

PrintPost
Code of Business Conduct
for
Staff

August 2010

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1. INTRODUCTION

1.1 Guiding Principles

- (i). The PrintPost Code of Business Conduct for Staff (the Code) is intended to guide the conduct of both the organisation and all those people who work for or on behalf of PrintPost in all business activities. This Code protects and promotes the organisation's reputation and inspires public confidence in how PrintPost conducts its affairs. The Code also helps to create a culture of excellence as PrintPost shows ongoing commitment to ethical behaviour.

PrintPost works with many suppliers and contractors who provide services to PrintPost (either directly or through corporate entities). This Code also applies to staff, contractors or suppliers engaged on an agency basis or a part-time and/or temporary/once-off basis. All these categories and all references to employees and staff in this Code include persons in these categories, except where the sense dictates otherwise.

- (ii). PrintPost's ability to live up to its commitments and ethical standards depends on the day-to-day choices and actions of each individual. These choices should be based on the principles of integrity, honesty and fairness in PrintPost's conduct of its business.
- (iii). It is incumbent on everyone in the organisation, both individually and collectively, to do his/her best to abide by the standard of business conduct outlined in this Code. Each person must also strive to support all commitments that PrintPost has made to conduct business in an honest, fair and ethical manner.
- (iv). All staff should conform to and be seen to conform to the highest ethical standards in conducting the business activities of PrintPost with its customers, suppliers, contractors and other third parties. Staff should compete vigorously and energetically but also ethically and honestly. The Code is drawn up to prevent the development of unethical practices and provide guidance to staff to deal with potential conflicts of interest that may arise. The Code is intended to be complementary to other established procedures, regulations and authority levels that already govern the conduct of much of PrintPost's business.
- (v). Each section of this Code covers an area in which staff have responsibilities to PrintPost. These include:
- Personal conduct and protection of PrintPost's assets
 - Obligations in conducting PrintPost's business with other people and organisations
 - Conflicts of interest and other considerations affecting PrintPost that may arise on one's own time
 - Competition
 - Gifts and Entertainment

1.2 Policy/Approach

- (i). PrintPost fully subscribes to the Code of Practice for the Governance of State Bodies revised by the Government in June 2009.
- (ii). Staff, whether direct employees or not, are expected to be conversant with the various PrintPost policies and procedures governing its activities, business and financial transactions.

1.3 Staff Duty of Care to PrintPost

- (i). Staff have a general duty of care to PrintPost. This duty of care includes the diligent performance of duties, use of PrintPost facilities and services and dealings with third parties on PrintPost's behalf.
- (ii). Staff are obliged to comply with all laws and regulations applicable to PrintPost's activities and its places of business.
- (iii). Section 84 of the Postal and Telecommunications Services Act, 1983 requires that staff do not open, delay or prevent the delivery of mail, disclose its contents or use information obtained from mail without the addressee's consent or tamper with the mail.
- (iv). Staff are required to act with integrity at all times and must never engage in fraudulent or irregular activity of any kind.
- (v). PrintPost is committed to ensuring that cost effective controls and procedures are operated to prevent, detect, deter and deal with fraud and irregularities and staff are required to co-operate fully at all times with these measures.
- (vi). PrintPost is covered by the *An Post Policy and Procedures for Raising Matters of Concern*. It refers to the disclosure, by employees or others associated with PrintPost, of malpractice as well as illegal acts or omissions at work. Staff are encouraged to use the procedures set out in that policy to report any instances of illegal or unethical behaviour by any of the Company's directors, managers, employees, agents or contractors. Malpractice is taken very seriously and PrintPost is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, staff who have serious concerns about any aspect of PrintPost's work are encouraged and expected to come forward and voice those concerns and they may do so without fear of victimisation, subsequent discrimination or disadvantage.
- (vii). It is PrintPost policy to report all instances of suspected fraud and other criminal offences to An Garda Síochána and to seek financial recovery through civil proceedings.

