

# Group policy

## Speak Up Policy

Version 9.0



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# 1 Overview

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## 1.1 Introduction by the standard owner

The Director of Assurance & Complex Investigations is the Policy Owner and, together with the Group Legal Director, has overall accountability to the Board of Directors to oversee that a Speak Up culture is proactively encouraged throughout Post Office Ltd (POL) and the current arrangements are challenged and assessed for areas of continuous improvement. They are accountable for the implementation of controls ensuring POL meets Speak Up obligations. Speak Up is a standing agenda item for the Audit and Risk Committee.

## 1.2 Purpose

The Policy has been established to set the minimum operating standards relating to the management of Speak Up throughout the Group and risks through Post Office.<sup>1</sup>

It is one of a set of policies which provide a clear risk and governance framework and an effective system of internal control for the management of risk across Post Office. Compliance with these policies supports the Post Office in meeting its business objectives and to balance the needs of shareholders, employees, and other stakeholders.

## 1.3 Core principles

'Speak Up' is POL's whistleblowing service, enabling individuals to raise concerns in confidence (and anonymously if preferred). POL encourages speaking up and raising concerns or identify wrongdoing. It is the right thing to do for our colleagues and Postmasters and helps protect our reputation. We commit to providing appropriate protections to Speak Up Reporters. The governance arrangements described in this Policy are based upon the following core principles:

- POL will treat Speak Up disclosures consistently, fairly, appropriately, and professionally and afford the protections from the Public Interest Disclosure Act 1988; Reporters raising a genuine concern will be protected from reprisals, even if they turn out to be mistaken;
- Encourage the reporting of any concerns as soon as possible in the knowledge that POL will take all concerns raised seriously and investigate them fully. Concerns will be kept confidential and disclosed only on a 'need to know' basis;
- The Speak up team will seek to not reveal a Reporters' identity outside of the team without the prior agreement of the Reporter. However, there may be occasions when details need to be shared, where there is a risk of harm to the reporter or others, or where we need to do so for legal or regulatory reasons, or are required to disclose documents to the Post Office Horizon IT Inquiry;
- POL will actively promote and publicise how staff can raise those concerns;
- That POL will provide a training and awareness program to ensure all employees are aware of the Speak Up 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.

## Definitions

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<sup>1</sup> In this Policy "Post Office" means Post Office Limited and any wholly owned subsidiary.

**"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"**, **"POL"** and **"Group"** mean Post Office Limited and any wholly owned subsidiary that formally adopts this Policy.

**"Speak Up"** in the context of PIDA refers to the act of a person (the **"Speak Up Reporter"**) making a disclosure that the Reporter 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 POL's policies and procedures
- behaviour that harms or is likely to harm the reputation or financial well-being of the POL

## 1.4 Application

This Policy is applicable to all Staff within the Group and outlines how POL will encourage, receive, and investigate incidents of Speak Up and the protections provided for Staff Speak Up Reporters by law and internal policies.

Procedures for the Speak Up team who handle the reports and those within the A&CI who investigate matter arising from Speak Up report are set out in an internal document called – the Investigator's Manual. This policy doesn't govern how Speak Up matter are investigated, that falls under the Groups Investigations Policy in the same way as any other investigation conducted by A&CI.

In order to encourage reporting of possible wrongdoing, POL will, where appropriate, and to the extent possible, follow equivalent principles to encourage, receive and investigate Speak Up report made by Postmasters (whether limited companies, partnerships, limited liability partnerships or individuals), Postmaster's assistants, and members of the public.

Although covered by the principles of this policy, Postmasters and their assistants are not protected under law to the same extent as POL staff. POL can extend confidentiality protection, but employment protection can only extend to employees. However, a POL employee who subjects anyone, which includes Postmaster's and their staff to a form of retaliation to raising a Speak Up matter, will be dealt with under POL's conduct code.

## 1.5 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



## 1.6 How to 'Speak Up'

POL supports and promotes a number of reporting mechanisms:

- The Speak Up Reporter's line manager
- Contacting the "Speak Up" line, a confidential reporting service which is operated by an independent company, Convercent, on behalf of POL
- Direct to the Speak Up Manager **GRO**
- To a front-line team, e.g. Area Managers, customer complaints, Branch Support Centre and Grapevine.

