



Code of Business Standards

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A Letter from Nick Read

Welcome to the most important document we have at Post Office – our Code of Business Standards

Post Office is unique – a commercial business delivering an important social purpose. We believe in the importance of connecting communities and enhancing the powerful role they play in all our lives. We stay true to this commitment by meeting customer needs through carefully designed, high quality products, and maintaining an unrivalled local presence across the UK.

The Code of Business Standards (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 make the right choice. It's a document which not only protects Post Office but each and every one of us.

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.

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 need help or have questions.

Thank you for your commitment to ensure our customers and the communities we serve continue to place their trust in us.

Sincerely

The logo consists of the letters 'GRO' in a bold, black, sans-serif font, enclosed within a dashed rectangular border.

Nick Read
Group CEO

Introduction

About Post Office

Post Office is the UK's largest retail network and the largest financial services organisation in the UK. We have provided services for more than 370 years and currently supply a range of essential products and services to communities' right across the UK.

Our UK Government mandate is to provide at least 11,500 Post Offices, some within certain geographical, demographic and social criteria that provide a unique operational challenge for Post Office compared to other wholly commercial retail or financial institutions. We are often at the heart of the local communities.

Post Office directly manages around 1% of the Network of branches which consumers will generally recognise as the larger branches

often situated in the centre of towns and cities across the UK. The remainder of the branches are managed on a franchise basis by independent small retailers and shop owners operating Post Office services within their own store. Business owners may own more than one shop operating Post Office services and have a range of other non-connected business interests. We also have Franchised facilities within some larger high street commercial partners, who like the smaller independent retailers, provide their own trained and friendly staff to provide our Post Office services to consumers.

At Post Office we are committed to doing business the right way.



Our purpose

'We're here in person, for the people who rely on us'

Our Intent for 2025

Our intent for 2025 is to be the **operator of a successful, sustainable, and sought-after franchise** and an organisation that colleagues **feel proud to work for**. There are seven strands to our future success:

1. We will prioritise **strong, trusting and rewarding relationships** with all our Postmasters.
2. We will **grow our network**, making sure we have the right branches in the right locations nationwide.
3. We will **innovate in Mails**, working with more carriers and delivering more of what customers want and small businesses need.
4. We will secure free, convenient and reliable **access to cash** in every community.
5. We will **build commercial partnerships**, to launch new products and services in our branches and online.
6. We will invest in **new branch technology** for Postmasters and online for their customers.
7. We will create **value for our shareholder** with a successful, sustainable and efficient business.

Beyond that, we intend to work with Government on the various means by which we could deliver on a long-term aspiration to facilitate profit sharing with our Postmasters, so Postmasters can share fairly in our success.



Our Ways of Working

We all want Post Office to be a great place to work. A friendly, helpful environment, where we work together collaboratively to achieve the same aims.

Created by colleagues, for colleagues, our Ways of Working reflect the kind of culture you would like us to have and set out how we need to work together to deliver our Purpose and our Intent. Everyone has a part to play in bringing them to life – by working in **partnership**, as **one team**, we **deliver** amazing results. **We are Post Office.**

We need to put the relationship with our Postmasters and branches at the centre of

what we do. This means getting the whole business aligned behind our frontline to ensure we deliver.

We can all help to make Post Office an organisation that everyone is proud to work for. By living our Ways of Working each and every day, we can all learn from and inspire one another, as we strive to do our best for our Postmasters, our customers and each other.

Each of our Ways of Working is supported by six statements to bring to life exactly how we will put them in to practice.

“We’re here,
in person, for
the people who
rely on us”

Ways of Working



We work in partnership



We are one team



We deliver

Working in partnership as one team we deliver amazing results
We are Post Office.

Our Ways of Working

We work in **Partnership**

Partnerships are at the heart of the way we work; they allow us to achieve far more than we could alone. In short, we are stronger together. Each partner brings different capabilities and resources, but it only works if we accept each other as equals and the partnership benefits both parties.

