

# CODE OF CONDUCT LA POSTE GROUPE



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**“ The group’s values and the trust placed in it on a daily basis commits it to each of its stakeholders. As La Poste employees, it is essential to follow the group’s rules of conduct to ensure its development and to continue to serve and be useful to everyone. ”**

**Philippe Wahl,**  
Chairman and Chief Executive Officer  
of La Poste Groupe

# FOREWORD

In recent years, La Poste Groupe has profoundly transformed. Our historical activities have been strengthened by the creation of new local services, responsible bancassurance products and services, trusted digital solutions, expertise in the healthcare field, and investments in the decarbonisation of transport, etc. Initiatives in all its business units continue to grow.

As a mission-led company since 2021, La Poste Groupe has been supporting its customers and local areas in the environmental and energy, digital, demographic, social and regional transitions. La Poste makes its social commitment the cornerstone of its business model.

To achieve these objectives and maintain the bond of trust that makes the group successful, each of us bear some responsibility.

This starts by staying true to the company's values. This means behaving in accordance with what is expected of a group whose success is based on trust.

This code of conduct applies to all of you, employees of La Poste Groupe including its subsidiaries, regardless of your status or position. It is a compliance and ethics guide designed to support you on a daily basis throughout your professional life.

This document is intended for educational purposes. It will enable you to deal with situations which you may face.

It sets out the group's commitments, in particular that of complying with the laws and regulations to which it is subject in the countries in which it operates. It specifies the behaviour that must be adopted towards partners and colleagues or when you are in contact with the public.

Finally, it tells you the best practices to adopt, the procedures to follow and the people you can contact in specific situations.

The group's commitments set out in this code of conduct are the commitments of everyone. I invite you to read them and make them your own.

The successful development of La Poste Groupe, a group that offers a quality service that is resolutely forward-looking, depends on our conduct.



**Philippe Bajou,**  
General Secretary and Executive  
Vice President of La Poste Groupe

# PART 1

CODE  
OF CONDUCT



# WHAT IS A CODE OF CONDUCT?

The code of conduct **lays down the values and missions** that guide La Poste Groupe<sup>1</sup>, as well as its employees in their day-to-day activities. It sets out the expectations and rules determined by the group. These define ethical behaviour and responsible practices.

This code of conduct contains specific examples and recommendations that make it **a reference document and a practical guide** that you should rely on in your working relationships, whether with others in the group who you work with, your customers or all of your partners.

In this document, La Poste Groupe **affirms its absolute compliance with the laws and regulations of the countries in which it operates** as well as its desire to comply with international conventions, in particular those of the Organisation for Economic Co-operation and Development (OECD), the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization.

# WHO DOES THE CODE OF CONDUCT APPLY TO?

The code of conduct **applies to all employees and agents** of La Poste Groupe regardless of their status, activity, job level or country in which they work. As such, this code of conduct must be rolled out by all subsidiaries controlled by La Poste Groupe. It is the responsibility of these subsidiaries' corporate officers to implement it.

You **should know** its principles, standards and expected behaviours and **apply them** in a professional situation.

La Poste Groupe expects its partners **to comply with equivalent rules and principles** as part of their business relationship.

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<sup>1</sup> In this code of conduct, La Poste Groupe covers La Poste and all the subsidiaries it controls.

# WHAT **OBLIGATIONS** ARISE FROM THE CODE FOR THE GROUP AND EMPLOYEES?

La Poste Groupe's code of conduct lists your various **rights and duties** in the context of carrying out your activity. The subsidiaries must ensure that it is implemented locally and that all their employees comply with its provisions.

**You are personally liable** for any failure to comply with the provisions of this code and will be subject to possible disciplinary measures, or civil or even criminal penalties according to the applicable laws.

The code of conduct **protects you from practices that could be harmful to you** and the group. You must refer to it in order to avoid any situation that would be contrary to the law or the code's values and missions.

# WHAT ARE **GOOD HABITS** TO ADOPT TO ENSURE ETHICAL CONDUCT?

The group expects you to demonstrate **integrity, show respect to everyone and assume responsibility**. The principles set out in the code of conduct should **support you in your day-to-day actions and decisions**. However, the code cannot directly and specifically illustrate every risk situation.

# HERE ARE THREE ESSENTIAL HABITS THAT YOU SHOULD ADOPT TO ENSURE ETHICAL CONDUCT.

## 1. ASK THE RIGHT QUESTIONS BEFORE ACTING

If you have a doubt or face an ethical dilemma, you should ask yourself the following questions:

- Does your action or decision **comply with the law**?
- Is your action or decision **in line with the group's code of conduct and policies**?
- Is your action or **decision guided** by your personal interest or that of a close friend or relative?
- Can your action or decision have **a negative impact** on your entity, La Poste Groupe, your colleagues or the stakeholders with which you interact?

## 2. ASK FOR ADVICE

**Many resources are available to help and guide you.** Within the code, the 'Find out more' sections enable you to familiarise yourself with the group's policies and to learn more about the topics covered.

If you are still uncertain, **you should seek advice** from the appropriate people who can guide you: your manager, your human resources department, your legal department, the compliance department or the ethics officer of your entity and/or the group.

## 3. REPORT

**In case of a suspected** violation or circumvention of the rules and principles in this code (including the documents to which it refers) or of the law, you may discuss this with your manager. If you do not wish to notify your manager or if your report is not acted upon, you can use the whistleblowing system of your entity or that of the group. The address of the group system is as follows<sup>2</sup>:

<https://www.alerte-ethique.laposte.fr>

**The term whistleblowing** means any report or disclosure, transmitted in good faith and without direct financial compensation, of information relating to a crime, offence, threat or harm to the general interest, a breach or an attempt to conceal a breach of an international commitment duly ratified or approved by France, a unilateral act of an

international organisation adopted on the basis of such a commitment, European Union law, other laws or regulations as well as any breach of the code of conduct.

**The whistleblowing system respects the confidentiality** of the information and facts provided as well as that relating to those named in the report (the whistleblower, persons involved, etc.).

**Whistleblowing is a right.** No employee may be subject to any kind of retaliation for reporting facts in good faith or cooperating in an internal investigation.

**Anonymous reports** may only be taken into account if the seriousness of the facts mentioned is established and the facts in question are sufficiently detailed.

 **Find out more:**  
Group whistleblowing procedures

<sup>2</sup> If you are an employee of a subsidiary with its own whistleblowing system, you must use that system.

# PART 2

## OUR VALUES AND OUR MISSION



# 1 THE VALUES OF LA POSTE GROUPE

THE GROUP'S CODE OF CONDUCT REFLECTS ITS VALUES:

## OPENNESS

Taking a fresh look at the company, and constantly listening to stakeholders to understand their developments and offer them solutions that are always appropriate.



## FAIRNESS

Adapting to the diversity of situations and requests and responding to them with equal attention and effectiveness.