2. PROTECTING CONFIDENTIAL INFORMATION

2.1 PrintPost Information

- (i). Staff who have, or gain, access to PrintPost proprietary and confidential information (e.g. financial reports, suppliers and customer details including pricing and volume data, employee records, computer source code and programmes) must take every precaution to keep this information confidential. Staff must also ensure that no information is given to third parties without prior permission from their manager.
- (ii). Protecting Company information also means reporting information as completely and accurately as is practicable. It is incumbent on all staff to ensure that all information reported (written and other reports) is accurate, relevant and timely.
- (iii). Dishonest reporting or omission of material information from reports within PrintPost or to organisations or people outside the organisation is strictly prohibited. This involves not only reporting information inaccurately, but also deliberately or carelessly organising it in a way that is intended to materially mislead or misinform those who receive it. Staff must ensure that they do not make false or misleading statements in external reports and/or other documents submitted or maintained for public bodies. Dishonest reporting can lead to civil or even criminal liability for staff.
- (iv). Employees, and certain non-employee staff, are entitled to reimbursement for reasonable expenses but only if these expenses are actually incurred. To submit claims for expenses for travel, meals, accommodation, or for any other expense not incurred is both a fraudulent act and dishonest reporting and is prohibited.
- (v). Staff who have access to Company email accounts must abide by the Company policy in relation to use of this email account. Details are included in this document at Appendix 1.

2.2 Acquiring Information about others

- (i). The receipt of sensitive business, financial, technical or other information from competitors or other industry organisations carries significant risks.
- (ii). Other organisations also have intellectual property, including confidential information, that they want to protect. In some circumstances, these companies are prepared to disclose and allow others to use this proprietary information for a particular purpose. In certain situations, companies may, in return, seek information from PrintPost. Where requests of this nature are made, and before information is disclosed, it must first be cleared by the General Manager/ Managing Director
- (iii). If staff receive another party's proprietary information, they must ensure the information is not misused or misappropriated. Data obtained under confidentiality or similar agreements should be treated in accordance with the agreed terms. Staff must try to ensure that, in all situations, PrintPost's relationship with its business partners is maintained to the highest standards. They must also ensure that the public profile of the organisation is not adversely affected by the manner in which proprietary information is used. In exceptional circumstances PrintPost may be required to release sensitive information received from others in the public interest. In such cases, PrintPost will consult with the third party in advance of disclosure of the information, where this is appropriate.

2.3 Data Protection

PrintPost complies with the Data Protection Acts. Staff and agents must ensure that all personal data on living persons which they record on computer or manual files is necessary, relevant, accurate and objective. Personal data must be deleted when it is no longer required. Compliance with PrintPost's Data Protection Policy helps maintain our reputation and avoids recording information, which if released, could cause embarrassment to or reflect negatively on PrintPost. Personal data may be accessed by the persons we hold information on.

2.4 Freedom of Information Act

- (i). PrintPost is not governed by the Freedom of Information Act at present but it is nonetheless affected by it. Much of the information that flows from PrintPost is routine and of no particular business value.
- (ii). A small amount, however, is confidential and commercially sensitive. An Post is not required to publish separate company accounts for PrintPost. Financial accounts for PrintPost are consolidated within the An Post annual report. Disclosure of such information into the public domain would not be in the interests of PrintPost. Accounts are not publicly available and turnover, gross and net profit and margins achieved are highly confidential and commercially

sensitive and must not be disclosed to others except with permission of the General Manager.

- (iii). Types of data that are commercially sensitive include margins achieved, business volumes customer profiles etc.

Many of PrintPost's clients and potential clients are subject to FOI and care should be taken when submitting data to such parties that it is marked as commercially sensitive where appropriate and otherwise treated to keep such data confidential.

- (iv). In these circumstances, it is important that staff in PrintPost who provide information to public bodies governed by the Freedom of Information Act are familiar with the aims and general operation of that Act. Awareness of the Act will ensure that sensitive information is appropriately treated and made public only in accordance with this law.
- (v). It is not intended that the Act should affect, except in minor respects, the maintenance of routine, effective communication between PrintPost and public bodies governed by the Act.
- (vi). A summary of the Freedom of Information Act and its application to An Post and its subsidiaries is available on the PrintPost Intranet site.

