



# **Our Code of Business Conduct**

**Our Commitment to doing  
what's right**



# Contents

<u>A message from our Group Chief Executive</u>	3
<b>Our Code and how we speak up</b>	
<u>Why we have a Code</u>	4
<u>Upholding the Code</u>	5
<u>Our ways of working</u>	7
<u>How to make good decisions</u>	8
<u>How do I speak up?</u>	9
<u>No retaliation</u>	10
<b>Our Colleagues</b>	
<u>Diversity and inclusion</u>	12
<u>Prevent bullying and harassment</u>	13
<u>Create a safe and healthy work environment</u>	14
<u>Avoiding conflicts of interest</u>	15
<b>Our Business</b>	
<u>Prevent bribery and corruption</u>	18
<u>Gifts and hospitality</u>	19
<u>Prevent financial crime</u>	20
<u>Prevention of Modern Slavery</u>	21
<u>Working with suppliers</u>	22
<u>Use of computers, internet, phones and email</u>	23
<u>Protecting Post Office Information</u>	24
<u>Managing personal data properly</u>	25
<u>Maintaining accurate business records</u>	26
<u>Financial Accuracy and integrity</u>	26
<u>Managing risk</u>	27
<u>Protecting the environment</u>	28
<u>The use of social media</u>	29
<u>Communication with the public</u>	30
<u>Glossary</u>	31



This document has been  
reviewed by the  
**Institute of Business Ethics**

# A message from our Group Chief Executive

Welcome to the most important document we have at Post Office – Our Code of Business Conduct.

If we are to earn the trust of our customers, colleagues, and the communities we serve we must act in a responsible, ethical, and lawful way. It is important to me that we maintain the trust of our customers, colleagues, and the communities we serve.

Our 'Ways of Working' underpin everything that we do, they are the 'How' of our business strategy. They differentiate our business and aim to inspire great behaviours. We know that by **working in partnership**, as **one team**, we **deliver** amazing results.

Our Code of Business Conduct (the Code) defines the expectations we have for how we act and how we make decisions. It sets out our clear standards of conduct to ensure that we always do what is right. The Code of Business Conduct should help every one of us live out our purpose that we are here, in person for the people who rely on us.

The way that we conduct business has never been more important which is why I expect everyone at Post Office to follow our Code, advocate for others to do the same, and feel empowered to speak up if you are ever in doubt or have questions. As our Code explains, our Speak Up channels are here for you and remember Post Office does not tolerate retaliation of any kind. We will always listen to you and I expect leaders and managers to foster a culture where employees feel free to ask questions and raise concerns when something doesn't seem right.

Read and re-read our Code. It matters. Think about how it applies to your work. Consider how your behaviours, actions and decisions may affect others. Speak up when you have concerns and always do what's right

I am proud to work for a company that has the highest standards of integrity and which passionately protects its people and reputation.

Sincerely

**GRO**

Nick Read  
Group Chief Executive Officer



# Why we have a Code

Doing what's right means we must always act with integrity and be open and honest to ensure we are trusted by our customers, colleagues, Postmasters, Retail Partners and the communities in which we work.

## Who is the Code for?

Our Code is for everyone working for and with Post Office: employees, directors, contractors, Postmasters, business and retail partners, and suppliers. We expect our Postmasters, business and retail partners and suppliers to uphold the same standards.

## What is the Code?

The Code is a centrepiece to our ethical culture. It sets out what we stand for, the principles we hold ourselves accountable to and what we expect from every single person for and with Post Office, helping us all make informed decisions and good choices.

Sometimes, you might face a situation where the right thing to do is not obvious. That is where our Code of Business Conduct can help. It is always here as a guide to preserving our reputation. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not clear

*Sometimes doing what's right is easier said than done. There are times when we all could use a little help to feel confident that we are making good choices.*

*Our Code is here to do that.*

The code enables you to:

- Conduct yourself honestly and ethically.
- Upholds our ways of working and protect our reputation.
- Understand what Post Office expects from you.
- Make good decisions every day.
- Comply with the laws, regulations and standards that apply to our Company.
- Understand where to go for assistance or guidance if you have any questions.

## What are the consequences of not complying with the Code?

There are very serious consequences for not complying with our Code which could result in disciplinary action, up to and including dismissal or termination of contract.

If an act violates the law, it could result in fines or criminal prosecution.

## When do we review the code?

The Code will be reviewed every three years and we may modify the Code as necessary. Any modifications will be approved by Post Office General Executive and the Board.





# Upholding the Code

## Employees' Responsibilities

### **Know and live the Code.**

Read it and follow it, along with any other policies that apply to our roles.

**Complete mandatory training** as required in a timely manner.

**Behave in an ethical manner.** Use good judgment, being honest and ethical in every action and decision you take.

### **Follow the law.**

Understand and ensure compliance with legal and regulatory obligations that apply to our jobs and our company.

**Ask for help.** When an answer is not clear, ask for guidance before taking action.

**Speak up.** Prevent harm to our company and its reputation by reporting concerns if you feel a working practice is not ethical or safe or it breaches the Code.

*Post Office reputation depends on the behaviour of each and every one of us.*





# Upholding the Code

## The Managers role

People managers and leaders have additional responsibilities to serve as a positive role model in every respect and to help our employees review, understand and apply the Code. The way our managers make decisions and handle concerns, different opinions, and even bad news, will set the foundation for trust with teams.

Take these simple steps to build a culture of trust and integrity within your team.

**Lead by example and model the Code.** Take personal responsibility for promoting and reinforcing the principles and standards set out in the Code.

Ensure your team members, including new joiners have read the Code and completed mandatory training.

**Be informed.** Recognise that you may not always find the answers that you need in the Code, so know where to go for answers when there are questions.

**Expect the best.** Ensure team members know that for results to matter, they must be achieved the right way. Be consistent in what you say and do.

**Be responsive and create a “speak up” culture.**  
Take seriously any concern raised and never retaliate against someone who raises a concern.

**Take action.** Take corrective or preventive action when someone violates the Code.

*As a leader, you have special responsibility for setting the culture and the work environment of your team*





# Our Ways of Working

Our Postmasters and branch colleagues are there, in person, serving communities across the UK day in, day out. Our role at Post Office is to be there for Postmasters, retail partners and Directly Managed Branches, supporting them and helping them to thrive.

## How we do it.

Our Ways of Working provide the answer. They set out how we need to work together to deliver our Purpose. Our Ways of Working are wrapped around our 'We are Post Office' colleague commitments, where we celebrate diversity and inclusion, encourage learning and growing, and champion taking care of and supporting each other.

Our Ways of Working reflect our culture where we work in partnership with our Postmasters and collaboratively work together to achieve the same aims. A place where colleagues are encouraged to speak up, feel safe to raise issues and are empowered to make a difference.

In short: **Working in partnership**, as **one team**, we **deliver** amazing results!



