

Angard Staffing

Code of Business Standards

Angard Staffing (and the Royal Mail Group of which it is a part) aims to conduct business with the highest standards of honesty, integrity and openness. This policy sets out the standards Angard employees are expected to adhere to in their work (including whilst on assignment to Royal Mail).

Main topic areas

| • | Introduction |
|---|--------------|
| | |

- Values
- Expectations
- Your Personal Commitment
- Making the Right Decision
- Health and Safety
- Service to our Customers
- Inside Information
- Security Privacy and Trust
- Commercial Behaviour and Compliance
- Security Privacy and Trust
- Dealing fairly with suppliers, clients and customers
- Political donations and impartiality and conflicts of interest
- Anti Bribery
- Gifts and Hospitality
- Review

Getting help

Please contact the Angard Helpline Number 0333 240 8502 or email angard.employee@reedglobal.com. For web access go to: www.angardstaffing.co.uk.

Introduction

Angard Staffing (Angard) is part of the Royal Mail Group Limited (Royal Mail) and its employees are from time-to-time assigned to Royal Mail as temporary workers. It is therefore important that Angard's employees adhere to this Code of Business Standards which sets out information on the standards expected of employees of Royal Mail. References to Royal Mail in this Code should be read as meaning Angard or any other company in the Royal Mail to which Angard employees are assigned or with which they have dealings.

This code is in effect from 1st April 2014.

Values

The Royal Mail values reflect the principles, beliefs and aspirations that guide our behaviour and shape our culture.

- We work safely;
- We have a passion to deliver for our customers;
- We have pride and care about what we do;
- We work together and treat each other fairly;
- We are trusted to succeed;
- We act commercially.

Expectations

What you can expect from us...

Angard commits to:

- Provide a safe, secure, healthy and productive work environment;
- Treat individuals fairly and with respect;
- Protect individuals from inappropriate or bullying behaviour;
- Support individuals to raise concerns;
- Operate within the law.

What we expect from you...

Angard expects all employees to:

- Act with honesty at all times;
- Be present and productive during working hours;
- Follow this Code:
- Use sound judgement and take personal accountability for workplace actions;
- Demonstrate respect for each other;

Operate within the law.

All of the above principles will apply to you as an Angard employee and, in particular, in relation to any assignments you complete within Royal Mail.

Your personal commitment

You will be asked to agree to:

Follow Our Code: Code of Business Standards (the Code)

We all have a duty to uphold the standards defined in the Code.

Please be aware that any breach of the Code may be dealt with under the Disciplinary Policy, and that any finding of misconduct could result in dismissal. In addition, some breaches of the Code may result in criminal prosecution.

Raise any serious concerns you may have

If you discover that the Royal Mail's standards and reputation are being put at risk by unethical or criminal behaviour, you should report the facts through the Angard Helpline Number (0333 240 8502 or email angard.employee@reedglobal.com). Ignoring bad behaviour is wrong and will damage the reputation of Royal Mail and everyone who works for it.

Making the right decision

The Code should be used to guide you when difficult situations arise.

Of course, not every situation you will encounter is covered: some decisions are clear cut, whereas others are more open to interpretation.

You are trusted to use good judgement in your day-to-day activities, and to seek further information or assistance when you need it.

Questions to consider

At some time in our working lives, we all confront dilemmas about whether an action is right. If you are faced with a dilemma ask yourself:

- Is it in line with Angard's Code of Business Standards, values and policies?
- Does it feel right?
- Is it lawful?
- Will it reflect negatively on you, Angard or Royal Mail?
- Would you be happy to defend your decision in public?
- Who else could be affected by this (e.g. colleagues, customers)?
- Would you be concerned if others knew you took this course of action?
- Is there a better alternative action?

If you are still unsure about the right thing to do call the Angard Helpline Number 0333 240 8502 or email angard.employee@reedglobal.com.

Health and Safety

Everyone has a responsibility for their own safety and that of their colleagues:

- You will support a safe culture and show this through responsible, accountable behaviour;
- Your actions will always take account of your own safety and that of others;
- You will report unsafe acts and conditions to enable them to be addressed;
- You must not carry out tasks without the proper training and necessary authority;
- You must always follow the appropriate safety rules standards and procedures, and ask for clarification if not sure:
- You will use and maintain all controls, procedures and safeguards provided for your protection and the protection of others;
- You must report all incidents, near-misses and personal injuries straight away to your manager.

Service to our customers

Our customers are important and we serve their needs by giving them:

- Consistent delivery of what we promise;
- Value-for-money services and products;
- Timely, reliable and secure performance of services nationwide;
- Accurate and accessible information about all our services and products;
- Helpful and courteous service at all times;
- A prompt and appropriate solution if things go wrong.

Everyone in the organisation has an important part to play in living up to these commitments, including Angard employees placed on assignments within Royal Mail. If we fail our customers, they are likely to take their business elsewhere. That is damaging to our business and to our job security.

And it will not go unnoticed. Royal Mail's external regulator, Ofcom, can impose penalties if Royal Mail fails to deliver on its obligations. Royal Mail also has a consumer watchdog, which takes an interest in the service it gives to customers.

Commercial behaviour and compliance

The only right way to compete is by ensuring that our business methods are always honourable, professional and lawful. As an Angard employee you will not usually be assigned to roles within Royal Mail that involve making commercial decisions, becoming involved in regulated activity or activity in which competition law is relevant. However, if you are, you will be provided with further information about the standards expected of you and may be asked to sign a copy of Royal Mail's fuller version of the Code.