## CONSIDERATION

Treating customers and employees with the attention and respect they expect.



## PROXIMITY

Being available to all customers in each location and at each site, adapting to specific local characteristics.

## SENSE OF SERVICE

Serving the customer through a relationship based on listening and professionalism.



## ACCESSIBILITY

Being present where customers need our services and when they need them, by adapting our delivery methods for all of the group's products to new uses. Facilitating access to our services for people with reduced mobility or in precarious situations.



# 2 THE STATUS OF A MISSION-LED COMPANY

In June 2021, **La Poste adopted the status of a mission-led company**, i.e. it includes an additional social and environmental purpose in its articles of association. Having served the public interest for several centuries, La Poste Groupe naturally falls within this conception of a company, which is keen to reconcile development with a commitment to serving everyone.

Being **a mission-led company** means affirming its purpose and social, societal and environmental objectives to everyone; it also means being accountable to everyone.

## A PURPOSE FOR ALL EMPLOYEES

The purpose summarises the objectives of the group's activities to serve society. Defined by the group's stakeholders, including its customers, employees or suppliers, it is an excellent benchmark for each company employee.

*“Serving all, useful to everyone,  
La Poste is a people-oriented company  
with a local presence that develops  
exchanges and builds essential links  
by contributing to the common wealth  
of society as a whole.”*

# 3 FOUR SOCIAL AND ENVIRONMENTAL COMMITMENTS FOR THE GROUP'S ACTIVITIES

La Poste has defined **four social and environmental commitments**, which constitute commitments to society as a whole. These objectives are directly linked to the major environmental and societal transitions that the group is steadfast in supporting:

 Contributing to the **development and cohesion of local areas**

 Fostering **social inclusion**

 Promoting **ethical, inclusive and sustainable digital services**

 Working to accelerate the **environmental transition** for all

Being a mission-led company is **a responsibility that binds the company and its employees**. It is up to everyone, regardless of their job or position in the company, to bring this purpose to life and to contribute to the objectives defined, which are all commitments made to the whole of society.

# PART 3

THE INTEGRITY  
OF OUR BUSINESS



**La Poste Groupe complies with the laws and regulations** in force in all the countries in which it operates. In addition, the group has put in place internal policies that specify the systems to be rolled out and that provide a framework for its employees' day-to-day activities.

The group and its entities **shall refrain from any relationship with business partners that do not comply with the laws and regulations in force.** They must assess the integrity of their third parties.

As employees, **you must comply with the laws, regulations and internal policies** that govern the group's missions and activities. Any violation may result in civil or criminal penalties and disciplinary measures against the employee involved and/or the group. If you notice any such situations, you can notify your manager or use the whistleblowing system in place (see page 6).

# 1 ANTICORRUPTION

Mutual trust and integrity are the foundation of the group's relations with its partners. La Poste Groupe rejects corruption in all its forms and has built its anticorruption plan around **three main principles** laid down by its management:

« **Zero tolerance,  
Everyone concerned,  
Everyone vigilant.** »

## WHAT YOU NEED TO KNOW

**Corruption** can take several forms. It is understood as giving an undue advantage for oneself or for others in exchange for making a decision, doing something favourable or refraining from doing something, which results in violating professional rules or laws. The mere suggestion of corruption is an offence as such, even if it does not succeed.

**Influence peddling** occurs when a person offers any undue advantage to a third party in return for that third party exercising real or supposed influence, with a view to obtaining a favourable decision from a public authority or administration (contracts, jobs, distinctions, etc.).



### WHAT YOU MUST DO

- **Refuse any undue advantage of any kind.** Otherwise, you are guilty of corruption.
- **Apply group policies and procedures.**
- **Report any solicitation or behaviour** that you believe is contrary to the rules, to your manager or via the whistleblowing system of the group or that of your entity.



### WHAT YOU MUST NOT DO

- **Accept payments or undue advantages,** even of small amounts.
- **Make so-called facilitation payments** to public officials to speed up an administrative process.



## EXAMPLES

**1** You are a sales representative within a group entity. One of your customers offers to buy one of the products you sell in exchange for information on an ongoing call for tenders to which the company of the customer's son wishes to respond.

### Is this arrangement acceptable?

No. Although this proposal increases the group's revenue, **it is corruption** as it results in your failure to comply with the principles of the purchasing procedure. You must refuse this proposal and report the customer's conduct to your line manager. You can also use your entity's whistleblowing system.

**2** You are in charge of international development in the sales department. The department wants to open a new facility in a given country and the local authorities have asked you to pay 'miscellaneous' fees to speed up the authorisation process. The amount requested is very small compared to the total investment and it was explained to you that this was standard practice.

### Can you make the payment?

No, even if the payment is presented as an established practice. In this situation, **the group does not authorise payment of this sum because it may constitute corruption**. You must refuse and report the conduct to your manager and ask the legal department or the ethics officer of your entity for assistance if necessary.



### Find out more:

Group anticorruption and influence peddling policy

# 2 GIFTS AND INVITATIONS

## WHAT YOU NEED TO KNOW

In the business world, relationships between individuals may lead to the exchange of gifts or invitations (trade shows, sporting or cultural events, restaurants, etc.), in order to consolidate or maintain these relationships. These practices are part of day-to-day business life but **must be reasonable and relevant to the business situation in question.**



### WHAT YOU MUST DO

Comply with the group's gifts and invitations policy which helps you make decisions:

- Gifts and invitations **must be of a professional nature** (therefore excluding the presence of a spouse or any other relative).
- They **must be occasional and of a reasonable nature.** In order to guide you, the policy imposes financial thresholds, and reporting and authorisation levels to be followed.



### WHAT YOU MUST NOT DO

- Accept **certain types of gifts or invitations** (e.g. cash, gift cards, smartphones or tablets).
- Offer or receive gifts or invitations during **strategic periods** (calls for tenders, business negotiations, etc.).



## EXAMPLES

**1** You work in the purchasing department of a group subsidiary. A supplier offers you tickets to attend a cultural event and thanks you for the trust that has bound you together for several years.

**Does this comply with the group's policy?**

You comply if:

- You are not in a **strategic period** of a call for tenders or a contract award;
- You offer **the second ticket to one of your colleagues** and not to one of your close friends or family;
- You have **observed the thresholds** specified.

**2** You work in a post office. A customer regularly offers small gifts to the team. These are frequent gestures of appreciation. After several months, this customer asks you to do things which are minor breaches of the rules, such as the delivery of a parcel for their son without any signing authority.

**Can you ignore the rule for this customer that you know well?**

**No. You must apply the procedures rigorously and, in all circumstances, regardless of the nature of your relationship with the customer.** You must also refuse small gifts as soon as they become systematic and may exceed the authorised annual threshold. It is your responsibility to make this customer understand that their gifts end up being inappropriate. You can seek assistance from your manager and, if necessary, your entity's ethics officer.



