Code of business conduct

Last updated: July 2026

A message from the Executive Team

Welcome to the most important document we have at Post Office our

Code of Business Conduct.

Our Code of Business Conduct (the “Code”) defines the expectations we have for how we act and how we make decisions. It sets out our clear standards of conduct to guide us to do what is right.

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

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

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Our code

POST OFFICE

Why we have a code

What is the Code?

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

Sometimes, you might face a situation where the right thing to do is not obvious. That is where our Code and ethical decision-making framework can help. The Code is always here as a guide to preserving our reputation. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not clear.

The code helps you to:

- Conduct yourself honestly and ethically.
- 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 is the Code for?

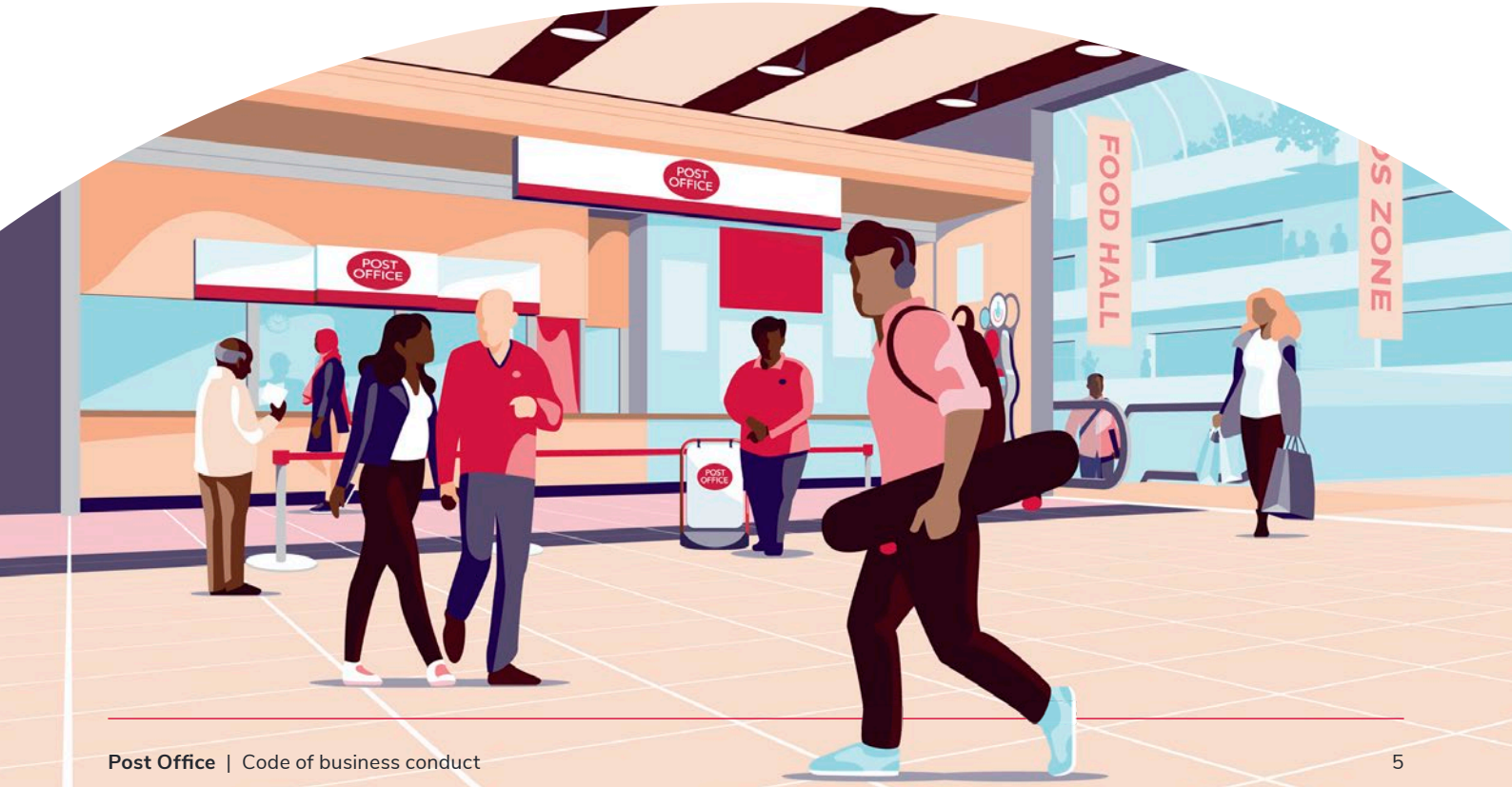
Our Code is for everyone working for and with Post Office. We expect our Postmasters, business and retail partners and suppliers to uphold the same standards.

