



PostNL N.V.
Board of Management

Group PostNL Business Principles

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Title Group PostNL Business Principles

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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](#).

Title **Group PostNL Business Principles**





1 Introduction

By delivering parcels every day and mail five days a week, we remain the indispensable link between senders and recipients, and the connection between the physical and the digital world. We deliver special moments.

We are continually evolving to remain relevant and innovative, optimising our delivery processes and services to benefit our customers. Yet one thing that hasn't changed is our purpose: delivering special moments.

While we operate in a world in which everything and everyone is connected, we understand that every moment of contact is a valuable moment.

Our services are for everyone. We collect, we sort, we deliver. From getting mail and parcels to their destination, to helping customers with innovative digital solutions and services – working together helps us realise our ambition of being everyone's favourite deliverer.

We ensure that you can send and receive anything, anywhere. We are the indispensable link between senders and recipients, and the connection between the physical and digital world in the Benelux and beyond. And we strive to work more sustainably everyday.

We keep things simple, we work smarter, and we work together to stay ahead of the curve and continually improve our performance. We achieve this in partnership with our customers and everyone who works for or with us.

We are a large company with many employees, multiple business units and an international network. Our Business Principles form the foundation for our actions and guide our decisions regarding doing business with others or entering into joint ventures. We expect everyone who works with or for PostNL, third parties and our business relations, suppliers and customers to comply with our Business Principles.

The Business Principles also describe what everyone who works with or for PostNL, third parties and our business relations can expect from us. Several Group policies have been formulated to explain certain situations in more detail. These Group policies describe the action to be taken in the situations described, and whom to contact in the event of any questions.

2 PostNL Business Principles





2.1 Reliable

1. We comply with the law and relevant legislation and regulations, as well as with the corporate policy we have formulated.
2. We provide full, fair, accurate and timely disclosure in our reporting. We deliver our external reporting on the basis of legal requirements and internationally applicable standards. We also comply with the rules of the stock exchange on which PostNL is listed. We follow the corporate policy set by the management responsible. This policy has been approved by the Board of Management and the Supervisory Board. Our company safeguards privacy.
3. PostNL takes all necessary measures to protect and safeguard personal data. This also applies to you as an individual: failing to handle privacy with care can harm the company's interests. We protect the property and information that have been entrusted to us. Our customers can count on us to handle the mail and goods they entrust to us with care and discretion as agreed. We therefore take all of the necessary measures to do so, and make every effort to maintain the confidentiality of any information provided to us.
4. We communicate openly, honestly and transparently with everyone who works with or for PostNL, our customers, our business relations, our shareholders, governments, the press and society. However, confidential information is and remains confidential. Accordingly, no confidential information is discussed in the potential presence of third parties. This applies to digital, verbal and written communications.

2.2 Fair trade

5. We avoid conflicts of interest. Our integrity and reputation depend to a large extent on the behaviour of our employees. Therefore you must make sure to avoid conflicts of interest or any suggestion of such, and that you act with integrity.
6. We do not use company resources for personal gain. Company resources are entrusted to you so that you can carry out your work. You must not use our company resources for financial or other personal gain.
7. We do not require, pay or accept bribes or inappropriate personal gifts. Make sure that you cannot be bribed; do not accept or pay any bribes, and in this context, do not accept any personal gifts.
8. We do not engage in unethical practices to gain a competitive advantage. Our customers can rest assured that we conduct our business fairly and transparently under all circumstances. We believe in fair competition. We do not engage in any prohibited practices to gain a competitive advantage. Similarly, we do not abuse the important position that we occupy in some markets. We comply fully with the applicable anti-corruption and bribery legislation that governs PostNL. We firmly believe that that this legislation is analogous to the current international anti-bribery and corruption legislation, including the United Kingdom's Bribery Act 2010; the OECD Convention guidelines on





Combating Bribery of Foreign Public Officials in International Business Transactions, 1997; and the Foreign Corrupt Practices Act of 1977 of the United States of America, as amended by the Foreign Corrupt Practices Act Amendments of 1988 and 1998. We also require all of our sub-contractors, agents and suppliers to comply fully with all anti-bribery and corruption legislation relevant to them and to have an internal compliance programme to deter bribery and corruption that is analogous to the current international anti-bribery and corruption legislation specified above. Any breach of relevant anti-bribery and corruption legislation by a sub-contractor, agent or supplier will be a material breach of any relevant agreement, providing PostNL with the right to terminate such agreement immediately on notice.

9. With respect to insider trading, all PostNL employees must adhere to regulations regarding the prevention of this practice, as laid down in our Group Policy on Insider Trading. These provisions stem from European and Dutch regulations preventing insider trading and/or market manipulation. We do not make charitable contributions and issue sponsorships as a means of bribery and corruption.

2.3 Respect, safety and diversity

10. We offer equal opportunities to all of our employees.
11. We do not discriminate on the basis of age, disability, ethnicity, gender, marital status, race, religion or sexual orientation. We do not allow discrimination within our organisation. If such behaviour occurs within our organisation, appropriate action will be taken.

At PostNL, we adhere to the following definition of discrimination: Discrimination involves unequal treatment of persons: the disadvantage or exclusion of people on the basis of personal characteristics such as gender, skin colour, culture or religion.

