



## GROUP POLICIES

### Whistleblowing Policy

Version – V5.21

#### Chief Executive's Endorsement

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

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# 1. Overview

## 1.1. Introduction by the Policy Owner

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

**Commented [HSF2]:** Amended to reflect responsibility for the WB Policy.

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## 1.2. Purpose

This Policy has been established to set the minimum operating standards relating to the management of Whistleblowing throughout the Group<sup>1</sup>. It is one of a set of policies<sup>2</sup> which provide a clear risk and governance framework and an effective system of internal control for the management of risk across the Group. Compliance with these policies supports the Group in meeting its business objectives and to balance the needs of shareholders, ~~staff~~<sup>3</sup> and other stakeholders.

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## 1.3. Core Principles

"Whistleblowing" refers to the act of exposing potential or actual wrongdoing, misconduct and/or dangerous practices by reporting it either internally within an organisation, or to an external party. A whistleblower is a person who raises a genuine concern in relation to any wrongdoing, this includes criminal activity, regulatory breaches, miscarriages of justice, damage to the environment, financial impropriety, reputational damage, any breach of legal or professional obligations, dangers to health and safety and the deliberate attempt to conceal it. In order to encourage Whistleblowing and provide appropriate protections to ~~W~~ whistleblowers, the governance arrangements described in this Policy are based upon the following core principles:

- Post Office will treat Whistleblowing disclosures consistently, fairly, appropriately and professionally;
- To encourage the reporting of any concerns as soon as possible in the knowledge that Post Office will take all concerns raised seriously and investigate fully, and that the confidentiality of all individuals will be respected;
- To provide guidance as to how to raise those concerns;
- To provide ~~W~~ whistleblowers reassurance that all genuine concerns are raised without fear of reprisals, even if they turn out to be mistaken;
- Post Office is committed to and oversees the implementation of the Policy in line with the Group's risk appetite. The Policy and associated procedures ~~for use by those~~

**Commented [SS5]:** Moved to new definitions section

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<sup>1</sup> In this Policy "Post Office" and "Group" mean Post Office Limited and any wholly-owned subsidiary that formally adopts this policy.

<sup>2</sup> The full set of policies can be found at: <https://poluk.sharepoint.com/sites/thehub/SitePages/Key%20policies.aspx?web=1>

<sup>3</sup> In this Policy "employee" and "staff" means POL or Group's permanent, temporary and fixed term employees, workers including temporary workers, agency workers (where the terms on which they are engaged are not substantially determined by them), contractors, consultants and anyone else working under a contract with Post Office, in all cases having regard to s.230(3) and s.43K Employment Rights Act 1996.

handling whistleblowing reports (the "Whistleblowing Procedures") (set out or referred to in this document where relevant<sup>4</sup>) are proportionate to the risks and complexity of the Group; and

- Post Office undertakes a training and awareness program to ensure all employees are aware of the Whistleblowing policy and procedure.

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

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#### 1.4. Definitions

"Employee" and "Staff" means an individual who has entered into or works under (or, where the employment has ceased, worked under) a contract of employment or any other relevant contract, as defined in sections 230(2) and (3) of the Employment Rights Act 1996, with Post Office or the Group or is defined as a "worker" under section 5 permanent, temporary and fixed term employees, workers including temporary workers, agency workers (where the terms on which they are engaged are not substantially determined by them), contractors, consultants and anyone else working under a contract with Post Office, in all cases having regard to s.230(3) and s. 43K Employment Rights Act 1996.

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

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"Whistleblowing" refers to the act of a person (the "Whistleblower") exposing making a disclosure that the Whistleblower reasonably believes is (a) in the public interest, and (b) regarding past, present or potential likely future or actual wrongdoing that falls into one or more of the following categories: misconduct and/or dangerous practices by reporting it either internally within an organisation, or to an external party. A whistleblower is a person who raises a genuine concern in relation to any wrongdoing, this includes

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

<sup>4</sup> The Whistleblowing Procedures will be provided internally to those handling Whistleblowing reports.

#### 1.4.1.5. Application

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

There are also corresponding Whistleblowing Procedures for those handling reports.