2.5 Proprietary Information

- (i). In the event that staff cease working for or with PrintPost for any reason, including retirement and/or service contract cessation, all property, including documents and media which contain PrintPost proprietary information must be returned to PrintPost. Also, PrintPost's ownership of intellectual property, created by or with the assistance of an individual, continues even after the individual ceases to be directly involved with PrintPost.

3. PROTECTING THE ORGANISATION'S ASSETS

- (i). It is each individual's responsibility to ensure that all preventative measures are taken to ensure the most efficient use of PrintPost equipment. Everyone who uses equipment also has a responsibility for understanding its proper use and maintaining it in good condition. The reputation of the organisation, its staff and its products and services and their reliability, accuracy, security and standing within the secure print industry are important assets that all staff have a responsibility to protect.

3.1 Physical Assets

- (i). Staff should be alert to any situations or incidents that could lead to the loss, theft, or misuse of Company property. Managers/Supervisors should accurately record Company property issued to staff and should recover that property before the employee departs from PrintPost. All such property or assets should be returned to PrintPost by staff prior to departure.

3.2 Internal PrintPost Information Systems

- (i). The reliance placed on internal information and communications facilities in carrying out PrintPost's business makes it crucial to ensure their integrity. These facilities should only be used for conducting business on behalf of PrintPost.
- (ii). Any unauthorised use of these facilities, whether or not for personal gain, will be considered a disciplinary matter. It is each person's responsibility to ensure that the use made of PrintPost information systems is relevant to the work undertaken and is properly authorised. PrintPost's internet, email and telephone usage policies must be complied with.
- (iii). Staff and contractors are required to familiarise themselves with the PrintPost IT Policies and Standards and adhere to them. They are designed to ensure that the integrity of the organisation's information systems is maintained to the highest standards.
- (iv). The PrintPost IT Policies and Standards and the email and Telephone Usage Policy are published on the PrintPost Intranet site. Hard copies of the policies are available on request.

3.3 Intellectual Property

- (i). Employees assign all rights, titles and interest in intellectual property developed when employed by PrintPost to PrintPost.
- (ii). This intellectual property includes such things as technical plans, IT programmes, documents which relate to PrintPost's actual or anticipated business, or from the work performed. This property is exclusively owned by PrintPost, whether or not it results from tasks performed on behalf of PrintPost either during or after work hours relating to PrintPost business.
- (iii). Employees who leave PrintPost are obliged to ensure that intellectual property developed by or entrusted to them is retained by PrintPost. There is an onus on employees leaving the organisation to ensure that under no circumstances is this property disclosed to outside agencies or prospective employers who may operate in the same market as PrintPost and would be deemed by PrintPost to be competitors.
- (iv). Copyright to work completed by employees during their term of employment with the organisation shall remain with PrintPost for the full term of the copyright. Similarly, any patent developed during employment will also belong to PrintPost. Employees will not be entitled to any additional copyright payments or patent royalties.

4. COMMUNICATING INFORMATION TO STAFF AND THE PUBLIC

- (i). PrintPost will provide staff with all relevant information affecting the organisation as appropriate. PrintPost will ensure that this information is complete and accurate and presented in a manner that is meaningful and easy to understand.
- (ii). Staff members are required to disseminate accurately and speedily relevant PrintPost information to their subordinates and colleagues in order to ensure that all staff are fully informed on matters that are likely to affect them.

4.1 Confidential Information

- (i). It is essential that, where circumstances dictate, certain information must remain confidential to protect PrintPost's competitive position and to comply with applicable agreements and laws.

5. PRINTPOST'S COMMITMENT TO STAFF

5.1 Work Environment

- (i). PrintPost will ensure that its employment and service contract practices are fair and will continue to promote a policy of dignity and respect in the workplace.
- (ii). PrintPost will ensure that all complaints by staff in relation to bullying and harassment or dignity at work will be fully investigated and appropriate action taken.

