

Code of Conduct

DPD Eesti



July 2025

Message from Geopost Executive Committee

Ethics is a key element of Geopost sustainable strategy and is **fully part of our DNA**.

At Geopost, we firmly believe that respecting people and the environment, conducting our business with integrity, and protecting our resources are paramount to our successful short- and long-term sustainable business development.

It is of the utmost importance to us to continue operating ethically to reach our international growth objectives and become a leader in sustainable delivery and e-services.

To reach these objectives, there was a need to reinforce our Code of Conduct in line with the update of our Governance rules.

The previous version of the Code of Conduct was issued back in 2017. The new Geopost Code of Conduct is updated to reflect best market practices and international standards.

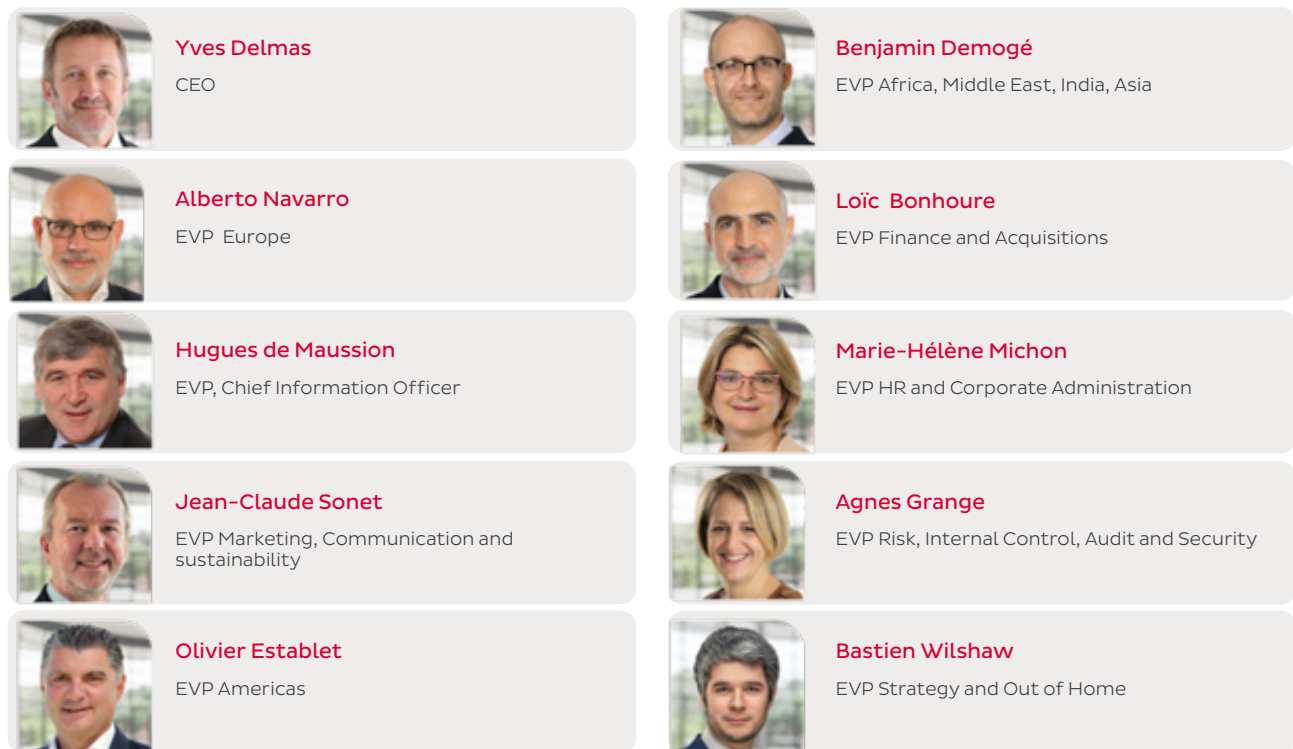
In line with our Federator Model, this Code was elaborated in a collaborative manner with our Business Units.

This new Geopost Code of Conduct applies to **all employees of Geopost Business Units**. In **practical terms**, it provides **all our employees** with the tools to help identify **the right and wrong things to do**.

We thank each CEO for ensuring that all employees of their Business Unit:

- carefully read, understand and apply the principles set out in the new Geopost/DPDgroup Code of Conduct; and
- use good judgment and common sense in any situation that may arise.

The adherence to and implementation of the new Code of Conduct by each of our Business Units will contribute to our sustainable development ambition.



The latest version of the organisation chart is available on the Geopost website <https://www.Geopost.com/en/about-us/governance-and-credentials/>

Message from DPD Eesti CEO

The DPD values reflect what matters most to us: caring, trust, joy and positivity, but also drive, achievement, ambition and entrepreneurship.

Transparent, fair, honest and law-abiding conduct is at the heart of all this. Our aim is to apply ethical principles to all our interactions and behaviour, and to maintain the same standards with our clients, partners and their employees.

As leaders, it is our responsibility to lead by example - to create a safe, caring and ethical environment and a clear framework to help all parties understand what is right and what is wrong.

We expect our employees to understand this framework and to adhere to it in their day-to-day activities and attitudes.

A sustainable, responsible and ethical culture means that we all share common values, treat each other with respect and dignity and behave appropriately in all situations.



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CEO

Contents

1. Our Code of Conduct.....	5
1.1. What defines us at Geopost?.....	5
1.2. How to read this Code of Conduct?.....	6
1.3. Who is covered by this Code of Conduct?.....	6
1.4. How to apply this Code of Conduct?.....	7
1.5. What are the consequences of violating the Code of Conduct?.....	8
1.6. What are the controls to ensure the implementation of and compliance with the Code of Conduct?	8
2. Respect of People and the Environment	9
2.1. Promote human rights.....	9
2.2. Ensure health and safety at work	11
2.3. Promote diversity, integrity and fairness	13
2.4. Combat harassment in any form.....	14
2.5. Protect Personal Data.....	15
2.6. Act to protect the environment	17
3. Integrity of Market and Business Activities	19
3.1. Prevent and combat corruption and influence peddling	19
3.2. Prevent and manage conflicts of interest	25
3.3. Establish responsible relationships with Business Partners	28
3.4. Manage donation and sponsorship initiatives.....	29
3.5. Demonstrate neutrality when contributing to public life.....	30
3.6. Promote fair competition.....	32
3.7. Use responsible marketing practices.....	34
3.8. Adhere to international trade compliance programs	35
3.9. Prevent and combat money laundering	36
3.10. Keep accurate and detailed books and records	37
4. Protection of the Resources of the Organisation	38
4.1. Preserve our resources and assets.....	38
4.2. Use social media properly	41
Annex 1 – Glossary	42

1. Our Code of Conduct

1.1. What defines us at Geopost?

Compliance with laws and regulations

We respect and comply with all applicable laws and regulations. We expect the same commitment from our Business Partners. In addition to complying with the various ethical standards set out in this Code of Conduct, we are committed to complying with all the regulations in force in the territories where we operate, especially the regulations that apply to our business, such as transport rules or customs requirements, which may affect the products we deliver. We comply with the highest level of applicable standards in relation to all these areas. To the extent that they do not violate applicable laws and regulations, we are committed to respecting customary practices and traditions of the countries in which we operate. When there is a conflict between applicable standards, we apply the strictest standard, unless it is considered illegal under local law.