**Find out more:**

Gifts and invitations policy

# FOCUS: DONATIONS, CORPORATE PHILANTHROPY AND SPONSORSHIP / PATRONAGE

## WHAT YOU NEED TO KNOW

A **donation** is the act of transmitting a sum of money, a good or a service without expecting anything in return from the beneficiary. In the group, donations are made for charitable or philanthropic purposes.

**Corporate philanthropy** is material or financial support provided, without any direct or indirect consideration from the beneficiary, for carrying out activities of general interest (cultural, humanitarian associations, etc.).

Such transactions are legal but cannot, however, be carried out with the intention of obtaining an undue advantage or concealing any consideration.

**Sponsorship / patronage** is support provided by the group to an event, person, product or organisation with a humanitarian, sporting, cultural or environmental nature, for example, in order to obtain a direct benefit. This support may take the form of a payment of money, the contribution of property or the provision of human resources.



### WHAT YOU MUST DO

- **Check** that these transactions are consistent with the group's values, missions and corporate strategy.
- Ensure that they are not carried out between people who may have a **conflict of interest**<sup>1</sup> (personal or professional ties).
- Before any transaction, verify and assess **the beneficiary's integrity**.
- **Formalise the transaction** through legal agreements including the compliance clauses in force within the group.

<sup>1</sup> See the Conflicts of Interest section.



### EXAMPLE

**You are a sales representative in charge of promoting the group's offers, particularly to town halls. The spouse of a mayor is the chairwoman of a local sports association that offers sponsorship opportunities. He asks you to sponsor the next local tournament and suggests that he will support the group's product offering to his spouse.**

#### What behaviour should you adopt?

You cannot accept such a proposal. The sponsorship is proposed in return for promising a favourable decision for the group. **If you accept, you place yourself in a situation of influence peddling.** You must refuse the proposal and inform your line manager.



### WHAT YOU MUST NOT DO

- Make donations or provide corporate philanthropy or sponsorship / patronage in order **to win a contract or obtain an advantage or decision favourable** to La Poste.



**Find out more:** Assessment procedure for non-commercial partners

# FOCUS: LOBBYING AND FINANCING POLITICAL ACTIVITIES

## WHAT YOU NEED TO KNOW

**Lobbying** consists of providing information to public decision-makers, with a view to influencing a decision (e.g. the adoption of a law). This is a primary activity carried out regularly. This activity is legal and is regulated by law in order to prevent it from being misused or for the purposes of corruption.

The group has **a responsible attitude towards public actors**, i.e. not only does it comply with the laws and regulations of the countries in which it operates, but it also complies with the ethical

principles set out in this code and in its lobbying charter (integrity and trust-based relations with stakeholders). Transparency and close monitoring of lobbying are essential.

**The employees responsible for this must be identified and trained.**

**La Poste Groupe does not finance political activities**, including in countries where these practices are authorised or tolerated.



### WHAT YOU MUST DO

- In any cases, **read the group's lobbying charter**, which contains a reporting obligation.
- If your duties lead you to be in contact with public officials, **check whether you meet the conditions to be considered as a lobbyist**.
- **In this case, request prior authorisation before giving any gifts or invitations** to public officials (from the first euro).



### WHAT YOU MUST NOT DO

- **Breach the reporting obligations regarding lobbying** within the country in which you work.
- Use the group's material and financial resources for the purpose of **financing or supporting political activities**.



**Find out more:**  
Lobbying Charter

# 3 MANAGEMENT OF CONFLICTS OF INTEREST

## WHAT YOU NEED TO KNOW

Any employee may one day be confronted with situations where their personal interests may conflict with their professional responsibilities or the group's interests, preventing them from being able to make objective and impartial decisions.

**The most common conflicts of interest include:**

- **personal or family relationships** with individuals involved in a contract with La Poste Groupe or one of its entities;
- **making a financial investment** (or acquiring a stake) in a supplier, customer or business partner of La Poste Groupe or of one of its entities.
- the recruitment of **a family member or close friend or relative;**

Conflicts of interest are common in business life. They are not illegal but pose a risk because they can alter an employee's judgment in favour of an interest that differs from that of the group. They must therefore be known, reported and dealt with.



### WHAT YOU MUST DO

- Respect your duty of **loyalty to the group**.
- If you believe that you are in a potential conflict of interest situation (or a situation that could be perceived as such), **report it officially to your manager**. This report can be made using the form included in the policy for preventing, identifying and managing conflicts of interest. Your manager will assess and weigh the risks in order to take measures to avoid them, such as asking you to withdraw from the decision-making process. This protects you and the group.



### WHAT YOU MUST NOT DO

- Make a decision when your discretionary power may be **influenced or altered by personal interest** or pressure from a third party.
- **Conceal information** about an existing or potential conflict of interest.



## EXAMPLES

**1** You work in a department of a group subsidiary and the department needs small quantities of specific equipment. Given the small amounts involved, you decide to make a purchase without going through a call for tenders. You use a company recently founded by a former employee of the group who you know. It is not the most competitive, but you feel compelled to prioritise a former colleague to help him because he has just started his business.

### Is this a conflict of interest situation?

Yes. The conflict of interest lies in the fact that **you are not acting here according to objective criteria but rather according to a sense of belonging to the group** and with an interest differing from that of your entity.

**2** In addition to your work within the group, you sit on the decision-making body of an association subsidised by the group. At a periodic meeting, this body is required to decide on service contracts that La Poste Groupe entities may fulfil.

### What should you do in this situation?

There is a conflict of interest here because **your personal interest within the association conflicts with that of La Poste Groupe**. You must therefore abstain from voting on decisions in which the group plays a role and withdraw from the decision-making process, explaining why.



### Find out more:

Policy for preventing, identifying and managing conflicts of interest

# 4 ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM

## WHAT YOU NEED TO KNOW

**Money laundering** involves concealing the origin, ownership or destination of funds obtained through illegal activities (tax evasion, corruption, financial fraud or terrorism) in order to make them appear legitimate.

**Terrorist financing** involves using funds, sometimes of legal origin, in order to finance terrorist action.

La Poste Groupe rejects and prohibits any attempt to use its activities to launder money or finance terrorism.

### WHAT YOU MUST DO

In all cases:

- **Be constantly vigilant** and actively help to prevent any form of economic crime by applying the procedures provided for this purpose; you must:
  - exercise appropriate due diligence on the source of the funds that the group receives or on their destination;
  - carry out an appropriate assessment of customers, partners, or more generally any contracting party, according to their profile.
- **Report any suspicious transaction** to your line manager or your entity's ethics officer. Do not hesitate to call the reporting line that you will find in the policy on Anti-Money Laundering and Countering the Financing of Terrorism (AML-CFT), if applicable.

