

MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2025/26

The statement includes Post Office Limited (Post Office) and Post Office Management Services Limited (POMS). Payzone Bill Payments Limited (Payzone) is no longer a Limited Company but operates as a separate brand as a part of Post Office.

This statement is made pursuant to section 54(1) of the Act. It sets out the steps taken by Post Office and POMS during year ending 31st March 2025 to mitigate the risks of modern slavery and human trafficking in its business and supply chains and sets out our planned approach for 2025/26.

Post Office and POMS are committed to combating the risk of modern slavery or human trafficking in our supply chain and business operations. We are committed to taking appropriate steps to ensure that everyone who works for Post Office in any capacity, benefits from a working environment in which their fundamental rights and freedoms are respected.

OUR BUSINESS AND SUPPLY CHAIN

Post Office provides a range of essential products and services to communities across the UK. With this, Post Office's subsidiaries provide cash and banking services, mail and parcel services, travel, life and general insurance policy cover (through Post Office Management Services) and bill payment services.

Our UK Government mandate is to provide at least 11,500 Post Offices, some within certain geographical, demographic and social criteria that provide a unique operational challenge for Post Office compared to other wholly commercial retail or financial institutions.

Post Office directly controls around 1% of the network of branches (Directly Managed Branches) which consumers will generally recognise as the larger branches often situated in the centre of towns and cities across the UK. The other branches are managed on an agency basis by independent small retailers and shop owners operating Post Office services within their own store. Business owners may own more than one shop operating Post Office services and have a range of other non-connected business interests. We also have agent managed facilities within some larger high street commercial partners, who like the smaller independent retailers, provide their own trained and friendly staff to provide our Post Office services to consumers.

Postmasters

Postmasters can operate one or more branches. As agents they have control over how their branches within their retail premises are run on a daily basis. All those working in an agency Post Office branch are employed directly by the retailer. The Retailer is self-employed and typically takes on a Post Office as a valuable community service provided within their own retail business. Post Office has no day to day control over the operation of these independent SME businesses but does have the ability to influence and inform. Post Office aims to support postmasters with their Post Office operations and influence their behaviours.

Commercial partners

A large proportion of the agency network is managed by commercial partners – corporate retail organisations with familiar fascia brands who themselves have a number of high street stores.

Trade Unions

Across our directly managed branch network, we work closely with the Communications Workers Union (CWU) and Unite (CMA) Communications Managers Association.

National Federation of Sub Postmasters (NFSP)

Postmasters are represented by the National Federation of Subpostmasters.

Third Party Suppliers

We also procure products and services from a range of managed suppliers, ranging from small and medium enterprises to large multinationals. Purchasing for our own managed Post Offices is controlled centrally by the Procurement team who also set the Supplier Relationship Management standards to ensure our teams maintain a consistent approach to supplier management. Our [Supplier Code of Conduct](#) outlines our expectations on suppliers to take a number of actions around Modern Slavery:

- ensure all UK workers receive minimum wage and robust immigration checks
- map supply chains to identify where there is highest risk and exposure to modern slavery
- undertake site inspections
- provide training to employees and local suppliers on modern slavery risks and compliance
- review supplier contracts to include obligations to comply with the Modern Slavery Act 2015
- prepare a statement outlining the steps they are taking to tackle modern slavery and publish it if required to do so by the Act

OUR BELIEFS AND PRINCIPLES

Respect for the dignity of the individual and the importance of each individual's human rights form the basis of the behaviours we expect in every workplace and are communicated through our Code of Business Conduct. We will not accept any form of discrimination, bullying or harassment. We require all our managers to implement and adhere to policies designed to ensure equality of opportunity and inclusion for all Post Office employees. We provide a range of resources and training for managers and employees to support this and engage with employee networks to gain additional input on best practice.

OUR POLICIES

We operate several policies to ensure we are conducting business in an ethical and transparent manner. These include:

1. CODE OF BUSINESS CONDUCT

Our Code is a centrepiece to our ethical culture. It sets out what we stand for, the principles we hold ourselves accountable to and the expectations we have for how we act and how we make decisions.

Our Code is for everyone working for and with Post Office including, employees, directors, contractors, postmasters, business and retail partners. Our Code is reviewed every three years and any modifications are approved by Post Office General Executive and Board.

Our Code is available on the Post Office Corporate website, internal intranet pages, provided to new hires during onboarding and linked across many of our company policies.

Our Code was updated in 2018 to include a dedicated section on modern slavery. Following a review in July 2024 our Code has been endorsed by the Institute of Business Ethics. [The Code is available here.](#)

2. SPEAK UP POLICY

All Post Office colleagues, postmasters and partners are made aware of how to raise concerns regarding wrongdoing or dangerous practices. References to concerns about modern slavery are included in this policy.

There are several ways people can report concerns regarding slavery or human trafficking within Post Office, by either contacting the Speak Up Team direct or via our confidential reporting service, which is operated by an independent company, on behalf of Post Office. This is regularly communicated to all employees, postmasters, suppliers, and contractors and is overseen by our Speak Up Team. Every report submitted is assessed and investigated. [The Speak Up policy is available here.](#)

3. RECRUITMENT & ONBOARDING POLICY



Our Recruitment and On-boarding Policy for Post Office employees sets out the overarching principles and controls to be followed and applied to ensure that personnel resourcing is conducted in a fair, open and transparent manner, including conducting eligibility to work in the UK checks for all employees.

DUE DILIGENCE PROCEDURES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAIN.