Serving our customers

We offer proven methods and excellent responsiveness to support the development of our customers. Close working relationships developed by our teams allow for greater flexibility and responsiveness, which are essential to the satisfaction of our customers.

Respect for human rights

Every human being has general, inalienable and indivisible rights, without distinction of any kind, regardless of location, gender, religion, nationality, ethnic origin, or any other status. As a signatory of the United Nations Global Compact¹ since 2016 and through our sustainable development policy, Driving Change™, we actively work to respect the 10 principles of the Global Compact relating to human rights, international labour standards, the environment and combating corruption. We also apply, under all circumstances, the international labour and human rights principles as defined by the International Bill of Human Rights, the OECD Guidelines, the International Labour Organisation Conventions, the United Nations Guiding Principles and the United Nations' Sustainable Development Goals.

Working together

When our Employees succeed in bridging borders around the world, it is because they are open-minded and work without barriers. At Geopost, we value teamwork and encourage it by all appropriate means. As such, all the principles outlined in this Code of Conduct should govern relationships between our team members just as they should guide how we conduct business. We expect our Employees and Business Partners to treat each other with the respect and consideration they deserve.

¹ <https://www.unglobalcompact.org/what-is-gc/mission/principles>





1.2. How to read this Code of Conduct?

All words identified hereafter with an initial capital letter have the meaning indicated in the Glossary presented in [Annex 1](#).

1.3. Who is covered by this Code of Conduct?

All Employees of DPD Eesti are required to read and respect the rules stated in the present Code of Conduct. All managers of DPD Eesti (SMT, department managers, teamleads and shift managers) are required to enforce the rules in the Code of Conduct by demonstrating:

Tone at the Top

Set an example of ethics and integrity every day through words and actions.

Promotion

Ensure that team members are aware of and understand the Code of Conduct and channels to report an alert (including the Whistleblowing System).

Impulse & Encourage

Encourage Employees to behave with integrity and praise them when they do so.

Trust

Maintain a climate of trust and careful listening among teams to encourage them to share their difficulties, ask questions and report any violations of the Code of Conduct.

Vigilance

Be alert to any situation that may constitute a violation of the Code of Conduct so that it can be appropriately addressed as soon as possible.

Expectations of Geopost with respect to our Business Partners are presented in the [Sustainable Procurement Charter](#).

1.4. How to apply this Code of Conduct?

A. Use your judgment

Because ethical situations are endless, they cannot be covered exhaustively and precisely in the Code of Conduct.

Anyone confronted with a situation that raises an ethical dilemma shall use their best judgment if they cannot find the answer in this Code of Conduct. This involves asking the following questions:

- Does the action or decision I am about to take comply with the law?
- Does the action or decision I am about to take comply with DPD Eesti policies and procedures?
- Could the action or decision I am about to take have a negative impact on DPD Eesti?
- Would I place myself or DPD Eesti in an uncomfortable position if the action or decision I am about to take were to be revealed internally or in the media?
- Would the action or decision I am about to take place me in a position where I owe something to a DPD Eesti Business Partner?

B. Ask for advice

If you still have questions, ask the right people for advice:

- your Manager
- your Ethics Officer
- your Human Resources Department

C. Report

All our Employees and external stakeholders can report any behaviour that they suspect to be in breach of applicable laws, regulations, and/or provisions of this Code of Conduct.

1. How to report something?

To allow you to voice your concerns in a way that is the most convenient, several channels are available. You can therefore:

Speak directly to a Manager, and/or to the Ethics Officer of DPD Eesti or any person with whom you are in contact within DPD Eesti.



Use the Whistleblowing System of DPD Eesti, if you suspect any violation of applicable laws or regulations or the Code of Conduct. Use the options provided by either guavaHR or Safecall





2. What guarantees?

- No Employees shall be disciplined for making a report if they have acted, in good faith, without financial compensation, and without intent to harm Geopost, DPD Eesti, their colleagues, and/or a third party.
- The identity of the Employees, whistleblowers, the subject of the whistleblowing alert and the information relating to such whistleblowing alert are confidential and known only to the people dealing with the alert. Where permitted by applicable regulations, whistleblowing alerts may be anonymous.

1.5. What are the consequences of violating the Code of Conduct?

In the event of a breach of the Code of Conduct, DPD Eesti may apply disciplinary measures to Employees up to dismissal, as provided by locally applicable legal provisions governing each Geopost concerned BU. As the case may be, Employees may be held liable in a court of law.

1.6. What are the controls to ensure the implementation of and compliance with the Code of Conduct?

To ensure implementation of and compliance with the Code of Conduct, Geopost has adopted an Internal Control Handbook which establishes a framework and list of internal controls that can be performed. These internal controls also seek to ensure operational performance and compliance with applicable regulations.

Moreover, the Ethics Officer and the Audit, Internal Control, Risk Management, Security and Quality Department of Geopost SA reserve the right to check on the implementation of and compliance with the Code of Conduct, particularly during audits.

Additional information: **WHISTLEBLOWING POLICY**



2. Respect of People and the Environment

2.1. Promote human rights

What is it about?



Human rights are universal, indisputable, indivisible and indissociable rights that all human beings enjoy, without distinction of any kind, wherever they are, including gender, religion, nationality, culture, ethnic origin, or any other status.

These rights include, but are not limited to, respect for international standards for migrant workers, respect for fair, safe and satisfactory working conditions, combating forced labour including slavery, child labour or similar, equal opportunity and non-discrimination, and respect for international labour standards.

All organisations shall respect human rights even when public authorities are unable to provide these protections. This means working proactively to ensure that the organisation does not contribute, directly or indirectly, to the non-respect of rights, striving to prevent and mitigate risks, promoting human rights, exercising their duty of vigilance and remedying any violations.

What is Geopost doing in this area?



At Geopost, we protect the human rights of everyone working in our value chain and transport network, in particular by prohibiting, for ourselves and our Business Partners, any form of illegal labour.

To this end, the duty of care compliance program applicable within Geopost sets out measures to continuously (i) identify the adverse impacts arising from its activities and its supply chain; (ii) prevent and mitigate such impacts; and (iii) monitor and assess the controls in place.