In order to encourage reporting of wrongdoing, Post Office will, where appropriate, and to the extent possible, follow equivalent principles to encourage, receive and investigate incidents of Whistleblowing by Postmasters (whether limited companies, partnerships, limited liability partnerships or individuals), Agent Assistants, and members of the public and will not subject any such persons to any detriment (including the termination of any contract or relationship with Post Office) for raising a genuine whistleblowing concern in an appropriate manner.

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#### 1.5.1.6. Legislation

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

- Employment Rights Act 1996
- Public Interest Disclosure Act 1998

#### 1.8-7. How to Report Whistleblowing

Post Office supports and promotes a number of reporting mechanisms:

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

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

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#### Information and Contact contact details

for the Speak Up line are:

- Telephone Number: [ ] GRO [ ]
- [ HYPERLINK "mailto:GRO" ] which is a secure on-line web portal

**Commented [HSF15]: Information from paragraph 3 has been included here as relevant.**

Grapevine:

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

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

NBSC:

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

- Telephone Number:
- E-mail: [ [HYPERLINK "mailto:nbscenquiries@GRO"](mailto:nbscenquiries@GRO) ]

Customer Support Team:

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

- E-mail: [ [HYPERLINK "mailto:customercare@GRO"](mailto:customercare@GRO) ]

Executive Correspondence Team:

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

- E-mail: [ [HYPERLINK "mailto:flagcaseadvisor@GRO"](mailto:flagcaseadvisor@GRO) ]

What information needs to be provided?

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

- openly,
- confidentially - the individual (or entity in the case of a limited company, partnership or limited liability partnership) making the report gives their or its name and the person handling the report will try to respect confidentiality where possible (subject to exceptions described in paragraph 1.8), or
- anonymously - reports made anonymously are taken seriously but Post Office encourages open reporting. Without certain details, it may not be possible to investigate a report as thoroughly and/or provide feedback on the progress or outcome of the investigation.

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What should be reported?

Whistleblowers should raise a concern if they are aware of, or suspect, certain wrongdoing which affects others (e.g. customers, members of the public, colleagues or the Post Office). The following lists some examples (this is a non-exhaustive list) of situations where an individual may raise a concern:

- Where Post Office or the Group is in breach of any legal obligation to which it is subject (usually a statutory rather than a contractual legal obligation)
- Financial Crime including Fraud, Money Laundering and financing of terrorism,
- Giving, offering or taking of bribes originating both inside or outside Post Office but related to Post Office business activities,
- Financial mismanagement, Tax evasion and Misreporting
- Racial, sexual, disability or other discrimination (Improper Behaviour),
- Practices that could put individuals or the environment at risk,
- Breach of Post Office internal policies and procedures
- Concerns about slavery or human trafficking<sup>5</sup>, and
- Any conduct likely to damage Post Office's reputation

Difference between Whistleblowing and other complaints

This Policy should not be used by staff wishing to raise complaints relating to their own personal circumstances, such as the way they have been treated at work, rather than a matter in the public interest that meets the definition of Whistleblowing set out in this

<sup>5</sup> More information in relation to Modern Slavery can be found here - [ [HYPERLINK "http://corporate.postoffice.co.uk/slaverystatement"](http://corporate.postoffice.co.uk/slaverystatement) ]

Policy. Grievances and matters such as bullying and harassment should be raised in accordance with the procedures set out in the appropriate HR policy.

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

<b>Whistleblowing</b>	<b>Not whistleblowing</b>
<u>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</u>	<u>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</u>
<u>Disclosure of a personal grievance <b>may</b> count as a legitimate complaint if it's in the public interest, for example on the grounds of racial, sexual or disability discrimination - A staff member complains that the branch manager has made racist/discriminatory remarks to other members of staff and members of the public.</u>	<u>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</u>
<u>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.</u>	<u>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</u>
<u>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..</u>	<u>A clerk complains that they feel they are being bullied by their line manager - this is covered by the Dignity at Work Policy</u>
<u>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</u>	<u>You are suspicious of a customer coming in to purchase large amounts of foreign currency on a regular basis - this is covered in the Anti Money Laundering and Counter Terrorist Financing Policy.</u>

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If an individual (or entity in the case of a limited company, partnership or limited liability partnership) is uncertain about whether something is within the scope of this Policy they or it should seek advice from the Whistleblowing Officerteam, whose contact details are set out in this Policy.