**And, more specifically, in the banking/insurance sector:**

- comply with limits for cash transactions;
- refuse any payment in cryptoassets (bitcoins, etc.).

### WHAT YOU MUST NOT DO

In all cases:

- Agree to a transaction involving a legal entity whose **beneficial owners cannot be identified**;
- Pay a supplier that changes its payment channel **to a bank account domiciled in a country considered as non-cooperative from a tax point of view** (refer to the Country Doctrine for the list of these countries).

**In addition, if you are an employee of an entity in the banking/insurance sector:**

- Enter into a business relationship with a customer refusing to (i) disclose their identification information or (ii) provide explanations concerning their transactions or which make it possible to identify the originator or the beneficiary;
- exceed the limits for cash transactions;
- Accept cryptoasset payments (bitcoins, etc.);
- Reveal to a customer that there are doubts or suspicions about them in terms of money laundering or give this information to a third party.



## EXAMPLE

You are a real estate manager and decide to sell premises that are no longer used. A foreign company offers to buy this property at a price that is much higher than the market price. You are tempted to accept but wonder why this company is making its offer and want to know more about its activities. You find out that it is in fact a subsidiary of another company registered in a tax haven.

### What should you do with the information about the company?

You are right to question the company's activity and the source of the funds. **Real estate transactions are one of the means used to launder money.** It is important to always verify the nature of the company or persons involved in large and complex financial affairs. You should also inform your manager, the group compliance department and your entity's finance department in order for an in-depth analysis to be performed that will determine whether the sale should be suspended, which is very likely.



### Find out more:

Policy on Anti-Money Laundering and Countering the Financing of Terrorism

# 5 COMPLYING WITH COMPETITION LAW

## WHAT YOU NEED TO KNOW

La Poste Groupe is a publicly owned group engaged in activities of public interest and commercial activities. As such, it occupies market positions, particularly in France, which impose constraints on it as regards other economic operators.

**Competition law** ensures the conditions for fair and open competition between companies on a market. It varies marginally from one country to another but aims in particular to prevent agreements between operators, for example, to impose prices and conditions of sale on customers. Thus, some practices are prohibited (abuse of a dominant position, arrangements, restrictive practices) and others are regulated (concentrations and state aid).

Following the rules prohibiting anti-competitive arrangements and abuses of dominant positions or economic dependence is not only a legal obligation but also a key element of the company's economic responsibility, given the negative consequences these infringements may have for the economy and consumers.



### WHAT YOU MUST DO

**Take care not to exchange sensitive information** with competitors or partners, including professional associations, which may distort competition. This sensitive information may relate to prices, conditions of sale and purchase, the characteristics, quality and performance of products, or companies that could be acquired, etc.



### WHAT YOU MUST NOT DO

- **Enter into an agreement or an arrangement** with a competitor that fixes prices, interferes in a bidding process or shares markets or customers.
- **Boycott** a customer or supplier.

 **EXAMPLE**

**You regularly use subcontractors. At a trade show, you meet one of them, and you discuss the call for tenders that you launched and to which the subcontractor has just responded. The subcontractor directs the discussion towards the prices offered by the companies that have tendered, including those of the subcontractor's competitors.**

**How should you react?**

You must end this discussion. **You have a duty of absolute confidentiality**, regardless of the circumstances.



**Find out more:**

Group policy on competition compliance

# 6 INTERNATIONAL SANCTIONS, EMBARGOES AND EXPORT CONTROLS

## WHAT YOU NEED TO KNOW

La Poste Groupe operates in many countries. In fact, **it is subject to all the laws and regulations** on international sanctions, embargoes and export controls, which target **countries, individuals and legal entities as well as product categories**. These regulations take the form of financial and/or commercial restrictions.



### WHAT YOU MUST DO

You may find yourself in a situation in which you have to consider the possible application of international sanctions. For example, the destination of a parcel may be prohibited, as may a financial transfer to a specific person.

#### **You must reason according to a 'Country, Person, Product' logic,**

i.e. consider in particular **the end beneficiary** of a transaction or service (parcel, transfer, opening of an account, etc.) and the country in which they reside.

Particular attention must be paid to so-called **dual-use technology and products** (i.e. civil and military such as a component for example).

In case of any doubt, you should contact your compliance department or that of the group.

#### **For example, the following are unlawful:**

- the shipment of a prohibited product to a company located in North Korea (country under embargo);
- the completion of a financial transaction (home loan, for example) for an individual whose assets are frozen.



### WHAT YOU MUST NOT DO

#### **Maintain business relationships with sanctioned persons or those in prohibited countries.**

This would expose the group to major legal and financial risks as well as serious damage to its reputation.

Deliberately carry out or participate in transactions or operations which have the objective or consequence of **circumventing or avoiding restrictive measures**.



## EXAMPLES

**1** You work within a group entity specialising in parcel delivery. A customer wishes to send a parcel to a country under embargo via a country that is not subject to sanctions.

**How should you react?**

**You must refuse to deliver the parcel.** Although the parcel passes through a country that is not under embargo, it is the country of final destination that counts. It is therefore prohibited to send the parcel.

**2** One of your banking customers' assets have been frozen and debit transactions are blocked. A family member asks you to make a withdrawal from this customer's account. The sum is small.

**What should you do?**

**You must refuse any transaction regardless of the amount.** You must also submit a report to your compliance department.



**Find out more:**

International Sanctions and Embargoes Policy; Country Doctrine

# 7 PROTECTION OF PERSONAL DATA

## WHAT YOU NEED TO KNOW

**The protection of individuals with regard to the processing of their personal data is a fundamental right.** La Poste Groupe is committed to scrupulously respecting this right, with a strict social responsibility policy at the heart of its strategic priorities.

**Personal data** may include names, contact details, telephone numbers, accounts, etc. belonging to employees, customers, suppliers or any partners of the group. This data, which concerns both private and professional spheres, may be stored on all types of media (digital and paper).

The group and its subsidiaries undertake **to comply with the applicable legislation in this area in Europe and in all countries in which they operate.** Similarly, they comply with other laws and case law with which they are expected to be familiar.

**The protection of personal data concerns many aspects of day-to-day work and can only be ensured with everyone's active participation.** This requirement is evident from the design of new projects, services or products, and must be constant throughout the retention period for the data in question.



### WHAT YOU MUST DO

- **Only use the personal data necessary** for your activity and exclusively for the purpose for which it was collected.
- Before using any personal data as part of a new project, **ensure that it relates to data processing entered in your entity's record of processing activities** and, if not, contact your data protection officer so that they can rectify the situation.
- **Inform the individuals whose data is being processed of their rights.** You can contact your entity's personal data protection officers to advise you.
- **Pay particular attention to data security** and confidentiality.
- As soon as you become aware of it, **report any violation or suspected violation** of the personal information stored.