5.2 Misconduct

- (i). PrintPost will not tolerate conduct which has an adverse impact on the work environment. This conduct includes, threats, violent behaviour or the sale or possession of illegal drugs or other controlled substances.
- (ii). Staff should not be on PrintPost premises or in an PrintPost work environment if they are under the influence of/or affected by illegal drugs or alcohol. The consumption of alcohol on PrintPost premises is only permitted in exceptional circumstances with the prior approval of management for promotions or other special events. Each individual has a responsibility to ensure that he/she is not under the influence of illegal drugs or alcohol while on duty. Staff who fail to adhere to these requirements will be subject to disciplinary action in the case of employees or other appropriate measures in the case of contractors or their staff.

5.3 Academic Pursuits

- (i). PrintPost will endeavour to support, whenever possible, work-related aspirations of its employees. This support is and will continue to be demonstrated by the provision of training and development opportunities within the organisation. Subject to budgetary constraints, PrintPost will, where possible, also provide some financial support for employees who decide to take on further academic studies where this is relevant to their work.

6. COMPETITION

- (i). PrintPost will compete vigorously, but in an ethical and legitimate manner. A Guide for employees entitled 'Fair Play, Complying with Competition Law', available on the intranet, explains how employees are expected to comply with Competition law. All relevant employees must adhere to the standards set out in this Guide.
- (ii). PrintPost will ensure that all decisions and actions taken by the organisation comply with competition regulations and laws.
- (iii). Where comparisons are made between PrintPost and its competitors, employees should ensure that these comparisons are fair and objective. It is the responsibility of each employee to ensure that he/she does not improperly denigrate competitors and/or their products or services. Materially false or misleading statements and innuendoes about competitors, their products or services, are considered to be improper and unacceptable behaviour. Such conduct damages the respect and integrity PrintPost enjoys.

7. PERSONAL AND PUBLIC ACTIVITIES OF STAFF

7.1 Impartiality

- (i). Whilst PrintPost respects the rights of individuals to participate in personal and public activities outside work, these activities must be consistent with PrintPost's service remit. Personal and public activities which are likely to compromise PrintPost or undermine public confidence in the organisation are inconsistent with a continuing role within PrintPost for the relevant staff member.
- (ii). Staff must use discretion in engaging in outside activities and must ensure that their identification with any particular project, product, service or viewpoint does not represent, or could not reasonably be inferred to represent, any implied or actual association with, or endorsement by, PrintPost where such would be considered to be inappropriate by the management of PrintPost.
- (iii). It is incumbent on staff to ensure that unfair advantage is not taken, and could not reasonably be implied to be taken, of their connection with PrintPost, and to ensure that no undesirable publicity is drawn to PrintPost resulting from their engagement in such outside activities. This is particularly relevant where the individual is involved in high profile or political or controversial activities and has access to sensitive areas within PrintPost. Staff involved in such activities must ensure that this does not lead to a situation in which public confidence in the professionalism and trustworthiness of PrintPost staff is undermined.

7.2 Political Campaigns

- (i). PrintPost does not reimburse staff for personal political contributions, nor does it allow staff to campaign on Company time or property. Staff will not be paid by PrintPost for any time spent running for public office, serving as an elected official or campaigning for a political candidate. Should a staff member wish to engage in such activities during normal working hours, PrintPost will provide them with a reasonable amount of time off without pay providing the individual's duties permit and this is approved by the General Manager /Managing Director in advance.

8. CONFLICT OF INTEREST

A conflict of interest may arise if an individual engages in any activities, or advances any personal interests, at the expense of PrintPost's interests.