It's always important to respect each other's unique perspectives, but for partnerships to work we need to find common ground and shared goals. We also need to build trust by being open about our aims, and to deal with any problems together. Be aware that partnerships evolve over time so it's important to regularly check that both parties are still happy and that you still share the same objectives.

1. We place those who work in Post Office branches at the **centre of everything we do**
2. We invest time and energy into **trusted and valued** partnerships
3. We **build lasting relationships** with all our partners
4. We respect and **recognise** each other's challenges
5. We enable our Postmasters and DMBs to **serve their communities**
6. We are **stronger together**

We are **one team**

Every day we are faced with decisions to make and we strive to achieve the right outcome. Often two heads are better than one and three would be better still.

It's important to remember that our colleagues' success is our success and vice versa. Diversity of thought is important because different ways of thinking drive innovation and ensure that everyone feels included. So, be open with your colleagues,

listen to them, and share your views. Working as one team is powerful and is already transforming our culture, but we need your help to create an environment where everyone feels empowered to speak up and share their feelings, thoughts and ideas.

1. We **collaborate** and share freely
2. We **listen** to understand and then respond
3. We **celebrate success** and say thank you often
4. We are **helpful, friendly and available**
5. We **trust** and **empower** everyone to make decisions
6. We act with **integrity** and are **open and honest**

We deliver

Delivering effectively is the end result of working well as one team, with our partners – it's a collective effort around a shared goal.

In order to deliver, we need to be outcome driven because this helps to clarify our approach, making it simpler and quicker to make decisions. Learning from our mistakes is also crucial and makes it easier to deliver more effectively next time.

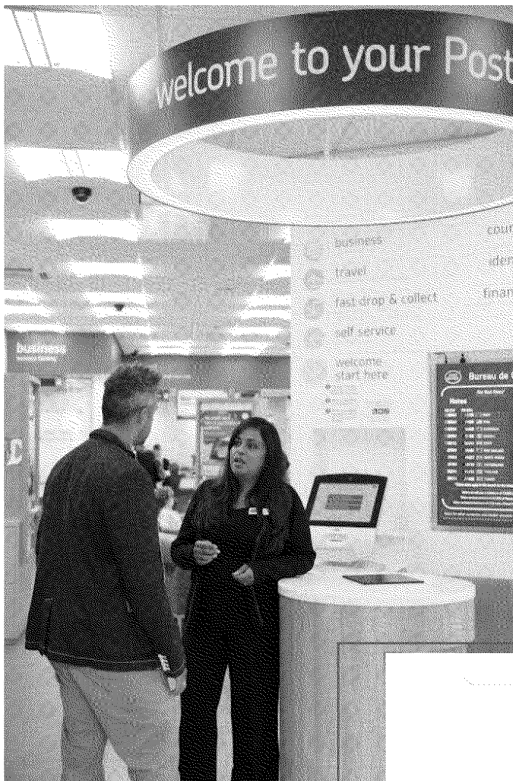
Delivering well and consistently builds trust; it will give us a reputation for being reliable and for doing what we say we will do.

1. We are **reliable** and always **do what we say we will do**
2. We are **passionate** about the service we provide
3. We **learn** from our mistakes
4. We **embrace change** and find ways to **innovate and improve**
5. We are **outcome driven**
6. We work to **keep it simple** and get stuff done

Our Ways of Working

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 and supporting each other.



Be Aware

Why we have a Code

As a purpose-led company, our 'Ways of Working' are the foundation to our success and essential to achieving our 'Purpose'.

Post Office's Code of Business Standards and the policies that support, set out the standards required from all our employees.

Sometimes, you might face a situation where the right thing to do is not obvious. That is where our Code of Business Standard can help. It is always here as your 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

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.

Who must follow this Code?

It does not matter where you work or what you do for the Company – you have a responsibility to use good judgment and follow our Code. That includes every full-time or part-time employee at every level of the Company.