Examples of the wrong things to do



- Use Business Partners that we know or suspect do not respect human rights
- Accept working conditions demanded by Business Partners that are not in line with the legal wage requirements and minimum social benefits of the countries in which we operate

Examples of the right things to do



- Treat everyone, Employees, and Business Partners, with the same respect
- Know and assess Business Partners to ensure that the risks of violating human rights are limited
- Refrain from working with stakeholders that do not respect human rights
- Respect and ensure that Business Partners comply with the same human rights protection requirements
- Report any concerns regarding activities that violate human rights to your Ethics Officer



2.2. Ensure health and safety at work

What is it about?



Our activities, whether office, transportation or delivery, can have an impact on the health and safety at work. To ensure a good level of physical, psychological and social well-being for Employees, teams shall take appropriate measures and implement them effectively. It is about preventing the risks relating to their activity and their negative effects on health, such as, for example, musculoskeletal disorders (MSD), psychosocial risks (PSR), fire risks or road accidents. It is also about monitoring the consequences of the diversification of work methods, in particular through the risks associated with hyper-connection and over-solicitation of Employees which are generated by the multiplication of digital tools in companies (laptops, smartphones, e-mails, internal messaging systems, etc.), and the development of remote working.

An active approach allows us to provide a safe and peaceful working environment to attract the best talent and partners, but also to reduce work-related accidents, combat absenteeism, increase the overall performance of our organisation and preserve the health and physical integrity of our Employees. It is everyone's responsibility to respect the rules and recommendations implemented in this regard.

What is Geopost doing in this area?



Geopost conducts its activities undertaking all preventive necessary steps to ensure the safety and protect the health of its work environment, including by complying with all applicable laws and regulations, by creating a work environment and providing work tools that meet the current standards, by being attentive or by training and informing on health and safety measures. Geopost also attaches the utmost importance to maintaining a work/life balance for its Employees. When it comes to health and safety at work, we all have a role to play, for ourselves and our colleagues.

Examples of the wrong things to do

- Refuse the use of individual/collective protection equipment
- Work or come to work under the influence of any substance (e.g.: alcohol, drugs, etc.)
- Request an immediate response to a work-related e-mail when it is not necessary
- Coming to work, when sick. If You are ill, stay home and open a sick leave
- Working without receiving necessary training
- Refusing to attend the mandatory health check, organized by DPD Eesti

Examples of the right things to do

- Know and respect the rules on health and safety at work
- Ensure the safety and quality of equipment by using equipment compliant with health and safety standards
- Use the protective equipment made available
- Be aware of emergency instructions
- Ensure that we are caring and attentive to our teams, especially during difficult periods (such as during a health crisis)
- Ensure that health and safety instructions are properly communicated and well known by everyone involved on DPD Eesti sites
- Set up prevention, information and training activities for Employees
- Report any situation that may endanger your own and/or other people's health and safety. This includes workplace hazards, broken or missing equipment, threatening or violent behaviour, and/or injuries
- Sort out what is urgent and what can wait until the next business day to be addressed
- Group together the questions you may have for your colleagues/teams rather than addressing them when they arise
- Empower yourselves by ensuring your own and others' disconnection

2.3. Promote diversity, integrity and fairness

What is it about?



Each human being is unique in their origins, culture, experiences, ideas, etc. This diversity is an asset for Geopost because it fosters the emergence of new ideas, innovation, the sharing of best practices and skills, and an environment conducive to collaboration. This allows us to meet the challenges of today and tomorrow more effectively, to create a unifying environment and to better serve our customers. It is for this reason that, at Geopost, we place significant emphasis on ensuring that diversity, integrity and fairness permeate all of our relationships.

Diversity involves factors such as: age, disability, gender identity, sexual orientation, skin colour, marital status, pregnancy status, political opinions, religious beliefs, union activities, ethnic, cultural or national origin, etc.

What is Geopost doing in this area?



At Geopost, we do not tolerate any discrimination, direct or indirect, individual or collective, based on any of the criteria above. The recruitment, pay, and promotion of our team members depend solely on their qualifications, skills, and professional performance.

Whenever possible, Geopost provides specific accommodations to people with disabilities, to assist them with joining its teams.

In addition, Geopost also takes the necessary steps to ensure that its Employees are trained in this area.

Examples of the wrong things to do



- Use intolerant or exclusionary language
- Exclude relationships based on criteria relating to age, disability, gender identity, sexual orientation, skin colour, marital status, pregnancy status, political opinions, religious beliefs, union activities, ethnic, cultural or national origin, etc.

Examples of the right things to do



- Be respectful of yourself and others, and among other things, of their beliefs, their cultures, their origins, etc.
- Adopt an active attitude of inclusion and anti-discrimination as part of the whole Employee experience: hiring, onboarding, daily life, career planning, etc.
- Develop active listening skills and an open mind to the ideas and opinions of others
- Be cooperative by involving others and supporting your colleagues in difficulty
- Adopt a constructive and benevolent way of communicating

Additional information: **RECRUITMENT POLICY**



2.4. Combat harassment in any form

What is it about?



Harassment is a behaviour that has the effect of being humiliating, abusive, aggressive and/or creating a hostile, intimidating, unstable or unpleasant working environment which undermines the dignity of the persons or group of persons who find themselves subject to such behaviour.

There can be different kinds of harassment, such as moral or sexual harassment. Harassment can take several forms, such as:

- Verbal (inappropriate comments, unjustified reprimands, inappropriate jokes);
- In writing (inappropriate e-mails, text messages, unwarranted rebukes or reprimands) or images/videos of suggestive nature;
- Visual (inappropriate staring);
- Physical (aggressive contact, unnecessary gestures or unwanted actions).

What is Geopost doing in this area?



Geopost categorically and absolutely rejects any form of harassment, be it moral or sexual. Moreover, Geopost does not tolerate any behaviour that might amount to harassment, such as toxic forms of management.

Examples of the wrong things to do

- Engage in humiliating, abusive, aggressive, or intimidating remarks or behaviour
- Attempt to hurt, offend or lead someone to commit wrongdoing
- Make indecent gestures or inappropriate touching; unwanted sexual remarks and jokes
- Continue behaviour that has been reported as unwanted

Examples of the right things to do

- Implement prevention, information and training actions to combat harassment
- Report harassment
- Behave appropriately in all circumstances
- Be respectful of others and treat them in an appropriate manner
- Encourage and promote commitment of Geopost to combating any form of workplace bullying or harassment

2.5. Protect Personal Data

What is it about?



Personal Data is any information relating to an identified or identifiable individual. It can be:

- Last name
- First name
- Photo
- Postal address
- E-mail address
- Signature
- Bank details
- Telephone number
- Parcel number

It is inherent to the status of Geopost as employer and its activities to collect, store and process certain Personal Data about its Employees and Business Partners.

What is Geopost doing in this area?



By its very nature, Personal Data is a gateway to the private life of the person concerned. It is therefore essential to handle such data with the utmost care and confidentiality, in line with the applicable regulations.