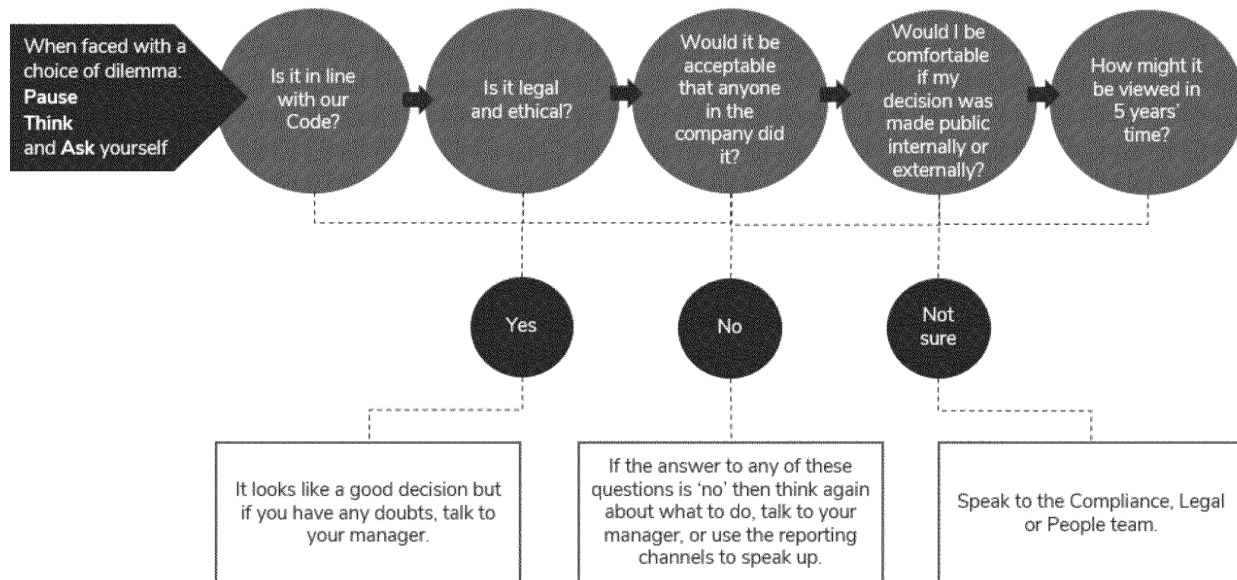
We work in partnership	We are one team	We deliver
We place those who work in Post Office branches at the centre of everything we do.	We are reliable and always do what we say we will do.	We collaborate and share freely.
We invest time and energy into trusted and valued partnerships.	We are passionate about the service we provide.	We listen to understand and then respond.
We build lasting relationships with all partners.	We learn from our mistakes.	We celebrate success and say thank you often.
We respect and recognise each other's challenges.	We embrace change and find ways to innovate and improve.	We are helpful, friendly and available.
We enable our Postmasters and DMBs to serve their communities.	We are outcome driven.	We trust and empower everyone to make decisions.
We are stronger together.	We work to keep it simple and get stuff done.	We act with integrity and are open and Honest.



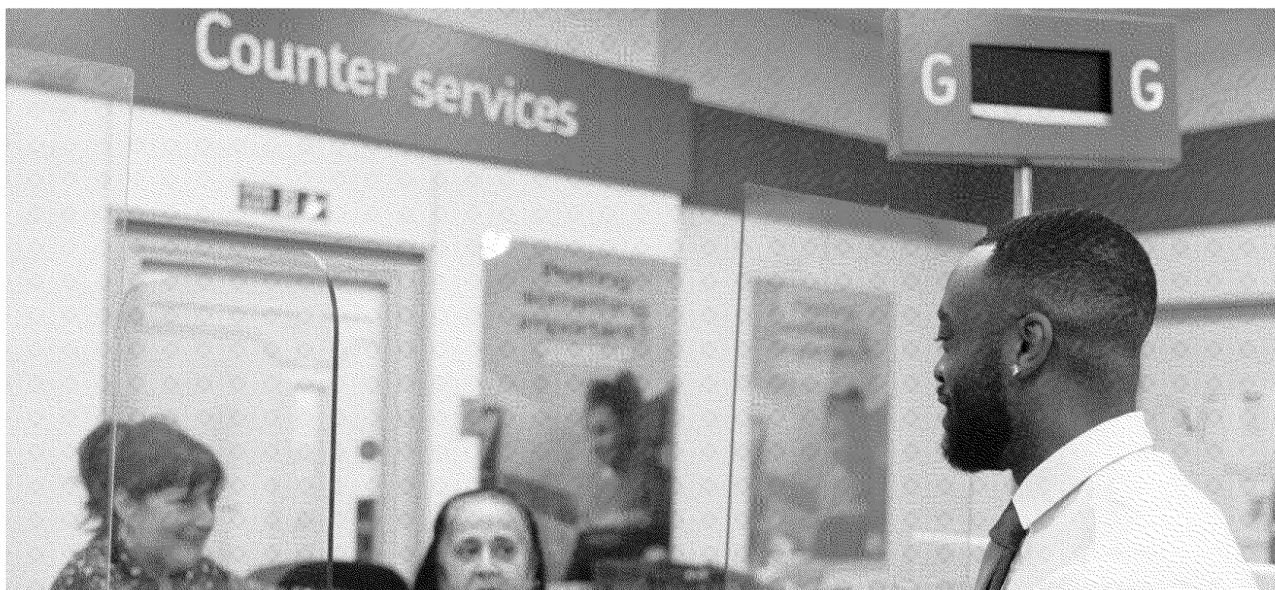
# How to make Good Decisions

We trust and empower everyone to make decision. Use our ethical decision-making model to support in making good decisions.

## Ethical decision-making model



*Making good decision and ethical choices builds trust between each of us and the people we interact with.*





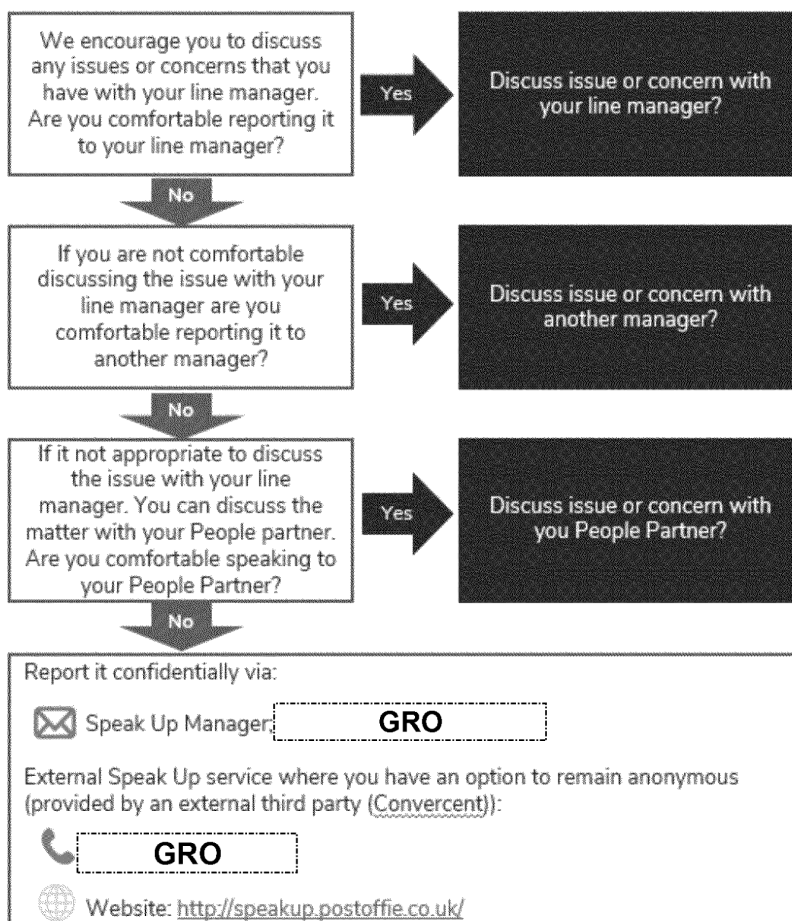
## How do I speak up?