## 1.8. Protecting the Whistleblower (Your Legal Rights)

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

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

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

- It may be appropriate or necessary in the course of an investigation to share this information with a relevant stakeholder (e.g. an investigator).
- Disclosure is allowed or required by law.
- There is no requirement for a Wwhistleblower to provide personal contact information, but not providing this information may reduce Post Office's ability to undertake a thorough investigation into the concerns raised. Please note that making a disclosure anonymously means it can be more difficult for an Employee or Staff member to qualify for protections as a Whistleblower, as there would be no documentary evidence linking the individual to the disclosure for the Employment Tribunal to consider.

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

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

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

## 1.7.9. The Whistleblowing Officer Champion and Management of Reports

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Post Office has appointed the General Counsel as the Whistleblowing Officer who can be contacted at [ HYPERLINK "mailto:whistleblowing\_GRO" ] or by telephone on: GRO a Non-Executive Director as Whistleblowing Champion to provide governance and oversight that the integrity of Post Office work, finances and wider obligations to the public are upheld at all times by ensuring best practice with Wwhistleblowing arrangements, together with support and protection for those speaking up.

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

The Whistleblowing Champion oversees that:

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

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

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

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

## **1.8 How to Report Whistleblowing**

Post Office supports and promotes a number of reporting mechanisms:

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

Contact details for the Speak Up line are:

- [ HYPERLINK "mailto:GRO"] which is a secure on-line web portal

What should be reported?

Whistleblowers should raise a concern if they are aware of, or suspect, certain wrongdoing which affects others (e.g. customers, members of the public, colleagues or the Post Office). The following lists some examples (this is a non-exhaustive list) of situations where an individual may raise a concern:

- Where Post Office or the Group is in breach of any legal obligation to which it is subject (usually a statutory rather than a contractual legal obligation)
- Financial Crime including Fraud, Money Laundering and financing of terrorism,

- Giving, offering or taking of bribes originating both inside or outside Post Office but related to Post Office business activities;
- Financial mismanagement, Tax evasion and Misreporting
- Racial, sexual, disability or other discrimination (Improper Behaviour),
- Practices that could put individuals or the environment at risk,
- Breach of Post Office internal policies and procedures
- Concerns about slavery or human trafficking<sup>6</sup>, and
- Any conduct likely to damage Post Office's reputation

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. Grievances and matters such as bullying and harassment should be raised in accordance with the procedures set out in the appropriate HR policy.

If an individual is uncertain about whether something is within the scope of this Policy they should seek advice from the Whistleblowing Officer, whose contact details are set out in this Policy.

## 1.9-10. Responding to Whistleblowing Reports

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

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

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

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

Post Office will endeavour to give Whistleblowers feedback in the context of a particular matter, subject to other considerations such as applicable regulations or Post Office's legal requirements. The whistleblower may be kept informed of any action taken, however, this information may be limited if it is required to keep the confidence of other people.

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

## 1.10-11. External Disclosures

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

<sup>6</sup> More information in relation to Modern Slavery can be found here - [ HYPERLINK "http://corporate.postoffice.co.uk/slaverystatement" ]

to listen to the concerns of ~~S~~taff. In most cases ~~individuals~~ Whistleblowers should not find it necessary to alert anyone externally.

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

#### Advice

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

Helpline: [ ~~GRO~~ ]  
Website: [ HYPERLINK "http://www.pcau.org.uk/advice" ]-line/ [www.pcau.org.uk](http://www.pcau.org.uk/advice)

Commented [SS23]: Updated website address

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

#### Advice may also be sought from:

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

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

#### Disclosures to the FCA or PRA

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

<u>Body</u>	<u>Contact details</u>
<u>FCA's Whistleblowing Service</u>	Helpline: [ <del>GRO</del> ] E-mail: [ HYPERLINK "mailto:whistleblowing@fca.org.uk" ] Website: [ HYPERLINK "http://www.fca.org.uk/site-info/contact/whistleblowing" ] Address: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN
<u>PRA's Whistleblowing Service</u>	Helpline: [ <del>GRO</del> ] E-mail: [ HYPERLINK "mailto:whistleblowing@pra.org.uk" ]