What are the consequences of not complying with the Code?

There are very serious consequences for not complying with our Code which could result in disciplinary action, up to and including dismissal or termination of contract. If an act violates the law, it could result in fines or criminal prosecution.

When do we review the code?

The Code will be reviewed every three years, but we may modify the Code as necessary between reviews. Any modifications will be approved by the Post Office Board.



Upholding the code

Colleagues' Responsibilities

- **Know and live the Code.** Read it and follow it, along with any other policies that apply to your role.
- **Complete mandatory training** within the specified timelines.
- **Behave in an ethical manner.** Use good judgment, being honest and ethical in every action and decision you take.
- **Follow the law.** Understand and ensure compliance with legal and regulatory obligations that apply to your job and our company.
- **Ask for help.** When an answer is not clear, ask for guidance before taking action.
- **Speak up.** Prevent harm to our company and its reputation by reporting concerns if you feel a working practice is not ethical or safe or it breaches the Code.

Managers' Responsibilities

In addition to the responsibilities that we all have as colleagues, managers must also:

- **Lead by example and model the Code.** Take personal responsibility for promoting and reinforcing the principles and standards set out in the Code. Ensure team members know that for results to matter, they must be achieved in line with the Code. Be consistent in what you say and do.
- **Ensure their team members, including new joiners have read the Code and completed mandatory training.**
- **Be responsive and create a "speak up" culture.** Take seriously any concern raised and never retaliate against someone who raises a concern.
- **Take action.** Take corrective or preventive action when someone violates the Code.

Our culture

At Post Office, our culture is **'A customer-focused Post Office that prides itself on its agility, inclusivity and impact'**. We envision a future of thriving communities throughout the UK where nobody is left behind.

To help us achieve this, we have four immediate outcomes that we must all focus on. They are:

- **Save to invest –** We will transform how we operate and spend. All to create capacity and invest more in reducing postmaster costs and making local work.
- **Thriving partnerships –** We will actively develop existing partnerships and build new ones with postmasters, strategic partners, and commercial partners. All to create more value for our postmasters and local communities.
- **Fuelled by digital –** We will grow our digital capability and revenue and use digital to drive better experiences through our customer journeys, and particularly to enable easier and faster in-branch transactions. All to create the funding and footfall to make local work.
- **Create new confidence –** We will develop our capability, rebuild confidence, and rediscover the joy of delivering as one Post Office.

Our culture is the most critical component that allows us to deliver against our purpose and enables us to achieve our strategic drivers.

Our culture is best described by our behaviours which inform how we show up at work each day. Our behaviours embody the shift in culture that we all need to embrace as we work to achieve our outcomes and ultimately our purpose.

Our behaviours are:

- **Customer First –** we start with the customer
- **Curiosity –** we continuously learn and improve
- **Progress –** we deliver results with integrity
- **Accountability –** we take ownership and follow-through
- **Collaboration –** we work across teams

Making good decisions

Our ethical decision-making framework is a tool designed to help you make decisions that are in line with the ethics and values of Post Office.

Whilst the policies outlined in the Code provide clear guidance on many decisions, it is not possible to cover every eventuality. That is where the ethical-decision making framework, alongside your owns skills and experience, can help you. Demonstrating that you have followed the ethical-decision making framework when making a decision protects you and Post Office.

If you have witnessed a decision that does not follow the framework, then you should follow the guidance in the Speaking Up part of the Code.

When faced with a decision, ask yourself the following questions:

- Have I actively demonstrated Post Office behaviours?
- Is it legal?
- Am I acting with integrity, fairness, and thinking inclusively?
- Have I sought out, listened to and taken different perspectives into account?
- Would I be happy to explain this decision to relevant stakeholders, colleagues, Postmasters, customers, communities?

If you can confidently say YES to all of these questions, and the decision is within your remit to make, move ahead.