These may be verbal or written communications.

### Information and contact details

Speak Up line:

- Telephone Number: **GRO**
- <http://speakup.postoffice.co.uk/> which is a secure on-line web portal
- Email direct: **GRO**



Any POL Staff who suspects that there is a breach of this Policy should report this without any undue delay through any of the reporting mechanisms set out above or to the Speak Up Champion, Non-Executive Director, Amanda Burton.

### What information needs to be provided?

There is no definitive list of what should be reported to Speak Up. Although the Speak Up Reporter is not required to provide evidence, they should be able to explain their concern, why they are making the disclosure and any relevant background information they have. Reports can be made:

- openly,
- confidentially –when 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 1.9, or
- anonymously – reports made anonymously are taken seriously, however, POL encourages open reporting as without certain details, it may not be possible to investigate a report as thoroughly as would otherwise be the case and/or provide feedback on the progress or outcome of the investigation.

### Difference between Speak Up 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. Speak Up reporting is a matter of public interest that meets the definition of a Public Interest Disclosure set out in this Policy and statute. Grievances and matters such as bullying and harassment or dissatisfaction with a performance rating 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 Speak Up disclosure.

Speak Up	Not Speak Up
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 <b>may</b> count as a legitimate complaint if it is 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 – This is potential fraud as this could lead to the Post Office declaring false figures	You are suspicious of a customer coming in to purchase substantial amounts of foreign currency on a regular basis – this is covered in the Anti Money Laundering and Counter Terrorist Financing Policy.

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 Speak Up team, whose contact details are set out in this Policy. Where reports are made to the Speak Up team that are not disclosures falling under the team's remit, the reports will be sent to an appropriate team in POL for consideration or the Reporter will be sign-posted by the Speak Up team to the appropriate team e.g. a complaint about an end of year performance review will be directed to the Grievance Policy unless there are PIDA-qualifying characteristics to the report.

## 1.7 External Disclosures

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying possible wrongdoing in the workplace and to demonstrate POL's commitment to listen



to the concerns of Staff. In most cases Speak Up Reporters should not find it necessary to alert anyone externally.

However, the law recognises that in some circumstances it may be appropriate for individuals 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 POL or an external agency first and usually in that order.

#### Advice

We strongly encourage Speak Up Reporters to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, have a list of prescribed regulators for reporting certain types of concerns. Their contact details are as follows:

Helpline: **GRO**

Website: [www.protect-advice.org.uk](http://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 [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing));
- Trade Unions; and/or
- Advisory, Conciliation and Arbitration Service (ACAS) ([www.acas.org.uk](http://www.acas.org.uk))
- Advice may be sought which would, among things, assist Speak Up Reporters 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 report concerns 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: <b>GRO</b> E-mail: <b>GRO</b> Website: <a href="http://www.fca.org.uk/site-info/contact/whistleblowing">www.fca.org.uk/site-info/contact/whistleblowing</a> Address: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN
PRA's Whistleblowing Service	Helpline: <b>GRO</b> E-mail: <b>GRO</b> Website: <a href="http://www.bankofengland.co.uk/prudentialregulation/whistleblowingand-the-pra">www.bankofengland.co.uk/prudentialregulation/whistleblowingand-the-pra</a> 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 Speak Up report first being made using POL's internal arrangements (nor is it necessary for a disclosure to be made to POL in the first instance), and it is possible to utilise POL's internal arrangements and contact the FCA or PRA simultaneously or consecutively.

Speak Up 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 those who Speak Up if they raise the matter with the third party directly. However, we encourage individuals to report such concerns internally in the first instance.

## 1.8 Protecting the Speak Up Reporter (Your Legal Rights)

POL has a statutory obligation to protect qualifying Speak Up Reporters and will endeavour to support anyone who raises genuine concerns under this Policy from detrimental treatment, even if the concern raised is unsubstantiated (not proven) after investigation. In respect of a certain class of person ("Staff" as defined under this policy) POL has a statutory obligation not to subject such persons to detriment or to dismiss them for reporting any wrongdoing via the Speak Up function.

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 Speaking Up. 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.