Geopost processes this data with the utmost professionalism and in compliance with the most demanding legal and regulatory standards, especially those that concern the protection of Personal Data, information of collection, specification of the purpose, the exercise of Employee rights.

Geopost undertakes to ensure the security and confidentiality of Personal Data. To do so:

- Geopost has technical processes in place to prevent any intrusions in our computer systems;
- Geopost has developed an authorisation system to only allow accredited users to access certain data;
- Geopost has response system in the event of a suspected cyberattack;
- Geopost restricts collecting, processing, storing and sharing Personal Data to the extent it is necessary.

Examples of the wrong things to do

- Interfere with our teams and Business Partners' privacy
- Share Personal Data with third parties without the consent of the data subject or Geopost
- Use Personal Data collected as part of our business activity for any purpose other than the purposes for which consent was given

Examples of the right things to do

- Respect Employees and Business Partners' privacy
- Comply with applicable policies and procedures regarding the collecting, accessing, and processing of Personal Data
- Report any suspected fraud and computer breaches

For more information:

RULES FOR WORK ORGANIZATION

INTERNAL RULES FOR PERSONAL DATA PROCESSING



Act to protect the environment

What is it about?



Respecting and protecting the environment is crucial for the survival and prosperity of current and future generations because we are dependent on our ecosystem and the resources of our planet. The same is true for our activities, which can only develop sustainably if we consider on a daily basis our impact on the environment. As we all share the same address, we all have a responsibility to respect and protect our planet and work together to address the multiple environmental challenges such as combating air pollution, climate change, destruction of biodiversity, etc. We all have a role to play.

What is Geopost doing in this area?



The sustainable development policy of Geopost is based on strong commitments, such as membership of the United Nations Global Compact since 2016 and support for its sustainable development goals. Geopost sustainable development policy is an integral part of our corporate strategy and our annual action plans. It aims to reduce our environmental footprint in terms of greenhouse gas emissions, local air pollutants, resource conservation and promotion of a circular economy. Each of these actions is managed by a dedicated team at Central level and supported by a strong commitment from our teams, all of whom are made aware of environmental issues.

Known as Driving Change™, our program focuses on four priorities where we believe we can make the most difference in terms of delivery and beyond:

- Measuring, reducing, and offsetting our carbon footprint;
- Contributing to the improvement of urban quality of life by deploying a network for measuring air quality;
- Support the circular economy, for example, by developing services that allow for use of reusable packaging and promote reuse or the second-hand industry; and
- Helping and supporting associations, to strengthen our roots in our local communities.

Examples of the wrong things to do

- Overlook everyday actions that reduce our environmental impact: switching off lights and electronic devices, soft transport modes, limitation of the consumption of resources, recycling, etc.

Examples of the right things to do

- Pay attention to energy consumption to reduce our emissions of greenhouse gases and air pollutants
- Work with our suppliers and sub-contractors to reduce their environmental impact
- Complete training in this area
- Engage in responsible sourcing, reuse, and recycling of our own waste and also contribute to the emergence of a circular economy through our services
- Reducing paper usage; digital cleaning and reducing digital waste

For more information: SUSTAINABILITY REPORT





3. Integrity of Market and Business Activities

3.1. Prevent and combat corruption and influence peddling

What is it about?



Corruption consists mainly of a person (public or private), who, in the performance of their duties accepts, solicits, or receives (passive corruption); or promises, offers or gives (active corruption):

- An undue advantage (which can take different forms: money, services, property, travel, entertainment, advancement, hospitality, awards, agreements, contracts, titles, administrative approvals, privileges, kickbacks, etc.),
 - for themselves or for others, or in favour of DPD Eesti and/or Geopost,
 - in exchange for a favourable decision, action or abstention,
 - in breach of their legal, contractual or professional obligations.

Intent is decisive in establishing the offence of corruption. This is why attempted corruption is a crime, even if the proposal is not followed up by any action or if no one benefits from it.

- The bribe-giver is the person who seeks to corrupt
- The bribe-taker is the person who solicits or accepts an undue advantage

Influence peddling is an offence which consists of a person (public or private) who accepts, solicits or receives (passive influence peddling) or promises, offers or gives (active influence peddling):

- An undue advantage (which can take different forms: money, services, property, travel, entertainment, advancement, hospitality, awards, agreements, contracts, titles, administrative approvals, privileges, kickbacks, etc.),
 - so that this person misuses their real or assumed influence to obtain, a favourable decision from a public authority or administration (awards, procurement contracts, employment, favourable decisions, etc.).

Like corruption, influence peddling is prohibited and reprehensible.

→ These practices are illegal and punishable by heavy criminal sentences applicable to both the bribe-giver and the bribe-taker.

What is Geopost doing in this area?



At Geopost, we comply with anti-corruption laws and oppose all forms of corruption by applying three key principles:

- “Zero Tolerance”
- “Applies to Everyone”
- “Everyone is Vigilant”

Geopost strives to prevent and detect risk in this area by providing a framework for the conduct of its Employees, by training them to detect irregularities and manage any difficulties, and by giving them the tools to implement, where appropriate, any corrective measures necessary.

Examples of the wrong things to do



- Accept or solicit money or anything of value (gifts, hospitality, etc.) aimed to give an undue advantage
- Offer, promise or give money or anything else of value (gifts, hospitality, etc.) to seek to obtain an undue advantage

Examples of the right things to do



- Bear in mind that corruption can take different forms: public/private; benefits in kind/money, etc.
- Ask for advice from your Manager or Ethics Officer whenever you are in doubt or have any questions

Case study

Gesture of “goodwill”

Q: A regulatory inspector arrives at an office. Can I give him an excellent bottle of wine as a gesture of goodwill and show him that we welcome him with the respect he deserves?

A: In application of DPD Eesti Gift and Hospitality Policy, you should never give anything of value to a third party, in the course of a strategic period, which includes any situation in which your BU is subject to a governmental audit or inspection. In addition, contrary to your initial objective, this could be perceived as a lack of respect by the inspector. Show your respect and cooperation by acceding to the inspector’s requests and being courteous.

Prohibit facilitation payments

What is it about?



Facilitation payments are unofficial payments of small amounts intended to facilitate or fast-track the smooth running of simple procedures or administrative activities that the person paying is nonetheless entitled to expect. They are considered a form of corruption.

What is Geopost doing in this area?



Geopost prohibits all facilitation payments, even in situations where local laws do not prohibit such payments. If an Employee's physical safety or integrity is threatened by a serious and imminent danger, Geopost may, as an absolute exception, tolerate such payments. In such situations, the Manager and/or Ethics Officer of the concerned BU shall be notified as soon as possible and any payments made shall be properly identified and recorded in the relevant accounting documents and records.

