



Group policy

on human rights

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| Author | Director PostNL Human Resources |
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Scope, definitions, communication and implementation of this policy can be read in the Sheet of Terms on the Group Policies site.

The scope of this Group policy is as follows:

| Applicable to | Human Rights |
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| All PostNL Group companies | In scope |
| PostNL branded companies | - |
| Large / medium sized PostNL Group companies | - |
| PostNL Group companies based in the Netherlands | - |

This PostNL group policy applies to all (employees of) PostNL group companies, and as such, all PostNL group companies must adopt and implement the group policy. This policy also sets expectations of conduct for all (employees of) PostNL contractors, suppliers, business partners and any other entities and stakeholders formally associated with PostNL operations worldwide.



1. Objective

This Human Rights policy outlines PostNL's commitment to uphold and respect internationally recognised human rights in its own operations and the operations of its subsidiaries. PostNL will encourage business partners in the value chain to uphold the same values and practices with regard to human rights. We view human rights as a vital social and governance topic, and we strive to act in line with the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We also commit to act in line with UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for MNEs on Responsible Business Conduct (OECD Guidelines). This complements the states' responsibility to protect human rights in their respective jurisdictions. The application of this policy will put particular emphasis on PostNL's material topics related to human rights, including SA8000 and a number of other topics in the field of human rights relevant to our sector and our organization.

This Policy, including the risks on Human rights and progress on addressing them, will be reviewed on a regular basis, at least every 12 months. Any policy changes impacting the way PostNL conducts human rights due diligence will be taken into account in our internal processes.

2. Policy provisions and responsibilities

This policy is leading at PostNL group level on matters related to human rights. Any related local policy must not contradict this Group policy.

Local procedures may be developed to support the implementation of the group policy. A local procedure may widen the coverage of the group policy, but it must not limit or redefine the requirements of the group policy.

Management of a PostNL group company is responsible for ensuring translations of this group policy are an accurate and fair translation in all aspects. Any requests for translating a group policy should be brought to the attention of Risk Management & Internal Control, accompanied by the Policy owner. Risk Management & Internal Control will subsequently arrange for a translation.

2.1. Governance

The PostNL human rights group policy is formally issued by the Chief Executive Officer on behalf of the PostNL Board of Management. The group policy is published on PostNL's internal SharePoint and corporate website.

Ultimate accountability for the PostNL commitment to, and respect of, Human Rights rests with the Board of Management. The Chief HR Officer is designated as Human Rights policy owner and is responsible for implementation of the requirements in this group policy. To ensure cross-company implementation and monitoring, the CHRO is chairman of the Human Rights Committee comprised of senior managers from relevant businesses and functions across the organization. The CHRO chairs the Human Rights Committee and reports to the Board of Management on implementation progress and performance.

3. Implementation

3.1. Human rights due diligence process

PostNL considers human rights due diligence to be an ongoing, process-oriented and proactive activity. In practice, we want to ensure that our due diligence efforts are kept manageable and realistic. Therefore, our processes will be based on the OECD Guidelines statement that the nature and extent of due diligence, such as the specific steps to be taken, should be appropriate to a particular situation and will be affected by factors such as the size of the enterprise, context of its operations, specific recommendations in the OECD Guidelines, and the severity of its adverse impacts.

In light of the evolving regulatory landscape, PostNL will continuously advance its approach to Human Rights Due Diligence, for which this policy will be the foundation.

3.2. Identification of actual and potential negative impacts

In order to identify the most severe negative impacts across our activities and business relationships, PostNL periodically conducts a salience assessment in accordance with the UNGPs. The outcomes serve as input to the PostNL double materiality assessment ("DMA", performed and audited under regulation 2022/2464, the Corporate Sustainability Reporting Directive, "CSRD"), which helps us to identify and report on the impacts that our operations pose to human resources, and how those impacts can affect our financial performance.

To perform these assessments and to evaluate our adherence to the commitments stipulated within this policy, PostNL engages in continuous dialogue with employees, value chain workers and other relevant stakeholders. Based on these inputs, PostNL reviews both the salience and materiality assessments on an annual basis and, if necessary, applies changes to the Human Rights policy. Depending on changes to our activities, or other changes affecting the context of relevant stakeholders, salience might be assessed at different levels of granularity, alternating between full assessments and 'lighter' options. In any event, even a light option will include adequate right-holder consultation.