All concerns raised via the Speak Up channels are treated confidentially. The Speak Up Reporters details, or any other information where their identity could be deduced, will not be shared outside the Speak Up process without their permission, unless required for legal purposes.

There is no requirement for the Speak Up Reporter to provide contact information, however, not providing this information may reduce POL'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 be provided with protections under the PIDA legislation, as there would be no link between the individual and the disclosure.

## 1.9 The Speak Up Champion and Management Reports

POL has appointed an independent Non-Executive Director as Speak Up Champion (the NED).

The Speak Up Champion acts as a point of assurance for the integrity, objectivity, independence, effectiveness, and evolution of the Speak Up function in adherence with the Group Speak Up Policy and associated procedures.

The Speak Up Champion oversees that:

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

The Speak Up Champion will also be an additional point of escalation for feedback or concerns raised about the Speak Up function from other parts of the organisation.

The Director of Assurance & Complex Investigations has oversight of the Speak Up Team as well as investigations that result from Speak up reports.

The Speak Up Manager oversees the day-to-day management of Speak Up reports and Speak Up Team. The Speak Up Manager is also responsible for ensuring that reports are investigated and



responded to in a timely manner. They determine the appropriate parties who should investigate the allegations raised, considering the sensitivities and seriousness of the report.

The Speak Up 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 Speak Up Reports

In all instances any Speak Up reports, regardless of reporting method, will be responded to within 5 working days.

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 Group Investigations Policy and Investigator's Manual. The Speak Up Manager will ensure that investigations are allocated to the appropriate team via A&C's Triage function.

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

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

## 1.11 Other Contact Details

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: **GRO**

BSC:

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: **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: **GRO**

Executive Correspondence Team:

- E-mail: **GRO**

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.

## 2 Risk appetite and required operational standards.

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### 2.1 Risk appetite

Risk Appetite<sup>2</sup> is the extent to which Post Office will accept that a risk might happen in pursuit of day-to-day business transactions. It therefore defines the boundaries of activity and levels of exposure that Post Office are willing and able to tolerate.

The risk tolerance level will be varied against each business unit. Information should be sought from the Central Risk Team with regards to the agreed appetite relevant to the policy being written.

Post Office have a five-scale approach to risk appetite, Averse, Cautious, Neutral, Flexible and Open.

Post Office acknowledges however that in certain scenarios even after extensive controls have been implemented a product or transaction may still sit outside the agreed Risk Appetite. In this situation, a risk exception waiver will be required. (See section 1.4 for further details)

### 2.2 Policy framework

The Speak Up Policy should be considered and read in conjunction with other policies where relevant. These may include the Group Investigations Policy, the Financial Crime Policy, the Anti-Bribery & Corruption Policy, Health & Safety Policies and HR Policies where relevant:

Who must comply?

Compliance with this Policy is mandatory for all Post Office employees<sup>3</sup> subsidiaries and commercial partners and applies wherever in the world the business is undertaken. All third parties who do business with Post Office including consultants, suppliers and business and franchise partners, will be required to agree contractually to this Policy with their own equivalent Policy.

Where material non-compliance is identified the matter must be referred to the Policy Owner and Sponsor. Where required, any investigations will be conducted in accordance with the Investigations Policy. Where it is identified that an instance of non-compliance is caused through wilful disregard or negligence, this may be treated as a disciplinary offence.

The next page sets out the minimum required operational standards that Post Office has implemented to control these risks.

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<sup>2</sup> The Risk appetite was agreed by the ARC May 2023

<sup>3</sup> In this policy "employee" and "staff" means all persons working for the Group or on our behalf in any capacity including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, and contractors.



### 2.3 Policy Required Operational Standards

A required operational standard defines the level of control that must be in place to manage inherent risks so that they remain within the defined Risk Appetite statements. This section of the policy also sets out the Business Area(s) responsible for managing that risk through their controls, and all employees must ensure that they comply with the policy requirements. There must be mechanisms in place within each business unit to demonstrate compliance. The policy required operational standard 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 policy operational standard in consideration of the stated risk appetite. The subsequent pages define the terms used in greater detail:

