whistleblowing Procedures for those handling reports.

In order to encourage reporting of wrongdoing, Post Office will, where appropriate, and to the extent possible, follow equivalent principles to encourage, receive and investigate incidents of Whistleblowing by Postmasters (whether limited companies, partnerships, limited liability partnerships or individuals), Agent Assistants, and members of the public.

1.6. Legislation

The Group seeks to comply with all relevant UK legal and regulatory requirements including (but not limited to) the following legislation as amended or supplemented from time to time:

- Employment Rights Act 1996
- Public Interest Disclosure Act 1998

1.7. How to Report Whistleblowing

Post Office supports and promotes a number of reporting mechanisms:

- The Whistleblower's line manager
- A senior member of the HR Team
- Direct to the Whistleblowing Manager ([HYPERLINK "mailto:[GRO]"])
- Via a complaint to a front line team, e.g. customer complaints, BSC and Grapevine. These may be verbal or written communications.
- Contacting the "Speak Up" line, a confidential reporting service which is run by an independent company NAVEX Global (formerly Expolink Europe Ltd)

Any Post Office Staff who suspects that there is a breach of this Policy should report this without any undue delay, again, through any of the reporting mechanisms set out above.

Information and contact details

Speak Up line:

- Telephone Number: [GRO]
- [HYPERLINK "http://postoffice.ethicspoint.com/"] which is a secure on-line web portal

Grapevine:

24/7 Security Support Centre provided by Kings Ltd. Grapevine provide security advice and record all security incidents across the business, this includes burglaries, robberies and the reporting of suspicious activity.

- Telephone Number: [GRO]
- E-mail: [HYPERLINK "mailto:[GRO]"]]

NBSC:

Branch Support Centre (BSC) is a helpline and the first port of call for Post Office branches if they have any operational query or require assistance.

- Telephone Number: [GRO]
- E-mail: [HYPERLINK "mailto:[GRO]"]]

Customer Support Team:

Complaints handling team based in Chesterfield. The team address complaints reported into Post Office via various channels, including post and telephone.

- E-mail: [HYPERLINK "mailto:[GRO]"]]

Executive Correspondence Team:

This team handles all complaints addressed directly to the Group Executives. The team liaise with various stakeholders within the business in order to resolve complaints.

- E-mail: [HYPERLINK "mailto:[GRO]"]]

What information needs to be provided?

The Whistleblower does not need to provide evidence for Post Office to look into the concerns raised, and reports can be made:

- openly,
- confidentially - the individual (or entity in the case of a limited company, partnership or limited liability partnership) making the report gives their or its name and the person

handling the report will try to respect confidentiality where possible (subject to exceptions described in paragraph 1.8), or

- anonymously – reports made anonymously are taken seriously but Post Office encourages open reporting. Without certain details, it may not be possible to investigate a report as thoroughly and/or provide feedback on the progress or outcome of the investigation.

Difference between Whistleblowing and other complaints

This Policy should not be used by Staff wishing to raise complaints relating to their own personal circumstances, such as the way they have been treated at work, rather than a matter in the public interest that meets the definition of Whistleblowing set out in this Policy. Grievances and matters such as bullying and harassment should be raised in accordance with the procedures set out in the appropriate HR policy.

The following table sets out examples of events that might prompt the making of a Whistleblowing disclosure.

Whistleblowing	Not whistleblowing
Actions that put colleagues or customers health and safety in danger - A branch manager refuses to follow security procedures when admitting visitors into the secure area of a branch, putting staff at risk	A member of staff tells you they are being constantly criticised by one particular manager. The manager seems to pick on their work and does so in front of others - – this is covered by the Grievance Policy
Disclosure of a personal grievance may count as a legitimate complaint if it's in the public interest, for example on the grounds of racial, sexual or disability discrimination – A staff member complains that the branch manager has made racist/discriminatory remarks to other members of staff and members of the public.	You believe that you are not provided with training and development opportunities because of your age or sex – this is covered by the Dignity at Work Policy
An individual identifies that an invoice from a company has a company address that is the home address of a company director or senior manager, and they do not believe this is being handled within Post Office Policy.	A manager believes they have been given an unfair PDR assessment, and they are not happy with the outcome of discussions with their line Manager – this is covered by the Grievance Policy
It is suspected that Post Office is breaching legal or regulatory requirements and that this is being covered up - A staff member reported to their manager that the dates on the fire extinguishers within the building have expired but still no action has been taken.	A clerk complains that they feel they are being bullied by their line manager - this is covered by the Dignity at Work Policy
A staff member has noticed their line manager changing the teams SLA results to show better figures when reporting –	You are suspicious of a customer coming in to purchase large amounts of foreign currency on a regular basis – this is