If the answer to any of these questions is NO, or you are UNSURE, pause and seek guidance from your line manager or another appropriate person* in the organisation before you proceed.

*Who might be an 'appropriate person' to provide further guidance?

Consider contacting the Central Risk, Legal, Compliance, CoSec teams or your People Partner.

Speaking up

To help us build the Post Office of the future we are committed to doing things correctly and we want you to always raise issues and concerns with us.

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

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

If you feel you cannot question or challenge a colleague directly, we ask that you take the following steps to raise issues of concerns:

1. Report the issue or concern to your line manager
2. If you are not comfortable discussing the issue or concern with your line manager, report the issue or concern to another manager
3. If you are not comfortable discussing the issue or concern with any manager, report the issue or concern confidentially via **speakup@postoffice.co.uk** or through the external speak up service provided by Convercent by calling 0800 041 8155 or by the website **speakup.postoffice.co.uk**

When you raise an issue or concern via Speak Up, the Speak Up team will decide whether to handle the concern through management action or investigation. There is Board level oversight of Speak Up activity with the Speak Up champion being a non-executive director – Amanda Burton.

A healthy organisation is one where people can speak up without fear and, as a result, stop harm.

No retaliation

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

We do not tolerate retaliation for:

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

Examples of retaliation might include demotion, dismissal, 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 our Code.

A concern raised honestly even if it turns out to be unfounded is never an excuse for any kind of retaliation.

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

Our colleagues

POST OFFICE

Equity, diversity and inclusion

We celebrate equity, diversity and inclusion at Post Office and strive to build a workplace in which all colleagues feel a sense of belonging and are valued for who they are and the differences they bring.

We are committed to building an equitable, diverse and inclusive workplace and pursue equality of opportunity and inclusion for all colleagues through our recruitment and employment policies and practices.

Embracing equity, diversity and inclusion means we must:

- Uphold the law regarding human rights and equality.
- Comply with our Equity, Diversity & Inclusion and Dignity at Work policies.
- Strive to promote fairness and equality of opportunity for employment and promotion based on merit.
- Not tolerate discrimination or harassment on any grounds.
- Encourage a range of ideas, opinions, and ways of thinking.
- Not engage in behaviours that discriminate or isolate individuals or groups.
- Consider the physical, mental, and emotional well-being of all colleagues by educating ourselves on inclusion and diversity.

Dignity at work

Post Office is committed to protecting the dignity of colleagues at work and we expect all colleagues to treat each other with dignity, courtesy, and respect at all times.

We are fully committed to sustaining a safe, positive, and mutually supportive working environment that is free from discrimination, bullying, harassment, and victimisation, where colleagues can work collaboratively and productively together, and where all colleagues are equally valued and respected.

Post Office does not tolerate any form of discrimination, bullying, harassment or victimisation. We are committed to taking the necessary action to ensure that they do not occur, or where they do occur that they are dealt with and eliminated.

Learn more

Equality, Diversity and Inclusion Policy
Dignity at Work Policy
Inclusion Playbook

We must:

- Set a good example through our own behaviours and challenge unacceptable behaviour at the earliest possible opportunity.
- Raise any concerns or issues about discrimination, bullying, harassment, or victimisation in good faith and in an appropriate and timely way to the appropriate person.
- Respect employees whose abilities, beliefs, religion, cultures, race, sexual identity or other characteristics are different from their own.
- Be open and honest in dealings with others and respect confidentiality.
- Challenge unacceptable behaviour in a way which is consistent with our behaviours and where possible take steps to put an end to it without delay.

Creating a safe and healthy work environment

Post Office is committed to providing a working environment which promotes and maintains the health, safety, and wellbeing of its employees.

Post Offices 'duty of care' towards employees, including managing and safeguarding the physical and psychological wellbeing of our employees.

Whether working in an office, branch, depot, at home, commuting to work or out in the field your safety and wellbeing is important to us. We will aim to comply with all applicable legislation and regulations and aim to continuously improve health and safety performance. We expect everyone at Post Office to behave in a safe and responsible manner at all times.

Post Office recognises that people are its most valued resource, and their health and wellbeing is essential to our overall success.