As employees, each of us has as a responsibility to:

- **Know and live the Code.** Read it and follow it, along with any other policies that apply to your job.
 - Complete relevant mandatory training on time as required by the company.
- **Think before you act.** Use good judgment, being honest and ethical in every action you take, ensuring you demonstrate respect for others.
- **Follow the law.** Understand and ensure compliance with laws that apply to your job and our company. If you are ever unclear about a law or regulation speak to your manager.
- **Ask for help.** When an answer is not clear, ask for guidance before taking action.
- **Report concerns.** Prevent harm to our company and its reputation by reporting your concerns of potential unlawful behaviour or violations of the Code as well as co-operating with Company investigations.
- **Never retaliate** against anyone who raises a concern in good faith about a possible violation of the Code or who cooperates in an investigation.

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.

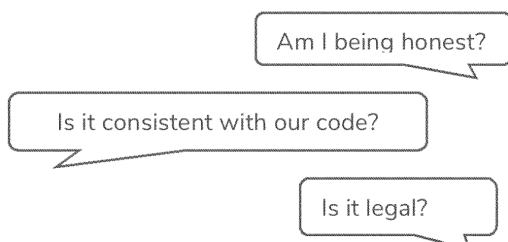
- **Lead by example and model the Code and our ways of working.**

- **Talk about the Code.** Ensure that all colleagues, including new joiners:
 - Have read the Code
 - Have completed any mandatory training
 - Understand how to raise concerns and/or report actual or suspected breaches
- **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 your team knows that for results to matter, they must be achieved the right way.
- **Be responsive and create a “speak up” culture.** Create an environment that fosters and enables ethical behaviour, where employees are comfortable speaking up without fear of retaliation. Take seriously any concern raised by an employee that compromises the Code and determine if the issue should be escalated.
- **Take action.** Take corrective or preventive action when someone violates the Code

How to make Good Decisions

Even with good judgement and the best intentions, we may not always know the most appropriate course of action to take. Doing what is right is our goal. The Code, along with our other company policies, is designed to help us make the right decisions.

If the right thing to do is not clear, ask yourself:



Does it follow our policies and ways of working?

What would others think of my actions?

Would I be comfortable if my actions were made public?

How would my decision impact on Post Office reputation?

If you are still unsure as to the right thing to do, you should talk with your manager and discuss your questions and concerns.

When a breach occurs

Compliance with the Code and our company policies is not optional.

Whenever we become aware of a breach of the Code, company Policy or the law, we will act to address the problem and prevent future occurrences. Depending on the circumstances, corrective and preventive steps might include training, counselling and disciplinary action up to and including termination of employment. If an act violates the law, it could result in fines or criminal prosecution.

The Company has other policies and processes governing performance, conduct and behaviour. Policy breaches that are not Code breaches will be handled under the appropriate policy or procedure.

Reporting Concerns

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.

If you witness or otherwise learn about the company's standards and reputation being put at risk by unethical or even criminal behaviour, you must immediately, report it.

Post Office encourages everyone to raise any concerns that you have with your line manager, but we recognise that sometimes this may be difficult or inappropriate, and therefore a number of different reporting mechanisms are available to raise your concern:

- A senior member of the People team, or
- Direct to the Whistleblowing Manager (whistleblowing@GRO) or
- Contacting the 'Speak Up' line, a confidential reporting service which is run by an independent company called Convercent:
 - Telephone Number: GRO
 - <http://speakup.postoffice.co.uk/> which is a secure on-line web portal

[Learn more:](#)
[Whistleblowing 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, against anyone who shares a concern in good faith or participates in any investigation into that concern. 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.

What is Retaliation?

We define retaliation as any action that would likely deter someone from reporting a concern or participating in 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.

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 what you have a reasonable, good-faith belief be 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.

**WE DO
NOT
Retaliate**

Speaking up

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

Fair Treatment of Employees

In our People related processes, such as recruiting, developing, promoting and other employment activities, we are committed to complying with the applicable employment and labour laws and regulations. These include, wage & working time, privacy, immigration, compulsory child labour, modern slavery, collective bargaining, anti-discrimination and similar employment rules.