Examples of the wrong things to do

- Accept a facilitation payment unless your safety or physical integrity is threatened
- Try hiding a facilitation payment

Examples of the right things to do

- Before making a payment on behalf of Geopost, always be mindful of the reasons for the payment and check that the amount requested is commensurate with the products and services provided
- Always ask for a receipt stating the reason for payment
- Refuse and immediately inform your Manager and/or Ethics Officer in the event of a request for a facilitation payment

Case study

Customs

Q: An operations manager notes that there are a lot of packages waiting to be cleared. A customs officer says that if he discreetly slips some cash into his pocket, the packages will be released faster. What should he do?

A: This proposal amounts to a facilitation payment and is prohibited.

Supervise giving and receiving Gifts and Hospitality

What is it about?



A normal course of business sometimes requires to offer or receive Gifts and/or Hospitality. Depending on the value they represent, the circumstances in which they are offered or received, the identity of the people offering and/or receiving them, Gifts and Hospitality may be admitted. However, they should lead the recipient and/or giver to examine whether they are acceptable.

What is Geopost doing in this area?



Geopost has defined a specific Gifts and Hospitality policy with rules on offering and receiving Gifts and Hospitality so that they can be offered or accepted in a way that is appropriate, legitimate, transparent, and which would not present any risks of participating in the commission of an offence.

Examples of the wrong things to do



- Accept or offer Gifts in cash or cash equivalent (gift vouchers, loans, etc.)
- Accept or offer Gifts or Hospitality during the course of a bidding process

Examples of the right things to do



- Ensure that Gifts and Hospitality offered/received are permitted under current regulations
- Respect the reporting, validation and registration thresholds applicable in DPD Eesti

Case study

A service provider offers tickets to a concert

Q: As part of a competitive bidding process for IT services, the company starts contractual negotiations with the prospective service provider. On this occasion, the service provider invites the company's project manager to a concert by a rock band that the latter is particularly fond of. What should the project manager do?

A: This hospitality outside a business setting is even more inappropriate as it comes in the middle of negotiations. It should therefore be refused. The project manager shall continue to be free to choose a service provider.

For more information: [GIFTS AND HOSPITALITY POLICY](#)



Manage relationships with Business Partners

What is it about?



Within the framework of its business relationships, Geopost may be in contact with various Business Partners, including Intermediaries.

An Intermediary is an individual or legal entity acting for and/or on behalf of Geopost SA and/or DPD Eesti (e.g. consultant, individual or legal entity involved in a commercial negotiation in order to enable or facilitate the conclusion of one or more contracts).

In certain circumstances, a BU could be held liable for corrupt acts committed by its Business Partner.

It is therefore necessary to supervise relationships with Business Partners to avoid this type of risk.

What is Geopost doing in this area?



The use of Business Partners requires undertaking strict precautions and conducting prior comprehensive analysis to ensure reputation and integrity of Business Partners. Geopost/DPDgroup is committed to assessing its Business Partners both upstream and during the business relationship.

Examples of the wrong things to do



- Consider that participation of an Intermediary in a corruption scheme will necessarily exonerate us

Examples of the right things to do



- Carry out the necessary anti-corruption due diligence on the Business Partner before and during the business relationship
- Ask your Manager and/or Ethics Officer for advice if you have any doubts or questions
- Formalise the business relationship with the Intermediary through a contract with appropriate anti-corruption clauses
- Ensure that the remuneration of Intermediary is reasonable and commensurate with the services provided

Case study

Appeals to your generosity during a tender process

Q: DPD Eesti has responded to a tender process for delivery services. The buyer explains to you that he is very involved in an association which supports schools in the town where he grew up and leads you to understand that the support DPD Eesti could provide to this association might make it stand out from the other competing companies. What should you do?

A: At Geopost, solidarity is key. However, the support we provide in this capacity shall be supervised to avoid abuse. In this case, one of the key rules is not to accept such requests when they are made during tender processes to avoid suspicion. This is especially true when the person making the request is personally involved with the organisation that would benefit from the contribution. You shall therefore limit the terms of your bid to what is relevant to the delivery service and inform your Ethics Officer of the proposal made to you.

Theft and sharing gains

Q: You have discovered a sub-contractor who stole packages intended for delivery, and the sub-contractor suggests that you turn a blind eye in exchange for sharing the stolen items. What should you do?

A: Any offer of something in return (in this case, a share in the parcels) in exchange for refraining from doing something (in this case, reporting the matter) constitutes corruption and is prohibited. You shall absolutely not follow up on this proposal and you should inform your Ethics Officer.

Arrangements between sales representatives

Q: Your contact at a Geopost client company suggests that you charge more than the value of the services provided in order to help you achieve your objectives. In exchange, they ask you to hand over 3% of the amount you earn for your company. What should you do?

A: At Geopost, transparency and honesty are key. Here, the client's request implies that you pay them a sum of money in exchange for overcharging, which they would overlook. This is not transparent, not honest... and not legal! It constitutes corruption and is punishable by criminal sanctions both for the contact making this suggestion (even if you do not accept) and for you, as soon as you give in to the suggestion. Do not therefore accept this suggestion and inform your Ethics Officer.



3.2. Prevent and manage conflicts of interest

What is it about?



A conflict of interest is a situation in which the private interest of a person is likely to affect, or be perceived as affecting, the independent, impartial, and objective performance of their professional duties.

Conflict of interest situations can take many forms:

- Result from a situation that affects us directly or indirectly, through our family, friends or close acquaintances;
- Be financial (such as shareholdings in another company), material, emotional, political, or charitable;
- Occur in the context of various employment duties such as selecting suppliers, recruiting employees, negotiating prices with a customer, setting up sponsorship, etc.

Some illustrations of situations in which there is a conflict of interest:

- Owning an interest in a company that may be a competitor, customer or supplier of Geopost and/or DPD Eesti;
- Having a personal or familial relationship with someone who is applying for a job at Geopost and/or DPD Eesti;
- Supervising, assessing or managing the performance of an Employee who is a relative or has a close personal relationship with you;
- Having a personal relationship with a person who works for a company that may be a competitor, customer or supplier of Geopost and/or DPD Eesti.

What is Geopost doing in this area?



Because conflicts of interest can affect the ability to make objective and unbiased decisions in the best interests of DPD Eesti and sometimes conceal improper practices, DPD Eesti has implemented a conflict of interest prevention and management policy which states, in particular, that:

- All Employees shall be made aware of the concept of conflict of interest and the applicable rules in this area;
- All Employees shall declare any real or potential conflict of interest situation to their Manager as soon as it occurs;
- Certain identified persons, including at the very least, a sample of decision-makers, shall confirm at least once a year that they are not involved in a conflict of interest situation;
- All declarations of conflict of interest shall be assessed by the Manager of the Employee and, if necessary, their Ethics Officer;
- Any actual conflict of interest shall lead to the implementation of remedial measures aimed at addressing or neutralising such conflict.