To help us build the Post Office of the future we are committed to doing things correctly and we want you to always raise issues and concerns with us. A healthy organisation is one where people can speak up without fear and, as a result, stop harm.

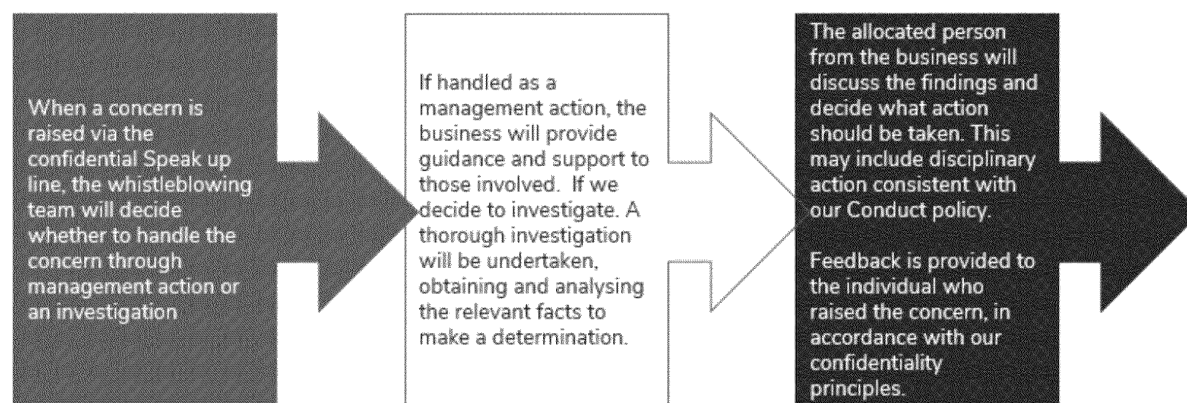
Noticing a problem and speaking up about it helps us address issues quickly. This in turn helps ensure that we can enhance Post Office's processes and controls and support our Postmasters and the communities that we serve.

You must never ignore unethical or unprofessional behaviour. We all have a responsibility to speak up, if we witness or otherwise learn about the company's standards and reputation being put at risk by unethical, unprofessional or even criminal behaviour, we must immediately report it. We don't have to have all the facts or evidence available to report a concern, the key element is to make sure it is reported.

If you feel you cannot question or challenge a colleague directly you can use the reporting model opposite that shows how we can all raise issues of concerns:



## What happens next?



Learn More

[Speaking Up Policy](#)



## No retaliation

It takes courage to speak up when something's not right. We understand that you might be uncomfortable or anxious. That is why we do not tolerate retaliation of any kind.

We do not tolerate retaliation for:

- Refusing to do something that violates our Code, policies or the law.
- Raising a concern in good faith about potential misconduct,
- Cooperating with an investigation.

Examples of retaliation might include demotion, firing, a reduced salary, job reassignment, threats, harassment or any other action taken against someone because they raised a concern, participated in an investigation, or attempted to deter someone from violating.

Concerns raised honestly even if they turn out to be unfounded is never an excuse for any kind of retaliation.

We take serious action, typically disciplinary action, against any individual who threatens or retaliates against individuals who have raised their concerns.

## No false accusations

As much as we encourage honest reporting, we do not tolerate knowingly false reports. Making a false accusation can divert investigatory resources away from credible good-faith concerns and damage morale.

Report when you have a reasonable, good-faith belief that it is true, but never knowingly make a false accusation, lie to investigators or refuse to cooperate in an investigation, as these actions may also violate our Code.

**I am concerned that my manager will find out if I raise a concern. Will it be kept confidential?**

Protecting the identity of people who raise a concern in good faith is our priority. Post Office will not tolerate retaliation against an employee who raises a genuine concern. We will keep what you tell us private and confidential throughout the investigation process, subject to our legal obligations. Anonymous reporting is also available through our external Speak Up line, although note that this may limit our ability to conduct an investigation

**I am a contractor working at Post Office and I have a concern to report. Can I use the External Speak up line?**

Yes. The external Speak Up line is for the use of employees and contractors as well as Postmaster, retail partners and suppliers.

*By asking questions and reporting concerns, you are doing the right thing and helping our Company stop or prevent misconduct.*



# Our employees





# Diversity and Inclusion

Our Ways of Working celebrate diversity and inclusion and we are committed to building a diverse and inclusive workplace so that we are as diverse as the customers that we serve.

We pursue equality of opportunity and inclusion for all employees through our employment policies and practices.

Embracing diversity and inclusion means we must:

- Uphold the law regarding human rights and equality.
- Act with the highest standards of conduct and integrity and show respect towards others in our dealings.
- Strive to promote fairness and equal opportunities for employment and promotion based on merit.
- Not tolerate discrimination or harassment on the

basis of any legally protected characteristics.

- Encourage ideas, opinions, and ways of thinking and prohibit exclusionary behaviours, which may include, bullying and workplace violence, discrimination and isolating individuals or groups.
- Invest in the physical, mental and emotional well-being of our employees through ongoing education around inclusion and diversity.

Post Office strives to build an inclusive workplace where we celebrate diversity and inclusion, where all employees feel a sense of belonging and valued for who they are and the differences they bring. Post Office does not tolerate harassment based on the grounds of race, ethnic or national origin, disability, marital or civil partner status, sexual orientation, pregnancy or maternity, age, religion or belief, sex and gender reassignment.



**Learn More**

[Equality, Diversity and Inclusion Policy](#)

[Dignity at Work Policy](#)

**I want to make a promotion decision. One colleague is 55 and the other is 30. Should I promote the younger colleague since they may work for us for more years before retiring?**

No. We only make employment decisions based on merit. Age should not be a deciding factor.

**Examples of meeting standards are:**

- Showing compassion and empathy as appropriate, to people we work or come in contact with.
- Taking a proactive approach to opposing discrimination and encourage reporting.
- Acting and make decision on merit, without prejudice.
- Considering the needs of the protected characteristic groupings
- Actively seek or use opportunities to promote equality and diversity.

*We work better together because of our differences, not despite them.*



# Prevent bullying and harassment

Post Office will not tolerate inappropriate behaviour, including bullying, harassment or abuse of authority.

We may instigate disciplinary or legal action against people who harass, bully or abuse their authority.

We must:

- Celebrate diversity and inclusion at Post Office.
- Treat each other with respect, regardless of role, employment status or length of service.
- Challenge any unfair behavior.
- Foster a culture in which anyone can comfortably raise a concern without fear of retaliation.
- Comply with Diversity and Inclusion, and Dignity at Work policies.
- Ensure that our communications abide by this Code, no matter how informal the situation.
- Speak up through the relevant channels if you think a colleague is being bullied or harassed.
- Ensure that our conduct when at off-site events is as it would be at work (i.e., social/team events).
- Complete unconscious bias training if involved in recruitment and hiring of others.