Post Office and POMS employs solely within the UK and undertake a range of due diligence steps around employment and sourcing of goods and services.

Our recruitment procedures ensure that all prospective employees are legally entitled to work in the UK. All successful applicants must produce one of the following: their original passport, driving license or birth certificate. Additionally, to comply with the Asylum and Immigration Act 1996 requirements, if they are from a non-European Economic Area (EEA) country, evidence of a right to reside and work in the UK must be produced.

We carry out reasonable and practical due diligence in the sourcing of goods and services and ensuring that the Act's obligations form part of the procurement process. As part of this, we have conducted a review of the criteria used by Post Office to evaluate whether suppliers meet Post Office's minimum tendering requirements. We have also reviewed our standard form procurement contracts to ensure that they make explicit reference to the Act, as well as covering other areas of company information, policies and procedures. This enables the procurement team to assist Business Units to identify and assess any potential risks relating to the goods or services being procured.

IDENTIFYING, ASSESSING AND MANAGING RISK

WHERE ARE THE RISKS OF MODERN SLAVERY AT POST OFFICE AND POMS

Post Office understands that our procurement of goods and services from third parties carry with it the risk of modern slavery and human trafficking.

We understand that a potential for risk of modern slavery sits within our agency network as there are many people employed by or engaged as independent retailers acting as postmasters, officers in charge or assistants (including commercial partners) who are not direct employees of Post Office or POMS.

GOVERNANCE

We have a cross-functional steering group through which we develop and coordinate our approach to addressing modern slavery risks within our operations and supply chain. This group consists of expertise from the legal, procurement, compliance, corporate affairs and operational functions in Post Office.

TRAINING

We provide annual Compliance Awareness Training to all our employees and provide awareness courses to our postmasters, both are tailored to ensure everyone is able to correctly identify signs of potential modern slavery or human trafficking if it is taking place within our network and report in line with our moral obligations and company policies. For employees, this training is mandatory and forms part of our performance management process.

WHAT DID WE DO THIS YEAR

1. Reviewed independent assurance checks carried out by third party adviser Good Values to ensure that all actions have been followed up on.
2. As a result, reviewed the modern slavery investigation process to ensure that Post Office teams are supported should they spot signs of possible modern slavery and the most appropriate escalation points are in place. This included a review of the data we gather, how we manage this data and the processes around onward referrals.

3. Reviewed our approach to the mandatory annual Modern Slavery Awareness Training to ensure that all employees can robustly spot signs of modern slavery.

PROGRESS VS PREVIOUS YEARS

2022/23	2023/24	2024/25
Across all years of our modern slavery work we have communicated with colleagues and our network, latterly building in case studies to reflect the real-world impact of this issue.	Across all years of our modern slavery work we have communicated with colleagues and our network, latterly building in case studies to reflect the real-world impact of this issue.	Across all years of our modern slavery work we have communicated with colleagues and our network, latterly building in case studies to reflect the real-world impact of this issue.
Began surveys of our key suppliers.	Continued surveys with lower-risk suppliers.	
Launched training in 2022/23 for all employees as part of the annual compliance calendar and have continued to roll this out every year since.	In 2023/24 we added a version of the training aimed at postmasters and added this to our onboarding training.	Moved the training calendar for this training to align with Anti-Slavery Day to enable us to get greater traction and be more topical.
Across all years of our modern slavery work we have engaged with our network team to provide relevant support around monitoring for modern slavery; beyond the training programme we provide.	Across all years of our modern slavery work we have engaged with our network team to provide relevant support around monitoring for modern slavery; beyond the training programme we provide.	Across all years of our modern slavery work we have engaged with our network team to provide relevant support around monitoring for modern slavery; beyond the training programme we provide.
	Drafted a Modern Slavery & Human Trafficking policy to support business processes and underpin the Modern Slavery Statement.	
		Reviewed the Modern Slavery investigation process to ensure that Post Office teams are supported should they spot signs of possible Modern Slavery and the most appropriate escalation points are in place.

WHAT COMMITMENTS ARE WE MAKING TO TACKLE MODERN SLAVERY IN THE YEAR AHEAD

As part of our initiative to identify and mitigate risk throughout 2025/26 we are committed to:

1. Updating the Modern Slavery Awareness Training module, reviewing and amending content and ensuring all colleagues have completed it.
2. Transferring responsibility for modern slavery to the Group Corporate Affairs function to give a more cross-business view, reviewing processes and membership of the Modern Slavery Steering Group and reviewing wider governance of modern slavery as part of other strategy reviews in the business.
3. Increasing communications relating to modern slavery to share across stakeholders to improve awareness and understanding of the reporting processes.
4. Reviewing the policy framework around Modern Slavery & Human Trafficking and related policies e.g. Speak Up Policy.

RAISING CONCERNS



Post Office provides a range of accessible and confidential channels for raising concerns around Modern Slavery and communicates these to relevant internal and external stakeholders.

- Post Office's Speak Up Officer: speakup@postoffice.co.uk
- The Government's Modern Slavery Helpline on 0800 0121 700.

We encourage any individual who has concerns about unethical behaviour in any part of our business or operations to speak up and to do so without fear of retaliation. We will review all instances of non-compliance, on a case-by-case basis and will implement appropriate remedial action.

REVIEW

This statement shall be reviewed and published annually.

This statement has been reviewed by the Board and signed by Neil Brocklehurst.

Neil Brocklehurst

Chief Executive

1 September 2025