### WHAT YOU MUST NOT DO

- **Disclose personal data** (e.g. sending files by email containing personal data for ease of use).
- **Create a file of personal data**, digital or paper, without first informing your entity's data protection officer and without informing the data subjects.
- **Store and use data for purposes other** than those intended or beyond the defined retention period.



## EXAMPLES

**1** You work in a department that processes customers' personal data. A customer wants to know the personal data retained about them. They also request the destruction of this data.

### Can you grant this customer's request?

Yes, you have to. Everyone has the right to know what data is retained about them and to request its erasure. Therefore, there are grounds for your customer's request. **You must send this request, for processing, to your entity's data protection officer who will judge whether it can be granted.** There are certain restrictions on erasing data, in particular if inquiries or civil or criminal investigations are under way.

**2** You work for the group and regularly process customer information in paper format. You usually leave your customer files on your desk overnight so you do not have to look for them the next day. Your office is not locked but your establishment is secured.

### Is there any risk to this situation?

Yes. Data can only be protected if you lock records away when you leave. In this case, the overall security of the building alone does not meet the regulatory data protection requirements and you place the group at risk in terms of protecting its customers' personal data. **You must therefore lock up your customer files.**



### Find out more:

La Poste Groupe general policy on the protection of personal data



# **PART 4**

**HUMAN**

**RELATIONSHIPS**

**THAT RESPECT RIGHTS**

**AND ARE SOCIALLY**

**RESPONSIBLE**



La Poste Groupe complies with the laws and case law governing human rights and fair work practices. With nearly 240,000 employees worldwide, it has a special responsibility to each of them.

# 1 RESPECT FOR HUMAN RIGHTS

## WHAT YOU NEED TO KNOW

**Human rights** cover antidiscrimination, particularly related to gender, age, health and disability, appearance, trade union activities as well as religious and political beliefs, etc. La Poste Groupe does not tolerate any form of harassment or discrimination. It is firmly committed to combating all practices contrary to human rights. The United Nations defines these human rights as the **inalienable rights** of all human

beings, without distinction of any kind, including race, sex, nationality, ethnic origin, language, religion or any other situation.

The group also promotes fair and decent work by respecting the diversity of employees and promoting equal opportunities.



### WHAT YOU MUST DO

- **Prohibit any form of verbal abuse or physical violence** between colleagues, towards customers and all partners.
- **Prevent harassment**, whether psychological or sexual, and serious acts of violence.
- **Seek dialogue** beyond differences.
- **Prohibit any form of discrimination** during recruitment, appraisals, in managerial relations and, more generally, in all everyday situations.
- **Be vigilant when faced with situations of undeclared**, forced or child labour at partners' premises, regardless of their location.
- **Respect the privacy of others**, colleagues, customers and partners, and refrain from any degrading comments against them.

When faced with such acts, you should not hesitate **to use La Poste Groupe's whistleblowing system**, which is the first step in the victim defence process. Once notified, ethics officers or human resources managers will be able to take effective action.



### WHAT YOU MUST NOT DO

- **Disregard the principles of human rights**, even under the guise of humour.
- **Tolerate sexist, racist or degrading behaviour or comments.**
- **Make innuendo and insults** via social media against colleagues or third parties.



## EXAMPLES

**1** A temporary worker works in your department. His direct boss, who is your deputy, makes advances to him by text message. Very upset, he asks for a meeting with you.

### What can you do?

The individual has showed you the messages he received. This is clearly sexual harassment that will have to be stopped as soon as possible. **You must protect the victim, in particular by contacting the HR departments** that have appropriate protocols. You must monitor the situation closely and find out how the victim is.

**2** Your manager throws in sexist, racist or xenophobic jokes into some of his remarks. You tell him that you are shocked. He explains to you that this is all normal and not very bad. According to him, these types of comments "lighten things up". He says he doesn't want to attack anyone in particular, but he is like that, and you have to take him as he is. You do not dare say anything further, but you know that other colleagues are shocked.

### How can you help them?

No employee, whoever they are, should be specifying what or what does not "lighten things up".

Such conduct is contrary to the group's values and must be strongly disciplined. If employees fear reprisals, **they must use the whistleblowing system**. Their ethics officer will take care of the case ensuring their confidentiality.

**3** You are a disabled worker. You are applying for a new position that corresponds to your skills. The interview process is going well. However, you are not being called back. Later, you learn from a colleague that the manager did not want to hire a disabled person because they feared that this person would often be absent.

### Is this normal?

Such conduct is contrary to the group's values. **Recruitment should only be based on the assessment of professional skills**. You can contact your HR department or your entity's ethics officer.



**Find out more:** La Poste Groupe's human rights policy;  
La Poste Groupe's duty of care policy

# FOCUS: RELIGION AND NEUTRALITY, EQUAL TREATMENT IN THE FACE OF PUBLIC SERVICE

This section concerns entities' employees carrying out **their activities in France and particularly those who carry out public service missions**, which require complete vigilance in order to observe the duties towards the State and the principles of public service.

## WHAT YOU NEED TO KNOW

These principles relate to **secularism, neutrality and equality** in the face of public service. Each employee concerned must adopt a duty of discretion and loyalty, in accordance with the laws of the French Republic which apply to employees performing public service missions, whether or not they are in contact with the public.



### WHAT YOU MUST DO

- **Respect and ensure respect** for the principles of secularism and neutrality.
- **Ensure equal treatment** of customers in all circumstances.
- **Refuse any request** from a customer or partner that is **contrary to the principles of secularism and equality** in view of the public service.



### WHAT YOU MUST NOT DO

- **Express political and religious opinions and beliefs** in front of the public.
- **Challenge the internal rules of procedure** in the name of personal convictions.



#### Find out more:

Guide on religion and life at work

# 2 HEALTH AND SAFETY, AND WELL-BEING AT WORK

The group has a legal and moral obligation to ensure **the health and safety** of its employees and all individuals who visit its establishments..

## WHAT YOU NEED TO KNOW

The group implements a comprehensive, proactive, multidisciplinary and dynamic **risk prevention policy** for internal and external individuals. Preventive actions in their favour are carried out taking into account the risks specific to the various business units in order to ensure appropriate working conditions and reduce accidents. Where appropriate, the group shall take the necessary measures.



### WHAT YOU MUST DO

- **Ensure the proper application of provisions** relating to health and safety and well-being at work.
- **Bring any failing or problem to the attention of management** or the managers concerned.



### WHAT YOU MUST NOT DO

- **Encourage employees not to follow certain safety rules** during periods of high activity.
- **'Forget' to pass on or complete mandatory health and safety training**, including for suppliers and subcontractors' employees on site.