We must never bully, harass, abuse, threaten or act violently toward others.



## Learn More

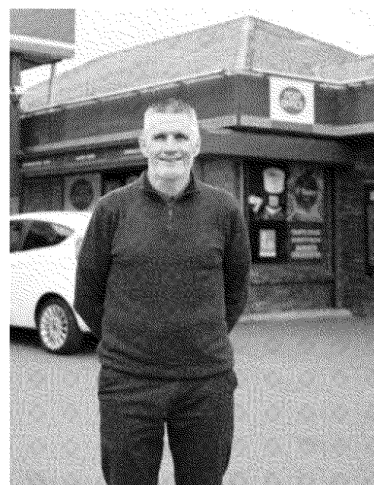
[Equality, Diversity and Inclusion Policy](#)  
[Dignity at Work Policy](#)

**A friend sent me an email with some rude jokes which I think are funny. Can I email them to my work colleagues?**

No. We treat all employees with dignity and respect and what you consider funny might be offensive to others. Always ask yourself if your actions might be offensive, abusive or intimidating to others.

**A colleague in my team often makes negative stereotyping comments about my race. If I object, they say they it's just banter and mean no offense. What should I do?**

Stereotyping, whether it be a joke or not, is an obstacle to the inclusive environment we expect in the workplace and can be a form of discrimination. This situation, or concern about inappropriate or non-inclusive behaviour should be reported to the line manager or People team.





# Creating a safe and healthy work environment

Whether working in an office, branch, depot, at home, commuting to work or out in the field nothing is more important than your safety.

We comply with all applicable legislation and regulations and aim to continuously improve health and safety performance.

We expect everyone at Post Office to behave in a safe and responsible manner at all times.

Everyone at Post Office has a role to play and we must:

- Follow health and safety policies, risk assessments, standards, procedures, laws and regulations to look after ourselves and the safety of others.
- Work and behave safely, so that we do not endanger ourselves or others.
- Make sure you know what to do if an emergency occurs at your place of work/on the road or at a location you are visiting
- Intervene when we think someone's safety is at risk.
- Promptly report any actual or near miss accident or injury, illness, unsafe or unhealthy condition so that steps can be taken to correct, prevent or control these conditions immediately.
- Complete mandatory and role specific Health and Safety training in a timely manner.
- Never work under the influence of drugs, alcohol.
- Always drive safely and legally and
  - Always wear a seatbelt.
  - Always obey the speed limit.
  - Never use a handheld mobile or device when driving.

**My colleague arrives at work under the influence of alcohol. I know they are having difficulties at home. What should I do?**

It is important that you discuss the issue with your line manager. The use of alcohol is likely to be affecting their wellbeing, safety and quality of work. It is likely that your colleague needs help and support in dealing with their difficulties.

*We do not tolerate anyone being under the influence of illegal drugs while working.*



## Learn More

[Health and Safety Policy](#)

[Alcohol and Drugs Policy](#)

[Physical Security Policy](#)



# Avoiding conflicts of interest

Conflicts of interest can arise when our personal relationships or financial interests overlap with our job responsibilities. If we don't navigate potential conflicts of interest carefully, these situations can impact the decisions we make, erode trust within teams, and harm Post Offices reputation.

In business, the line between personal and professional interests can become easily blurred. Separating the two can be challenging, especially when personal relationships, outside employment or investments are involved. We are all expected to act in the best interest of the company. This means we must never allow our personal interests to influence our actions on behalf of Post Office. Every decision we make while on the job must be objective and with the company's business interests in mind.

We must:

- Act in the best interests of Post Office. We must not do anything which conflicts with our duty as an employee of the company or use our position for private advantage.
- Avoid situations where a personal relationship or financial interest in another company might influence decisions we make in our job.
- Understand that a conflict can exist even if we are convinced that our decisions will not be affected by an outside relationship.
- When a conflict of interest arises, ensure these are disclosed, and advice and approval is gained from the Chief People Officer.
- Before taking on outside work, ensure that the work does not harm Post Office's business interests.

If you find yourself in a position where your personal and business interests potentially come into conflict, you are required to declare, obtain approval and register these potential conflicts of interests. Any actual conflicts must be avoided/removed.

To help you decide whether you are facing a potential conflict of interest, imagine you are explaining your actions to friends, a colleague or the media and consider whether you would feel comfortable. Your line manager will be able to assist you in determining whether a conflict exists, and whether it is an actual or potential case.

## A close friend is applying for a job in Post Office. Is this ok?

We encourage you to recommend Post Office as a great place to work. You must ensure that you are not involved in the recruitment process.





# Conflicts of interest

## Family Member and Close Working Relationships

Relationships with family members and close personal friends can influence our decisions. It is important to be careful about company business decisions that involve close personal relationships.

To prevent conflicts of interest we must:

- Avoid taking part in the hiring or promotion of family members.
- Avoid holding a position with access to or influence over, performance appraisals, salary information or other confidential information related to a family member.
- Avoid the procurement of services of family members or friends.
- Report any family member and close working relationship to the People team.

## Outside Board Members

Serving on outside boards can present conflicts of interest and should be disclosed and discussed with line managers. Before accepting memberships on any board, it is important to understand one's legal responsibilities and avoid affiliations that carry potential for distraction and conflict of interest.

## Political Activity

We respect your right to engage in political activity to support political groups. You can only offer support and contributions to political activities in a personal capacity.

Post Office is a politically neutral company, and our reputation must not be compromised by your interest, affiliation or activities to a political party's pressure groups or other causes.

We must:

- Ensure any contributions towards and support for, political parties are clearly personal and give no impressions of being connected to Post Office.
- Ensure any personal political support or contributions do not affect our performance or objectivity at work.
- Not improperly use company resources or time for personal party-political purposes

**I have just found out that a member of my team has been dating his subordinate for several months. Should I do something?**

This is a very sensitive situation. We respect employees' private lives, and therefore we do not need or want to know about their romantic relationships. However, we do have a legitimate interest in their professional relationship, namely when one reports to the other or is in a position of authority or control over the other person. The situation you describe is not appropriate because there is a conflict of interests. A manager cannot be expected to judge their subordinate objectively if they are romantically involved. You should consult your manager or a member of the People team. Depending on the facts and circumstances, there may also be a sexual harassment issue



**Learn More**

[Conflicts of Interest Policy](#)



# Our business





# Prevent bribery and corruption

At Post Office, we have a policy of zero tolerance of bribery and corruption, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability and undermines the Group's effectiveness. We conduct business using ethical practices only.

Bribes come in many forms, and they are not always obvious. We strictly prohibit bribes, fraudulent conduct, kickbacks, illegal payments and any other offer of items of value that may inappropriately influence or secure an improper advantage.

The consequences of violating bribery laws can be severe – for you and for the Company.

A gift, the promise of a job, the offer of a trip, a charitable contribution, all could be considered bribes, if offered in exchange for any decision or favourable treatment, so it's important you know how to spot a potential bribe.

Gifts and Hospitality are part of everyday commercial life, but they must have a demonstrable link with a legitimate business purpose, the value must be justifiable and proportionate for the roles and relationship with the client and they must be defensible under potential public scrutiny.