Risk area	Description of risk	Required operational standard	Business control owners	Frequency
Receipt and investigation of Speak Up matters	Failure to meet legal and regulatory requirements	<b>Preventative control:</b> POL must nominate a Speak Up Champion to provide governance and oversight, ensuring that all reports are fully investigated and that any appropriate corrective action is undertaken.	POL CEO and Board must nominate the Speak Up Champion	Ongoing
		The Speak Up Manager must provide a Speak Up report to the RCC and ARC at least annually.	The Director of Assurance & Complex Investigations is responsible for providing report	Annually
		Any Speak Up concerns must be promptly escalated to the GLD, GGC and the Speak Up Champion.		
		<b>Detective control:</b> All Employees and Staff are trained, and the Policy is available to them	Speak Up Manager	Training must be provided at least annually and within 30 days of joining Post Office
		Must ensure that appropriate arrangements are in	Speak Up Manager	Ongoing

		<p>place to ensure that Speak Up reports are addressed promptly including during absences.</p> <p>Communications and awareness provided to all Employees and Staff.</p> <p>Corrective Control The Speak Up Manager must escalate Speak Up reports to the appropriate Integrity Investigator for investigation to take place.</p> <p>The nominated Investigator is responsible for conducting the investigation must report the findings back to the Speak Up Manager.</p>	<p>Speak Up Manager</p> <p>Speak Up Manager</p> <p>Allocated Investigator within A&amp;CI</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
Breach of confidentiality	Failure to ensure confidentiality for the Speak up Reporter	<p><b>Preventative control:</b> Speak Up Policy is robust and up to date.</p> <p>Confidential Speak Up line reports are shared only with the Speak Up Manager and nominated deputies</p> <p>Speak Up email inbox access is restricted to the Speak Up Manager and nominated deputies</p> <p>Speak Up Manager must put arrangement in place to protect the confidentiality of the Speak Up Report during investigations</p> <p><b>Detective control:</b> All incidents of breaches are escalated to the Head of the Central Investigations Unit to review and take necessary actions.</p>	<p>Speak Up Manager</p> <p>Speak Up Manager is responsible for ensuring that reports are shared with the appropriate persons Speak Up Manager</p> <p>Speak Up Manager</p> <p>Speak Up Manager</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
Incorrect	An individual may raise a Speak Up	<b>Preventative Control:</b>		



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	the Speak Up Manager, due to factors such as resource or IT failure.	effectiveness of the service provided by Convercent at least annually.  The Speak Up 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 Speak Up reports are identified and communicated promptly.	Complex Investigations to ensure review takes place.  Director of Assurance & Complex Investigations to ensure review takes place.	Annually
Treatment of Speak Up Reporters	Breach of Speak Up guidelines such that a Speak Up Reporter suffers prejudice, detriment or dismissal as a result of making a Speak Up report	<b>Preventative Control</b> Training must be provided to all people managers as part of their induction process as a manager and on appointment to POL.  Annual training must be provided to all POL Employees and Staff to remind them of the protections available to Speak Up and the importance of identifying and reporting wrongdoing  The Code of Business Standards must refer to the Speak Up policy must be provided to all new joiners as part of their induction programme.	Speak Up Manager  Speak Up Manager  Speak Up Manager and People Training Manager	Ongoing  Ongoing  Ongoing
Line managers	A Reporter 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.	<b>Preventative Control</b> Employees and Staff should be made aware of the multiple ways to disclose a report and also that reports can be anonymous.  Training must be provided to line managers as part of their induction process as a manager and on appointment to POL regarding the handling of	Speak Up Manager  Speak Up Manager	Ongoing  Ongoing

		reports and the importance of encouraging Employees and Staff to make reports.		
Support available to Speak up Reporters	Speak Up Reporters are not supported throughout the process of an investigation	Preventative Control Feedback should be taken from Speak Up throughout an investigation to monitor that they feel supported and protected by the POL	Speak Up Manager	Ongoing



## 3 Where to go for help

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### 3.1 Additional policies

This Policy is one of a set of policies. The full set of policies can be found on the SharePoint Hub under [Policies](#).

### 3.2 How to raise a concern

Any Post Office employee who suspects that there is a breach in this Policy should report this without any undue delay, staff may:

- Discuss the matter fully with their Line Manager; or,
- A senior member of the HR Team, or
- Direct to the Whistleblowing Manager: GRO, or
- Contacting the "Speak Up" line, a confidential reporting service which is run by an independent company Convercent:
  - Telephone Number: GRO
  - <http://speakup.postoffice.co.uk/> which is a secure on-line web portal.