8.1 Attendance to duties

- (i). PrintPost accepts that staff are free to engage in any activity outside normal working hours provided that, in doing so, this does not impair their ability to give a satisfactory service to the organisation in accordance with their contract of employment. It is up to the individual concerned to avoid situations in which loyalty to the organisation may become divided.
- (ii). It is incumbent on PrintPost employees to ensure that they give regular and undivided attention to their duties. Any activity which impedes the employee from carrying out his/her duty involves a breach of his/her contract of employment. Where such activities or involvement impacts on the employee's capacity to perform his/her work in a competent manner, disciplinary action may be taken, up to and including dismissal.
- (iii). PrintPost may request employees to discontinue their involvement in any activity or interest which could potentially be in conflict with the interests of the organisation, impair the ability of employees to perform their work in a satisfactory manner, or have an adverse effect on their punctuality or attendance.
- (iv). To avoid any uncertainty, all staff must inform their Managing Director/General Manager of their involvement in any activities or interests outside work where it is questionable that the staff member's involvement in these activities conflicts with PrintPost's interests.

8.2 Involvement in Other Business Activities

- (i). Employees must not become engaged in outside activities or have a business or financial interest that may compete with or supply PrintPost or could be regarded as being a conflict of interest with their terms and conditions of employment.
- (ii). Any employee who is either employed in or running any business, consultancy or company outside of his/her relationship with PrintPost, or who has a significant financial interest in such a business, must inform their Managing Director / General Manager in writing.
- (iii). The Managing Director / General Manager will assess if there is a conflict of interest and will notify the employee accordingly.
- (iv). An employee may be requested to discontinue his/her involvement in the outside business or activity concerned or, in certain circumstances, asked to dispose of his/her financial stake in such interests. Alternatively, PrintPost may alter the employee's contract of employment to avoid such a conflict of interest.

8.3 Competing Against PrintPost

- (i). Staff must have no involvement with any competitors to PrintPost.
- (ii). Involvement in outside business activities which do not compete with PrintPost may not be regarded as constituting a conflict of interest, provided the two activities are strictly separate. The following criteria must be observed by all staff engaged in activities outside PrintPost:
 - work for the other organisation(s) is not performed on PrintPost time
 - while engaged in outside activities, staff must ensure that PrintPost equipment and supplies and other employees' time are never used on outside activities
 - staff must not promote or attempt to sell products or services resulting from their outside business activities to other staff within PrintPost or on PrintPost premises or on PrintPost time.
- (iii). Employees and directors may not take up employment or appointments or provide consultancy services with bodies in the private sector who compete with PrintPost or take up such positions where it gives rise to the potential for conflicts of interest and/or to breaches of the person's duty of confidentiality to PrintPost.

8.4 Documentation

- (i). In the course of work, staff may receive documents which deal with business matters that conflict with his/her personal interests. Where this happens, the staff member should not read the document any further and should pass the documents to his/her immediate manager explaining the position. He/she should also write an explanation and report it to his/her manager.

8.5 Meetings

- (i). A staff member should excuse himself/herself from any meetings where there is discussion of issues that conflict with his/her own interests. The staff member should notify his/her manager that he/she withdrew from the meeting in accordance with the provisions of this Code and he/she should also report the matter to the General Manager / Managing Director or Company Secretary.

9. GIFTS AND ENTERTAINMENT

9.1 Definition

- (i). In this context, gift is broadly defined as anything that is given to staff, either as a result of a relationship with a particular party or because the member of staff is a public figure and for which the recipient staff member does not pay fair market value.
- (ii). Gifts offered by personnel of different organisations differ widely and may include material goods, services, promotional premiums, travel and accommodation for business or vacation purposes, tickets to sporting or cultural events and on-going discounts not generally or readily available to the public at large.
- (iii). It is important to note that, under Section 38 of the Ethics in Public Office Act, 1995, a member of staff will be judged to have corruptly accepted a gift unless he/she can prove otherwise.