Examples of the wrong things to do

- Select, or help to select, for a contract, a supplier in which you or one of your relatives have an interest
- Use confidential information for your own benefit or a relative's benefit
- Influence the hiring, performance assessment, or determination of the salary of a relative
- Conceal information about real or potential conflicts of interest

Examples of the right things to do

- Avoid activities, investments or close relationships with organisations whose interests might interfere with those of DPD Eesti and, at the very least, inform your Manager
- Inform your Manager in the event of potential or actual conflicts of interest
- Share any concerns about whether a personal interest may interfere with DPD Eesti interests

Case study

Selecting suppliers

Q: Your job is to select a supplier for DPD Eesti. One of the suppliers you interviewed is a company owned by your cousin. What precautions should you take?

A: Firstly, you should discuss this with your Manager. In this situation, the fact that this company is owned by your cousin creates a conflict of interest situation, as you are responsible for choosing the best supplier for DPD Eesti. The proper course of action is to not participate in the selection process.

My brother...

Q: Your brother is an advisory consultant or decision maker at company X, which is one of your clients. You work in sales and have had no contact with company X up to this point. You have just been asked to manage the account of company X. What should you do?

A: Tell your Manager about the job of your brother because in your new role, you will have discretionary authority in your dealings with company X. If your Manager still wants to assign you the company X account, ask him for a written approval.

Additional information: **CONFLICT OF INTEREST POLICY**



3.3. Establish responsible relationships with Business Partners

What is it about?



Our delivery and services partners allow us to respond in an agile manner to the need of our customer while creating local employment. They are therefore a key factor in our value chain and transport network. That is why we need to work with Business Partners who share the same professional and ethical standards throughout our value chain.

This means including an ethical, social and environmental dimension in our choice of Business Partners and associating them with a common approach to ensure and enhance respect for human rights, health and safety, and the environment.

What is Geopost doing in this area?



Geopost implements third-party due diligence procedures to assess, in particular, the integrity of Business Partners considered for a business relationship, the risks such relationship may present and ways of remedying them.

Geopost also expects its Business Partners to ensure that their own business partners meet the same ethical standards.

Examples of the wrong things to do



- Turn a blind eye to red flags that would call into question the integrity of a third party with whom we have or are planning to have a business relationship

Examples of the right things to do



- Integrate ethical, social and environmental criteria when selecting Business Partners
- Treat Business Partners responsibly
- Diversify supplier portfolio to avoid creating a situation of economic dependency
- Regularly and throughout the business relationship with our Business Partners, ensure the quality of this relationship and its economic and social balance

For more information: **SUSTAINABLE PROCUREMENT CHARTER**



3.4. Manage donation and sponsorship initiatives

What is it about?



Commitment to civil society consists of investing in the support of causes, associations, projects or events by making human, material or financial resources available. When this commitment is made on a philanthropic basis, with no expectation of a return, it is called a donation. When contribution of DPD Eesti enables promotion of the DPD brand in connection with the project or event supported, it is called sponsorship.

What is Geopost doing in this area?



At Geopost, we want to make a positive contribution to civil society by mobilising our own strengths and skills for the benefit of others. To this end, Geopost:

- Carries out solidarity delivery operations;
- Provides human resources through the donation of working skills;
- Participates in charity and sporting events for the benefit of associations it supports;
- Organises solidarity collections.

The aim of Geopost is to allow its Employees to get involved in the actions that are important to us. By contributing to maintaining links between people, we make a difference.

Examples of the wrong things to do



- Support or launch any initiative that may generate any reputational risk or damage to the image of Geopost/DPDgroup (by promoting any form of discrimination, political organisation or union, etc.)
- Pressure or lobby others to participate in charities or associations
- Propose or agree to carry out sponsorship activities for the sole purpose of obtaining an undue advantage and/or making cash contributions

Examples of the right things to do



- Ensure that your external involvement does not interfere with your professional duties and does not create a conflict of interest with Geopost
- Obtain the necessary approvals before proceeding to the transfer of funds or to contributions in the name or on behalf of Geopost
- Ensure the integrity of the recipient organisation and its representatives

For more information: **SPONSORSHIP AND DONATION POLICY**



3.5. Demonstrate neutrality when contributing to public life

Participate in public life strictly in line with applicable laws and regulations

What is it about?



Economic stakeholders' participation in political life mainly consists in sharing their experience and expertise in business sectors concerning them, which is also known as lobbying or representation of interests. This can be carried out directly or through professional organisations. These practices are increasingly regulated and require more and more transparency.

What is Geopost doing in this area?



As a responsible company, Geopost uses its best judgment and probity when meeting with public officials to explain its position on a particular issue.

Geopost always complies with applicable regulations. Accordingly, Geopost will never attempt to exert improper influence over a public official or lawmaker to obtain a decision in the interest of Geopost.

Examples of the wrong things to do

- Take part in decision-making that affects or may affect Geopost when your involvement in the political activities in question is personal
- Offer a Gift or Hospitality to a public official during a parliamentary debate on legislation that may have an influence on activities of Geopost
- Join a professional body in the name or on behalf of Geopost without complying with any applicable internal approval policies
- Get involved in the name or on behalf of Geopost, in discussions with public officials without complying with any applicable internal approval policies
- Endorse a candidate in an election in the name or on behalf of Geopost

Examples of the right things to do

- Provide reliable and objective information, and abstain from exercising any kind of pressure to obtain information or decisions
- Ensure that interest representatives/ lobbyists acting on behalf of Geopost conduct their activities in accordance with applicable laws and regulations
- Ensure that your political opinions and actions are clearly identified as personal and individual, and do not involve Geopost

Refrain from contributing to financing political life

What is it about?



Depending on the country, companies may be permitted or, on the contrary, prohibited from contributing to political life by funding political parties, election campaigns, or candidates for public office. In Estonia, this is prohibited by Political Parties Act.

What is Geopost doing in this area?



To avoid any confusion between the convictions of Geopost and the interests of political representatives, Geopost refuses to participate in financing political life in any country.

At Geopost, our Employees are totally free to participate as active citizens in the political life of their communities, including supporting political parties, elected officials, candidates, etc. However, any such involvement shall be outside of working hours and not involve Geopost resources or mention the name of Geopost.

Examples of the wrong things to do

- Purchase tickets to a political fundraising event using Geopost funds or on behalf of Geopost
- Use resources (working time, Geopost telephones, e-mail addresses, etc.), to conduct or support political activities in a personal capacity
- Make or authorise any expenses which involve a direct or indirect (e.g. through a foundation) payment to a political party

Examples of the right things to do

- Refuse any request for a contribution to finance a political action or political party in the name or on behalf of Geopost



3.6. Promote fair competition

What is it about?



Competition law aims to preserve free competition and innovation by prohibiting certain practices such as cartels (for example, market sharing or price fixing), and abuses of dominant position when the purpose of these practices or their effect is to distort competition on markets. Competition law also regulates the commercial relations of the company with its partners.