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

- Follow health and safety policies, risk assessments, standards, procedures, laws, and regulations.
- Not behave in a way that might put ourselves or others in danger.
- Make sure we know what to do if an emergency occurs in the workplace.
- If safe to do so without risking own safety, intervene when we think someone's safety is at risk.
- Promptly report any actual or near miss accident or injury or unsafe conditions, so that corrective or preventative measures can be put in place.
- Complete mandatory and role specific Health and Safety training in the specified timescales.
- Never work under the influence of drugs or alcohol.
- If driving for work, drive safely and legally.
- Promote a positive attitude to health and wellbeing.
- Familiarise themselves with policies, guidance and how to access support services including Occupational Health and Employee Assistance Programme (EAP).
- Promote a culture where all health and wellbeing issues can be discussed openly in a supportive way and an environment which is conducive to employees engaging with each other on wellbeing.
- Prevent, so far as it is reasonably practicable, those circumstances detrimental to health and wellbeing.
- Raise concerns with their line manager or Employee Assistance Programme (EAP) when factors are impacting their wellbeing so that appropriate support can be put in place.
- Take personal responsibility for own wellbeing and signpost colleagues to appropriate support services.
- Understand any necessary adjustments their colleagues are receiving as a result of their health and wellbeing.

Learn more

Health and Safety Policy
Health and Wellbeing Policy
Alcohol and Drugs Policy
Physical Security Policy

Avoiding conflicts of interest

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

In business, the line between personal and professional interests can become easily blurred and separating the two can be challenging, especially when personal relationships, outside employment or investments are involved.

We are all expected to act in the best interest of the company. This means we must never allow our personal interests to influence our actions on behalf of Post Office. Every decision we make at work should be objective and with the company's business interests in mind.

Learn more
Conflicts of Interest Policy

We must:

- Disclose to our line managers any conflict or potential conflict of interest which arises including any family member or close working relationship at Post Office.
- Disclose any work for other organisations which conflicts or poses a potential conflict with Post Office's business interests.
- Not use our position for private advantage.
- Not allow a personal relationship or financial interest in another company to influence decisions we make in our job.
- Not take an active part in hiring/promoting family members.
- Not procure services from family members.
- Not promote personal political activity as being connected to Post Office.

When considering a potential conflict of interest imagine explaining your actions to a friend, colleague, or the media and use the ethical decision-making framework.

Our business

POST OFFICE

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 and systems. Our requirements to protect information apply to all formats.

Post Office has an Information Classification Standard which defines how information within the Post office should be classified, handled and protected.

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

- Familiarise ourselves with all information handling policies and complete any mandatory training in the specified timeframe.
- Understand the nature and classification of the information, as defined in the Information Classification Standard; understand and adhere to the handling requirements detailed in the Cyber and Information Security Policy; and take personal responsibility for the proper use, circulation, retention, protection and disposal of Post Office's information.
- Not disclose confidential information to a third party unless there is an approved purpose.
- Not share confidential information internally beyond those who need it for their job. Take care not to disclose information in public places, including taking all necessary steps to protect information in documents and on IT devices away from the workplace.
- Not forward emails containing non-public Post Office information to personal email accounts.
- Not store or synchronise Post Office information onto personal devices, without appropriate measures.
- Not take any Post Office confidential information if we leave the company. Any work carried out during employment will remain the intellectual property of Post Office and must not be deleted or destroyed upon leaving.
- Immediately report events which could impact the security of Post Office information by following the information security reporting procedures.

The security of our information and IT systems is critical. Many of us will have access to Post Office systems, information and devices such as laptops and mobile phones. It's important that anyone who accesses them knows how to keep them secure by following the requirements in the Cyber and Information Security policy.

Failure to comply with the Cyber and Information Security policy can carry profound consequences for you and Post Office. Breaches of the policy may lead to disciplinary action up to and including dismissal.

To help protect our systems and information, you should:

- Ensure Post office equipment is used appropriately and protected from damage, loss and theft.
- Immediately report to the IT Service Desk the loss or theft of any Post Office equipment.
- Use a password or pin to lock unattended Post office equipment. Use complex passwords to protect your access.
- Ensure any removable Post Office IT equipment is secured when left in the office overnight, is locked away or put out of sight when left unattended at home, in a hotel, or in a vehicle. When travelling, keep equipment with you.
- 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 use a personal email service for Post Office communications, such as Gmail or Yahoo mail or sign up for public cloud storage services which have not been procured by Post Office.
- Use your personal IT equipment in line with the Bring your own Device (BYOD) Standard to undertake Post Office business.

