

CODE OF CONDUCT – EMPLOYEES

AN POST GROUP

1. INTRODUCTION

- 1.1 State-owned companies like An Post are expected to operate according to very high standards of fairness, transparency and honesty. The Irish Post Office has a particularly long record of loyal and useful service to people, a record that has been built on the personal integrity and trustworthiness of its employees over many years.
- 1.2 Government requirements and legislative changes in recent years have made it necessary for An Post to introduce codes of conduct that apply both to Directors of the Company and to those who work for it. A code of conduct for Directors has been in place for some time and now, after discussion and agreement with employee representatives, the Company has drawn up codes which apply both to the employees of An Post and to those in subsidiary companies within the An Post Group.
- 1.3 The Ethics in Public Office Act, 1995 imposes particular duties on people who work in the public sector. The Act requires them to disclose certain business and financial information about themselves and their families if there is a danger that their personal interests might conflict with their duty as employees.
- 1.4 While this disclosure requirement applies to all employees, it is particularly relevant for those in what are called “designated positions”. These are senior or sensitive positions within the An Post Group which have been designated by the Minister for Finance. Employees in these positions are required to make regular disclosure statements whereas most employees need only disclose interests if the Company Secretary asks them to do so or if their circumstances require it. Recognising this distinction in disclosure obligations, the Company has prepared two versions of its code of conduct, one slightly amended to take account of those employees who are in designated positions.
- 1.5 The disclosure obligations covering all employees and the various other matters covered in the code are summarised in the following sections. Any employee who would like a copy of the code of conduct should contact the Company Secretary’s Office, GPO, Dublin.

2. APPLICATION OF THE CODE

The code applies to all employees of An Post and its subsidiary companies. It does not replace those rules and obligations which currently exist but is designed to deal with particular issues, especially conflicts of interest, which may have become more prominent in the business environment in recent years.

3. CONFLICTS OF INTEREST

- 3.1 Every employee is expected to act solely in the interests of An Post. A conflict of interest arises whenever the personal affairs of an employee (or a connected party)* impinge on Group affairs in such a way that his or her actions or decisions are affected. Such conflicts are most clearly seen when there is some advantage to be gained in a particular situation by doing or, indeed, failing to do something.
- 3.2 It may be that some benefit for an employee can be gained without causing any damage or loss at all to An Post. This, however, makes no difference to the conflict of interest position: what does matter is that no benefit is gained by the employee or by the relations and friends of that employee.
- 3.3 While conflicts of interest can arise in many different circumstances, they tend to emerge most clearly in situations involving purchasing and contract decisions. Strict adherence to existing Group rules for handling these matters will help to reduce the dangers of a conflict arising.
- 3.4 An employee, in the course of work, may receive documents which deal with business matters that conflict with his or her personal interests. Where this happens, the employee should pass the documents to his or her immediate supervisor explaining the position. He or she should also make a report to the Company Secretary.
- 3.5 Similarly, an employee should excuse himself or herself from any meetings where there is discussion of issues that conflict with his or her own interests. The employee should, once again, report on the matter to the Company Secretary and notify his or her supervisor that he or she withdrew from the meeting in accordance with the code of conduct.

4. DISCLOSURE OF INTERESTS

- 4.1 Where an employee believes he or she may be faced with a conflict of interest, he or she must disclose the position to the Company Secretary explaining how the conflict arises.
- 4.2 The Company Secretary may request any employee to furnish details of personal financial interests and professional relationships if he or she believes that a conflict of interest may arise for a particular employee.

- 4.3 On appointment to a designated position (see 1.4 above) an employee will be required by the Company Secretary to submit details of his or her personal financial interests and professional relationships.
- 4.4 Any employee who is uncertain about any of the disclosure issues may seek advice and clarification from the Company Secretary's Office.
- 4.5 Interests disclosed in accordance with this section will be treated in confidence by the Company Secretary who will maintain a register of the interests declared. This register will be revised annually. Only the Company Secretary, Chief Executive or a person authorised by them will have access to the register's information.

5. GIFTS AND BENEFITS

- 5.1 Employees must not obtain any personal advantage from someone dealing with An Post. Gifts or inducements of any type, the value of which could make it seem (to an impartial observer) that an attempt was being made to influence an employee, must not be accepted but tactfully returned. In particular, no cash or monetary benefit of any kind may be accepted.
- 5.2 If an employee is concerned in any way about the propriety of accepting a gift or feels that an inducement is being offered, he or she should consult his or her supervisor.
- 5.3 It is important to note that recent changes to the law (Section 38 of the Ethics in Public Office Act, 1995) mean that an employee will be judged to have corruptly accepted a gift unless he or she can prove otherwise.

6. CONFIDENTIALITY

- 6.1 In the course of their work, employees deal with confidential information, some of it received from customers and members of the public. Such information should be treated confidentially at all times.
- 6.2 When an employee leaves An Post or one of its subsidiaries, that employee is required to maintain a sensitive respect for any confidential information he or she may have dealt with when with the Group.

7. HONESTY AND INTEGRITY

- 7.1 All employees are expected to carry out their duties to the highest standards of integrity and to refrain from any actions that might bring the An Post Group into disrepute.
- 7.2 Company time and resources should not be used for the benefit of people or organisations other than An Post.

8. COMPLIANCE WITH THE CODE OF CONDUCT

- 8.1 It is an employee's duty to observe the principles of this code and failure to comply with it will be a disciplinary matter.

9. ADVICE AND GUIDANCE

- 9.1 An employee who wants guidance on any aspect of the code should consult his or her supervisor. Further advice may be sought from the Company Secretary's Office (telephone 7058804) or the Manager Regulatory Affairs (telephone 7058485).