## EXAMPLE

**Your site manager decides to disregard various safety rules for goods handling operations. You raise the issue with him because you are concerned about the risks involved. He does not take this into account on the grounds that "it goes much faster like that!"**

### What can you do?

Compliance with safety rules is everyone's responsibility and you have good reason to raise the issue. If your manager does not change his mind, you can **report this situation to a safety manager, an HR manager or refer the matter to the ethics officer.**



### Find out more:

HR Policy - Acting to succeed in our transformations (2023)



# **PART 5**

**RELATIONS**

**WITH THE GROUP'S  
BUSINESS PARTNERS**



# 1 CUSTOMER RELATIONS

## WHAT YOU NEED TO KNOW

**The group's success relies on the trust of its customers.** This is based on the quality and safety of the products and services offered to meet their needs, as well as on compliance with ethical, social, societal and environmental principles.

The group adopts best practices regarding statements, communications and presentations made to customers and adheres to three key principles: **clarity, accuracy and honesty.**

Anyone involved in negotiating contracts or in projects with customers must act according to these principles.

In the context of its banking activities, the group pays particular attention to **ensuring that its customers are informed, their interests are met and that they are protected.** You must ensure this is done so that our customers can make their decisions in full knowledge of the facts, in accordance with the regulatory requirements in force.



### WHAT YOU MUST DO

- Do everything possible to **demonstrate trust** on a daily basis.
- **Behave with integrity and respect** for customers.
- **Act with discernment in a situation of rude customer behaviour**, which is always difficult to manage. Whatever the context, you must use all the resources available to you to calm the situation. Do not hesitate to seek advice and report the situation.
- **Wear professional clothing items**, mandatory for certain positions. This enables everyone to recognise that you work for the group and facilitates the initial contact.



### WHAT YOU MUST NOT DO

- **Fail to comply with procedures**, even at the request of customers.
- **Authorise special privileges.**
- **Harm the group's image**, such as disparaging the group in front of customers.

 **EXAMPLES**

**1** You are a customer service manager, and you want to speed up the processing of a customer file, in order to satisfy them and avoid uncalled-for comments. You take it upon yourself and circumvent the procedures. Finally, the customer's file is rejected. You still think you did the right thing because your customer needed answers quickly.

**Were you right?**

**No, the procedures must be followed regardless of the circumstances.** They protect you as much as the customer. In the event of a technicality due to their non-compliance, the customer may also appeal. Your conduct creates differences in the treatment of customers, and between employees who follow the procedures and those who interpret them, believing they are doing the right thing.

**2** Disgruntled customers take photos of employees and post them on social media with insults.

**Should you let this happen?**

**No, the publication of photos taken in such circumstances is prohibited and may result in prosecution.** You should refer the matter to the ethics officer and the department in charge of media and social networks, who will take the appropriate measures.

# 2 RELATIONS WITH SUPPLIERS AND SUBCONTRACTORS

## WHAT YOU NEED TO KNOW

La Poste Groupe attaches great importance to its relations with suppliers and subcontractors, which are governed by purchasing procedures based on leading by **example, integrity and mutual commitment**.



### WHAT YOU MUST DO

- **Strictly follow the purchasing procedure** in all circumstances with the support, if necessary, of purchasing specialists and experts.
- **Make the values known by imposing a contractual commitment**, respect them and ensure they are respected by your suppliers and subcontractors.
- **Ask your partners, suppliers and service providers to prohibit any corruption or influence peddling**. They must commit contractually by agreeing to be audited, particularly in all areas of compliance.
- **Check that your partners, suppliers and service providers contractually undertake to comply with the fundamental principles** adopted by the International Labour Organization which prohibit harassment, discrimination, child labour and forced labour. You must be careful that such behaviour does not occur.



### WHAT YOU MUST NOT DO

- **Enter into contracts with companies or persons that employ individuals in breach of regulations**, and children whose age is lower than that adopted by international conventions and the specific legislation of the country concerned.
- **Enter into contracts with companies or persons that do not comply with our ethical principles and the employment law of the country concerned** (human rights, fundamental freedoms, anticorruption, free competition, environmental protection, forced labour, work under conditions that may affect the health and safety of individuals, etc.).



## EXAMPLES

**1** With regard to a call for tenders, you know the teams of a supplier well because they are already working with you on another contract. You therefore trust this supplier and you want to prioritise its bid even though it is not the most competitive. You would like to modify certain selection criteria so that the bidder is better ranked.

**Do you have this option?**

**No, such conduct is contrary to the group's purchasing rules.** It is also ineffective because good relationships in one given area do not guarantee success in another. It is essential that you refrain from such conduct.

**2** A work colleague posted information about a supplier on an external social network, detailing the legal problems they were experiencing. This information is important to you, but you are embarrassed by the dissemination of such information that is accessible to everyone.

### What can you do?

You have access to information about your suppliers that is necessary for business. However, **this information must remain strictly confidential**. In addition, this information may not give rise to a conviction. You should speak to your manager to request the removal of this information.



#### Find out more:

La Poste Groupe's Responsible and Ethical Purchasing Charter

## FOCUS: BUSINESS INTRODUCERS AND INTERMEDIARIES

### WHAT YOU NEED TO KNOW

The group and its entities may use business intermediaries to provide a legitimate, useful service based on professional expertise.



### WHAT YOU MUST DO

- **Select the intermediary ensuring that the same supplier selection principles above are followed and also checking that:**
  - the services concerned are precisely defined beforehand;
  - a standard contract is used (compliance clause, termination clause, etc.); remuneration is objectively determined, consistent and stipulated in the contract and is triggered after verification of the service provided; business intermediaries (or business introducers) are subject to integrity assessments and dedicated controls.
- **Inform your business intermediaries of the principles contained in the code of conduct.** They must undertake to comply with them, regardless of their services and the country of operation concerned.



# PART 6

## PROTECTION OF THE GROUP'S ASSETS



# 1 MANAGEMENT OF CONFIDENTIAL INFORMATION

As part of your duties, you may be required to access, be the custodian of or be responsible for **confidential information** relating to the activities of the group or its entities.

This information could also concern customers, suppliers, or business partners. It includes financial information, information relating to future or completed acquisitions, business results, new products, etc.

## WHAT YOU NEED TO KNOW

Each group entity ensures **that access to confidential information is limited** to employees whose duties specifically require its use and/or processing.

More generally, **it is important to be as discreet as possible in one's professional world**, even in the most common situations of professional or private life.



### WHAT YOU MUST DO

- **Protect the data**, including if it comes from our customers or service providers.
- **Ensure the confidentiality of the information** in your possession when it is categorised as such.
- **Avoid conversations about your work in public places** (e.g. public transport).
- **Verify the identity of your contact person** (particularly on the telephone) before any work conversation. Serious cases of fraud may occur if the identity of the contact is not verified.

**These rules also apply to intellectual property to which employees may have access as part of La Poste's commercial relations with its customers and partners.**



### WHAT YOU MUST NOT DO

- **Disseminate confidential information** to a contact person who is not authorised or without the authorisation of your line manager.
- **Display or leave confidential information** unattended on your desk.