This is potential fraud as this could lead to the Post Office declaring false figures	covered in the Anti Money Laundering and Counter Terrorist Financing Policy.
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If an individual (or entity in the case of a limited company, partnership or limited liability partnership) is uncertain about whether something is within the scope of this Policy they or it should seek advice from the Whistleblowing team, whose contact details are set out in this Policy.

1.8. Protecting the Whistleblower (Your Legal Rights)

Post Office has a statutory obligation to protect Whistleblowers and will endeavour to support any Whistleblower who or which raises genuine concerns under this Policy in an appropriate manner, even if they or it turn out to be mistaken. In respect of a certain class of person ("Staff" as defined under this policy) Post Office has a statutory obligation not to subject such persons to detriment or to dismiss them for Whistleblowing.

Where a member of Staff is subject to a Post Office settlement agreement, any clauses within it will not prevent the member of Staff from Whistleblowing. This should in any event be made clear by the terms of the settlement agreement itself and staff should receive independent advice in relation to those terms when entering into a settlement agreement.

Post Office will, at all times, respect confidentiality and protect the Whistleblower's identity, except where:

- It may be appropriate or necessary to share this information with a relevant stakeholder.
- Disclosure is allowed or required by law.

There is no requirement for a Whistleblower to provide contact information, but not providing this information may reduce Post Office's ability to undertake a thorough investigation into the concerns raised. Please note that making a disclosure anonymously means it can be more difficult for an Employee or Staff member to qualify for protections as a Whistleblower, as there would be no documentary evidence linking the individual to the disclosure for the Employment Tribunal to consider.

Post Office will take all reasonable steps to ensure that Whistleblowers who are Employees or Staff do not suffer any detrimental treatment as a result of raising a genuine concern in an appropriate manner. Detrimental treatment includes disciplinary action, dismissal, threats or other unfavourable treatment connected with raising a concern. Serious action, typically disciplinary action, will be taken against any individual who threatens or retaliates against Whistleblowers in any way.

If a Whistleblower who is an Employee or member of Staff believes that they have suffered any such treatment, they should inform the Whistleblowing Manager immediately. The Whistleblowing Manager or nominated deputy will take all necessary steps at the earliest opportunity to address any victimisation, which may include working with the HR team to put appropriate remedial measures in place. If the matter is not addressed the Whistleblower should raise it formally using Post Office's Grievance procedure.

In all cases the Whistleblower's concerns will be treated sensitively and in confidence.

1.9. The Whistleblowing Champion and Management of Reports

Post Office has appointed an independent Non-Executive Director as Whistleblowing Champion to provide governance and oversight that the integrity of Post Office work, finances and wider obligations to the public are upheld at all times.

The Whistleblowing Champion has responsibility for ensuring and overseeing the integrity, independence and effectiveness of this Policy and procedures on Whistleblowing including those policies and procedures intended to protect Whistleblowers from being victimised because they have made a disclosure that constitutes Whistleblowing. The Whistleblowing Champion oversees that:

- A positive whistleblowing culture is proactively encouraged throughout Post Office
- The current arrangements are challenged and assessed for areas of continuous improvement and best practice
- Whistleblowers are always supported and protected when raising a concern
- Barriers to speaking up are uncovered and addressed
- The Whistleblowing team, senior managers and leaders receive training on the importance of Whistleblower support
- Root cause analysis is undertaken for all cases and issues, so that continual improvements can be made in the relevant areas

The day to day management of Whistleblowing reports and processes is overseen by the MLRO & Head of Financial Crime (the Whistleblowing Policy Owner) via the Whistleblowing Manager and nominated deputies who receive all internal reports raised, regardless of the channel used, review any concerns raised and determine the best course of action, if any. They may ask for further information in order to make this decision.

