



Group policy on human rights

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Policy owner	Director PostNL Human Resources
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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	Human rights
All PostNL Group companies	In scope
PostNL branded companies*	-
Large / medium sized PostNL Group companies	-
PostNL Group companies based in the Netherlands	-

1. Overview

Our impact on society is clear. From our daily presence at millions of front doors, through to our wide-range of services and solutions that positively impact the lives of our customers, the communities we serve, and the people who work for and with us. At the heart of this is our respect for Human Rights. We believe that being a responsible business partner and a good employer, that ensures fair compensation, safeguards labour rights, stimulates diversity and inclusion, prevents discrimination and protects privacy, helped us to become the company we are today.

PostNL is committed to protect and advance Human Rights and works vigorously to protect people against infringements of Human Rights in its operations. We respect ILO's Declaration on Fundamental Principles and Rights at Work and particularly endorse the UN Guiding Principles on Business and Human Rights. PostNL has been a signatory to the UN Global Compact since 2012. In drafting this Policy, we considered the most important and relevant aspects for PostNL, including possible risks. This Policy, including the progress and risks on Human Rights, will be reviewed on a regular bases.

1.1. Employees

Being one of the largest private employers in the Netherlands, where the location of our head office is, PostNL is a true people's company. PostNL employs over 38.000 people and has a presence in 13 countries with key operations in the Benelux, Germany and Italy. Every day our employees make the difference for our customers. Therefore, it is crucial that we are a good employer. Our people count on us to respect Human Rights at work. Human Rights that are particularly relevant to PostNL as an employer, will be addressed here.

1.1.1. Adhere to employment legislation

Our commitment

PostNL abides by all international and national employment legislation that is applicable in the countries we are active in. We have agreed several Collective labour agreements with the unions. The agreements protect both employee interests and those of PostNL. In some smaller operating companies we have agreed collective employment conditions with the respective Works Council.

In our Business Principles we describe what we expect from our business relations and everyone who works with or for PostNL, as well as what they can expect from us. Our first Business Principle states that we comply with relevant legislation and regulations and with the corporate policy we have formulated. We provide full, fair, accurate and timely disclosure in our reporting.

Actions and procedures we undertake to meet our commitment

Meeting our commitment on Human Rights is integrated in our Human Resources Group Policy and way of working. Both Human Resources and our internal auditors perform regular checks to make sure that legislation, regulations and policies are being adhered to.

Within PostNL an Internal Control Framework for Human Resources is in place, which is reviewed by our internal audit function as well as our external accountant. The Internal Control Framework is supported by Risk Management & Internal Control and reports and validates the most important (financial) risks in the Human Resources area, such as compliance with relevant legislation and policies.

PostNL's internal audit function provides independent and objective assurance to the Board of Management and the Supervisory Board on the effectiveness of the internal control framework and performs yearly audits on the compliance of the Collective labour agreements. Audits are scheduled in close cooperation with the

business concerned. For each audit specific topics are selected, for example the implementation of new collective labour agreements, or correct salary payment. Audits are organized in such a way that the external auditor can use the internal audit activities optimally. Each audit is followed by a formal audit report. Adequate follow-up on audit findings is assured. Also, trade unions and Works Councils will ensure that the (Collective) labour agreements are being observed.

1.1.2. Freedom and dignity

Our commitment

PostNL guarantees that our employees can do their work in freedom and with dignity. PostNL complies with all relevant legislation on child labour.

In our Business Principles we state that we have a fair and respectful treatment to everyone, with respect for privacy. We believe it is important that our employees treat others fairly and with respect. We are all responsible for maintaining good work relationships and a pleasant work environment.

As stated in our PostNL Group Statement on Slavery and Human Trafficking, we fully support both the act and the equivalent anti-slavery and human trafficking legislation in force in the countries in which we operate. We are committed to maintain and improve our systems to safeguard against all forms of slavery, forced or compulsory labour, servitude and the trafficking of persons (“slavery and human trafficking”) in our own operations and in our supply chain.

Actions and procedures we undertake to meet our commitment

In our Group Statement on Slavery and Human Trafficking our due diligence processes are explained, as well as our effectiveness in combatting slavery and human trafficking, and how we train our people.

1.1.3. Equal opportunities and non-discrimination

Our commitment

PostNL believes that diversity and inclusion among our employees makes our company stronger, more innovative and more attractive. We therefore have a Diversity & Inclusion Policy, which can be found on our website.

As stated in our Business Principles, PostNL offers equal opportunities to all employees. We will not discriminate on age, disability, ethnicity, gender, marital status, race, religion or sexual orientation.

Actions and procedures we undertake to meet our commitment

PostNL supports several internal networks. The PostNL Pride network stimulates that all lesbian, gay, bisexual and transgender colleagues are fully accepted and appreciated in all parts of the company. The Woman Inclusion Network supports the development of ambitious women.

PostNL creates a safe place to work for people with disabilities or limitations. We have long term contracts with social workplace-companies. In 16 sorting- and distribution centres a part of the sorting process is handled by people with a social or physical limitation. Also, PostNL is the first employer in the Netherlands to have developed a diversity index, which measures items such as acceptance, inclusiveness and diversity.

1.1.4. Safe workplace

Our commitment

We ensure that all our employees can work in a safe and healthy environment.

In our Business Principles we state that we offer all our employees a safe workplace and healthy working conditions. We work hard to reduce the risk of illness and to avoid workplace accidents. We will do

everything in our power to ensure that our employees can carry out their work in a safe way. We also do not tolerate any form of threat or violence.