Website: [www.bankofengland.co.uk/prudential-regulation/whistleblowing-and-the-pra](http://www.bankofengland.co.uk/prudential-regulation/whistleblowing-and-the-pra)  
Address: Confidential reporting (whistleblowing) IAWB team, Legal Directorate, Bank of England, Threadneedle Street, London, EC2R 8AH

Commented [SS25]: Added reference to PRA

Helpline: [GRO](#)

E-mail: [ HYPERLINK "mailto:whistle" [GRO](#) ]

Website: [ HYPERLINK "http://www.fca.org.uk/site-info/contact/whistleblowing" ]

Address: ~~Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN~~

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

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

## 2. Risk Appetite and Minimum Control Standards

### 2.1. Risk Appetite

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

The Group takes its legal and regulatory responsibilities seriously and consequently has<sup>7</sup>:

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

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

### 2.2. Policy Framework

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

### 2.3. Who Must Comply?

~~All third parties who do business with the Group, including consultants, suppliers and business and franchise partners, will be required to agree contractually to this policy or have their own equivalent policy.~~

~~Any investigations will be carried out in accordance with the Investigations Policy which is available on the Post Office Intranet~~

<sup>7</sup> The Risk appetite was agreed by the Groups Board January 2015

### 2.4.2.3. Minimum Control Standards

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

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

<b>Risk Area</b>	<b>Description of Risk</b>	<b>Minimum Control Standards</b>	<b>Who is responsible</b>	<b>When</b>
Receipt and investigation of Whistleblowing reports	Failure to meet legal and regulatory requirements	<p>Directive Control: Post Office must nominate a Whistleblowing Officer-Champion to receive reports, to provide governance and oversight, ensuring that all reports are fully investigated and that any appropriate corrective action is undertaken.</p> <p>The Whistleblowing Officer Manager must provide a Whistleblowing report to the R&amp;CC and ARC at least annually.</p> <p>Any serious Whistleblowing concerns must be promptly escalated to the Chairman of the Post Office Audit and Risk Committee.</p> <p>Preventative Control:</p>	<p>Post Office CEO and Board must nominate the Whistleblowing Champion.</p> <p>Whistleblowing OfficerMLRO &amp; Head of Financial Crime is responsible for providing report.</p> <p>Whistleblowing OfficerMLRO &amp; Head of Financial Crime</p>	<p>Ongoing</p> <p>Annually</p> <p>Ongoing</p> <p>Training must be provided at</p>

**Commented [SS26]:** Amended throughout to reflect proposed change to process and governance to be approved at March 2021 ARC

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
		<p>All <u>e</u>Employees <u>and</u> Staff are trained and the policy is available to them</p> <p>The Whistleblowing Officer Manager must ensure that appropriate arrangements are in place to ensure that whistleblowing reports are addressed promptly including during absences.</p> <p>Communications and awareness provided to all employees<u>Employees and Staff</u>.</p> <p>Corrective Control</p> <p>The Whistleblowing Officer Manager must escalate WhistleblowingB reports to the appropriate Investigating manager for investigation to take place.</p> <p>The nominated Investigating manager responsible for conducting the investigation must report the findings back to the Whistleblowing OfficerManager.</p>	<u>MLRO &amp; Head of Financial Crime</u>  <u>Whistleblowing OfficerManager</u>  <u>Head of Financial Crime</u>  <u>MLRO &amp; Head of Financial Crime</u>  <u>Whistleblowing OfficerManager</u>	least annually and within 30 days of joining Post Office  Ongoing  Ongoing  Ongoing  Ongoing