The Whistleblowing Manager is also responsible for Post Office's overall Whistleblowing Policy and governance framework, which ensures that reports are investigated and responded to in a timely manner. They are responsible for determining the appropriate parties who should investigate the allegations raised, taking into account the sensitivities and seriousness of the report and the need to protect the Whistleblower.

The Whistleblowing Manager is also responsible for identifying key trends or issues, and providing assurance to the Board that the policy is complied with.

1.10. Responding to Whistleblowing Reports

In all instances any Whistleblowing reports, regardless of reporting method, will be responded to within 5 working days and passed onto the Whistleblowing Manager.

All reports will be fully reviewed and investigated and any information, including emails, or records of telephone calls, letters, or any other form of communication will be stored securely and confidentially.

Any investigations will be carried out in accordance with the Investigations Policy which is available on the Post Office Intranet and sets out specific Whistleblowing considerations for investigations.

The time frame for investigating the reports raised is dependent on the nature of the report and the investigation required, however, the Whistleblower will be given feedback via the reporting channel they have used, or have given the Whistleblowing Manager permission to use (Speak Up line, e-mail or phone call) during the investigation and once it has been concluded.

Post Office will endeavour to give Whistleblowers feedback in the context of a particular matter, subject to other considerations such as applicable regulations or Post Office's legal requirements.

Where a report received is anonymous, Whistleblowers will not ordinarily be able to receive feedback and details of action taken by Post Office may be limited. However, feedback in this instance could be sought through a telephone appointment or by using an anonymised email address.

1.11. External Disclosures

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace and to demonstrate Post Office's commitment to listen to the concerns of Staff. In most cases Whistleblowers should not find it necessary to alert anyone externally.

However, the law recognises that in some circumstances it may be appropriate for Whistleblowers to report their concerns to an external body such as a regulator. It will rarely, if ever, be appropriate to alert the media at least without informing Post Office or an external agency first and usually in that order.

Advice

We strongly encourage Whistleblowers to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect (formerly Public Concern at Work) have a list of prescribed regulators for reporting certain types of concerns. Their contact details are as follows:

Helpline:
Website: www.protect-advice.org.uk

Protect operates free, confidential advice to people concerned about crime, danger or wrongdoing in the workplace. All Protect advisors are legally trained and supervised by qualified lawyers and their advice is fully confidential and subject to legal privilege. All information, including emails, or records of telephone calls, letters, or any other form of communication with Protect advisors is stored in a fully encrypted format.

Advice may also be sought from:

- the Government (general guidance is available on [[HYPERLINK "https://www.gov.uk/whistleblowing" \]](https://www.gov.uk/whistleblowing));
- Trade Unions; and/or
- Advisory, Conciliation and Arbitration Service (ACAS) (contact details are available on [[HYPERLINK "http://www.gov.uk/pay-and-work-rights" \]](http://www.gov.uk/pay-and-work-rights))

Advice may be sought which would, among things, assist Whistleblowers to verify the position that a personal grievance is not generally regarded as a protected disclosure.

Disclosures to the FCA or PRA

Post Office Management Services (POMS) is directly regulated by the Financial Conduct Authority (FCA), and Post Office Limited is an appointed representative of Bank of Ireland (UK) Limited which is authorised by the Prudential Regulation Authority (PRA). As such individuals may decide to whistleblow directly to the FCA or PRA, and can do so by using one of the following channels.