## EXAMPLES

**1** You have hired a temporary worker. He owns a small business and has access to your customer files. You find out that he uses these files to approach customers on his own behalf.

**Should his actions be stopped?**

**Yes. You are responsible for the confidentiality of your establishment's management data.** As such, you must terminate the services of this individual if his actions are proven. The content of his computer and business telephone may be inspected by the group's authorised departments. You must file a complaint with the assistance of your legal department or the security department, in case of evidence of data misappropriation for his benefit.

**2** You are an accountant, and during a reception, you are approached by a person who is very interested in your work. He wants to know how the group manages its transfers to pay its suppliers. He also wants your work contact details. You prefer to cut short the conversation.

**Did you do the right thing?**

Yes, there is a technique called 'CEO fraud' in which a thief impersonates a senior manager of the group and asks, by phone, to make an emergency transfer. The more details they give about procedures and people, the more likely they are to be trusted. **You must therefore remain very discreet about the details of your work.**



**Find out more:** La Poste Charter on access to and use of information systems;  
Information Protection Guide

# 2 PROTECTING THE GROUP'S ASSETS

The assets of La Poste Groupe and its entities may not and must not be used for illegal purposes or purposes unrelated to their activities.

## WHAT YOU NEED TO KNOW

Each employee or person acting in the name or on behalf of the group and its subsidiaries **must protect the assets** (IT equipment, communication devices such as smartphones, office supplies, company vehicles, tools and work premises, etc.) against theft, damage or inappropriate use.

This protection obligation includes property entrusted to the group by third parties.



### WHAT YOU MUST DO

- **Only use group assets for professional, lawful and appropriate purposes.** The group makes these assets available to its employees on a temporary basis and they remain the group's property.
- Make sure you **protect the equipment** provided to you (smartphones, computers, vehicles, etc.).
- **Help to make the premises secure** by following the instructions and prohibit physical access to any unauthorised person.



### WHAT YOU MUST NOT DO

- **Misappropriate or steal group assets** for your benefit or for the use of a person not employed or not authorised by the group. This is an offence, which may, in addition to disciplinary action, result in civil or criminal proceedings.



## EXAMPLES

**1** A colleague regularly uses a business fuel card, which is strictly for professional use, to fill up his personal vehicle and asks if you also wish to use the card, which shocks you.

### What should you do?

You must refuse your colleague's proposal. His behaviour is strictly prohibited. **This is fraud.** You must then explain the consequences to him. There are control procedures in place to prevent these fraudulent acts which, sooner or later, will reveal his unlawful actions. You can submit a report to your line manager or the ethics officer of your entity.

**2** You prefer to use your work email rather than your personal email for personal exchanges and your work number to confirm your purchases made on the Internet. You find this much more convenient.

### Is this a problem?

The use of a work email and telephone for personal use **is acceptable if it is limited in volume and duration** so as not to affect the proper functioning of the information systems and tasks entrusted to employees. You must include the words 'private' or 'personal' in the 'subject' field and at the beginning of the message. You must also include this type of wording in any text messages you may send from your work phone.

# FOCUS: FRAUD

## WHAT YOU NEED TO KNOW

The purpose of **fraud** is to obtain an unlawful material or immaterial advantage by illegal means and/or means contrary to internal policies and procedures, to the detriment of a person or organisation (to the detriment of La Poste Groupe customers or to the detriment of La Poste Groupe itself).

### Fraud takes three forms:

- **external fraud:** this is committed by persons outside La Poste Groupe;
- **internal fraud:** this is committed intentionally by group employees (misappropriation of assets or funds) using an unlawful process in the performance of their duties in order to obtain an advantage, often financial;
- **mixed fraud:** this involves the active or passive participation of a group employee who is complicit with external individuals.

It covers several types of offences: swindling, falsification of documents, identity theft, breach of trust, etc.

For La Poste Groupe, **fraud is a major risk:** managing it represents both a guarantee of trust for all our customers and an essential performance lever..



### WHAT YOU MUST DO

- **Comply with the rules and procedures** in force.
- **Refrain from any misconduct**, a first step towards fraud.
- **Identify risky situations** and warning signs.
- **Use the whistleblowing and escalation tools** made available to you.



### WHAT YOU MUST NOT DO

- **Conceal** activities amounting to fraud of which you are aware.
- **Fail to report or escalate** cases or attempts of fraud identified.
- **Allow yourself to be corrupted** so that a fraudulent act can be carried out.
- **Manage a file alone** that requires a segregation of duties.

## EXAMPLES

**1** You are the finance manager in charge of purchasing and receive a WhatsApp message from an individual introducing themselves as a member of the Executive Committee. He asks you to make an immediate transfer as part of a financial transaction that must remain confidential.

### What should you do?

This is attempted CEO fraud. It is one of the main scenarios of external fraud through identity theft.

**No transaction must be executed** if it does not comply with the internal rules and procedures. You must be vigilant to unusual, so-called urgent requests received through professional or non-professional channels that require circumventing established procedures. If in doubt, you must refrain from carrying out the transaction and immediately notify your line manager..

**2** A colleague with whom you have a very good relationship asks you for your access codes (username and password) to connect to his work device. He claims to have connection problems with his codes, but he has to carry out an urgent transaction for a customer. You are really hesitant in refusing because you are afraid of being perceived as a bad colleague and this colleague seems to have good reasons to ask for your help.

### What should you do?

You have a duty to report such events. Your colleague's behaviour is abnormal: **under no circumstances should you give your personal codes** to anyone or for any reason whatsoever. This colleague may commit fraud under your identity, and you will be legitimately held accountable because sooner or later, the controllers and investigators will highlight these actions. You must also notify your line manager, HR department or ethics officer as soon as possible.



**Find out more:** Group Fraud Prevention Policy;  
Group Fraud Prevention e-learning

# FOCUS: CYBERSECURITY

## WHAT YOU NEED TO KNOW

The Group's connected IT equipment, made available to employees, **is regularly subject to attacks** that jeopardise data retention and the very operation of the system.

These attacks may, in certain situations, lead to blackmail, or the blocking, public dissemination or deletion of the information contained in these files.

This equipment must be used in accordance with the rules and principles laid down by the group, with which employees must comply.

The group has developed **a framework with which each employee must comply**, and which specifies the conduct to adopt in order to secure the data collected and used by the group.



### WHAT YOU MUST DO

- Open a work session on the group's information systems using the passwords, badges, cards, etc. provided to you by the group. **You are responsible for securing the means of authentication** (passwords, badges, cards, etc.) used to open a work session.
- **Only connect your computer to equipment that has been validated** by your IT department.
- **Lock your work session** as soon as you leave your desk.
- **Inform the relevant department in case of suspicious emails.** These emails must never be opened.