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
Breach of confidentiality	Failure to ensure confidentiality for the <u>Whistleblower</u>	<p>Preventative Control: Whistleblowing Policy is robust and up to date.</p> <p>Confidential Speak Up line reports are shared only with the Whistleblowing <u>Officer Manager</u> and nominated deputies</p> <p>Whistleblowing email inbox access is restricted to the Whistleblowing <u>Officer Manager</u> and nominated deputies</p> <p>Whistleblowing <u>Officer Manager</u> must put arrangement in place to protect the confidentiality of the <u>Whistleblower</u> during investigations</p> <p>Corrective Control: All incidents of breaches are escalated to the <u>Whistleblowing Officer-MLRO &amp; Head of Financial Crime</u> to review and take necessary actions.</p>	<p>Investigating manager</p> <p>Whistleblowing <u>Officer Manager</u></p> <p><u>Whistleblowing Officer-MLRO &amp; Head of Financial Crime is responsible for ensuring that reports are shared with the appropriate persons.</u></p> <p>Whistleblowing <u>Officer Manager</u></p> <p>Whistleblowing <u>Officer Manager</u></p> <p><u>Whistleblowing Officer Manager to escalate to the MLRO &amp; Head of Financial Crime.</u></p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
Incorrect handling of Whistleblowing report	<p>An individual may raise a whistleblowing report with other individuals in the Group. Details may then be shared with various stakeholders before being passed onto the Whistleblowing Officer Manager.</p>	<p>Preventative Control:</p> <p>Training provided to contact teams to identify potential whistleblowing reports and ensure these are correctly handled, e.g.:</p> <ul style="list-style-type: none"> <li>• Grapevine,</li> <li>• NBSC,</li> <li>• Customer Support, and</li> <li>• Executive Correspondence Team.</li> </ul> <p>Communications and awareness provided to all Employees and Staff. –</p> <p>Corrective Control:</p> <p>All incidents of breaches are escalated to the Whistleblowing Officer MLRO &amp; Head of Financial Crime to investigate and take appropriate actions.</p>	<p>Whistleblowing Officer Manager</p> <p>Head of Financial Crime MLRO &amp; Head of Financial Crime</p> <p>Whistleblowing Officer Manager to escalate to the MLRO &amp; Head of Financial Crime.</p>	<p>Annually and within 30 days of joining the Post Office</p> <p>Ongoing</p> <p>Ongoing</p>
Insufficient Information	<p>Failure to capture/report sufficient information about the issue may mean that the underlying issue cannot be properly investigated and resolved</p>	<p>Directive Control:</p> <p>Individuals-Employees and Staff are encouraged to report issues and provide full information and their contact details, where they feel able to do so.</p> <p>Corrective Control:</p> <p>All reports, including those where insufficient information</p>	<p>Whistleblowing Officer Champion and Whistleblowing Manager to encourage Employees and Staff to do so.</p>	<p>Ongoing</p> <p>Ongoing</p>

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
		has been provided and no further action was taken are recorded on the Whistleblowing database, which is reviewed for trends and issues.	Whistleblowing OfficerManager	
The 'Speak Up' Service	Failure to effectively record Whistleblowing reports and pass onto the Whistleblowing OfficerManager, due to factors such as resource or IT failure.	<p>Preventative Control: The Whistleblowing Officer Manager must review the effectiveness of the service provided by NAVEX Global (formerly known as Expolink Europe Ltd) at least annually.</p> <p>The Whistleblowing Officer Manager must review the effectiveness of the processes operated by Grapevine, BSC, Customer Support, and The Executive Complaints Team at least annually to ensure that whistleblowing reports are identified and communicated promptly.</p>	<p>Whistleblowing OfficerMLRO &amp; Head of Financial Crime to ensure review takes place.</p> <p>Whistleblowing OfficerMLRO &amp; Head of Financial Crime to ensure review takes place.</p>	<p>Annually</p> <p>Annually</p>
Treatment of Whistleblowers	Breach of Whistleblowing guidelines such that a Whistleblower suffers prejudice, detriment or dismissal as a result of	Preventative Control Training must be provided to all people managers as part of their induction process as a manager and on appointment to Post Office.	Whistleblowing Officer Manager and People Training Manager	Ongoing