Body	Contact details
FCA's Whistleblowing Service	Helpline: [HYPERLINK "tel: [GRO]] E-mail: [HYPERLINK "mailto: [GRO]] Website: [HYPERLINK "http://www.fca.org.uk/site-info/contact/whistleblowing"] Address: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN
PRA's Whistleblowing Service	Helpline: [HYPERLINK "tel: [GRO]] E-mail: [HYPERLINK "mailto: [GRO]] Website: www.bankofengland.co.uk/prudential-regulation/whistleblowing-and-the-pra Address: Confidential reporting (whistleblowing) IAWB team, Legal Directorate, Bank of England, Threadneedle Street, London, EC2R 8AH

Contacting the FCA or the PRA is not conditional on a Whistleblowing report first being made using Post Office's internal arrangements (nor is it necessary for a disclosure to be made to Post Office in the first instance), and it is possible to utilise Post Office's internal arrangements and contact the FCA or PRA simultaneously or consecutively.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier, agent, Postmaster or service provider. In some circumstances the law will protect Whistleblowers if they raise the matter with the third party directly. However, we encourage Whistleblowers to report such concerns internally in the first instance.

2. Risk Appetite and Minimum Control Standards

2.1. Risk Appetite

Risk Appetite is the extent to which the Group will accept that a risk might happen in pursuit of day to day businesses transactions. It therefore defines the boundaries of activity and levels of exposure that the Group are willing and able to tolerate.

The Group takes its legal and regulatory responsibilities seriously and consequently has³:

- **Tolerant risk appetite** for Legal and Regulatory risk in those limited circumstances where there are significant conflicting imperatives between conformance and commercial practicality
- **Averse risk appetite** for litigation in relation to high profile cases/issues
- **Averse risk appetite** for litigation in relation to Financial Services matters
- **Averse risk appetite** for not complying with law and regulations or deviation from business' conduct standards for financial crime to occur within any part of the organisation
- **Averse Risk Appetite** in relation to unethical behaviour by our staff.

The Group acknowledges however that in certain scenarios even after extensive controls have been implemented an action may still sit outside the agreed Risk Appetite.

2.2. Policy Framework

Post Office has established a suite of policies and procedures, on a risk sensitive approach which are subject to an annual review. The policy suite is designed to comply with applicable legislation and regulation. The Whistleblowing Policy should be considered and read in conjunction with other policies where relevant. These may include the Financial Crime Policy, the Anti-Bribery & Corruption Policy, Health & Safety Policies and HR Policies where relevant.

³ The Risk appetite was agreed by the Groups Board January 2015

2.3. Minimum Control Standards

A minimum control standard is an activity which must be in place in order to manage the risks so they remain within the defined Risk Appetite statements. There must be mechanisms in place within each impacted business unit to demonstrate compliance. The minimum control standards can cover a range of control types, i.e. directive, detective, corrective and preventive which are required to ensure risks are managed to an acceptable level and within the defined Risk Appetite.

The table below sets out the relationships between identified risk and the required minimum control standards in consideration of the stated risk appetite. The subsequent pages define the terms used in greater detail:

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
Receipt and investigation of Whistleblowing reports	Failure to meet legal and regulatory requirements	Directive Control: Post Office must nominate a Whistleblowing Champion to provide governance and oversight, ensuring that all reports are fully investigated and that any appropriate corrective action is undertaken.	Post Office CEO and Board must nominate the Whistleblowing Champion.	Ongoing
		The Whistleblowing Manager must provide a Whistleblowing report to the R&CC and ARC at least annually.	MLRO & Head of Financial Crime is responsible for providing report.	Annually
		Any serious Whistleblowing concerns must be promptly escalated to the Chairman of the Post Office Audit and Risk Committee.	MLRO & Head of Financial Crime	Ongoing
		Preventative Control: All Employees and Staff are trained and the policy is available to them	MLRO & Head of Financial Crime	Training must be provided at least annually and within 30