Complying with the legal requirements is only part of the formula for cultivating a culture of respect in our workplace — we are all responsible for assuring that everyone at Post Office is treated with respect and given fair consideration.

Embrace Diversity and Inclusion

We are committed to building a diverse and inclusive workplace in which everyone feels like they belong and are empowered to bring their authentic self to work

Embracing diversity and inclusion means we:

- Strive to promote fairness and equal opportunities for employment and promotion based on experience, qualifications and skills.
- Are respectful of the differences between people and their circumstances and do not tolerate discrimination or harassment on the basis of any legally protected characteristics.
- Encourage ideas, opinions, and ways of thinking that may be different from our own and prohibit exclusionary behaviours, which may include, bullying and workplace violence, discrimination and isolating individuals and groups who are different.

- Foster an inclusive and respectful workplace by assessing our conscious and unconscious biases, removing barriers to inclusion, focusing on systemic equity in our people processes and company procedures for consistency and fairness, being a supportive ally and standing up for others.
- Invest in the physical, mental and emotional well-being of our employees through ongoing education around inclusion and diversity initiatives.

Post Office strives to build an inclusive workplace where we celebrate diversity and inclusion with all employees feel a sense of belonging and valued for who they are and the differences they bring. Post Office does not tolerate discrimination 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](#)

Q: I want to make a promotion decision. One colleague is 50 and nearing retirement age and the other 30. Should I promote the younger colleague since they may work for us for many more years?

A: No. We only make employment decisions based on job-related skills, achievements and performance.



Be Kind and Respectful

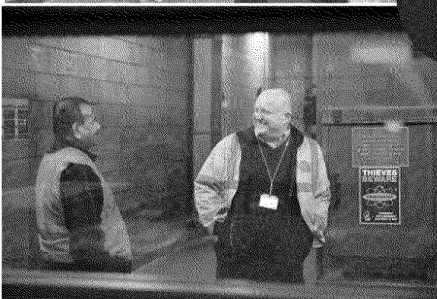
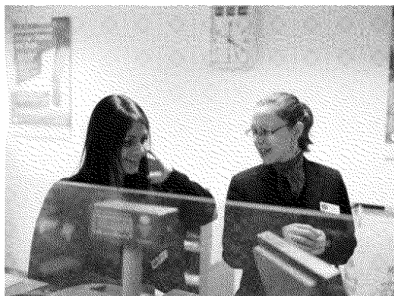
We have a responsibility to create a respectful and inclusive workplace. It is important that you feel valued and respected and that you are treated fairly.

You must:

- Familiarise yourself and comply with Equality, Diversity and Inclusion and Dignity at Work policies.
- Understand employment and equal opportunities laws and local culture that may have an impact on workplace decisions and ways of working.
- Treat every colleague with respect, regardless of role, position, employment status or length of service.
- Consider the needs and perspectives of others and how our words and actions might be received.
- Never threaten, act violently toward or harass others.
- Not insult, bully, disparage, shame or mock others and be vigilant for signs that others are being harassed or bullied.
- Not retaliate against others—everyone should foster a culture in which anyone can comfortably raise a concern without fear of retaliation.
- Speak up through the relevant channels about anything that may violate Post Office Diversity and Inclusion policies so that we can all work together to make Post Office a great place to work.
- Make sure that your conduct when you are at off-site events is as it would be at work. Company-organised events include social events such as Christmas parties, team events and social outings.
- Complete unconscious bias training if you are to be involved in recruitment activity.

Learn more:

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



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

A: No. We treat all colleagues with dignity and respect and what you consider funny might be considered offensive by others. Always ask yourself whether your actions might be offensive, abusive or intimidating to others.

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.

You must:

- Familiarise yourself with our Post Office Modern Slavery statement which can be found on our website [here](#)
- Complete the mandatory Modern Slavery and Human Trafficking training on time

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 contact the below:

- Direct to the Whistleblowing Manager ([whistleblowing@postoffice.co.uk](#)) or
- Contacting the 'Speak Up' line, a confidential reporting service which is run by an independent company called Convercent:
 - Telephone Number 0800 028 2828
 - <http://speakup.postoffice.co.uk/> which is a secure on-line web portal, or,
- The Government's Modern Slavery Helpline or [gov.uk/modernslavery](#)

Learn more:

[Modern Slavery Statement](#)

Q: I heard a POL 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?

