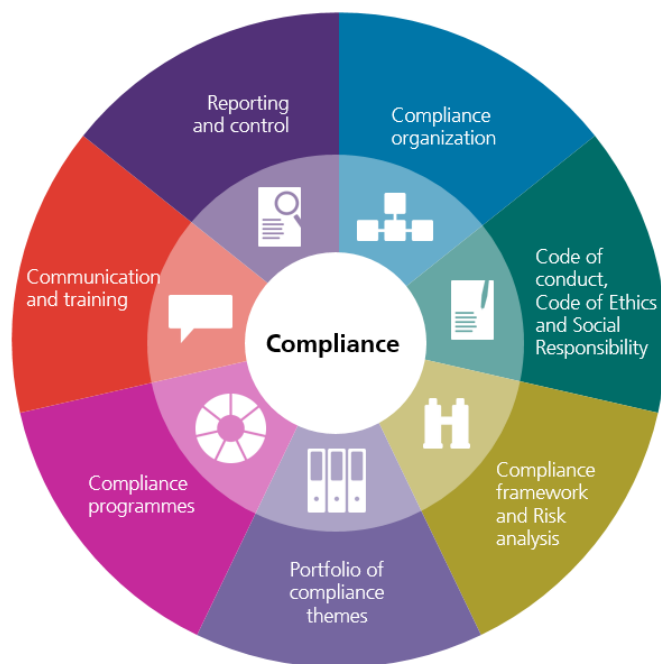# COMPLIANCE
COMPLIANCE MANAGEMENT SYSTEM

Compliance allows Swiss Post to help its employees comply with binding legislation and internal regulations as they perform their duties. In addition to credible values and clear commitment, compliance – as part of a careful company management – involves an internal management system aimed at tackling concrete risks.

The compliance management system is part of systematically established corporate governance. It comprises all codes of conduct and measures taken to ensure adherence to internal and external company directives.
Its purpose is to prevent any violation of these regulations within the company.

The Swiss Post compliance management system

Swiss Post's compliance management system is represented in the compliance circle and comprises seven elements.

Compliance organization

The **Swiss Post Board of Directors** has supreme supervisory control over compliance matters.
It is committed to a modern, effective compliance system and demands that Swiss Post operates a company-wide functioning system to prevent breaches of norms and ethics.

The Board of Directors delegates the implementation of this task to Executive Management and requires a report every six months.

Executive Management sets out the compliance process and the responsibilities and defines the compliance framework as well as the themes included in the compliance portfolio.

Executive Management appoints the **Compliance Technical Committee** to work out theme-related compliance programmes for the compliance portfolio.

The Compliance Technical Committee receives support from the **Compliance department.** A compliance officer is appointed for every theme within the compliance portfolio.

Code of Conduct

The Swiss Post Code of Conduct is aimed at employees of Swiss Post and its subsidiaries, and determines the behaviour expected of them.

Its key aspects relate to the acceptance of responsibility, dealing with all stakeholders with respect, integrity and care in the interests of Swiss Post, as well as compliance with rules and regulations.

The Code of Conduct is part of the employment contract.

Code of Ethics and Social Responsibility

The Code of Ethics and Social Responsibility is aimed at all Swiss Post providers and suppliers. It requires suppliers and providers to comply with the basic social and ethical requirements, as well as the environmental principles of Swiss Post. The Code also stipulates the protection of employees in accordance with Swiss and international standards.

Compliance framework and Risk analysis

All legal themes relevant for Swiss Post are identified in the compliance framework. The risks arising from the violation of prohibitory and regulatory standards are periodically analysed and assessed. The key themes for Swiss Post from this risk analysis constitute the portfolio of compliance themes.

Portfolio of compliance themes

The portfolio of current compliance themes for Swiss Post comprises the following:

- Data and information protection
- Anti-corruption
- Public procurement law
- Antitrust law and
- Postal law

The portfolio is reviewed regularly and tailored to the relevant requirements.

Compliance programmes

The Compliance Technical Committee issues a compliance programme with the necessary measures for every theme within the compliance portfolio. This is a preventative measure to minimize the risks associated with the violation of standards and provisions.

The measures portfolio may contain the following measures:
1. Substantive specifications/codes of conduct
2. Organization and processes
3. Reporting and control

The compliance programmes are regularly reviewed in terms of their effectiveness and adapted where necessary.

Communication and training

Clear, tailored communication and training measures are the basis for a properly functioning compliance management system.

The Compliance Technical Committee determines the communication and training measures each year and monitors their effectiveness.

Reporting and control

Monitoring and control are basic requirements for the proper functioning of a compliance management system.

The Compliance Technical Committee determines the measures for monitoring and control each year. The Compliance department documents compliance with the measures and the effectiveness of the compliance system periodically and provides the Board of Directors with feedback via the Compliance Technical Committee.

Breaches of compliance regulations

Employees who breach compliance regulations can expect to deal with anything from labour law measures to criminal sanctions.

Points of contact

Employees can forward any questions relating to the theme of compliance or report breaches of compliance regulations to their line manager, to the Compliance department or anonymously to Swiss Post's reporting office (www.PostCourage.ch).

Related links

- Swiss Post Code of Conduct
- Swiss Post Code of Ethics and Social Responsibility