



PostNL Group policy on integrity

Date 1 August 2019

Policy owner Director Audit & Security

Title Group policy
on Integrity

Version 2.1



Scope, definitions, communication and implementation of this policy can be read in the Sheet of Terms on the Group Policies site.

The scope of this Group policy is as follows:

Applicable to	Integrity
All PostNL group companies	In scope
PostNL branded companies	-
Large / medium sized PostNL Group companies	-
PostNL Group companies based in the Netherlands	-

1. Objective

PostNL is committed to sound business conduct and therefore manages its business according to the PostNL Business Principles and core values. This requires an ethical and transparent way of conducting business.

Integrity within PostNL is defined as being compliant with the PostNL Business Principles.

The objective of this policy is to outline the mandate and the responsibilities concerning integrity related matters. An adequately working integrity framework has to be in place which includes:

1. establishing and maintaining the PostNL Business Principles;
2. an Integrity Office for establishing and executing the integrity approach and programme (including the monitoring of compliance with the PostNL Business Principles);
3. an Integrity Committee for monitoring the integrity approach and programme and to advise our Board of Management;
4. the registration, reporting and case handling of integrity related incidents and topics.

This policy has been implemented with effect from 17 May 2017 and has been revised on 1 August 2019.

2. Policy provisions and responsibilities

2.1. Policy owner

The ownership of this policy and the responsibility regarding the execution and implementation of this Group policy rests with the director Audit & Security. This ownership includes also the PostNL Business Principles, the PostNL Group procedure on fraud prevention and the PostNL Group procedure on whistleblowing.

2.2. Other related Group policies or procedures

Document	Owner
Group procedure on conflict of interest	director PostNL HR
Group procedure on gifts and hospitality	director PostNL HR
Group policy on privacy	director Group Legal/General Counsel
Group policy on prevention of insider trading	director Group Legal/General Counsel
Group procedure on pre-employment screening	director PostNL HR
Group procedure on incident reporting	director Audit & Security
Group policy on Human Rights	director PostNL HR

2.3. Integrity Office

The Integrity Office is responsible for the day-to-day management of the PostNL Integrity programme. The PostNL Integrity programme focuses on the pillars: governance, training & awareness and response & maintenance. The Integrity Office deals with the registration, reporting and case handling of integrity related incidents and topics. The Integrity Office supports the Integrity Committee and reports to the director Audit & Security.

2.4. Integrity Committee

The PostNL Integrity Committee is appointed by the Board of Management to:

- advise and assist the Board of Management in developing, implementing and monitoring Group policies and procedures aimed at enhancing integrity and ethical behaviour and fraud prevention as defined in the objective of this policy;
- oversee investigations based on reports of possible breaches filed under the PostNL Business Principles, the PostNL Group procedure on whistleblowing and the PostNL Group procedure on fraud prevention. Investigations are coordinated by the director Audit & Security. The director Audit & Security will involve other departments or external advisors if appropriate;
- advise and make recommendations to line management, the Board of Management, the Supervisory Board and/or the Audit Committee with regard to integrity related issues;
- collect, analyse and report regularly to the Board of Management and every six months to the Supervisory Board regarding the investigations of (potentially) serious breaches of the PostNL Business Principles and the general trends in the character, background and number of incidents.

2.5. PostNL management

Management of the PostNL Group company has to comply with this policy and at shortest notice inform and involve the director Audit & Security in all relevant integrity related matters. Management of the PostNL Group company is required to ensure that all staff within their area of responsibility remain informed about the objectives and requirements as laid down in this Group policy.

Management of the PostNL Group company is required to ensure that all their business associates, agents and suppliers remain informed, in order that they observe the PostNL Business Principles and Group policies.

Management of the PostNL Group company is required to lead by example, to stimulate and monitor that all their staff, business associates, agents and suppliers comply with the PostNL Business Principles and Group policies.

2.6. Integrity ambassadors

Management of the PostNL Group company must appoint an integrity ambassador. This ambassador is the single point of contact between the specific business unit and / or PostNL Group company and the Integrity Office for questions and support in relation to the integrity programme.

2.7. PostNL staff

People who work for or on behalf of PostNL have to familiarise themselves with the PostNL Business Principles and related documents and act accordingly. PostNL encourages all employees to promptly report any suspected misconduct to their line manager or the next in hierarchy, management or the director Audit & Security. PostNL investigates reports promptly and with strict confidentiality, and will not retaliate or undertake action against employees for filing a report or assisting another employee in doing so. Any employee who reports suspected misconduct, which the employee reasonably believes, or may reasonably believe, to be true, will be given protection for such reporting.