

| Post Office Ltd Financial Investigation Policy | |
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| 1 | <p>PURPOSE</p> <p>This policy describes the role of the Financial Investigation Unit in mitigating losses, supporting criminal investigations and recovering Post Office funds within the functions of the Post Office Ltd Fraud Team.</p> |
| 2. | <p>INTRODUCTION</p> <p>The Financial Investigation Team sits within the overall Fraud Strand and its mission statement is:</p> <p>"To mitigate the threat of fraud against Post Office Ltd. In order to protect its People, Assets and Brand and Reputation".</p> |
| 3 | <p>AIMS</p> <ul style="list-style-type: none"> • Provide effective support to the investigation team, casework management team, Post Office Finance team and Criminal Law Team in order to recover Post Office funds and mitigate losses. • At all times to adhere to UK and EU legislation and corporate governance to ensure best practise is being adopted. • Ensure that the powers conferred under the Proceeds of Crime Act 2002 are used appropriately by each Financial Investigator during the course of any enquiry. • All financial investigations to be conducted with absolute impartiality and proportionality. • Maximise efficient use of limited resources by ensuring good communication and collaboration with all relevant parties. • Protect Post Office Ltd's brand and reputation. • Develop policies to provide succession planning for the unit to ensure an effective working team at all times. |
| 4 | <p>STRUCTURE</p> <p>The Financial Investigation Unit comprises of one team leader who is also an Accredited Financial Investigator and two further Accredited Financial Investigators.</p> |

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| 5. | PRINCIPLES <ul style="list-style-type: none">• The Financial Investigation Team to fully support and interact with its stakeholders and partners.• The Team will ensure that all stakeholders and customers are fully informed with all necessary developments.• All enquiries to be conducted within the due processes available and with the necessary consideration given to corporate policies. |
| 6. | PROCEDURES AND STANDARDS Framework <p>The Financial Investigation Team adopts a structured approach to the key areas in which it is concerned, namely money laundering and confiscation.</p> <ul style="list-style-type: none">• Identify at the earliest opportunity which type of financial investigation will be pursued.• Adhere to the rules concerning the Human Rights Act 1998, Police and Criminal Evidence Act 1984, Data Protection Act 1998, Regulation of Investigatory Powers Act 2000 and the Criminal Procedures and Investigations Act 1996.• Ensure that all investigations are recorded correctly and in a timely manner.• Only use the powers available under the Proceeds of Crime Act 2002 appropriately, such as;<ol style="list-style-type: none">1. Applications for Production Orders2. Applications for Restraint Orders3. Applications for Account Monitoring Orders4. Applications for Customer Information Orders5. Cash Seizures6. Applications for Confiscation Orders |
| 7. | MONITORING <p>Representatives from the National Policing Improvement Agency constantly monitor the work conducted by the Financial Investigation Unit.</p> |