### WHAT YOU MUST NOT DO

- **Store company files outside** the group's information systems.
- **Disclose your access permissions** to a third party, including the IT department, its employees and management.
- **Under no circumstances use your rights to access information, applications or an IT account other than the one assigned to you.**
- **Deliberately accessing an information system for which the employee is not authorised** constitutes professional misconduct.

The group reserves the right to access all infrastructure via an administrator profile or in the event of an internal investigation.



## EXAMPLES

**1** One of your customer's has died. His heirs are asking you for an accurate statement of the movements on his account. According to them, the account balance is well below what it should be. During the investigation, it appears that regular withdrawals are made from this account by one of your colleagues. This colleague absolutely denies this. You learn that this colleague's login details were accessible to everyone and were used.

### How can this kind of situation be avoided?

Above all, each employee's ID codes allow them to access the operations they must carry out. **It is essential to keep these codes absolutely confidential**, and they must under no circumstances be visible or disclosed (post-its, notebooks, etc.).

**2** For the first time, you receive an email from a sender that you do not know but that looks authentic. You open it and then discover that there are spelling errors or that the content is completely irrelevant to your day-to-day tasks.

### What should you do?

You are visibly faced with an unsolicited email that can be dangerous for information systems. Inform your entity's technical teams immediately, do not reply to the message or click on any link it may contain.

Before opening an email, **make sure that it does not contain anything unusual or suspicious** (message in a foreign language, unusual sending address, unusual extension, etc.).



### Find out more:

La Poste Charter on access to and use of information systems

# FOCUS: USE OF SOCIAL MEDIA

## WHAT YOU NEED TO KNOW

**Social media** makes it possible to communicate with and address third parties with which the group interacts (customers, suppliers, institutions, etc.).

**They are valuable** for exchanging information in real time, but they are also dangerous if the information conveyed is not controlled or is poorly controlled.

Communications and exchanges on these media are subject **to the requirement of protecting the image and reputation of the group and its employees.**



### WHAT YOU MUST DO

- On professional media, **behave in accordance with the provisions of this code:** no comments that are discriminatory, disparaging or contrary to the interests and image of the group.
- **A duty of discretion, confidentiality and loyalty** to the group is also to be observed when speaking as an employee on social media. The point of view you express can only be personal and must be clearly defined as such unless authorised by the group.



### WHAT YOU MUST NOT DO

- **Give professional, behavioural, technical or day-to-day information.** You may be followed by others who are eager for this type of information or by malicious and aggressive individuals who may use this information to attack the company or attempt to blackmail you.
- **Use these networks to disparage** colleagues or the group, its competitors or its customers.



## ILLUSTRATIONS

**1** One of your employees uses social media without specifying whether they are acting in a personal capacity. They are also a member of an association. They post scathing comments against people in this association. These people are questioning you over this behaviour.

### How do you deal with your employee?

It is very difficult to manage the interpretations and follow-up given to comments made on social networks. **You should ask this employee to specify that they are speaking in a personal capacity on social media.** Only authorised persons may speak on behalf of La Poste.

**2** A colleague likes to film themselves at work and post their videos on social media. You sometimes appear in these videos, and it bothers you.

### Are these colleague's actions compliant?

No, there is a safety risk to publishing films made in the workplace. In addition, **you have image rights,** and your colleague cannot post films in which you appear.



**Find out more:**

Social Media – best practice guide

# FOCUS: ARTIFICIAL INTELLIGENCE

**Artificial intelligence** (AI) refers to systems that demonstrate intelligent behaviour by analysing their environment and taking steps – with some degree of autonomy – to achieve specific objectives.

La Poste Groupe is convinced that the trusted use of AI requires its control and the assurance of its **high level of quality**. It relies on the state of the art in order to:

- **Ensure the origin and ownership of the data** used as well as that of the algorithms used.
- **Organise information** of stakeholders about their interactions with AI systems.
- **Inform users** when an AI system is implemented in an interactive service or solution.
- **Protect the integrity of AI systems** against cyber attacks that seek to access data and manipulate its results.
- **Continuously update its expertise** in line with technological developments.
- **Put in place an organisation and methodology** to avoid potential bias in learning data and during AI system construction.



## WHAT YOU MUST NOT DO

**Provide retail customer AI with confidential information** relating to the activities of the group or its entities.



**Find out more:** Charter for trusted AI: ethical principles and AI

# PART 7

## OUR SOCIETAL AND ENVIRONMENTAL COMMITMENT



# SAFEGUARDING THE ENVIRONMENT AND PROMOTING SUSTAINABLE DEVELOPMENT IN OUR ACTIVITIES

La Poste Groupe is aware of its responsibilities towards the environment and is strongly committed to the environmental and energy transition. **It is one of the leading companies in the field of social and environmental responsibility at the global level.** Involved in the development and cohesion of the regions, it also acts for inclusion.

## WHAT YOU NEED TO KNOW

In order to minimise the group's environmental impact, particularly in terms of greenhouse gas emissions, pollutants and resource consumption, **the group is changing and adapting its behaviour and production tools.** Its environmental impact is taken into account in its decision-making processes.

**The risk of impact on biodiversity is also taken into account, for example,** when selecting financing or investment projects in retail and investment banking, transport activities (consumption of fuel and raw materials) or in real estate transactions (land take).

## WHAT YOU MUST DO

- **Help the group and its subsidiaries meet their commitment** to protect the environment.
- **Monitor your behaviour when performing your day-to-day tasks** (installation, business habits, office life, business trips, waste management, etc.). It is essential for the environment.
- **Consume less energy and resources** (e.g., through responsible behaviour and eco-habits).
- **Make sure that a responsible procurement, and waste reuse and recycling approach is in place.**

## FOCUS: GROUP PARTICIPATION IN REGIONAL DEVELOPMENT

The group helps to **combat regional inequalities** by giving local authorities the means to act, enabling retailers and companies to develop and empowering citizens. **This involves:**

- **Adapting the group's presence** to the needs of local areas.
- **Innovation at the heart of local ecosystems** (local alliances with players in the social and solidarity-based economy).
- **Supporting local economic players** in their development through local services and appropriate financing solutions).
- **Developing a responsible purchasing policy.**

In addition to the group's collective commitments, employees are encouraged to play an active role in local areas.

## FOCUS: PROMOTING ETHICAL, INCLUSIVE AND AFFORDABLE DIGITAL SERVICES

**The group works towards useful and responsible digital technology** that allows everyone to access new services while respecting data confidentiality and everyone's choices. Particular attention is paid to people who are vulnerable and unfamiliar with digital uses in order to reduce the **digital divide and digital illiteracy**.

At a time when data circulation is increasing, particularly with solutions based on artificial intelligence, **the group refuses to adopt a logic of exploiting and marketing its users' personal data.**



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with share capital of €5,857,785,892 - 356 000 000 RCS Paris  
Registered office: 9 RUE DU COLONEL PIERRE AVIA - 75015 PARIS  
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PRC PACA - April 2024