Inside information

Information that is known to employees that could affect the price of Royal Mail Plc shares is called 'inside information'. As an Angard employee it is unlikely that you will ever come into contact with such information when assigned to Royal Mail. However, it is important that you must:

- Keep Royal Mail and Angard information confidential and disclose it only to employees who need to know it;
- Not communicate with the media, shareholders or analysts unless you have been specifically authorised to do so:
- Not deal in Royal Mail plc shares or encourage anyone else to do so or tell anyone else if you have inside information;
- As appropriate, comply with Royal Mail's Continuous Disclosure and Communications Policy and Share Dealing Policy.

Royal Mail's obligations as a listed company

As a company listed on the London Stock Exchange, Royal Mail Plc is required to comply with the obligations contained in the UK Listing Authority Listing, Prospectus and Disclosure and Transparency Rules (**Listing Rules**). The Listing Rules require listed companies to meet certain standards of governance and investor protection. As above, it is unlikely that, as an Angard employee, you will be assigned to any role at Royal Mail in which the Listing Rules are likely to be relevant to your job. If this is the case, you will be informed of this and may be asked to sign a copy of Royal Mail's fuller version of the Code.

You should be aware that any breach of the Listing Rules is likely to mean you are committing a criminal or civil offence and could also lead to you facing disciplinary proceedings.

Security, privacy and trust

Millions of items are entrusted to Royal Mail by its customers every day. Royal Mail must therefore win and keep the absolute trust of its customers and others it comes into contact with. As an Angard employee on an assignment to Royal Mail you will play an important role in maintaining this trust.

Maintaining our standards means:

- Handling all items, mail, cash and valuables entrusted to us with honesty and integrity;
- Safeguarding company and customer property and assets, ensuring they are not stolen, abused, damaged, or taken for personal use;
- Ensuring company funds and property are never used for private purposes, including not using Royal Mail pre-paid envelopes for personal use;
- Reporting any action that misuses company property or goods entrusted to Royal Mail;
- Correct accounting in all financial transactions and claims, and observance of established business control procedures:
- Making economic use of resources, avoiding waste and extravagance;
- Accurate reporting of business performance measures, such as ensuring there is no interference or undue influence on the record of quality measurements;
- Ensuring company premises and facilities are not abused for unauthorised commercial transactions;

- Safeguarding confidential information against abuse or unauthorised disclosure, and complying with the laws protecting personal data;
- Displaying Angard photo ID at all times when on Royal Mail premises and being prepared to politely challenge, in an appropriate way, anyone on our premises who is not wearing their identification.

Royal Mail's obligations as a regulated entity

As a regulated postal operator, Royal Mail has an obligation to ensure the protection and security of the mail. As an Angard employee on an assignment to Royal Mail you will play an important role in this.

Safeguarding the mail

Any loss or breach of security undermines customer confidence in our ability to safeguard the mail and may attract negative media attention.

We must protect the integrity of the mail by:

- Ensuring all employees are aware of, and have access to, the security standards and procedures required to ensure mail security;
- Individually and collectively complying with those standards;
- Reporting and recording any incidents of loss, theft, damage or interference.

Operational Pipeline Security Standards:

- Customers' Parcels and Letters are not left unattended or unsecure at any time;
- Everyone performing work for Royal Mail has an appropriate level of security awareness and training;
- Unauthorised access to all Royal Mail sites is prevented;
- Special Delivery, Secure and high risk customers' Parcels and Letters are afforded appropriate protection;
- Managerial checks to safeguard all customers' Parcels and Letters are effectively deployed;
- All vehicles and equipment used to convey customers' Parcels and Letters are afforded the appropriate level of security at all times.

Dealing fairly with suppliers, clients and customers

Angard employees will not usually be assigned to Royal Mail in roles where they will be dealing with suppliers or commercial clients and customers of Royal Mail. If you are, you will be provided with further information on the standards expected of you.

Political donations and impartiality and conflicts of interest

Angard's approach to conflicts of interest and political activity is set out in its Conflict of Interest Policy.

Anti-bribery

Corrupt acts expose Royal Mail Group and its employees to the risk of prosecution, fines, debarment from tendering for business and other penalties.

What is bribery?

Bribery is promising, offering, giving, requesting or accepting any advantage to induce or reward behaviour that is improper (i.e. illegal, unethical or a breach of duty). This can be directly or through a third party. Even if a bribe is turned down or fails to have the intended effect, it is still a bribe. 'Advantages' may be financial or non financial and may include: money, loans, donations (including charitable donations), an award of business, employment contracts, preferential treatment, gifts and hospitality and any other advantage or benefit which is intended, or perceived to be, of value to the recipient or another person.

Royal Mail Group has a zero tolerance policy on bribery. Therefore:

- You must never promise, offer or give a bribe;
- You must never request or accept a bribe;
- If you become aware of any knowledge or suspicion of bribery, you should report it as soon as reasonably possible to the Angard helpline or the Speak up helpline 0800 0971131.
- You will not suffer demotion, penalty or other adverse consequences for refusing to pay or receive bribes.

Angard employees are expected to comply with Royal Mail's Anti-Bribery Policy, which is available via the Angard website.

Gifts and hospitality

Angard's approach to gifts and hospitality is set out in its Gifts and Hospitality Policy, which is available via the Angard helpline or website.

Review

Angard will review this policy from time-to-time and may need to update it in accordance with business requirements.