If you are offered gifts or hospitality, always consider how the acceptance of the gift or hospitality would be viewed by others or could be portrayed by the media - would others see it as appropriate and proportionate?

We responsibly invest in our business relationships but never offer or accept gifts, hospitality of entertainment or anything else of value to improperly influence people. An overly generous gift can pressure the recipient to return the favour or feel indebted to the giver – with decisions that benefit the giver and create a conflict of interest or perception of a conflict of interest.



Learn More

[Anti-bribery and Corruption Policy](#)



*Post Office has zero tolerance towards bribery. Bribery is not only unethical, but also illegal.*



# Gifts and hospitality

## Gifts

The giving and receiving of gifts to an external 3<sup>rd</sup> party should ordinarily be below £100 per person in value (and must also be approved by your GE Member).

Items costing £20 or less, such as pens, calendars, diaries, notepads and paperweights do not need to be reported and approved.

We must:

- Not accept cash or cash equivalent (e.g., Gift Cards)

## Hospitality and Entertainment

Numbers on both sides should be limited to those whose presence is necessary to progress the business in hand.

Hospitality should 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).

Small offers of hospitality such as tea, coffee, sandwiches, etc. do not need to be recorded via the gifts and hospitality too, but the recipient details must be recorded fully on the expenses claim via the Selenity Expense Reporting Tool.



**Learn More**

[Gifts and Hospitality Reporting Tool](#)

We must:

- Familiarise ourselves with and follow the Anti-bribery and Corruption policy and procedures.
- Always make clear, internally and when dealing with third parties, that Post Office has a zero-tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favour to improperly influence a business outcome.
- Apply this code in good faith to ensure gifts and hospitality are never considered to be excessive, confer improper advantage or create an actual or perceived conflict of interest
- Familiarise and observe monetary limits that Post Office has set separately for gifts and hospitality.
- Ensure all gifts and hospitality are reported and approved, prior to the offer or acceptance.
- Never accept cash or cash equivalent (e.g., Gift Cards)
- Not offer or accept any gifts or hospitality if the third party or Post Office is currently or about to tender for a contract for services involving the other party.
- 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)
- Immediately notify our line manager if we become aware of any suggested or actual payment or other transaction which has the potential to be in breach of the Anti- Bribery and Corruption Policy.
- Complete mandatory Anti-Bribery and Corruption training in a timely manner.

**I have been invited out to dinner by a potential supplier currently bidding for a new contract. What should I do?**

You should decline. It is inappropriate to go for dinner with a supplier during a tender process.



# Prevent financial crime

At Post Office we are committed to conducting business in a way that prevents the use of our product, services and business transactions by those who might abuse them, and we all have a responsibility to ensure that the highest standards of financial crime prevention, detection and management are maintained.

Failure to manage Financial Crime risks and incidents appropriately could have serious consequences for Post Office including financial loss, customer impact, regulatory breaches, fines, prosecution, prevention from selling a particular product, loss of existing or future contracts/relationships and damage to reputation.

Financial Crime" is any offence involving: fraud or dishonesty, misconduct in, or misuse of information or handling the proceeds of crime. It can be internal (by individuals within Post Office) or external (by criminals using Post Office to facilitate financial crime). Financial Crime is commonly considered as including one or a combination of the following offences:

Fraud	Cybercrime	Bribery and Corruption	Tax evasion facilitation	Information security breaches	Terrorist financing	Money laundering
-------	------------	------------------------	--------------------------	-------------------------------	---------------------	------------------

Post Office has a range of approved policies and business procedures and controls designed to prevent activities that could facilitate financial crime, and it is important you always follow these.

Money laundering is the process criminals use to conceal, disguise, and dispose of money and assets obtained from criminal activity, such as terrorism, drug dealing, tax evasion, human trafficking and fraud, and change them into clean money or assets that have no obvious link to their criminal origins.

You may be committing an offence and be prosecuted if you facilitate or carry out a transaction where you know, or suspect, that the funds are intended for use in support of money laundering or terrorism, regardless of whether the funds were the proceeds of criminal activity or lawfully derived.



## Learn More

[Anti-Money Laundering and Counter Terrorist Financial Crime Policy](#)  
[Speaking Up Policy](#)

We must:

- Familiarise ourselves with and follow all Post Office policies.
- Understand and follow procedures and internal controls that are designed to prevent financial crime or money laundering.
- Be proactive when it comes to spotting behavior or transactions that might signal a problem and ensure we report our concerns as soon as possible (suspicions of money laundering should be reported to Grapevine on **GRO**)
- Complete mandatory Anti-Money Laundering and Counter Terrorist Financing training in a timely manner.

Any activity where there is a suspected link to money laundering needs to be reported straight away.



# Prevention of 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.

We must:

- Read our Post Office Modern Slavery statement which can be found on our website [here](#)
- Complete the mandatory Modern Slavery and Human Trafficking training in a timely manner.

If you have any concerns about the issues raised in the statement or if you think you have identified signs of modern slavery within our business or supply chains, please Speak up.

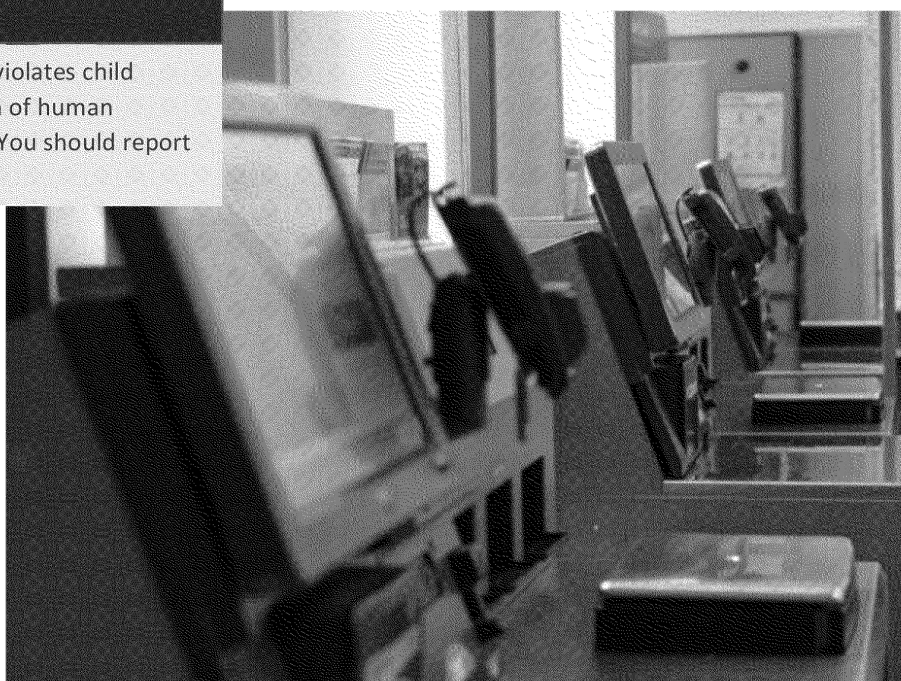


Learn More

[Modern Slavery Statement](#)

**I heard a supplier created a work experience program that allows minors under the age of 16 to work unlimited hours per week without pay. Should I be concerned?**

Yes. The program you describe violates child labour laws and raised suspicion of human trafficking and modern slavery. You should report this concern.