9.2 Receiving Gifts

- (i). Staff are responsible for ensuring that they maintain the highest standards when involved in dealings with outside agencies whether or not they are acting on behalf of PrintPost in this capacity. As such, staff and/or their family members should never solicit or accept personal advantages or gifts of material value from firms or persons and which gifts arise directly or indirectly as a result of the staff member's association with PrintPost.
- (ii). Business gifts may be accepted by staff members as courtesies where they are designed to build understanding and goodwill among business partners. In this context, during the traditional gift giving seasons, gifts of modest value may also be accepted, where refusal to accept might give offence.
- (iii). When an employee is a guest in another country and if the gift is being offered as part of a public occasion it is best to accept the gift on behalf of the organisation. In such situations, the employee should report the gift to his/her manager and hand it over to the organisation.
- (iv). Employees can accept promotional items of limited value, such as inexpensive pens, calendars, mugs etc. that bear a company's name. Employees of PrintPost can also present gifts such as these to other business partners.

- (v). The value of gifts accepted in any year from any one source must not exceed €150. All staff are expected to disclose fully all individual gifts with a value exceeding €75 to their General Manager/Managing Director.
- (vi). A gift which exceeds these criteria should be returned with a polite explanation stating that acceptance of the gift is not permitted under the PrintPost Code of Business Conduct. Details of returned gifts must be notified in writing to your manager.

9.3 Giving Gifts

- (i). Employees should not give any money or any gift to any director, executive, official or employee of any supplier, customer or any other organisation if doing so would influence or could reasonably give the appearance of improperly influencing the organisation's relationship with PrintPost. Employees may provide a gift of a nominal value once it meets the criteria set out in this Code for receiving gifts and the same financial and practical guidelines apply.

9.4 Receiving Business Entertainment

- (i). Entertainment of staff by suppliers or customers is acceptable within normal commercial criteria where it is designed to build understanding and goodwill among business partners. However, business entertainment must be moderate in scale and clearly intended to facilitate business goals. This is defined as follows:
 - business entertainment in the form of meals and beverages at a local venue is acceptable as long as it is modest and infrequent;
 - a ticket for a sports event (such as football, golf, racing etc.) or other public entertainment at a local venue may be accepted;
 - attendance at such events should be regarded with discretion and not become habitual;
 - the number of people representing PrintPost at such events should be kept to a minimum and such representatives should always behave in an appropriate manner;
 - identification in a public way by PrintPost staff with a particular supplier/vendor should be avoided;
 - endorsement of a particular supplier's design/product, to the exclusion of others, should be avoided, except where this accords fully with PrintPost policy;
 - under no circumstances may cash or cash vouchers be accepted by any staff member;
 - entertainment should, as far as possible, be on an equivalent and reciprocal basis;
 - overnight accommodation and foreign trips paid for by third parties are not permitted.

An offer of entertainment which exceeds the criteria should be declined with a polite explanation stating that acceptance of the offer is not permitted under this Code.

9.5 Providing Business Entertainment

- (i). Entertainment by PrintPost staff of customers, suppliers and other parties is acceptable within normal commercial criteria where these are designed to build understanding and goodwill among business partners. However, PrintPost business entertainment must be moderate and clearly intended to facilitate business goals. The criteria outlined above in relation to receiving business entertainment apply equally to entertainment provided by PrintPost.

9.6 Sponsorship

Sponsorship must never be solicited from suppliers/vendors and where offered may only be accepted with express approval in writing by your manager.

10. PROCUREMENT REGULATIONS

10.1 Purchasing Procedures

- (i). In many circumstances, staff will be required to transact business on PrintPost's behalf. Staff must ensure that all business transactions are properly accounted for and reported in the Company records.
- (ii). PrintPost's Purchasing Procedures apply to all staff in jobs that deal directly with suppliers and potential suppliers. These procedures must be adhered to. This ensures fairness in the choice of suppliers and honesty in all business transactions with them.
- (iii). If domestic or foreign travel is necessary to investigate products or services, PrintPost will pay the costs involved. Supplier's offers of foreign travel and/or hotel accommodation should not be accepted, as this could influence or be seen to influence the procurement decision.