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



Creating a Safe and Healthy Work Environment

Whether working in an office, commuting to work, at home, in depots or branches or out in the field nothing is more important than you staying safe and healthy. We care about your wellbeing; we want to create conditions in which you are free from harm and free to do your best work.

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

Everyone at Post Office have a role to play. We all have a duty to ensure a healthy and safe work environment and work safely

You must:

- Familiarise yourself and comply with health and safety policies, risk assessments, method statements (safe system of work), standards, procedures,

Learn more:

[Health and Safety Policy](#)

[Alcohol & Drugs Policy](#)

[Physical Security Policy](#)

[Health & Wellbeing Policy](#)

[Safety, Environment and Wellbeing Team Site](#)

Protecting the Environment

At Post Office we comply fully with all relevant environmental law and promote initiatives that save on the resources that we use.

We are committed to taking account of the environmental and ethical effects of our policies in our planning and operations.

We can all play an important part in supporting good environmental practice by not wasting resources, such as fuel, energy and paper.

laws and regulations relevant to your work.

- Familiarise and comply with all policies related to physical security.
- 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
- Support one another, be aware of and utilise the business wellbeing and mental health support resources.
- 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 Health and Safety training.
- Not work under the influence of illegal drugs, alcohol or any other substance that could compromise safety or performance.



We should take every opportunity to recycle or reuse waste products and minimise waste to landfill

The use of Social Media

While it is recognised that all employees are entitled to privacy in their 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 you may wish to use your own devices such as mobile phones, to access social media websites while you are at work, but you should limit your use so not to interfere with your working day and should be limited to your 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 your actions can damage the Post Office's reputation. All communications you 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 your employment in anyway which breaches provisions of the Data Protection Act 2018
- Make disparaging or defamatory statements about the company, your colleagues, customers, postmasters or suppliers
- Make comments that could be considered to be bullying, harassment or discriminatory against an individual.
- Respond yourself to negative posts about Post Office. You may come across negative or disparaging posts about the Company or see third parties trying to spark negative conversations. Avoid the temptation to respond yourself and instead let those who are certified internally know and respond if required, by reporting to social **GRO**

Use at work: You are allowed to access social media sites from any Post Office devices in connection with work related activities, such as posting about our services, upcoming events or publicising Post Office. You are reminded that they must comply with the below:

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

Q: A co-worker posted an offensive, sexual comment about me on their personal social media page. Are they allowed to do that?

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

How we Conduct Business

Prevent Bribery and Corruption

At Post Office, we are committed to 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.

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.

In the drive to be successful in our business, there may be instances where you are asked to give or accept a bribe. Do not do it. The consequences of violating bribery laws can be severe – for you and for the Company.

Learn to spot a bribe. Bribes come in many forms, and they are not always obvious. 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.

Gifts and Hospitality are part of everyday commercial life. If you are offered gifts or hospitality, as a test of appropriateness, you

should 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.

You must:

- 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.



Prevent Bribery and Corruption

Gifts

The giving and receiving of gifts should ordinarily be below £100 per person in value. Items costing £20 or less, such as pens, calendars, diaries, notepads and paperweights do not need to be reported and approved.

You must:

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

Hospitality and Entertainment

Hospitality may only be given and accepted where it has a clear and demonstrable link with a legitimate business purpose, e.g. an organised event or a meal at which business is to be discussed.

In relation to offers of hospitality, numbers on both sides should be limited to those whose presence is necessary to progress the business in hand.

You must:

- Ensure the hospitality is 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.

You must:

- Familiarise yourself 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.

- 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
- Always obtain approval for any gifts or hospitality offered or received.
- 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.
- Immediately notify your manager if they 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.

Ask yourself these questions



Is the gift prohibited?

Could it be interpreted as a bribe?

