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PostNL Holding B.V.
Group HR

PostNL Group Procedure

on gifts & hospitality

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on gifts & hospitality
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The definitions, communication and implementation of this Group procedure can be read on the Group Policies site on PostNL Connect.

The Scope of this Group procedure is as follows:

Applicable to	Gifts & hospitality
All PostNL Group companies	In scope
PostNL branded companies	-
Large / medium size PostNL Group companies	-
PostNL Group companies based in the Netherlands	-





1 Objective of this Group procedure

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.

There may be differences of perception of how and why gifts and hospitality are given and received. What some see as a gift others may see as a potential bribe; furthermore, gifts and hospitality could raise concern for potential conflicts of interest between an employee and the company.

The aim of this Group procedure is to prevent situations where an employee's professional judgment and the interests of the company, could be affected as a result of gifts or hospitality offered or received.

The PostNL Business Principles provide that our employees must avoid improper personal benefits for themselves or family members that result from their association with PostNL.

Employees may not accept gifts or hospitality that might appear to create reciprocity.

2 Procedure provisions and responsibilities

2.1 General

- PostNL encourages the use of good judgment, discretion, and moderation when giving or accepting gifts or hospitality in business settings. Gift and hospitality practices may vary in different cultures; however, any gifts and hospitality given or received must be in compliance with legislation and regulations, must not violate the giver's and/or receiver's policies on the matter, and be consistent with local custom and practice.
- Any gift or hospitality given or received must be reasonable in cost, quantity and frequency.
- It is forbidden to offer and provide any gifts or hospitality to any government employee or official unless it is permissible under the applicable laws and regulations.
- All expenditures for gifts and hospitality provided by PostNL employees or agents must be fairly and accurately recorded and accounted for.
- Offering or receiving any gift, gratuity or hospitality that might be perceived to influence the employee's good business judgment or that might place the employee under the obligation to return such gift, gratuity or hospitality, is forbidden.
- For the purposes of this Procedure it makes no difference if gifts or hospitality are offered, received or given directly or indirectly via an intermediate person or entity.





2.2 Gifts

For each business segment and head office department the maximum amount acceptable for gifts is determined on EUR 50,- or equivalent amount in local currency.

- Gifts exceeding EUR 50,- (or equivalent amount in local currency) must be approved, in writing, by the next higher management level.
- Gifts of nominal value can be both offered and received in reasonable quantities. Examples of this kind of gifts are pens, t-shirts, mugs, calendars, etc. containing the logo of the company.
- It is not allowed to offer, provide or accept money or money equivalents, such as vouchers and discount coupons.
- Gifts that are repetitive (no matter how small) may be perceived to be an attempt to create an obligation to the giver and therefore should be avoided.
- Employees should always inform their managers when giving or receiving gifts.

2.3 Hospitality

For each business segment and head office department, the maximum value acceptable for hospitality is set on EUR 150,- or equivalent amount in local currency.

- Hospitality exceeding EUR 150,- or equivalent local amount must be approved, in writing, by the next higher management level.
- All international travel in the context of international sport and hospitality events must be, as a rule, approved by a member of the Board of Management, unless the approvals has been delegated and the expense is being reported transparently.
- Hospitality offered by any PostNL employee must include the presence of such employee or any other PostNL representative.
- Hospitality received by any PostNL employee should be reasonable in the context of the business. For example, accompanying a business associate to a cultural or sporting event or to a business meal would be acceptable in most cases. Incidental costs will be borne by PostNL unless it involves any substantial incidental costs that are typically of a personal private nature, which must be borne privately by the employee.
- Employees should always inform their managers when giving or receiving hospitality.

2.4 Procedure owner

The Procedure owner is the director Group HR. The Procedure owner is responsible for reviewing this Procedure on an annual basis to assess whether revisions are necessary. The Procedure owner is also responsible for monitoring compliance with this Procedure.

2.5 Related policies and procedures

- PostNL Business Principles
- PostNL Group Policy on Integrity





- PostNL Group Procedure on Conflicts of Interest
- PostNL Group Procedure on Whistleblowing