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
		<p>The Whistleblowing Manager must ensure that appropriate arrangements are in place to ensure that Whistleblowing reports are addressed promptly including during absences.</p> <p>Communications and awareness provided to all Employees and Staff.</p> <p>Corrective Control The Whistleblowing Manager must escalate Whistleblowing reports to the appropriate Investigating manager for investigation to take place.</p> <p>The nominated Investigating manager responsible for conducting the investigation must report the findings back to the Whistleblowing Manager.</p>	<p>Whistleblowing Manager</p> <p>MLRO & Head of Financial Crime</p> <p>Whistleblowing Manager</p> <p>Investigating manager</p>	<p>days of joining Post Office</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
Breach of confidentiality	Failure to ensure confidentiality for the Whistleblower	<p>Preventative Control: Whistleblowing Policy is robust and up to date.</p> <p>Confidential Speak Up line reports are shared only with the Whistleblowing Manager and nominated deputies</p>	<p>Whistleblowing Manager</p> <p>MLRO & Head of Financial Crime is responsible for ensuring that reports are shared with the appropriate persons.</p>	<p>Ongoing</p> <p>Ongoing</p>

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
		<p>Whistleblowing email inbox access is restricted to the Whistleblowing Manager and nominated deputies</p> <p>Whistleblowing Manager must put arrangement in place to protect the confidentiality of the Whistleblower during investigations</p> <p>Corrective Control: All incidents of breaches are escalated to the MLRO & Head of Financial Crime to review and take necessary actions.</p>	<p>Whistleblowing Manager</p> <p>Whistleblowing Manager</p> <p>Whistleblowing Manager to escalate to the MLRO & Head of Financial Crime.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
Incorrect handling of Whistleblowing report	An individual may raise a Whistleblowing report with other individuals in the Group. Details may then be shared with various stakeholders before being passed onto the Whistleblowing Manager.	<p>Preventative Control: Training provided to contact teams to identify potential Whistleblowing reports and ensure these are correctly handled, e.g.:</p> <ul style="list-style-type: none"> • Grapevine, • NBSC, • Customer Support, and • Executive Correspondence Team. <p>Communications and awareness provided to all Employees and Staff.</p> <p>Corrective Control: All incidents of breaches are escalated to the MLRO & Head of</p>	<p>Whistleblowing Manager</p> <p>MLRO & Head of Financial Crime</p> <p>Whistleblowing Manager to escalate to the MLRO & Head of Financial Crime.</p>	<p>Annually and within 30 days of joining the Post Office</p> <p>Ongoing</p> <p>Ongoing</p>

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
		Financial Crime to investigate and take appropriate actions.		
Insufficient Information	Failure to capture/report sufficient information about the issue may mean that the underlying issue cannot be properly investigated and resolved	<p>Directive Control: Employees and Staff are encouraged to report issues and provide full information and their contact details, where they feel able to do so.</p> <p>Corrective Control: All reports, including those where insufficient information has been provided and no further action was taken are recorded on the Whistleblowing database, which is reviewed for trends and issues.</p>	<p>Whistleblowing Champion and Whistleblowing Manager to encourage Employees and Staff to do so.</p> <p>Whistleblowing Manager</p>	<p>Ongoing</p> <p>Ongoing</p>
The 'Speak Up' Service	Failure to effectively record Whistleblowing reports and pass onto the Whistleblowing Manager, due to factors such as resource or IT failure.	<p>Preventative Control: The Whistleblowing Manager must review the effectiveness of the service provided by NAVEX Global (formerly known as Expolink Europe Ltd) at least annually.</p> <p>The Whistleblowing Manager must review the effectiveness of the processes operated by Grapevine, BSC, Customer Support, and The Executive Complaints Team at least annually to ensure that whistleblowing reports are</p>	<p>MLRO & Head of Financial Crime to ensure review takes place.</p> <p>MLRO & Head of Financial Crime to ensure review takes place.</p>	<p>Annually</p> <p>Annually</p>