Is it in line with our (or their) gift policy?

Could it influence a business decision?

How would it be perceived if it were publicly disclosed?

If any of these questions raise doubts, you should speak to your line manager

Learn more:

[Anti-bribery and Corruption Policy](#)

Fraud and 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, so we comply with anti-money laundering, financial crime and anti-terrorism laws

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

You may be committing an offence, and be prosecuted if you 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.

Full details are available in the Anti-Money Laundering and Counter Terrorist Financing policy or the Financial Crime policy.

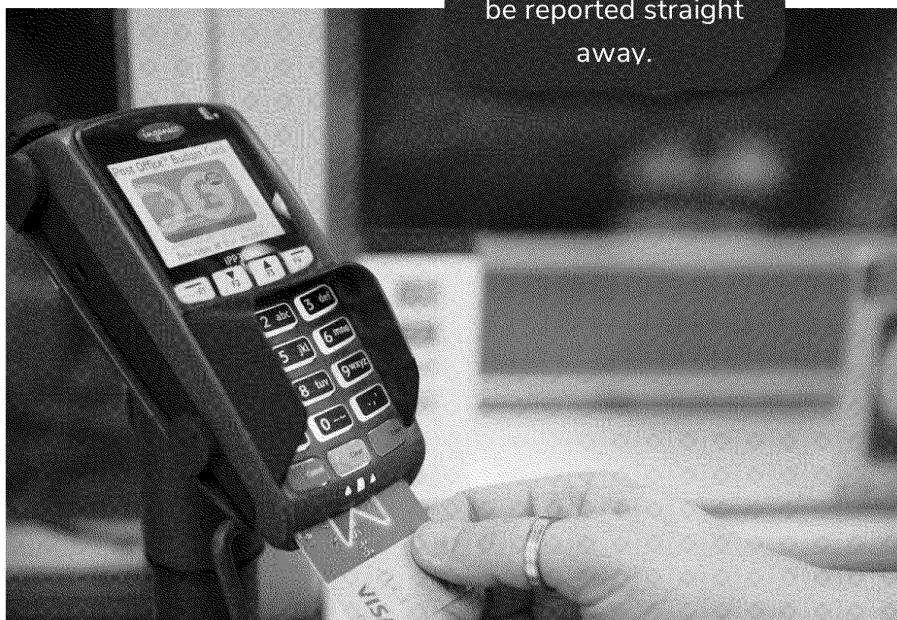
You must:

- Familiarise yourself with and follow Anti-Money Laundering and Financial Crime policies.
- Understand and follow procedures and internal controls that are designed to prevent individuals in money laundering and engaging in other illegal activities.
- Be proactive when it comes to spotting financial transactions that might signal a problem and report your concern (to Grapevine on **GRO**) if you see or suspect an activity of transaction that is outside of normal processes.
- Complete mandatory Anti-Money Laundering and Counter Terrorist Financing training on time.

Learn more:

[Anti-Money Laundering and Counter Terrorist Financing Policy](#)
[Financial Crime and Supply Chain Compliant Team Site](#)
[Financial Crime Policy](#)
[Fit and Proper Policy](#)

Any activity you suspect could be linked to money laundering needs to be reported straight away.



Risk Management

Risk management is fundamental to how Post Office is directed, managed and controlled at all levels. 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;

