

AN POST ANTI-BRIBERY & CORRUPTION



Top Level Commitment

An Post are fully committed to ensuring there is an ethos of Anti-Bribery & Corruption embedded within its culture both internally and externally. An Post have focused on top level commitment from the Management Board down to all An Post employees.

What is Bribery & Corruption?

BRIBERY - An attempt to make an individual do something for you by giving them money, presents or something else for personal gain.

CORRUPTION - Acts in which individuals wrongfully use their influence in a business transaction in order to procure some benefit for themselves or another person, contrary to their duty to their employer or the rights of another (for example, kickbacks, self-dealing, or conflicts of interest).

Examples of Bribery & Corruption risks within An Post

- Creating documentation which may contain a false statement or an incorrect reporting of figures for personal gain
- Submitting fraudulent expense claims
- Accepting gifts or other rewards in return for more favourable terms.

Adherence to Policy

All An Post employees must adhere to the Anti-Bribery & Corruption Policy. All third parties and contractors must also adhere to the policy.

Failure to adhere to the policy may result in either:

- Suspension/dismissal
- Legal Action may be taken resulting in a fine or imprisonment.

Risk Framework for Preventing Bribery & Corruption

An Post are committed to a 'Tone from the Top' approach to preventing Bribery & Corruption by embedding the culture of reporting incidents, reviewing the policy on a frequent basis and providing training for all employees within the organisation along with ensuring there are consequences in place for misconduct.

PREVENT	DETECT	RESPOND
Clear Policies, Training Programs and Support	Comprehensive Control System	Clear Consequences and unambiguous Response
TONE FROM THE TOP		
COMPLIANCE ORGANISATION		
<ul style="list-style-type: none"> • Policies and Procedures • Programme Communication • Centralisation • Training 	<ul style="list-style-type: none"> • Forensic and part of standard audits • Compliance Reviews • Compliance Controls 	<ul style="list-style-type: none"> • Consequence for misconduct • Global Case Tracking • Monitoring Effectiveness
<ul style="list-style-type: none"> • Compliance Helpdesk (including global ombudsman function) 		
<ul style="list-style-type: none"> • Integration with personnel Processes 		

Reporting and investigating incidents.
 Relevant Legislation.
 Employee Training.



Reporting Incidents

An Post have committed to ensuring reporting is embedded within its culture by introducing the 'Raising Matters of Concern' programme. All employees within An Post will be able to anonymously report any suspicious activity in relation to bribery & corruption and the matter will be investigated by our Security Services team.



Investigation of Incidents

Any bribery or corruption offences will be investigated by the Security Services team and may require reporting the incident to An Garda Síochána where required.



Relevant Legislation

The policy reflects obligations arising under legislation including:

- **The Criminal Justice (Corruption Offences) Act 2018**
- **The Ethics in Public Office Act 1995**
- **The Protected Disclosures Act 2014.**

Anti-Bribery & Corruption Training for Employees

▶ 01

The An Post Learning & Development team will be designing online mandatory training for employees and embedding the anti-bribery & corruption training with fraud training.

▶ 02

All employees will complete the mandatory training and be made aware of the anti-bribery and corruption policy within the company.

▶ 03

The policy/training will be monitored on a frequent basis by the Security Services team and additional updates will be made to the training and policy where applicable.

▶ 04

The policy and training for employees will increase awareness of the importance ensuring there is no bribery or corruption with An Post or with its subsidiaries and third parties.

