

PostNL Group Policy

on Pre-employment screening

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1 Objective of this policy

PostNL is committed to sound business conduct and therefore manages its business according to the PostNL standards and the PostNL Business Principles, which require an ethical and transparent way of conducting business.

We seek to attract, develop, reward and retain outstanding individuals. People are our most important asset. Therefore, the integrity of our employees, at all levels, is considered to be a key requirement for PostNL.

2 Scope

This group policy applies to all **PostNL Group Companies**.

3 Definitions

Terms defined in this group policy are presented in **bold** type.

PostNL Group Companies is defined as:

Any subsidiary, associate or joint venture in which PostNL N.V., directly or indirectly, has a controlling interest and/or control.

A **subsidiary** is an entity controlled, directly or indirectly, by PostNL N.V. Control is regarded as the power to govern the financial and operating policies of the entity so as to obtain benefits from its activities. A **joint venture** is a contractual arrangement whereby PostNL N.V. (in)directly and one or more parties undertake an economic activity that is subject to joint control. An **associate** is an entity that is neither a subsidiary nor an interest in a joint venture and over whose commercial and financial policy decisions PostNL N.V. (in)directly has the power to exert significant influence.

4 Policy provisions and responsibilities

4.1 Minimum Standards

The mandatory elements of pre-employment screening comprise checks of the following elements regarding any individual to be employed or engaged by any **PostNL Group Company**, including temporary workers and personnel of subcontractors:

- a. **Identity:** verification based upon examination of original, official and valid identification documents;
- b. **Academic, Previous Employment and / or Professional Background:** assessment of the authenticity of the represented certificates and other documents and references confirming the applicant's educational and professional backgrounds; also, as far as permitted under local law, previous employers may be contacted to validate the applicant's dates of employment and any other relevant information.
- c. **Criminal background:** check to determine if the applicant has a record of any criminal conviction, as far as permitted under local law.

Deviations for other than legal reasons are permitted with the prior approval of the Board of Management.

4.2 Responsibilities

The management of the **PostNL Group Companies** is responsible for the implementation of the mandatory screening elements set forth in this policy, with the support of the respective Human Resources departments, which must carry out and coordinate all activities related to this policy.

The screening of temporary employees and/or personnel from subcontractors and suppliers may be contracted out to the employment agencies and/or the third parties concerned. Written agreements between the **PostNL Group Companies** and the employment agency or third party should specify that the third party can be held liable for not checking a candidate as rigorously as a PostNL Group Company does.

Audit & Security Department is responsible for the maintenance of these minimum standards as well as the monitoring of the implementation of this policy.

4.3 Policy owner

The policy owner is the Director Audit & Security. The policy owner is responsible for reviewing this group policy on an annual basis to assess whether revisions are necessary. The policy owner is also responsible for monitoring compliance with this group policy.

4.4 Related policies and procedures

- PostNL Business Principles
- PostNL Group Policy on Fraud Prevention
- PostNL Group Policy on Conflicts of Interest

5 Relationship between Policies and Local Policies

All **PostNL Group Companies** must adopt and implement this group policy. It is prohibited from amending or re-branding this group policy as a local policy. Any related local policy must be aligned with this group policy.

Local procedures may be developed to support the implementation of this group policy. A local procedure may widen the coverage of this group policy, but it must not limit or redefine the requirements of this group policy.

The managing directors of a **PostNL Group Company** are responsible for ensuring translations of this group policy are an accurate and fair translation in all aspects.

6 Communication

This group policy has been formally issued by the CFO on behalf of the PostNL Board of Management. This group policy is published on the PostNL website.

7 Implementation

It is the responsibility of all PostNL Group Company's Managing Directors, Head Office Directors and Statutory Directors to implement fully the requirements of this group policy. The policy owner is responsible for providing all additional communications and/or training/guidance as required to assist with the implementation process.

The CFO has delegated the responsibility of monitoring compliance of this group policy to the policy owner, whereby the compliance with the document retention and document destruction sections are also delegated to the policy owner.

This policy has been implemented with effect from 31 May 2011.