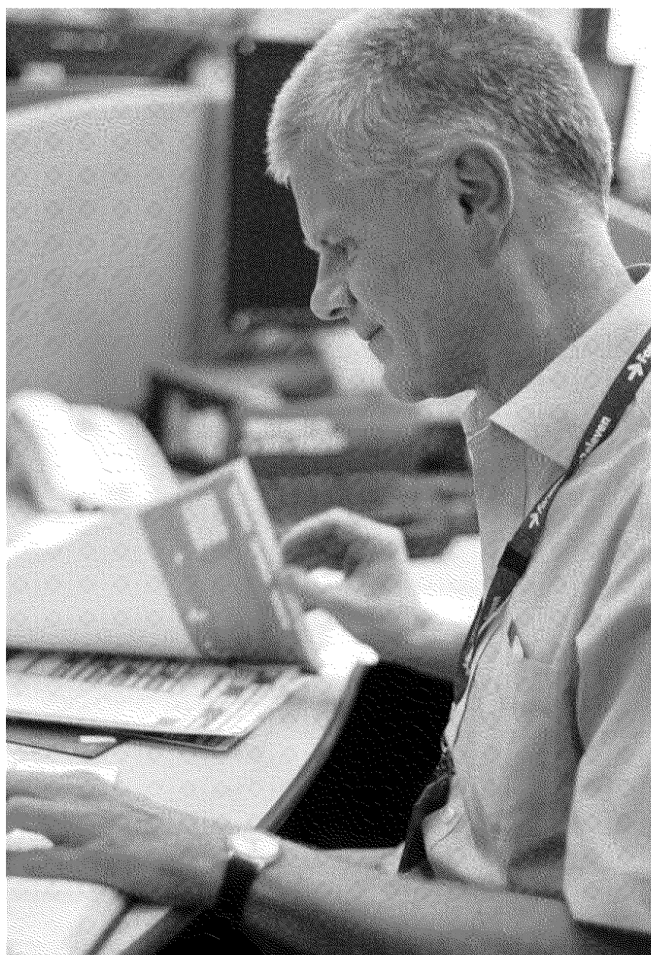
Risk management must follow a consistent, transparent and auditable methodology and proactively recognise external factors, opportunities, and uncertainties.

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

Learn more:
[Risk Policy](#)



Risk must be identified,
measured, monitored,
managed and reported.



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

Use of Computers, Internet, Phones and Emails

The security of our information and IT systems is critical. Many colleagues 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 the 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 cloud storage services such as Dropbox

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
- 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 In the event it is not possible to reach the service desk through the above you can email **POLITDSD** **GRO**

Learn More:

[Cyber and Information Security Policy](#)

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 handling Post Office's information, you must:

- Familiarise yourself with all information handling policies and complete any mandatory training on time.
- Complete mandatory information security 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 synchronising Post office information onto personal devices
- Not take any Post Office confidential information with you if you leave the company. Any work carried out during employment will remain the intellectual property of Post Office.
- 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 Standards](#)

[Cyber and Information Security Policy](#)

[Cyber Information Classification Standard](#)

[Cyber Security Team Site](#)

Personal Data and Privacy

When customers, postmaster 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 consumers, postmaster, third parties and employees

Learn more:

[Protecting Personal Data Policy](#)

You can contact
[data.protection@GRO](#)
[GRO](#) if you have any
questions or concerns in
regards to the access,
transfer or use of personal
data.

Maintaining Accurate Business Records

At Post Office we generate a large volume of business records each day. You are responsible for ensuring that the records in your custody or control are maintained, retained and destroyed in compliance with all legal and regulatory record keeping requirements. To manage your business records properly, you should:

- Comply with our records management policies and retention schedules for all business records, paper or electronic.
- Keep records 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.
- If you receive a Legal Hold notice, follow all retention instructions on the notice regardless of the retention schedule or applicable law.

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.

Learn more:

[Document Retention and Disposal Policy](#)

Financial Accuracy

At Post Office we are committed to accurate reporting in our company's books and records. You are expected to be accountable for the accuracy and honesty of the business records, contracts and agreements that you handle in the normal course of business. You should 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 of your transactions, no matter what the amount, must 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.



Communication with the Public and Journalists

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

No Post Office employee is 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 pressooffice **GRO**



Choose Suppliers with Integrity

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 to 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.

Learn more:

[Procurement Policy](#)

[Purchasing Process](#)

[Contract Execution Policy](#)

[Supplier Code of Conduct](#)

- 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



Avoiding Conflicts of Interest

When do Conflicts of Interest Occur

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 the Company's 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 the company. Every decision we make while on the job must be objective and with the company's business interests in mind.



CONSIDER THIS

When someone says.....

"Could you put in a good word for me?"