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.
- Procure new product and services without going through the formal procurement process, to reduce 'shadow IT'.
- 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 ServiceNow or alternatively you can contact them on **0330 123 0778**. In the event it is not possible to reach the service desk through the above you can email **POLITDSD@postoffice.co.uk**

Learn more

Cyber and Information Security Policy

Managing personal data properly

When customers, postmasters, retailers or third parties do business with us, they entrust us with personal data. Our colleagues 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.

All colleagues work with personal data as part of their jobs – this could be user account information, sensitive health data or simply colleague email addresses. Guard this data well by following the Company policies regarding the storage, 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 in the specified timeframe.
- Promptly report incidents involving personal data following the appropriate process.
- Provide assistance to the Information Rights team with any requests relating to individual rights or Freedom of Information requests.
- 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 with appropriate safeguards.
- 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, colleagues must not:

- Retain personal data for longer than necessary to achieve the business objective or meet minimum legal requirements.
- Use personal data for any new purposes without talking to the Data Protection team.
- Contact **data.protection@postoffice.co.uk** if you have any questions on concerns regarding the access, transfer or use of personal data.

Learn more

Protecting Personal Data Policy

Maintaining accurate business records

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

To manage business records properly, we must:

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

Using social media

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

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

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

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

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

Use at work

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

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

Communicating with the public and journalists

Post Office is committed to providing accurate, clear, complete, and consistent information to the public.

We are not permitted to agree to an interview with a journalist; share material with a journalist; participate at an 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 the press office or a member of the wider Communications team.

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 **020 7012 3456** or **pressoffice@postoffice.co.uk**

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

Preventing bribery and corruption

At Post Office, we have a zero-tolerance policy regarding bribery and corruption as this goes against fundamental values of integrity, transparency and accountability and undermines the Group's effectiveness. The consequences of violating bribery laws can be severe – for you and for the Company.

We conduct business using ethical practices only.

Bribes come in many forms, and they are not always obvious. Any offer of items of value that may inappropriately influence or secure an improper advantage can be considered a bribe. A gift, the promise of a job, the offer of a trip, a charitable contribution, could all be considered bribes if offered in exchange for any decision or favourable treatment.

Gifts and hospitality must have a demonstrable link with a legitimate business purpose, the value must be justifiable and proportionate for the roles and relationship with the client and they must be defensible under potential public scrutiny.

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

We responsibly invest in our business relationships but never offer or accept gifts, hospitality or 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 and create a conflict of interest or perception of a conflict of interest.

Gifts

Gifts costing £25 or less do not need to be reported and approved. All gifts of £25 and over which are received or offered must be recorded using the Gifts and Hospitality tool, whether accepted or declined by the receiver

Gifts exchanged with external third parties should ordinarily be under £150 per person in value (and must also be approved by your Executive Member).

Hospitality and Entertainment

Hospitality should be reasonable (not lavish or extravagant), proportionate to its purpose and must ordinarily be below £200 per person in value (if over £200 it must also be approved by your Executive member).

The number of attendees on both sides should be limited to those whose presence is necessary to progress the business in hand.

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

We must:

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

Learn more

Anti-bribery and Corruption Policy
Gifts and Hospitality Reporting Tool

Preventing financial crime

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

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

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

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

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

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

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

We must:

- Familiarise ourselves with and follow all Post Office policies.
- Understand and follow procedures and internal controls that are designed to prevent financial crime or money laundering.
- Be proactive when it comes to spotting behaviour or transactions that might signal a problem and ensure we report our concerns as soon as possible. Suspicions of money laundering should be reported to Grapevine on **0345 603 4004**.
- Complete mandatory Anti-Money Laundering and Counter Terrorist Financing training in the specified timeframe.

Learn more

Anti-Money Laundering and Counter Terrorist Financial Crime Policy
Speaking Up Policy

Preventing modern slavery

Modern slavery is a complex crime that takes several different forms and amounts to a violation of fundamental human rights, such as slavery, servitude, forced or compulsory labour and human trafficking. All of these acts deprive a person's liberty in order to exploit them for personal or commercial gain. There is no typical victim and some victims do not understand that they have been exploited and are entitled to help and support

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.