3.3. Prevention and mitigation of identified impacts

PostNL is committed to embedding the findings of the salience assessment in its way of doing business, namely by designing and implementing prevention and mitigation measures to address the salient issues.

With regards to human rights issues impacting PostNL's own employees and temporary staffing workers, PostNL will build on the work of the Human Resources and Sourcing departments, as both are involved in making sure that policies and regulatory requirements pertaining to people (and particularly workers) across our organization, including in our operations, are adhered to.

We have agreed several collective labour agreements with labour unions. The agreements protect both employee interests and those of PostNL. In some smaller operating companies, we have agreed collective employment conditions with the respective Works Council.

With regards to human rights issues impacting value chain workers at suppliers, we refer to our Business Principles and the Guideline for Delivery Partners, where we describe what we expect from our business relations and everyone who works with or for PostNL as a third party.



The process of prevention and mitigation of adverse human rights impacts will need to be continuously refined and matured. PostNL will work to further tailor our response to human rights impacts on the basis of our (future) salience assessments. The tailored actions identified might impact suppliers and business partners- therefore, PostNL reserves the right to conduct supplier audits, or set up dedicated supplier and business partner engagement efforts to prevent, mitigate and bring adverse human rights impacts to an end.

The following section includes our policy commitments on PostNL's material topics related to human rights as well as a number of other human rights issues deemed relevant to our sector and organization.

3.3.1. Child labour, forced labor, slavery and human trafficking

PostNL does not tolerate child labour within our own operations or our value chain. We adhere to the legal minimum age of employment in any country or local jurisdiction. In line with the International Labour Organization Standards, we set the general minimum age for admission to employment or work at 15 years, and the minimum age for hazardous work at 18 years, unless local legislation requires a higher minimum age.

We do not tolerate any forms of forced or compulsory labour, slavery or human trafficking within our own operations and our value chain. All labour must be on a voluntary basis and can never be under threat of any penalty, sanction or coercion. We prohibit the use of bonded or forced labour and we are committed to addressing this topic across our operations and in our value chain.

We fully support anti-slavery and human trafficking legislation in force in the countries in which we operate. As a domestic and cross-border mail, parcel, e-commerce and logistic solutions provider PostNL has complex supply chains in multiple jurisdictions. We are committed to working with our suppliers and other stakeholders to get to grips with any areas of risks relevant to slavery and human trafficking and to mitigate such risks.

3.3.2. Working conditions

PostNL is committed to ensure that all people working within its operations can do so in a safe and healthy environment. In our Business Principles we state that we offer all our employees a safe workplace and healthy working conditions. We work hard to reduce the risk of illness and to avoid workplace accidents. We will do everything in our power to ensure that every individual active on our site can carry out their work in a safe way. We also do not tolerate any form of threat or violence, including any form of physical or verbal harassment.

Suppliers are required to provide their employees with a safe, clean and healthy workplace that complies with all applicable local, national and international laws and regulations. Suppliers are required to implement appropriate and effective measures to prevent accidents and injuries during the work, and to address potential risks in the workplace.

PostNL is dedicated to the responsible scheduling and management of working hours for all employees and temporary staffing workers, and we respect all relevant legislation on working hours and vacation. It is our commitment to prevent the negative effects of excessive working hours, inadequate rest periods, and irregular or excessive night shifts. All employees of PostNL are entitled to sufficient time to rest and paid vacation. We are also committed to working with our delivery partners and temporary labour agencies to ensure they implement mechanisms to monitor and ensure adequate working hours and rest periods.

Work councils and trade unions are important and respected partners of PostNL and are crucial in protecting the interests of both PostNL and our employees. We invest in these relationships and acknowledge the power of constructive dialogue with these partners. We have agreed several Collective labour agreements with the unions, in some smaller operating companies we have agreed collective employment conditions with the respective Works Council. PostNL ensures that all its employees can



execute their rights on freedom of association. We stimulate, support and facilitate the participation of employees in the various Work Councils and trade unions and also expect our suppliers, including delivery partners to acknowledge the fundamental right of workers to organize themselves in order to represent and defend their interests.

Our Collective labour agreements also ensure equal and fair compensation for PostNL employees. PostNL believes in equal pay for equal work, irrespective of gender or background. We stand for equal opportunities for all. We respect the statutory minimum wage levels and have a payment policy that does not discriminate based on gender or background. PostNL strives to ensure that all its people are appropriately remunerated and rewarded for their performance. PostNL also expects its suppliers, including delivery partners to provide their workers fair compensation in line with applicable national standards or agreed sector standards if these are higher.