# Working with suppliers

As a publicly funded organisation, we are committed to ensuring that we deliver value for money through our trusted and valued partnerships with suppliers. We are subject to the Public Contract Regulations ("PCR") 2015, which mandate the processes we must follow, from the initial supplier selection through to sourcing competitions and contract award. These processes are designed to:

- Stimulate market competition for public contracts.
- Deliver value for money and innovation.
- Ensure equal treatment and transparency with all suppliers.
- Ensure contracts are awarded fairly.

We must ensure that our commercial activity is compliant with the legislation and demonstrates our commitment to best practice.

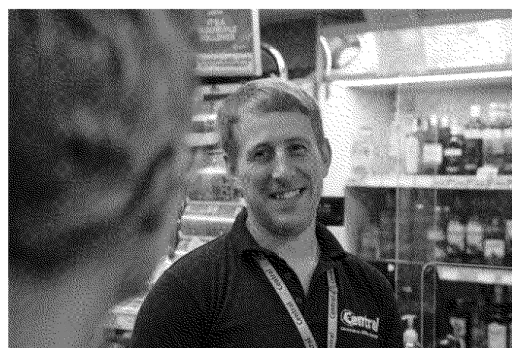
Maintaining our reputation for ethical business integrity is absolutely vital and we must also ensure that we partner with suitable suppliers who will align with our ways of working.

If you work with suppliers, you must:

- Complete the Procurement online Training module.
- Consult with the Procurement team for advice, and to ensure that processes are followed.
- Familiarise yourself with the Procurement Policy, Purchasing Process, and the associated procedures on our Hub page.
- Ensure there is no commitment or contractual engagement with Suppliers until they are onboarded correctly, which includes accepting the Supplier Code of Conduct and other guidance documents.

Once a Supplier has been selected and a contract is in place, you must:

- Ensure that Purchasing process is followed to ensure that orders are raised and managed so that we are only paying for the goods or services that we have received
- Ensure that contracts are managed effectively in line with our policies and controls.
- Notify your Line Manager and the Procurement team if they know of or suspect that third party suppliers are not meeting requirements or if they are performing contrary to the agreed contractual terms.



## Learn More

[Procurement Policy](#)

[Purchasing Process](#)

[Contract Execution Policy](#)

[Supplier Code of Conduct](#)



# Use of computers, internet, phones and emails

The security of our information and IT systems is critical. Many of us will have access to Post Office systems, information and devices such as laptops and mobile phones. It's important that anyone who accesses them knows how to keep them secure by following the requirements in the Cyber and Information Security policy. Failure to comply with the Cyber and Information Security policy can carry profound consequences for you and Post Office. Breaches of the policy may lead to disciplinary action up to and including dismissal.

To help protect our systems and information, you should:

- Ensure Post office equipment is used appropriately and protected from damage, loss and theft.
- Immediately report to the IT Service Desk the loss or theft of any Post Office equipment.
- Use a password or pin to lock unattended Post office equipment. Use complex passwords to protect your access.
- Ensure any removable Post Office IT equipment is secured when left in the office overnight is locked away or put out of sight when left unattended at home, in a hotel, or in a vehicle. When travelling, keep equipment with you at all times.
- Follow the appropriate IT request process to install any software applications on your Post Office equipment.
- Only use approved data storage areas, such as One Drive. Don't sign up for public cloud storage services which have not been procured by Post Office



Learn More

[Cyber and Information Security Policy](#)

*Don't open emails from unknown sources and never click on links or open attachments you are unfamiliar with or seem suspicious.*

You must not:

- Try to disable, defeat or circumvent Post Office security controls, including but not limited to firewalls, browser configuration, privileged access, anti-virus and the deletion of system logs
- Use Post Office systems or equipment to intentionally access, store, send, post or publish material that is:
  - Pornographic, sexually explicit, indecent or obscene, or
  - Promotes violence, hatred, terrorism or intolerance.
- Run or engage in any form of private business using Post Office IT equipment.
- Use your personal IT equipment to undertake Post Office business.
- Open emails when you don't know who they are from and click on unknown links and attachments in emails
- Use your Post Office password for non- Post Office IT Systems
- Use your Post Office email address for non-business-related websites or online activity
- Share your Post Office access passwords/pins with anyone else, including work colleagues
- Access Post Office Systems or Information after leaving Post Office employment

If you become aware of any information security issues or incidents, you should always report it through the Service Desk primarily through Service NOW or alternatively you can contact them on **GRO** **GRO** In the event it is not possible to reach the service desk through the above you can email

**GRO**

**My manager does not have access to their emails while on vacation. They have asked me to check their emails for an important message by logging into their email using their password. Is this ok?**

No. It is against company policy to share passwords. You should refuse the request and remind your manager that it is against company policy to share passwords and access another person's system.



# Protecting Post Office information

Information is one of Post Office's most valuable business assets: Post Office is committed to safeguarding and protecting our information and any other information entrusted to us. Disclosing (or "leaking") confidential information outside of Post Office or to those who do not need it for legitimate business purposes can have dire consequences on Post Office business, damaging our reputation and breaching the trust of others.

Information within Post Office is held in many different formats, including on paper, electronically in documents or in IT applications & systems. Our requirements to protect information apply to all formats.

Post Office has Information Classification standards which define how information within Post office should be classified, handled and protected.

When we are handling Post Office's information, we must:

- Familiarise ourselves with all information handling policies and complete any mandatory training on time.
- Understand the nature and classification of the information, as defined in the Information

Classification Standards; understand and adhere to the handling requirements detailed in the Cyber and Information Security Policy; and take personal responsibility for the proper use, circulation, retention, protection and disposal of Post Office's information.

- Not disclose confidential information to a third party unless there is an approved purpose.
- Not share confidential information internally beyond those who need it for their job. Take care not to disclose information in public places, including taking all necessary steps to protect information in documents and on IT devices away from the workplace.
- Not forward emails containing non-public Post Office information to personal email accounts.
- Not store or synchronise Post Office information onto personal devices.
- Not take any Post Office confidential information if we leave the company. Any work carried out during employment will remain the intellectual property of Post Office and must not be deleted or destroyed upon leaving.
- Immediately report events which could impact the security of Post Office information by following the information security reporting procedures



Learn More

[Cyber and Information Security Policy](#)





# Managing personal data properly

When customers, postmasters or third parties do business with us, they entrust us with personal data. Our employees do the same when they join the company. We take our responsibility and obligations seriously to collect, use and process any personal data only for legitimate business purposes and protect it from possible loss, misuse or disclosure.

Keeping personal data secure is critical to our people, our business and our reputation. We recognise this responsibility and follow the laws requiring us to protect personal data that can identify an individual or which relates to an identifiable individual.

Many employees work with personal data as part of their jobs. If you are one of them, guard this data well by following the Company policies regarding the access, transfer and use of this data.

You must:

- Familiarise yourself with and follow company policies regarding the access, transfer and use of personal data.
- Complete mandatory Data Protection training on time.
- Only collect data that is adequate and relevant and use it solely for the purpose for which it is collected.
- Be transparent with individuals in relation to how their personal data is used in alignment with Post Office privacy notices.
- Keep personal data up to date correcting inaccurate data when requested and respecting individual legal rights.
- Keep personal data confidential and secure.
- Act responsibly and ethically, always considering the risk to individuals in using their personal data and take steps to mitigate such risk.