Actions and procedures we undertake to meet our commitment

We operate several policies and processes aimed at reducing absenteeism and to prevent accidents. We frequently perform risk assessments and evaluations, in cooperation with Human Resources experts, management and Works Councils.

We run frequent trials to monitor safety and working conditions within the company and implement improvements wherever possible. PostNL meets the OHSAS 18001 (Occupational Health and Safety Assessment Series) standards, which is confirmed both by internal and external audits.

Every year, we measure how safe and well our employees feel, through our 'engagement monitor.' The results are discussed in employee meetings and used for improving policies and working conditions.

1.1.5. Trade unions and employee representation

Our commitment

PostNL ensures that all its employees can execute their right on freedom of assembly. We stimulate, support and facilitate the participation of employees in the various Work Councils and trade unions. Both Works Councils and trade unions are important and respected partners to PostNL, with whom we have a long history of constructive cooperation.

Actions and procedures we undertake to meet our commitment

In our collective labour agreements we have agreed additional (paid) time and other facilities for active trade union members. We have similar agreements with the Works Councils. Our collective labour agreements also secure that the position of active union members is not influenced by their activities for the union.

1.1.6. Fair compensation

Our commitment

PostNL respects the level of minimum wages and our employees are being rewarded equally for equal work.

Actions and procedures we undertake to meet our commitment

Equal and fair compensation is ensured in our collective labour agreements and also through our job evaluation/rating method. In our collective labour agreements we have made agreements on additional rewarding.

1.1.7. Working hours and paid vacation

Our commitment

All employees of PostNL are entitled to sufficient time to rest and paid vacation. We respect all relevant legislation on working hours and vacation.

Actions and procedures we undertake to meet our commitment

In our collective labour agreements we have made additional agreements on working hours, vacation, leave for special occasions as well as additional leave for older employees, in order to keep all employees healthy.

1.1.8. Privacy

Our commitment

PostNL is a trusted partner in mail delivery, and the consumers and companies alike rely on us to uphold the mail secrecy. In the digital age, we strive to maintain the level of trust our customers place in us. We therefore apply the same high privacy standards to handling of digital data. Privacy is a core value of PostNL and we consider privacy and data protection to be an integral aspect of our services. PostNL respects the privacy of all employees and consumers.

In our Business Principles, PostNL Group Policy on Privacy and Privacy Statement we state that PostNL takes all necessary measures to protect and safeguard personal data.

Actions and procedures we undertake to meet our commitment

PostNL has implemented technical and organisational measures to secure personal data.

1.2. Suppliers and partners

Our commitment

PostNL is committed to corporate responsible behaviour. Sustainable procurement is vital if we are to honour our commitment. We therefore look beyond price and quality when it comes to selecting suppliers and shaping our procurement processes, considering social aspects as well. PostNL complies with relevant local and international legislation and standards and we expect our suppliers and logistic business partners to act in a similar manner.

We conduct our business in accordance with our General Conditions of Purchase and the PostNL Business Principles. Procurement within PostNL acts in accordance with the PostNL policy in the matter of sustainability of the supply chain.

Actions and procedures we undertake to meet our commitment

We have established several measurable objectives and targets to maintain and continually improve the performance of our supplier and (sub)contractors.

- Assess the sustainability risk of our suppliers and (sub)contractors.
- Share best practices and work with our suppliers and (sub)contractors to eliminate or reduce supply chain risks.
- Implement a set of guidelines for suppliers and (sub)contractors, which address relevant social issues such as child labour, freedom of association, hazardous substances etc. Suppliers and (sub)contractors are obliged to sign and to adhere to this set of guidelines.
- Develop and maintain management systems that establish responsibilities, targets, monitoring methods and a review process of our supplier and (sub)contractor performance. These management systems will be renewed and revised annually, taking into considerations changes in legislation and or company requirements.

We visit our suppliers who have a high risk on violating human rights. If necessary, improvements will be implemented. We do not contract suppliers that we do not find reliable.

1.2.1. Monitoring the sustainable procurement policy

Carrying out the PostNL Sustainable Supply Chain Policy is the responsibility of Procurement & Services. For the business units of PostNL the Protocol Sustainable Procurement is available, which contains guidelines, risk classifications, follow-up actions and checklists. In this protocol is, among other things, the use of the General Conditions of Purchase PostNL N.V. and the PostNL Business Principles described.

1.3. Assessment of Human Rights risks

In drafting this Group policy, we considered the most important and relevant aspects of Human Rights for PostNL, including possible risks. This Group policy, including the progress and risks on Human Rights, will be reviewed on a regular basis.

Within PostNL a risk management approach has been designed to identify and prioritise our main risks and develop appropriate responses. A risk assessment, supported by the internal risk management function, is carried out at least once a year in the management teams of the members of the Executive Committee. The topic of Human Rights is an explicit part of the risk assessment by the Human Resources management team, presided by the Director of Human Resources. In the human resources management team, all business units are represented by a business human resources director. During the risk assessment the team identifies actual or potential human rights risks, and where these risks could occur. An action plan is formulated for every risk; the follow up is discussed in the management team and monitored by the compliance officer.

1.4. Complaints and support

There are various ways our employees can ask for help and guidance if they feel that their rights have been violated, or they have not been treated well. PostNL provides external confidential advisors, social workers and an Ombudsman. Also, there are various formal procedures for complaints. If there is a suspicion of a violation of the Business Principles, employees can turn to the Integrity Office or the Security Office. Related to this, the PostNL Group procedure on whistleblowing is in place.

In 2019 PostNL introduced a digital tool where employees can report complaints and find information and help.