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
		identified and communicated promptly.		
Treatment of Whistleblowers	Breach of Whistleblowing guidelines such that a Whistleblower suffers prejudice, detriment or dismissal as a result of making a Whistleblowing report	<p>Preventative Control Training must be provided to all people managers as part of their induction process as a manager and on appointment to Post Office.</p> <p>Annual training must be provided to all Post Office Employees and Staff to remind them of the protections available to Whistleblowers and the importance of identifying and reporting wrongdoing</p> <p>The Code of Business Standards must refer to the Whistleblowing policy and must be provided to all new joiners as part of their induction programme.</p>	<p>Whistleblowing Manager and People Training Manager</p> <p>Whistleblowing Manager and People Training Manager</p> <p>Whistleblowing Manager and People Training Manager</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
Line managers	An Employee or member of Staff may not want to make a report to their line manager in case it affects their relationship or where the disclosure involves the line manager.	<p>Preventative Control Employees and Staff should be made aware of the multiple ways to disclose a report and also that reports can be anonymous.</p> <p>Training must be provided to line managers as part of their induction process as a manager and on appointment to Post Office regarding the handling of</p>	<p>Whistleblowing Manager and People Training Manager</p> <p>Whistleblowing Manager and People Training Manager</p>	<p>Ongoing</p> <p>Ongoing</p>

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
		reports and the importance of encouraging Employees and Staff to make reports.		
Support available to Whistleblowers	Whistleblowers are not supported throughout the process of an investigation	Preventative Control Feedback should be taken from Whistleblowers throughout an investigation to monitor that they feel supported and protected by the Post Office.	Whistleblowing Manager	Ongoing



2.4. Governance Responsibilities

As at the date of approval of this Policy, the Group Compliance Director is the Policy Sponsor and the MLRO & Head of Financial Crime is the Policy Owner, responsible for oversight of the Policy.

The Audit and Risk Committee are responsible for approving the Policy and overseeing compliance.

The Board is responsible for setting the Group's risk appetite.

3. Control

3.1. Policy Version

Date	Version	Updated by	Change Details
April 2016	1.4	Jane MacLeod	Sponsors review and sign-off
August 2017	1.5	Vitor Camara	Annual Review and update.
September 2017	1.6	Thomas Richmond	POL R&CC approval
September 2017	2	Thomas Richmond	Final version approved
June 2018	2.1	Vitor Camara	Annual review and update.
July 2018	2.2	Sally Smith	POL R&CC approval
July 2018	2.3	Sally Smith	POL ARC approval
September 2018	2.4	Sally Smith	POMS ARC approval
September 2018	3	Vitor Camara	Final version approved
June 2019	3.1	Sally Smith	Annual review and update
June 2019	3.2	Sally Smith	Incorporating legal review comments
July 2019	3.3	Sally Smith	POL R&CC approval
September 2019	3.4	Sally Smith	POMS ARC approval
September 2019	4.0	Sally Smith	Final version approved
April 2020	4.1	Sally Smith	Updated with new Speak Up service contact details
June 2020	4.2	Sally Smith	Annual review and update
July 2020	4.3	Sally Smith	POL RCC approval
July 2020	5.0	Sally Smith	Final approval by ARC's
March 2021	5.1	Sally Smith	Amendments following Protect self-assessment and external review by Herbert Smith Freehills
March 2021	5.2	Sally Smith	Amends after Group Director of Compliance review
March 2021	5.3	Sally Smith	POL R&CC approval
March 2021	5.4	Sally Smith	POL ARC approval

3.2. Policy Approval

Group Oversight Committee: Risk and Compliance Committee and Audit and Risk Committee

Committee	Date Last Approved
POL R&CC	13 th July 2020
POL ARC	27 th July 2020
POMS ARC	22 nd July 2020
Committee	Date v.6.0 Approved
POL R&CC	16 th March 2021
POL ARC	30 th March 2021
POMS ARC	

Policy Sponsor: Group Director of Compliance

Policy Owner: MLRO & Head of Financial Crime

Policy Author: MLRO & Head of Financial Crime

**Next Reviewxt March 2022Ma
review:**

Company Details

Post Office Limited and Post Office Management Services Limited are registered in England and Wales. Registered numbers 2154540 and 08459718 respectively. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

Post Office Management Services Limited is authorised and regulated by the Financial Conduct Authority (FCA), FRN 630318. Its Information Commissioners Office registration number is ZA090585.

Post Office Limited is authorised and regulated by Her Majesty's Revenue and Customs (HMRC), REF 12137104. Its Information Commissioners Office registration number is Z4866081.