Many of the key modern slavery offences are committed if a person or company knew or ought to have known that an offence was taking place. It is therefore vital that we all keep our eyes open to the possibility that such practices might be taking place. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all Post Office employees at all levels.

We must:

- Read our Post Office Modern Slavery statement.
- Complete the mandatory Modern Slavery and Human Trafficking training in the specified timeframe.
- Use the confidential Speak Up service 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.

Learn more
Modern Slavery Statement

Working with suppliers

As a Contracting Authority governed by public law, we are committed to ensuring that we deliver value for money through our contracts with suppliers. We are subject to the Public Contract Regulations (PCR) 2015, which mandate the processes we must follow, from the initial supplier engagement through to sourcing competitions and contract award. These processes are designed to:

- Be fair, open and transparent.
- 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 Code.

If you work with suppliers, you must:

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

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

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

Learn more

Procurement Policy
Purchasing Process
Contract Execution Policy
Supplier Code of Conduct

Ensuring financial accuracy and integrity

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

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

All transactions, no matter what the amount, are to be properly authorised, executed and accounted for in line with International Reporting Standards and Post Office's internal accounting policies.

If you notice an inaccuracy in a Group record, a failure to following financial accounting policies or our internal control processes, speak up and report it immediately.

You should only ever spend company money where there is a legitimate business need and where the cost is worth the benefit. You should know the local expenditure limits and the Groups Procurement policy which directly apply to your role.

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

We are expected to:

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

Managing risk

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

We do this by our:

Risk Policy – An established set of minimum operating standards relating to enterprise risk management throughout Post Office. Compliance with our policy supports Post Office in meeting its business objectives and balances the needs of our shareholders, Postmasters, employees, and stakeholders,

Risk Management Framework – designed to ensure risks throughout the business are identified, assessed, and effectively managed, at all levels. Our framework incorporates four core elements; identify, assess, respond, and monitor.

Risk Appetite and Tolerance – Our risk appetite statements set a clear and concise set of statements against our corporate risk appetite scale, an important component of our control environment and provides key input to strategic decision making. This scale has several risk acceptance levels, ranging from (averse) avoiding nearly all risks where at all possible to, we will take risks, and accept the possibility of failure (open). Risk tolerance was introduced to support the management of risks for an agreed period, where we may need to tolerate more risk due to funding/ resource/programme constraints.

Learn more

Group Risk Policy

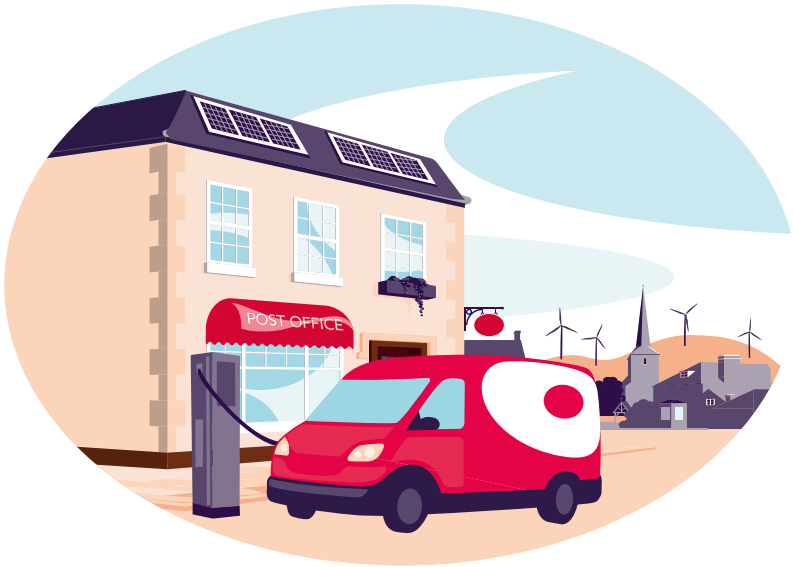
Protecting the environment

We recognise that our business activities and policies have an impact on the environment. We shall take account of the environmental effects of our policies in our planning, decision making and day-to-day activities. We will formally manage and mitigate environmental and climate risk as part of our risk framework.

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

At Post Office we:

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



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