3.3.3. Equal treatment and opportunities for all

PostNL believes that diversity and inclusion among our employees makes our company stronger, more innovative and more attractive. We therefore have a Diversity & Inclusion Policy, which can be found on our website. As stated in our Business Principles, PostNL offers equal opportunities to all employees. We will not discriminate on age, disability, ethnicity, gender, marital status, race, religion or sexual orientation. We are also committed to creating a workplace which includes people with additional guidance needs, including those who are distanced from the labour market.

PostNL does not tolerate any form of unwanted interpersonal behaviour including discrimination, physical or mental abuse, the threat of physical abuse, sexual and other abuse on any grounds, as well as verbal violence or bullying.

The PostNL international, parcels and mail networks and related services play a vital role in our society. As the designated universal service provider (USP) in the Netherlands, PostNL has the responsibility to provide accessible and reliable postal services for everyone. We strive to implement measures which promote social inclusion and accessibility to our products and services without discrimination. This includes adopting measures and procedures that improve accessibility of our physical and digital products and services for people with disabilities, impairments or other limitations.

3.3.4. Privacy

PostNL is a trusted partner in mail delivery, and the consumers and companies alike rely on us to uphold the mail secrecy. In the digital age, we strive to maintain the level of trust our customers place in us. We therefore apply the same high privacy standards to handling digital data.

Privacy is a core value of PostNL, and we consider privacy and data protection to be an integral aspect of our services. PostNL respects the privacy of all employees and consumers. In our Business Principles, PostNL Group Policy on Privacy and Privacy Statement we state that PostNL takes all necessary measures to protect and safeguard personal data.

PostNL has implemented technical and organisational measures to secure personal data. We continuously evaluate and improve our data privacy protocols and security strategies to meet both legal requirements and the ethical expectations of our stakeholders.

3.4. Tracking and monitoring progress and reporting externally

PostNL is committed to tracking mitigating measures and accounting for its progress and improving as needed. We will report on our progress and improvements made over the year with the publication of the annual report and keep our practice in line with applicable (and evolving) legislation.

3.5. Access to remedy

The access to remedy mechanisms depends on the relationship between PostNL and the actual adverse impact. In line with the UNGPs, we commit to providing access to remedy in those cases where we have caused or contributed to a negative impact linked to PostNL activities or those of its business partners in the context of PostNL operations.

- a) Reporting: We have implemented a formal procedure for reporting incidents, including human rights incidents, that allows any affected individual across the value chain (including those working for suppliers and partners) to report an incident. If there is suspicion of a violation of the Business Principles, employees can turn directly to the Integrity Office or the Security Office. Related to this, the PostNL Group procedure on whistleblowing is in place.
- b) No retaliation: PostNL will not retaliate or allow retaliation against anyone who reports a potential violation.
- c) Investigation and remediation: Any reports of violations of law or policy will be assessed and where deemed necessary an investigation will take place. Where appropriate and permitted by law, PostNL will take immediate appropriate corrective action. All PostNL employees, management in particular, are expected to be alert for signals of violations or incidents and act if they identify them. PostNL management is required to report any (suspected) integrity violations or incidents occurring within PostNL. Any violations of law or policy, including adverse human rights impacts, that we cause or contribute to will be remedied in good faith through legitimate processes.
- d) *Suppliers and partners*: PostNL expects its suppliers and partners to establish remedy mechanisms for any violations of this Human Rights policy and to ensure no retaliation against anyone who reports a potential violation.

4. Appendix

List of relevant global human rights instruments setting the context and guiding the execution of this Policy

United Nations Instruments

Universal Declaration of Human Rights, 1948

International Covenant on Civil and Political Rights, 1966

International Covenant on Economic, Social and Cultural Rights, 1966

United Nations Guiding Principles on Business and Human Rights, 2011

International Labor Organization instruments

Declaration on Fundamental Principles and Rights at Work, 1998 (amended in 2022)

Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)

Right to Organise and Collective Bargaining Convention, 1949 (No. 98)

Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)

Abolition of Forced Labour Convention, 1957 (No. 105)

Minimum Age Convention, 1973 (No. 138)

Worst Forms of Child Labour Convention, 1999 (No. 182)

Equal Remuneration Convention, 1951 (No. 100)

Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

Organization for Economic Cooperation and Development

Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023