10.2 Choosing Suppliers

- (i). Staff involved in procurement activities on behalf of PrintPost must ensure fairness in the choice of suppliers and honesty in all business transactions with them.
- (ii). Purchasing decisions must be made on the basis of competitive price, quality, quantity, delivery and service. Furthermore, the suppliers own ethical and environmental standards and practices may have an influence on PrintPost's purchasing decisions.
- (iii). The overall aim is to purchase the most economic goods and services which meet our quality and other specifications, to the highest professional standards in compliance with PrintPost's purchasing procedures.

10.3 Conflicts of Interest

- (i). Actual and perceived conflicts of interest must be avoided by all PrintPost staff involved in purchasing decisions. Staff with actual or potential conflicts of interest should notify their manager of the conflict and should not take part in the related purchasing decision. The manager will appoint another person to make the purchasing decision where necessary.
- (ii). Where a member of staff has an interest in a company which supplies products and/or services to PrintPost, he/she must not attempt to influence decisions regarding the selection process in order to obtain special treatment for a particular

- supplier. Any attempt to do so will undermine the integrity of the organisation and breaches purchasing regulations. This may result in the staff member being subject to employment disciplinary action or breach of service contract proceedings as appropriate.
- (iii) In order to avoid any conflict of interest, interests held by friends or family of staff members in Supplier companies or prospective supplier companies, whether as an employee or owner of that company, must be reported to the General Manager / Managing Director in writing. Failure to comply with this may result in the staff member being subject to employment disciplinary action or breach of service contract proceedings as appropriate.

10.4 Procedure

- (i). Purchases should be made only in accordance with PrintPost Purchasing Procedures. Clarification on the procedures may be obtained from the General Manager / Managing Director if required.
- (ii). Competitive tendering is the normal procurement method in PrintPost, save in exceptional circumstances. If, for some compelling reason, a significant contract is to be awarded without competitive tendering it should only be done with the express consent of the General Manager / Managing Director **before the contract is awarded.**

10.5 Confidentiality

- (i). All supplier and tender information relating to a tender process must be treated in the strictest confidence, at least up to the time of contract award (see (ii) below for details). Disclosure of such information, particularly to another interested party, is strictly prohibited. Adherence to this principle is required to ensure all suppliers are treated equally and fairly.
- (ii). After the award of contract, information may be provided to both successful and unsuccessful Suppliers by means of a debriefing session. Supplier information for example, actual prices of other tenders, specifications submitted by others etc. must not be discussed at debriefing sessions. Information given to PrintPost by Suppliers must be treated as commercial in confidence.
- (iii). All confidential information must be properly safeguarded.

11. EQUALITY

11.1 Discrimination

- (i). PrintPost strives to maintain a healthy, safe and productive work environment which is free from discrimination or harassment based on race, colour, religion, sex, sexual orientation, age, disability, marital status, or membership of the travelling community.
- (ii). In accordance with An Post's Dignity at Work Anti-Bullying and Harassment Policy, PrintPost does not tolerate sexual harassment, harassment or bullying in any form. Staff found to be engaged in such acts, or who have misused their positions of authority in this regard, will be subject to disciplinary action (up to and including dismissal) or to breach of service contract proceedings as appropriate.

11.2 Equal Opportunities

- (i). PrintPost promotes equal opportunities for all employees including creating an ethos in which all employees can realise their full potential.

11.3 Employee Responsibility

- (i). Each staff member has a responsibility for creating and sustaining a pleasant, secure and productive working environment in which all staff and third parties are treated fairly and with respect.

12. COMMITMENT TO OUR CUSTOMERS

- (i). PrintPost values its customers and treats all customers equally. PrintPost believes that sustainability can only be secured through satisfied and loyal customers and that customer satisfaction is at least partly dependent on satisfied and effective staff.
- (ii). PrintPost will strive continually to achieve and maintain its market position through the provision of superior value services and products. To support a culture of excellence, the organisation will invest resources to develop its range of services and products.
- (iii). PrintPost seeks to minimise the impact of its operations on the environment. Where possible waste materials should be separated for recycling and items for disposal at landfill must be kept to the absolute minimum. All toner, waste paper, cardboard and plastics must be segregated and recycled.