In addition to ultimately harming consumers, violations of competition law can result in substantial fines, including up to 10% of the worldwide sales of the group to which the sanctioned company belongs.

What is Geopost doing in this area?



Geopost conducts its activities in the strictest compliance with anti-competitive practices regulations and implements policies and procedures to cover this requirement.

Examples of the wrong things to do

- Agree with competitors to align commercial practices, such as setting prices or allocating customers or markets
- Refer to the fact that Geopost/is “dominant” in a given market. It would be preferable to use the term “leader”
- Discuss, even in an informal manner, with competitors commercially sensitive information such as the identity of our customers, the prices we charge them, the tenders we participate in, our discount policy, our Employee compensation, the terms of our sales promotions, our special sales conditions, or our business strategies

Examples of the right things to do

- Comply with the rules/principles defined by Geopost and/or the relevant regulators
- Before approving an acquisition of shares by Geopost, check with the Legal and Compliance Department of Geopost SA to verify if the transaction requires a filing with the national or European competition authorities
- Ensure that the information received about our competitors comes from publicly available sources or has been obtained in a legitimate manner
- Be especially vigilant when participating in professional associations or working groups in the presence of competitors
- Define transparent, objective and non-discriminatory tendering conditions
- Terminate any discussions/leave any meetings where commercially sensitive information is exchanged between competitors, publicly distance yourself from these exchanges and notify your Market Integrity Local Compliance Officer (MILCO)

For more information: **ANTI-COMPETITIVE PRACTICES COMPLIANCE POLICY**





3.7. Use responsible marketing practices

What is it about?



Marketing plays a central role in making our company, services and offers known to our customers. It showcases the services we are able to offer.

What is Geopost doing in this area?



At Geopost, we strive to provide our services to customers in a way that is consistent with our values and ethics.

Geopost requires its advertising and marketing to be fair and accurate, without presenting misleading or non-existent offers.

At the very least, Geopost ensures that all its advertising complies with applicable laws and regulations, including consumer protection laws. In Estonia, it is governed by the Advertising Act.

Examples of the wrong things to do



- Provide our customers with misleading, vague, or unduly flattering information about Geopost or its services (e.g. in the environmental area)

Examples of the right things to do



- Provide a precise, accurate and detailed description of the services that our capabilities and resources enable us to provide (including destination and timing)
- Ensure that our customers understand exactly what we are offering
- Invite customers with complaints to contact customer service

3.8. Adhere to international trade compliance programs

What is it about?



Some states or international organisations, such as the United Nations, the European Union, or the United States, adopt international, economic and/or financial sanctions programs that are aimed at prohibiting or restricting trade of targeted goods, technologies, software, and/or services within the territory of certain states, or with governments, individuals and/or companies included on national and/or international sanctions lists.

These programs aim to sanction states, entities and persons who violate international law or export control measures and/or jeopardise the interests or national security of the states or organisations concerned. These regulations are multiple and change rapidly.

What is Geopost doing in this area?



Our international activity leads us to be present in several countries. As such, Geopost ensures compliance with international sanctions regulations. To that end, Geopost has a central team dedicated to analysing and monitoring risk situations under sanctions and export controls programs relating to international trade.

Examples of the wrong things to do

- Send streams of items with prohibited or unlicensed content to countries, territories, persons, or companies that do not comply with instructions of Geopost/DPDgroup and/or regulatory requirements
- Use third parties to bypass international trade compliance programs

Examples of the right things to do

- Identify the risks to avoid sending packages to or from territories subject to international sanctions
- Identify customers to avoid sending packages to or from people targeted by international sanctions
- Follow the instructions of the specialist teams or request advice at: trade-compliance@dpdgroup.com if you have any questions
- Look up the applicable laws in the country in which / with which you are required to work
- Check export licences and contents of packages to high-risk countries

For more information:
GLOBAL TRADE COMPLIANCE POLICY
SANCTIONS COMPLIANCE POLICY



3.9. Prevent and combat money laundering

What is it about?



Money laundering consists of concealing the nature and origin of funds derived from unlawful activity by incorporating this “dirty money” into legal transactions. The aim is to give these funds a proper and legal appearance, which involves concealing their origins and their owner. Illegally acquired money can be the result of arms, drugs or human trafficking or other illegal activities.

The following criteria should make you wonder about potential money laundering:

- Requests for payment in cash
- Unusual payment terms
- Splitting payment into multiple transactions
- Transactions involving cash flows towards or from countries or territories known to be tax havens
- Transfers of funds to or for third parties unrelated to the transactions at stake
- Reluctance by the third party to provide the information requested
- Use of multiple foreign bank accounts for no apparent reason

What is Geopost doing in this area?



Geopost implements policies to reasonably know who we are working with and identify risky transactions. This allows us to avoid being used as a vehicle for money laundering.

Examples of the wrong things to do

- Accept large payments in cash or similar means
- Accept transactions involving cash flows towards or from countries known to be non-cooperative jurisdictions for tax purposes

Examples of the right things to do

- Ensure that we get to know our Business Partners such as payment terms when we enter into a business relationship with them
- Be alert to any behaviour that suggests a Business Partner is attempting to use us to launder money, in particular when cash-on-delivery is used or when services are paid using multiple transfers from different accounts
- Alert your Manager if you have any doubts or questions about the legality of the transaction

3.10. Keep accurate and detailed books and records

What is it about?



Company books and records allow the tracing of its assets, liabilities, income, expenses and business transactions. They shall be kept comprehensively and accurately.

What is DPD Eesti doing in this area?



At DPD Eesti, we ensure that our corporate books and records accurately and fairly reflect our assets and liabilities, as well as our financial, legal, and operational needs.

All books and records are supported by internal documents (such as employment contracts), or external documents (such as sub-contracts or invoices), that accurately show our assets and liabilities. DPD Eesti requires all parties to act fairly and honestly in ensuring that these documents are accurate, complete, reliable, and secure.

At DPD Eesti, we apply all applicable laws and international accounting standards. In addition, we have implemented a system of internal controls to prevent and identify frauds.

Examples of the wrong things to do



- Conceal or destroy documents or records that are subject to an investigation or may be used in official proceedings or in a general way that may be useful for the conduct of financial operations
- Adjust accounts to mitigate differences between forecasts and results

Examples of the right things to do



- Maintain and destroy DPD Eesti records in accordance with records management and retention policies
- Provide the accounting department with documents to support transactions
- Ensure that the books and records of DPD Eesti are a true and accurate reflection of the transactions conducted
- Ensure that the books and records of DPD Eesti are prepared in accordance with applicable accounting standards and frameworks

4. Protection of the Resources of the Organisation

4.1. Preserve our resources and assets

Use resources and assets responsibly

What is it about?



In order to carry out its duties, Geopost provides its Employees with various tools such as computers, telephones, vehicles, and intangible resources such as network bandwidth. They shall be used responsibly.