"No one needs to know – you can do the work in your free time"

"My Nephew has a company"

Be Aware these can be warning signs of possible conflict.

You must:

- Act in the best interests of Post Office. You must not do anything which conflicts with your duty as an employee of the company or use your official position for private advantage.
- Avoid situations where a personal relationship or financial interest in another company might influence decisions you make in your job.
- Understand that a conflict can exist even if you are convinced that your 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.
- Before taking on outside work, ensure that the work does not harm Post Office's business interests.
- Not exploit your personal or family relationship with any colleague for any gain including to yourself or others.

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 employees should:

- 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.

These situations should also be avoided in connection with another employee of a prospective employee with whom one has a close personal relationship outside the Company.

Outside Board Members

Serving on outside boards can present conflicts of interest and should be disclosed and discussed with your manager. 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 the right of employees to engage in political activity to support political groups. Employees 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.

Employee's 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 your performance or objectivity at work.
- Not improperly use company resources or time for personal party-political purposes



THINK IT THROUGH

- Will this activity or relationship influence, or appear to influence, my ability to make sound and unbiased business decisions or otherwise interfere with my ability to do my job?
- Will I personally gain something or will a family member benefit from my involvement in this activity based on my status as an employee of Post office?
- Will I be using Company assets for personal gain?
- Will my participation cause me to put my interests ahead of what's best for the Company?
- Will public disclosure of the activity damage the reputation of Post Office?

If you answered "yes" to any of the above questions or if you feel that you might have a potential conflict of interest, inform your line manager and seek their advice if you are unsure.

Learn More:

[Conflicts of Interest Policy](#)

The Last Letter

Thank you for your commitment to Post Office and our Code of Business Standards.

Be inspired and work each day in a way that inspires others.

Follow not only our Code, our policies and the laws and regulations that apply to your work, but also your conscience. When something does not feel right or puts our Company, our people or those we serve at risk, report your concerns. When you do, you preserve our good name and reputation.



Document Control Record

Summary			
GE Policy Sponsor	Policy Owner	Policy Implementer	Policy Approver
Group Chief People Officer Angela Williams	Employee Relations and Policy Director Lee Kelly	Senior Employee Relations Manager Janene Mellor	Group Chief People Officer Angela Williams
Version	Document Review Period	Policy – effective date	Policy location
1	12 months	08/01/2018	UK

Revision History			
Version	Date	Changes	Approved by
2	01/10/18	Removed reference to B&H policy and included Dignity at Work	Janene Mellor
3	17/12/18	Minor amends to Gifts and Sponsorship and Hospitality and Entertainment	Sally Smith
4	08/04/19	Updated hyperlinks	Janene Mellor
5	13/11/19	Updated hyperlinks throughout Updated CEO sign off (pg 4) Updated 9 protected characteristics (pg 9) Added reference to the Transgender Equality Policy (pg 10) Added reference to menopause, family friendly and sick pay provisions as well as link to information on mental health first aider (pg 12)	Janene Mellor
6	07/01/20	Updated 'GE Policy Sponsor' and 'Policy Approver' contact	Janene Mellor
7	25/06/2020	Update language to ensure consistent with dignity at work policy (pg9) Included reference to the POEM and return to work network (pg 10) Added hyperlinks to network forums on Peoplehub (pg10) Updated policy hyperlinks Added link to gifts & hospitality reporting tool (pg 17 & 18) Updated speakup contact details (pg 20 & 21)	Janene Mellor
8	02/11/20	Updated policy hyperlinks	Janene Mellor

9	01/12/2021	Replaces Code of Business Standards effective 08/01/2018 in its entirety.	Post Office GE and Board
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Document Distribution Status			
Distribution	Mark x as appropriate	Document Sensitivity	Mark x as appropriate
Internal	x	Non-sensitive	x
External		Sensitive	

Quality Statement	
Quality Control	Next Review Date
This document is periodically reviewed, and at least every 12 months from the last effective date.	Jan 2023
This policy has been reviewed against the latest Post Office policy standards and legislative requirements.	