### 3.3 Who to contact for more information.

If you need further information about this policy or wish to report an issue in relation to this policy, please contact John Bartlett, Director of Assurance & Complex Investigations, email: john.bartlett@GRO

## 4 Governance

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### 4.1 Governance responsibilities

The Policy sponsor takes responsibility at GE level for policies covering their areas.

The Policy Owner is the Director of Assurance & Complex Investigations, who is responsible for ensuring that the content is up to date and is capable of being executed. As part of the review process, they need to ensure that the minimum controls articulated in the policy are working or to identify any gaps and provide an action plan for remediation.

Additionally, the Director of Assurance & Complex Investigations is responsible for providing appropriate and timely reporting to the Risk and Compliance Committee and the Audit and Risk Committee as required.

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.

## 5 Definitions

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

**“Speak Up”** in the context of PIDA refers to the act of a person (the **“Speak Up Reporter”**) making a disclosure that the Reporter 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 POL's policies and procedures
- behaviour that harms or is likely to harm the reputation or financial well-being of the POL



## 6 Document control

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### 6.1 Document control record

#### Summary

GE policy sponsor	Policy owner	Policy Author	Standard approver
Group General Counsel	Director of Assurance & Complex Investigations	Speak Up Manager	RCC & ARC
Version	Document review period	Policy – effective date	Policy location
	Annually	April 2023	Policy Hub Intranet <a href="#">Key policies</a> (sharepoint.com)

#### Revision history

Version	Date	Changes	Updated by
1.4	April 2016	Sponsors review and sign-off	Jane MacLeod
1.5	August 2017	Annual Review and update	Vitor Camara
1.6	September 2017	POL R&CC approval	Thomas Richmond
2.0	September 2017	Final Version Approved	Thomas Richmond
2.1	June 2018	Annual Review and update	Vitor Camara
2.2	July 2018	POL R&CC approval	Sally Smith
2.3	July 2018	POL ARC approval	Sally Smith
2.4	September 2018	POMS ARC approval	Sally Smith
3.0	September 2018	Final version approved	Vitor Camara
3.1	June 2019	Annual review and update	Sally Smith
3.2	June 2019	Incorporating legal review comments	Sally Smith
3.3	July 2019	POL R&CC approval	Sally Smith
3.4	September 2019	POL ARC approval	Sally Smith
4.0	September 2019	Final version approved	Sally Smith
4.1	April 2020	Updated with new Speak Up service contact details	Sally Smith
4.2	June 2020	Annual review and update	Sally Smith
4.3	July 2020	POL R&CC approval	Sally Smith
5.0	July 2020	Final approval by ARC's	Sally Smith

5.1	March 2021	Amendments following Protect self assessment and external review by Herbert Smith Freehills	Sally Smith
5.2	March 2021	Amends after Group Director of Compliance review	Sally Smith
5.3	March 2021	POL R&CC approval	Sally Smith
5.4	March 2021	POL ARC approval	Sally Smith
6.0	May 2021	POI ARC approval	Sally Smith
6.1	July 2021	Amended Speak Up contact details	Jenny Brady
6.2	March 2022	Changed responsible people from MRLO to Head of Central Investigations Unit and added paragraph following internal audit recommendations.	Sally Smith
6.3	March 2022	Annual approval by RCC	Sally Smith
7.0	April 2022	Annual approval by ARC	Sally Smith
8.0	April 2023	Annual approval. Updates with new Speak Up function following External Review by EY	John Bartlett
9.0	April 2024	Annual approval by R& CC	John Bartlett

## 6.2 Oversight committee: Risk and Compliance Committee / Audit and Risk Committee

Committee	Date approved
POL R&CC	07/05/24
POL ARC	21/05/24
POMS ARC	TBC

**Next policy annual review date: May 2025**

## 5.3. 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: 100 Wood Street, London, EC2V 7ER

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.

Payzone Bill Payment Limited is a limited company registered in England and Wales under company number: 11310918. VAT registration number GB 172 6705 02. Registered office: 100 Wood Street, London, EC2V 7ER