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
	making a <u>W</u> histle-blowing report	<p>Annual training must be provided to all Post Office <u>Employees and s</u>Staff to remind them of the protections available to <u>W</u>histleblowers and the importance of identifying and reporting wrongdoing</p> <p>The Code of Business Standards must refer to the <u>W</u>histleblowing policy and must be provided to all new joiners as part of their induction programme.</p>	<u>Whistleblowing Officer Manager</u> and People Training Manager	Ongoing
<u>Line managers</u>	<p><u>An Employee or member of Staff may not want to make a report to their line manager in case it affects their relationship or where the disclosure involves the line manager.</u></p>	<p><u>Preventative Control</u></p> <p><u>Employees and Staff should be made aware of the multiple ways to disclose a report and also that reports can be anonymous.</u></p> <p><u>Training must be provided to line managers as part of their induction process as a manager and on appointment to Post Office regarding the handling of reports and the importance of encouraging Employees and Staff to make reports.</u></p>	<u>Whistleblowing Manager and People Training Manager</u>  <u>Whistleblowing Manager and People Training Manager</u>	<u>Ongoing</u>  <u>Ongoing</u>
<u>Support available to Whistleblowers</u>	<u>Whistleblowers are not supported throughout the process of an investigation</u>	<p><u>Preventative Control</u></p> <p><u>Feedback should be taken from Whistleblowers throughout an investigation to monitor that</u></p>	<u>Whistleblowing Manager</u>	<u>Ongoing</u>

**Commented [SS27]:** New control standard to clarify line management responsibilities

**Commented [SS28]:** New control standard to reflect feedback from Protect self-assessment

<b>Risk Area</b>	<b>Description of Risk</b>	<b>Minimum Control Standards</b>	<b>Who is responsible</b>	<b>When</b>
		<a href="#"><u>they feel supported and protected by the Post Office.</u></a>		

## 3. Definitions

### 3.1. Definitions

#### **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:

E-mail: [\[ HYPERLINK "mailto:gapevine.admin@GRO" \]](mailto:gapevine.admin@GRO)

#### **NBSC**

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

Telephone Number:

E-mail: [\[ HYPERLINK "mailto:nbscenquiries@GRO" \]](mailto:nbscenquiries@GRO)

#### **Customer Support Team**

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

E-mail: [\[ HYPERLINK "mailto:customercare@GRO" \]](mailto:customercare@GRO)

#### **Executive Correspondence Team**

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

E-mail: [\[ HYPERLINK "mailto:flagcaseadvisor@GRO" \]](mailto:flagcaseadvisor@GRO)

## 4. Where to go for help

### 4.1. Additional Policies

This Policy is one of a set of policies. The full set of policies can be found at:

[ [HYPERLINK](#) ]  
[ **GRO** ]

### 4.2. How to raise a concern

Any Post Office employee who suspects that there is a breach of this Policy should report this without any undue delay. Whistleblowing can be reported via the following channels:

- Their line manager;
- A senior member of the HR Team, or
- If either or both are not available, staff can contact the Post Office's Whistleblowing Officer Team, who can be contacted by email at: [ [HYPERLINK](mailto:whistleblowing) ]  
[mailto:whistleblowing] [ **GRO** ] or by telephone on: [ [HYPERLINK](#) ] [ **GRO** ]
- the confidential Whistleblowing Speak Up service 'Ethicspoint' provided by Navex Global via telephone on: [ [HYPERLINK](#) ] [ **GRO** ]
- or via a secure on-line web portal: [ [HYPERLINK](#) ] [ **GRO** ]

In some instances it may be appropriate for the individual to report in the form of a complaint to Grapevine, the Customer Support Team or the Executive Correspondence Team.

### 4.3. 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 the Policy sponsor or Policy owner.

## 5. Governance

### 5.1.2.4. Governance Responsibilities

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

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

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

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## 6.3. Control

### 6.3.1. Policy Version

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

### 6.2.3.2. Policy Approval

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

Committee	Date Last Approved
POL R&CC	13 <sup>th</sup> July 2020
POL ARC	27 <sup>th</sup> July 2020
POMS ARC	22 <sup>nd</sup> July 2020
Committee	Date 5.2 Approved
POL R&CC	
POL ARC	
POMS ARC	

**Policy Sponsor:** Group Director of Legal, Director of Compliance & Governance

**Policy Owner:** Whistleblowing Officer, MLRO & Head of Financial Crime

**Policy Author:** Head of Financial Crime, MLRO & Head of Financial Crime

**Next Review:** March 2022

**Next review:** July 2021 Ma

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### Company Details

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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.