What is Geopost doing in this area?



In general, Geopost tolerates the use of these tools for personal purposes, provided that this is conducted in an appropriate manner and without prejudice for Geopost.

Examples of the wrong things to do



- Consider it acceptable to visit an inappropriate website with the equipment provided by DPD Eesti, even if there is no filtering software blocking access to the site
- Commit any offence using the equipment provided by DPD Eesti, even in the context of the missions entrusted to us (e.g. speeding)
- Download an unauthorised software

Examples of the right things to do



- Use resources provided by DPD Eesti, such as computers, telephones, and vehicles, etc. in a responsible manner consistent with the interests of DPD Eesti, and recognise the risks, in particular theft, loss, waste, misappropriation, unauthorised access, etc.
- Store only business-related information on computers or devices provided by DPD Eesti
- Use the DPD Eesti e-mail system for business purposes only

Additional information: Geopost IT CHARTER





Protect our confidential information

What is it about?



Confidential information is information that is collected in the context of your duties for DPD Eesti and that is not publicly available. This may include information about our team members, Business Partners, corporate strategy, etc.

Confidential information may be “privileged” when it relates to a publicly listed company and the disclosure of the information might have an impact on the stock price.

Protecting this data means processing it confidentially and ensuring that it is not disclosed to any unauthorised third party.

What is Geopost doing in this area?



Geopost takes all necessary measures to protect its confidential information:

- Geopost asks its Employees and Business Partners not to disclose information unless there is a legitimate business necessity to do so;
- Geopost asks its Employees to be careful when discussing, reading, or disposing documents containing confidential information in public places;
- Geopost includes confidentiality clauses in its contracts;
- Geopost has technical procedures in place to prevent any intrusion into our information systems;
- Geopost has implemented an authorisation system for access to certain data by authorised persons;
- Geopost has a response system in the event of a suspected cyberattack.

The vigilance required when handling confidential information does not restrict communications between Geopost team members or communications authorised or required by law.

Examples of the wrong things to do

- Discuss sensitive information (which can be restricted, confidential or secret by its very nature), or read documents that contain such information in public places (lift, hotels, transportation, restaurants, etc.)
- Be involved in stock market transactions that are based on the insider information that you are aware of

Examples of the right things to do

- Protect the confidentiality of sensitive information (which can be restricted, confidential or secret by its very nature), notably by limiting access to it (small teams, code names, regular checks on access rights, etc.)
- Take precautions regarding the storage and distribution of sensitive information (which can be restricted, confidential or secret by its very nature), (encryption of documents and e-mails, setting relevant confidentiality levels, etc.)
- Protect sensitive information of DPD Eesti (which can be restricted, confidential or secret by its very nature), even after leaving DPD Eesti
- Report any suspected cyberattacks or computer breaches that you become aware of to itsecurity@dpd.ee
- Regularly change passwords
- Lock the access to your computer when you step away
- Use screen protectors whilst using laptops in public spaces

4.2. Use social media properly

What is it about?



Social media should be understood broadly and covers:

- Social networks (Facebook, LinkedIn, Instagram, TikTok, etc.)
- Video and photo-sharing websites (Flickr, YouTube, etc.)
- Microblogging sites (Twitter, Weibo, Snapchat, etc.)
- Blogs (professional and personal)
- Forums and discussions platforms (Yahoo! Groups, Google Groups, etc.)
- Collaborative publishing platforms (Wikipedia, Google Docs, etc.)

What is Geopost doing in this area?



Using social media is a great way to communicate our enthusiasm and values to our customers. However, posts on social media can also affect the reputation of DPD Eesti, Geopost, La Poste Group and/or each Employee.

Geopost has a proactive policy on social networks and manages the company's social accounts on a daily basis, in a spirit of coordination between its subsidiaries and parent company. Geopost also assists Employees who want to set up their own accounts, particularly on LinkedIn or Twitter, to, among other things, inform them about risks and good practices.

Examples of the wrong things to do



- Disclose confidential information in social media postings made as part of our business activity without prior approval
- Comment on or criticise competitors and/or their products and services
- Use your professional e-mail address to connect to social media for personal use
- Post personal publications which may be perceived as issued on behalf of DPD Eesti
- Indicate, on social networks, assuming a position not in line with the position actually held within DPD Eesti or Geopost

Examples of the right things to do



- Use your judgment and be responsible in your use of social media
- Respect the values of DPD Eesti in any communications related to our business
- Make a clear distinction between professional and personal communications/posts
- Prohibit posting photographs of individuals and tagging them without their consent

For more information: **SOCIAL MEDIA REFERENT GUIDE**



Annex 1 – Glossary

Business Partner	means any supplier, subcontractor, partner or customer, intermediary, and more generally, any third party to Geopost/DPDgroup with whom it intends to create or has already created a business relationship
Business Unit or BU	means any entity in which Geopost SA holds, directly or indirectly, a majority stake or may have a controlling power over the decisions of top management and/or governance bodies
Employee	means any person working for and being paid directly by Geopost SA or a Geopost BU, regardless of the term of their contract (indefinite or fixed-term), including people under training or apprenticeship contracts
Ethics Officer	means any person in charge of ensuring compliance with the ethics framework within each BU
Executive	means any legal representative, the Chief Executive Officer (CEO) of the BU or any member of the Senior Management Team (SMT) or similar body
Geopost	means the group composed of Geopost SA and all its BUs
Gift	<p>means any financial or moral, material or immaterial benefit offered or received in the context of a past, present and/or certain or potential future business relationship</p> <p>Examples: Customer and supplier gifts: Boxes of chocolates, branded gifts, discounts, rebates, services, transport upgrades, etc.</p>
Hospitality	<p>means any tangible or intangible benefit, any form of hospitality (meals, entertainment, accommodation, etc.) offered or received in the context of a past, present and/or potential future business relationship</p> <p>Examples:</p> <ul style="list-style-type: none">• Meals in restaurant: Inviting a client to lunch;• Invitation to a sporting or cultural event: Invitation to a concert by a service provider;• Trade show invitation: Invitation to a trade show from a supplier of electric vehicles;• Seminar invitations: Invitation by a client to a seminar to speak at a round table on “technologies of the future”
Human Resources Department	means the department responsible for human resources within Geopost SA or a Geopost BU

Annex 1 – Glossary

Intermediary	means any legal entity or individual acting for and/or on behalf of Geopost SA and/or of any BU Examples: Consultants, individuals or legal entities, participating in commercial negotiations in order to enable or facilitate the
Legal Department	means the department responsible for legal matters within Geopost SA or a Geopost BU
Manager	means any person to whom Employees report within Geopost SA or a Geopost BU
Personal Data	means any information relating to an identified or identifiable individual, directly or indirectly
Whistleblowing System	means any technical system implemented to send an alert within Geopost SA and/or the BU