12. We treat everyone fairly and with respect for their privacy. It is important to us that our employees treat others fairly and with respect. We are all responsible for maintaining good working relationships and a pleasant working environment. We do not allow harassment, sexual harassment or bullying within our organisation. If such behaviour occurs within our organisation, appropriate action will be taken.

At PostNL, we adhere to the following definition of bullying: Bullying is repeated undesirable negative behaviour against which someone is unable to defend themselves. This can be verbal, non-verbal or physical behaviour, or a combination of these.

At PostNL, we adhere to the following definition of sexual harassment: Sexual harassment is any form of sexual advances, requests for sexual favours or other sexually tinged verbal, non-verbal or physical behaviour in the work environment that is perceived as undesirable.

13. We offer all our employees safe and healthy working conditions. We work hard to minimise the risk of illness and workplace accidents. We run frequent trials to monitor safety and working conditions within the company, and implement improvements wherever possible.





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

At PostNL, we adhere to the following definition of aggression and violence: Aggression and violence are verbal and physical acts in which a person is harassed, threatened or attacked.

2.4 Customer focus

14. We aim to provide our customers with the most reliable and efficient solutions. Our customers can count on us to always find the most effective and reliable solutions to support their e-commerce and other business, as well as to transport and deliver their mail and parcels.

2.5 Neutral

15. We do not involve ourselves business in party politics. We are independent and impartial. We also do not issue loans, gifts or donations to political groups. An individual or business endeavour on behalf of a political party may never be linked to the PostNL brand.

2.6 Socially responsible

16. We are committed to developing and promoting a culture that does not infringe human rights. We accept our responsibility. We feel free to contribute our social views on issues that can have an impact on the environment, the world, the principle of equality, our operations, our employees, our shareholders and our customers. We expect the same high standards from everyone who works with or for PostNL, third parties and our business relations. We expect that our suppliers will hold their own suppliers to the same high standards.

17. PostNL aims for sustainability and high quality. We support and strive to implement developments in our business operations with a sustained, beneficial impact on the environment and society. Society can expect us to integrate any such initiatives into our business operations whenever that is possible and opportune. We act on our corporate social responsibility and are constantly looking for ways to develop it further. Production of goods, procurement or financial investment may not lead to or contribute to land conversion or deforestation. Ecosystems may also not be disturbed to the extent of having a significant impact on biodiversity. By land conversion we mean a change from a natural ecosystem to another land use or a radical change in the species composition of the natural ecosystem, structure or function. By deforestation we mean the loss of natural forest as a result of conversion to agriculture or land use other than forest, conversion to a plantation, or severe or persistent degradation. By biodiversity we mean the variety of life (in all kinds





of forms) on earth. Biodiversity includes the number of species, their genetic variation, and the interaction of these life forms within complex ecosystems. We expect our suppliers and their suppliers not to engage in activities that have a significant negative impact on biodiversity or result in conversion or deforestation. We would prefer to see them actively committed to a supply chain free of conversion and deforestation, and a focus on healthy ecosystems.

18. At PostNL, digital solutions must be ethical. We encourage discussions about the desirability of our digital solutions, and we ensure human oversight of our digital solutions in order to monitor their impact. To ensure that our digital solutions benefit PostNL, people and planet and promote human rights, it must be possible to challenge the digital solutions at all times.

3 Application

The PostNL Business Principles apply to all PostNL Group companies and PostNL employees. PostNL expects its business associates, agents and suppliers to comply with the PostNL Business Principles. The PostNL Board of Management is responsible for adopting, communicating and enforcing the PostNL Business Principles. Our internal audit, integrity, risk management and security functions support the board in monitoring compliance.

Any change in the principles or waiver of provisions may be made only by the PostNL Board of Management with approval from the PostNL Supervisory Board. Such changes will be promptly disclosed on the website of PostNL.

We will not penalise employees for loss of business resulting from adherence to the PostNL Business Principles, for pointing out misconduct or suspected misconduct in relation to these principles, or for taking any lawful action with regard to misconduct or suspected misconduct.

Violation of the PostNL Business Principles can lead to disciplinary action, dismissal and, where laws are broken, civil or criminal prosecution.

Any PostNL Stakeholder who reports suspected misconduct, which the PostNL Stakeholder reasonably believes or may reasonably believe to be true, will be given protection for such reporting.

This protection means that PostNL will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any PostNL Stakeholder in the terms and conditions of employment.





PostNL does not tolerate any form of threat, retaliation or other action against a PostNL Stakeholder who has made or assisted in the making of a report of suspected misconduct. Any such threat, retaliation or other action must immediately be reported to the Director of Audit & Security.

4 Questions or advice

All employee decisions must be made with full recognition of and compliance with these PostNL Business Principles.

Whenever you have any questions about as to whether specific conduct is permissible, you should check with your supervisor or line manager. If your concerns cannot be addressed locally or if you would like advice on implementing or applying the PostNL Business Principles, please contact PostNL Integrity and/or the Director of Audit & Security.

Contact information:

E-mail: integrity@postnl.com

Phone: +31 (0)88 8686116 (available during office hours)

Mail:

PostNL Integrity

PO Box 30250

2500 GG 's Gravenhage

E-mail: integrity@postnl.com

Phone: +31 (0)88 868 6116

For more information, please also consult the PostNL Group procedure on Whistleblowing and/or the PostNL Group policy on Integrity.

This policy has been implemented with effect from November 2023.

