



# Royal Mail Group

## Policy for the Prevention of Bribery, Corruption and the Facilitation of Tax Evasion

Ensuring everyone understands:

- What is expected of them
- How to protect themselves
- When to seek advice
- How to raise a concern

## Overview and Policy Statement

Royal Mail Group (RMG) is committed to conducting its business honestly, fairly and ethically. Crimes like bribery, corruption and tax evasion are contrary to everything we do and what our brand stands for. We (and anyone acting on RMG's behalf) must not carry out any form of bribery or corruption or deliberately and dishonestly facilitate tax evasion by a third party.

### Key Questions to Ask Yourself

*'Does someone expect this business relationship to be influenced improperly because of the payment, advantage, gift, hospitality, donation or sponsorship in question?'*

*'Is what I'm doing going to help someone avoid paying tax?'*

If the answer is 'yes' to either of these questions, this might be unlawful, so don't do it. If in doubt, seek advice from Group Compliance & Ethics.

### Statement by the Chief Executive

We have a great history of doing business in a responsible way. Our success is built on trust – from our customers, colleagues and business partners.

Bribery, corruption and tax evasion are contrary to everything that we and our brand stand for.

We have a strict zero tolerance policy towards bribery and corruption and the facilitation of tax evasion. This principle has been unanimously approved by the Board and has the full support of my Executive Team.

We are all responsible for compliance and each of us has a role to play. Please take time to read this Policy and the associated guidance carefully to ensure you understand your role and obligations in these important matters. We all must remain committed to building a responsible and ethical culture where we can speak up confidently if we have questions or concerns without fear of retaliation.

We have a great business. I am confident that together we can continue to build a successful company that we can be proud of.



**Simon Thompson**  
Chief Executive, Royal Mail UK  
May 2021

### Our Responsibilities for Preventing Bribery and Corruption

#### We must:

- Comply with all applicable bribery and corruption laws, including local laws when employed by or performing services for RMG outside the UK;
- Always follow applicable due diligence processes and onboarding protocols when setting up new commercial arrangements with suppliers and other business;
- Keep accurate financial records and have appropriate internal controls that evidence the business reason for payments made or received;
- Always use approved business channels to make payments – never use cash or offshore accounts;
- Follow the requirements in the RMG Gifts, Hospitality, Sponsorship and Donations (GHSD) Guidance issued under this Policy, which include:
  - ensuring all GHSD are for a legitimate business purpose and reasonable in all the circumstances; and
  - registering in advance on the gifts and hospitality register any GHSD valued at more than £50 and any GHSD offered to or by a public official, regardless of value;
- Disclose any connections that might cause a conflict of interest in our work for RMG;
- Immediately report any attempt, request or demand by a third party to engage in bribery or corrupt activity to Group Compliance & Ethics; and
- Contact Group Compliance & Ethics if you have any concerns about any bribery or corruption issues or if contacted by an authority (such as the Serious Fraud Office).

### **We must not:**

- Request, offer or accept a bribe either directly or via someone else;
- Request, offer or accept any GHSD if it is intended to influence a decision, conceal a bribe or if there are on-going commercial negotiations (including tenders);
- Allow a private interest to influence our work for RMG or use our position at RMG for our own advantage;
- Request, offer or accept any gift of cash or cash equivalents such as shares, gift cards or vouchers (this excludes Christmas tips and tips in respect of other religious festivals from customers to frontline staff);
- Make facilitation payments (see below) or give the impression that RMG will make such payments, unless there is a threat to safety or life (in which case report it immediately to Group Compliance & Ethics); or
- Threaten or retaliate against anyone who refuses to take part in any bribery or corruption or who reports any concerns that an offence has been committed.

### **Our Responsibilities for Preventing the Facilitation of Tax Evasion**

#### **We must:**

- Always follow applicable due diligence processes and onboarding protocols when setting up new commercial arrangements with suppliers and other business partners;
- Take reasonable steps to obtain contractual commitments to comply with applicable anti-facilitation of tax evasion laws from suppliers and other business partners;
- Follow all RMG standard processes and procedures that are in place to prevent the facilitation of tax evasion;
- Immediately report to Group Compliance & Ethics any fraudulent tax evasion or any attempt, request or demand to facilitate any person's tax evasion; and
- Contact Group Compliance & Ethics if you have any concerns about any facilitation of tax evasion issue or if contacted by an authority (such as HMRC).