When collecting, using or storing personal data, employees must not:

- Retain personal data for longer than necessary to achieve the business objective or meet minimum legal requirements.
- Collect and use personal data for purposes that are not reasonably expected by our customers, postmasters, third parties and employees.

You can contact **GRO** if you have any questions or concerns in regards to the access, transfer or use of personal data.

	<b>Learn More</b>
<u><a href="#">Protecting Personal Data Policy</a></u>	




## Maintaining accurate business records

At Post Office we generate a large volume of business records each day. We are responsible for ensuring that the records in our custody or control are maintained, retained and destroyed in compliance with all legal and regulatory record keeping requirements.

To manage business records properly, we must:

- Comply with our records management policies and retention schedules for all business records, paper or electronic.
- Keep records for only as long as necessary for a legitimate business purpose or legally required. Follow the retention periods specified in the Records Retention Schedule, if applicable, or as required by law.
- Where we receive a Legal Hold notice, follow all retention instructions on the notice regardless of the retention schedule or applicable law.
- Cooperate with internal and external auditors.

*Destruction of documents subject to a Legal Hold notice, even inadvertently, could expose our company and you to civil and criminal liability. You should consult the legal team if you have specific questions about documents referred to in a Legal Hold notice.*

	<b>Learn More</b>
<u><a href="#">Document Retention Disposal Policy</a></u>	

## Financial accuracy and integrity

At Post Office we are committed to accurate reporting in our company's books and records.

We are accountable for the accuracy and honesty of business records, contracts and agreements that we handle in the normal course of business. We never falsify, omit, misstate, alter or conceal any information, or otherwise misrepresent the facts on a company record or encourage or allow anyone else to do so.

All transactions, no matter what the amount, are to be properly authorised, executed and recorded.

If you notice an inaccuracy in a company record, or a failure to follow our internal control processes, speak up and report it immediately.

You should only ever spend company money where there is a legitimate business need and where the cost is worth the benefit. You should know the local

expenditure limits and financial policies which directly apply to your role.

Our managers have an extra duty to ensure that their teams manage budgets well and spend company money carefully.

We are expected to:

- Understand and apply the finance and expense policies that are relevant to our role
- Strive to find the best value when spending company money
- Understand when we can and when we can't commit Post Office funds.
- Purchase goods and services only through our registered suppliers.





## Managing risk

Risk management is fundamental to how Post Office is directed, managed and controlled at all levels. The identification and mitigation of risk must be embedded in all Post Office activities and is key to effective decision making.

All material risks must be identified, measured, monitored, managed and reported on a continuous basis.

Our risk management processes must also align and integrate with the delivery of our strategy and in such a way that supports an enterprise-wide approach. Risk management must follow a consistent, transparent and auditable methodology and proactively recognise external factors, opportunities, and uncertainties.

Managers are accountable for identifying, assessing, owning and managing their risks as well as the maintenance of the associated internal controls.



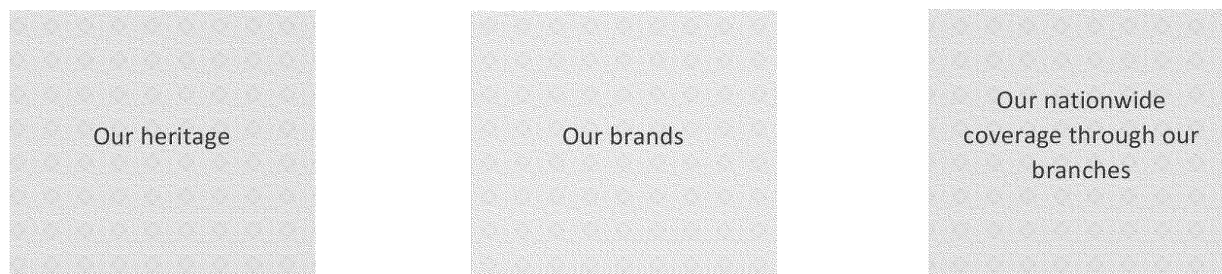
**Learn More**

[Group Risk Policy](#)



# Protecting the Environment

We recognise that our business activities and policies have impacts on the environment. We shall take full account of the environmental effects of our policies in our planning, decision making and day-to-day activities. We recognise and value our unique position in society which ensues from:



Protection of this unique position and maintaining positive stakeholder relationships are integral to our business and we shall aim to clearly demonstrate that we are an environmentally responsible company.

We are committed to the principle of Sustainable Development. We will seek to contribute to national and local sustainable development policy aims. By enhancing economies, acting with social responsibility and minimising our impact on the environment we can help create a world in which our company can flourish now and for generations to come.

At Post office we:

- Integrate environmental considerations into business decisions to establish relevant performance indicators along with key measures and associated improvement targets.
  - Develop and implement management frameworks that ensures high standards of environmental performance.
  - Comply with all relevant environmental legislation and regulations and endeavor to meet and exceed appropriate environmental good practice standards.
  - Promote transparency by having clear environmental accountabilities and publish relevant information about our environmental performance on an annual basis.
  - Reduce consumption of materials in our operations, reuse rather than dispose whenever possible, and promote recycling and the use of recycled materials.
  - Promote the prudent use of fuel, energy, water,
- raw materials and other resources, including progressively increasing our use of renewable energy sources.
  - Minimise waste and discharges to surface or ground water.
  - Reduce wherever practicable the level of harmful emissions from our vehicles, buildings and equipment.
  - Encourage the implementation by all employees of sound environmental practices, providing training where appropriate.
  - To support the promotion of active environmental management with relevant external groups and organisations.
  - Work with our suppliers to minimise the impact of their operations through a partnership approach to our purchasing policy and to develop, where practical, new products and services, which seek to achieve greater sustainability.



# The Use of Social Media

While it is recognised that we are entitled to privacy in our personal life, Post Office is committed to maintaining confidentiality and safety whilst also maintaining the reputation of Post Office by exhibiting acceptable behaviour at all times.

Social media is a collective term for websites and applications which focus on communication, community-based input, interaction, content-sharing and collaboration (this includes sites such as Twitter, Facebook, LinkedIn as well as YouTube, Flickr, Instagram, Snapchat, TikTok and other image and video sharing sites (not exhaustive)).

**Personal use:** Post Office understands that we may wish to use our own devices such as mobile phones, to access social media websites while we are at work, but we should limit use so not to interfere with our working day and should be limited to our allocated break times.