13. ETHICS IN PUBLIC OFFICE ACTS, 1995 AND 2001

13.1 Disclosure Requirements

Directors and holders of designated positions in PrintPost are required under the Ethics in Public Office Acts 1995 and 2001 to disclose interests they may hold that could materially influence them in or in relation to the performance of the functions of their position by reason of the fact that such performance could so affect those interests as to confer on or withhold from them or their spouse or child a substantial benefit.

13.2 Statement of Registrable Interests

A Statement of Registrable Interests must be completed each year by designated directors and holders of designated positions. The statement of registrable interests covers:

- i) Designated directors and holders of designated positions own interests, and
- ii) the interests, of which they have actual knowledge, of their spouse, child or a child of their spouse.

Designated directors and holders of designated positions must not serve as directors of any organisation which supplies goods or services to, or competes with PrintPost. They must also provide the Company Secretary with written notice in circumstances where a spouse or other close relative is involved or intends to pursue an activity or become involved in a business interest that could be regarded as constituting a conflict of interest with PrintPost.

13.3 Registrable Interests

1. Occupational Income

This includes income from a trade, profession or rental income exceeding €2,600.

2. Shares

Shareholdings in any company where the aggregate value of the shares exceed €13,000.

3. Directorships

A directorship or shadow directorship of any company held during the relevant period.

4. Land

Any interest in land worth over €13,000 must be disclosed. A private home or holiday home is not included in this.

5. Travel, Accommodation, Meals etc.

Travel facilities, accommodation, meals and entertainment provided free of charge or at a discounted price which, in aggregate, at commercial prices, would exceed €650.

6. Remunerated Positions

Any remunerated position as a political or public affairs lobbyist, consultant or adviser held by a designated director or holder of a designated position.

7. Public Service Contracts

Details of any contract to which the person concerned was a party, or was in any other way, directly or indirectly interested, for the supply of goods or services to a Minister of the Government, or a public body during the period, if the value supplied exceeded €6,500 in aggregate.

8. Gifts, Property and Services

A gift given, or gifts given by the same person, where the value exceeded €650. Property supplied or lent or a service supplied for less than commercial value where the commercial value would have exceeded €650.

9. Other Interests

Any other interests which they, or their spouse, or child or a child of their spouse, holds which could materially influence the designated director and holder of a designated position in the performance of his official duties.

14. PUBLICATION AND CIRCULATION

- (i). A copy of this Code of Business Conduct for Staff shall be given to each employee and member of staff in PrintPost. Each new employee or member of staff shall be given a copy on joining PrintPost. Employees will acknowledge their receipt and understanding of the Code in writing.
- (ii). This Code of Business Conduct for Staff will be published on the PrintPost Intranet site and on the PrintPost website.

15. REVISION

- (i). PrintPost shall review this Code of Business Conduct for Staff at least every two years.

16. SUMMARY OF KEY POINTS

- (i). This section provides an indicative checklist of actions and behaviours that are (a) encouraged or mandated for all staff, and those that are (b) discouraged and forbidden. It is intended as a guideline and it is not meant to be exhaustive or definitive.

Staff members will:

- Be truthful and honest in all business dealings.
- Ensure that there is no conflict of interest between their work in PrintPost and any outside personal interest.
- Inform their manager in writing if any such conflicts arise.
- Ensure PrintPost obtains the best value for money in procurement and business dealings (subject to appropriate material specifications if relevant).
- Progress any concerns and grievances using, in the first instance, agreed internal processes.
- Ensure that their work complies with all applicable laws and regulations in the countries in which PrintPost operates.

Staff members will not:

- Participate in any matter or transaction where a conflict of interest exists.
- Disclose details of confidential Company matters to third parties including the media.
- Accept any money, significant gift, material or service from a customer or supplier.
- Behave in any manner which may damage the reputation of PrintPost.

17. ADVICE AND CLARIFICATION

- (i). Staff should consult with their line manager, General Manager/Managing Director or the Company Secretary if they have any doubts or require clarification on any aspect of this Code.