#### **We must not:**

- Engage in any form of facilitating a third party's

evasion in the UK or anywhere else in the world, including asking anyone to break the law to avoid paying tax or helping them to do so in any way; or

- Threaten or retaliate against anyone who refuses to facilitate tax evasion or who reports any concerns that an offence has been committed.

### **Further Information**

#### **Bribery and corruption**

**Bribery** It is promising, offering, giving, requesting or accepting any advantage to encourage or reward improper behaviour, i.e. behaviour which is illegal, dishonest or a breach of duty. Bribery is a criminal offence, even if the bribe is turned down or fails to have the intended effect. Businesses can be held liable for failing to prevent a person associated with them from offering or accepting bribes.

**Corruption** is the abuse of entrusted power related to your position or someone else's position for personal benefit. This may arise from a conflict of interest between your private affairs and your work for RMG.

Facilitation payments are typically small, unofficial payments or gifts made to public officials to secure or speed up the performance of their duties. Examples include unofficial payments to accelerate customs clearance or to obtain a permit, licence or visa. Facilitation payments are bribes and are illegal.

#### **Facilitation of Tax Evasion**

Dishonestly or fraudulently evading tax is a criminal offence. Businesses can be held liable for failing to prevent a person associated with them from deliberately and dishonestly facilitating UK or foreign tax evasion by a third party, including intentionally 'turning a blind eye'.

### **Further Guidance and Documents**

Group Compliance & Ethics provides guidance to assist you in complying with this Policy. All guidance is available on our [Compliance & Ethics Guidance Hub](#).

The relevant guidance includes:

- Anti-bribery and corruption guidance
- Compliance guidance for Operations
- Gifts, hospitality, sponsorships and donations guidance
- Gifts and hospitality guidance - FAQs
- Sponsorship and donations - FAQs
- Gifts and hospitality guidance for approvers
- Guidance on preventing the facilitation of tax evasion

## Reporting Concerns

### Do the right thing, speak up.

Everyone should be able to raise concerns without fear of retaliation.

You can talk to your line manager or you can Speak Up by calling the confidential helpline on **0800 090 3154** or using the online service at <https://royalmail.gan-compliance.com/p/speakup>. We will take action.

## Scope of this Policy

This Policy applies to all our people working anywhere in the world for RMG and its wholly or majority owned subsidiary companies and joint ventures, except the GLS group, which maintains its own policies and procedures which are aligned with this Policy. Our people include employees, casuals, agents, professional interims, agency workers, contract staff, consultants, officers and any other representative acting on our behalf. This Policy does not form part of any employee's contract of employment and RMG may amend this Policy at any time. RMG may also require third parties (in particular business partners, suppliers and agents) working on its behalf to comply with this Policy and the associated guidance, and/or with all applicable anti-bribery and corruption and tax evasion laws, in all their dealings for or on behalf of RMG.

## Breach of this Policy

Anyone found in breach of this Policy may be subject to disciplinary action up to and including dismissal. Where a business partner fails to comply with this Policy, RMG may seek to terminate that business relationship.

Any breach of laws to prevent bribery and corruption and the facilitation of tax evasion is a serious matter. Failure to comply with this Policy could potentially lead to unlimited fines for RMG, being prevented from competing for contracts, and damage to our reputation. Bribery and facilitating tax evasion are criminal offences. If you are convicted of bribery in the UK, you could go to prison for up to ten years or face unlimited fines. If you are convicted of facilitating tax evasion by another person, you could face fines.

## Getting Help with this Policy

Contact Group Compliance & Ethics for advice on this Policy or the guidance documents supporting this Policy:

- 020 7449 8302
- [group.compliance@royalmail.com](mailto:group.compliance@royalmail.com)

## Version control

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This document is classified: **RMG – PUBLIC**

To request changes or updates to this document, contact the policy owner.