While using social media in a personal capacity and not acting on behalf of Post Office it should still be recognised that our actions can damage Post Office's reputation. All communications we make in a personal capacity must not:

- Make statements which cause, or may cause, harm to our reputation or otherwise be prejudicial to our interests.
- Use data obtained in the course of our employment in anyway which breaches provisions of the Data Protection Act 2018.
- Make disparaging or defamatory statements about the company, our colleagues, customers, postmasters or suppliers.
- Make comments that could be considered to be bullying, harassment or discriminatory against an individual.
- Respond ourselves to negative posts about Post Office. We may come across negative or disparaging about the Company or see third parties trying to spark negative conversations. Avoid the temptation to respond and instead let those who are certified internally know and respond if required, by reporting to

GRO

**Use at work:** We are able to access social media sites from any Post Office device in connection with work related activities, such as posting about our services, upcoming events or publicising Post Office. In doing so we must first gain permission for from our GE Member and comply with the below:

- Post Office brands or logos are not used or altered without prior permission from  
GRO
- Do not create any social media accounts whether for your Product Category, Area, Region, Department, Depot without seeking permission from  
GRO
- Copyright and fair usage laws and restrictions are respected and observed.
- Must not disclose any intellectual property, confidential or commercially sensitive information relating to the company.
- Do not respond to negative post about Post Office and instead report these to  
GRO

**Sometimes the internet seems to be full of misinformation about Post office. Isn't it my responsibility to correct it?**

No. If there is erroneous information circulating in public, you should report to  
GRO and they will take action if required.

**A co-worker posted a very offensive comment about me on Facebook. Are they allowed to do that?**

No. Employee use of online social media must comply with company policies, including our Dignity at Work policies.



# Communication with the Public and Journalists

Post Office is committed to providing accurate, clear, complete, and consistent information to the public. We must not speak at public events or to journalists without prior authorisation.

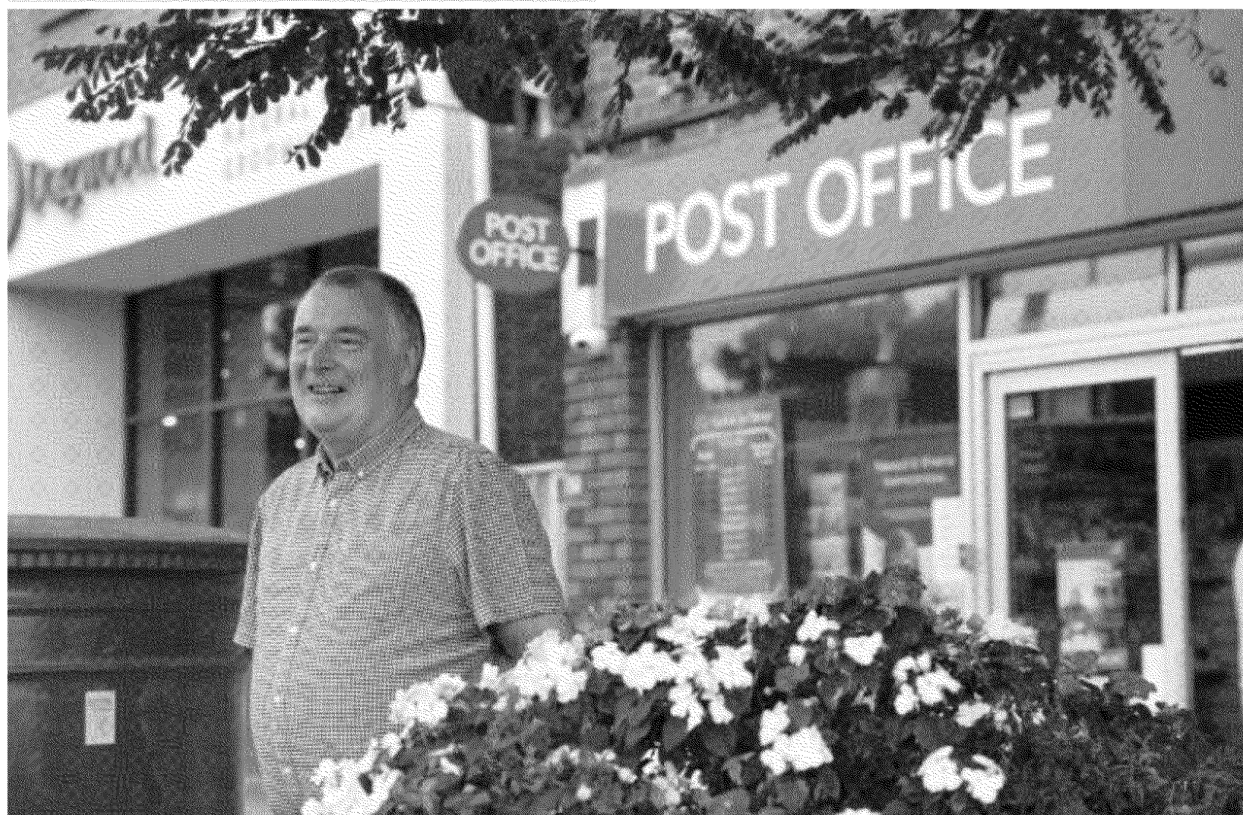
We are not permitted to agree to an interview or external speaking engagement (business or personal) in which the company will be discussed or referenced or publish any video or written content related to Post Office without the support and approval of a member of the Communications team.

Where a journalist wishes to speak with someone from Post Office, this request should be put to our Press Office who will decide whether it is appropriate to provide a comment to the journalist.

Should you be asked directly 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, you must always direct the request to our Press Office. They can be contacted on **GRO** or **GRO**

**A local newspaper has contacted me about a rumour which is circulating about Post Office. Can I speak to them? I want to set the record straight.**

No, unless you are an authorised representative you should not make a public statement on behalf of the Company. You should direct the request to the Press Office.





# Glossary

Term	Definition
ABC	Anti-bribery and corruption.
Bribe	Giving or receiving anything of value in exchange for an improper decision or action.
Company asset	A term that refers to everything belonging to the Company, i.e., its money, computer systems and software, electronic and communication devices, photocopiers, Company vehicles etc.
Conflicts of interest	A situation where a person has competing interests or loyalties.
Conversant	Confidential online and telephone service, allowing the user to raise a concern about an actual or potential breach of the Code
Discrimination	Discrimination includes less favourable treatment based on age, gender, disability, race, sexual orientation, religion of belief, gender reassignment, marriage of civil partnership or pregnancy and maternity.
Employee	A person employed by Post Office under one of a variety of contracts. The term covers all employees, whether full-time, part-time, fixed term or permanent.
Family member	A relative, by blood or by marriage (or similar informal relationship), notably a spouse, live-in partner, parent, or child. The term includes sibling, step or adopted child, stepparent, grandparent, uncle, aunt, cousin, grandchild or any relative who has lived with you for the past 12 months or more
Facilitation payments and kickbacks	Small payments made to government officials to expedite or facilitate non-discretionary actions or services, such as paying £10 to an official to seed up a visa application. A kick back is a payment made to an individual in return for a referral transaction or contact with another party
Harassment and bullying	Unwanted behaviour from another person which is intimidating, malicious, offensive, insulting, humiliating, or degrading. It may be related but not limited to age, gender, sexual orientation, race, disability, religion, or belief, and can be either a repeated or a one-off incident. It can be verbal, non-verbal, physical and isn't always face-to-face.
Retail Partners	A third-party organisation that is not a legal entity or employee, with which Post Office has established a formal business relationship via a Franchise.
Retaliation	Retaliation is when someone takes a negative action against a colleague for exercising their rights under employment law. Post Office has zero tolerance for retaliation.
Speaking up	Being accountable for concerns and issues that we spot by reporting or telling someone.
Supplier	Any vendor of products or services to the Company. The term also refers to any supplier that our Company is actively considering using, even if no business ultimately is awarded.