

# Fact booklet: Sustainability at Posten



**Attachment to** 

The Annual Report and Sustainability Report 2019

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## Introduction

## **About the report**

Business, governments and individuals are becoming increasingly aware of what is needed to ensure the sustainable development of companies and the world as a whole. Posten Norge has worked systemically on sustainability since 2010 and reports annually on the most significant areas. You can read about our initiatives and results from the last year in the Annual Report and Sustainability Report and in this Fact booklet, which is a supplement to the main report with detailed tables, guidelines and responsibilities

## We have divided the 2019 reports as follows:

- Annual report and sustainability report: How we work on sustainability and what we have achieved
- Fact booklet: Detailed tables, guidelines and responsibilities

## This is Posten Norge

The Group had an annual turnover of NOK 24,212 million. Total capital is NOK 19,867 million, with an equity ratio of 32.0%.

There are a total of 14,270 employees in 13 countries in the Group. In addition to its own employees, a considerable number of services are purchased, for example at Post-in-Shops and from transport subcontractors.

Since 2018, the following topics have been merged to simplify reporting: "Pollution to the sea" is incorporated under "Local pollution", "Integration" and "Equality" are merged, "Climate-efficient buildings" are entered under "Emissions-free and efficient transport and logistics" and "Enable circular solutions for customers and recipients" are entered under "Making life simpler for customers and recipients".

## About the reporting

Reporting is conducted in accordance with GRI Standards and the period covered is from 1 January to 31 December 2019. Reporting takes place annually and this

year's report will be published on 27 March, after being reviewed by the Board of Directors on 26 March 2020. It is made available at postennorge.no. The English edition will be available from 9 May 2020. The report for 2018 was published on 28 March 2019 after being reviewed by the Board of Directors on 27 March 2019.

For financial reporting purposes, the Group has split operations into two segments, Mail and Logistics. This division is not used in the GRI report, instead we report for the Group as a whole.

Posten Norge AS participates in the following external initiatives: the United Nations Global Compact, Global Reporting Initiative G4, Zero, SINTEF, Næring for Klima, International Post Corporation, Nordic Swan Purchasing Club and Grønt Punkt

Posten Norge AS is a member of the following associations: International Post Corporation, Nordic Swan Purchasing Club and Grønt Punkt.

The contact point for questions for the report is Monica Estensen, monica.estensen@posten.no.

## **Our selected Sustainable Development Goals**

4 of the UN's 17 Sustainable Development Goals stand out as being particularly relevant to our business. We have selected the following sub-goals:



- 8.5) Achieve full and productive employment and decent work for all women and men, including young people and persons with disabilities, and achieve equal pay for equal work by 2030.
- 8.8) Protect workers' rights and promote a safe and secure working environment for all workers, including immigrants and especially female immigrants, as well as workers in difficult working conditions.



9.4) By 2030, upgrade infrastructure and restructure business to become more sustainable, with more efficient use of resources and greater use of clean and environmentally friendly forms of technology and industrial processes, where all countries make an effort based on their own ability and capacity.



11.6) By 2030, reduce the negative impact on the environment in metropolitan areas measured per capita, among other things by placing special emphasis on air quality as well as public and other forms of waste management.



- 13.2) Incorporate measures against climate change into national policies, strategies and planning.
- 13.3) Strengthen the ability of individuals and institutions to counteract, adapt and mitigate the consequences of climate change and their ability to provide early warnings, and to strengthen knowledge and awareness of this.

# Stakeholders help set the framework for our sustainability work

## We have a broad stakeholder group that has different requirements and expectations

Defining our key stakeholders has been a central element of the materiality analysis. In the materiality analysis, the significance for stakeholders is aggregated. In the reporting, the importance will be specified per stakeholder group.

#### **Authorities and politicians**

Demands on value creation in society, high-quality service delivery, reduction of the environmental footprint and employee care

#### **Recipients**

High expectations of availability, quality, customer service, digital and simple customer solutions

#### Capital market

Concerned with the financial results of environmental plans, in addition to cost savings and lower risk premiums as a result of good HSE work

#### Owner

Requirement to deliver targeted return on invested capital

## **Employees**

Want a safe and attractive workplace

#### **Business customers**

Demands on supplier management, integrity and the environment

#### **Suppliers**

Focused on predictability in processes for completion and tenders

## Private customers and local communities

High expectations on availability quality and customer service

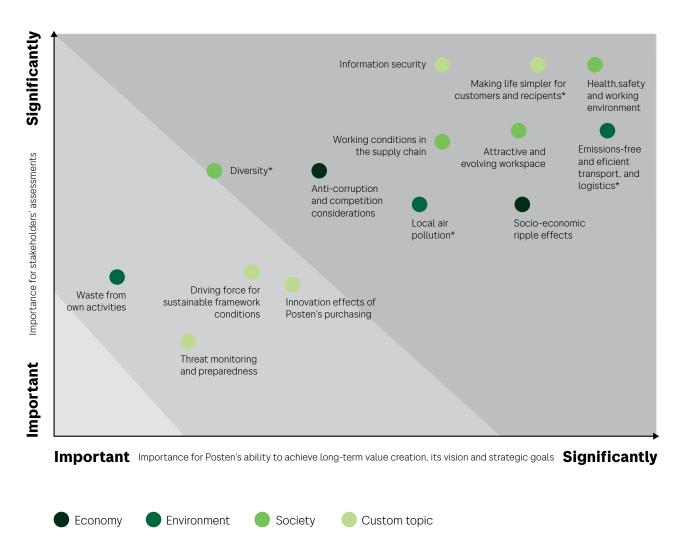
### Interest organisations

Fragmented groups that place demands on, for example, the environment and universal design

## The areas where we make a difference

# The materiality areas are based on where our stakeholders feel we have the most impact.

One of the fundamental principles of GRI Standards is that companies shall design their sustainability reporting based on the sustainability topics that are most significant to the company. Materiality in this context is determined by: The extent of the company's financial, environmental and social impact (x-axis). Factors that will significantly affect the assessments and choices of the company's stakeholders (Y-axis). The matrix shows the most important and significant topics for stakeholders when it comes to our impact on the environment. In the autumn of 2018, the Group conducted a materiality analysis which is the basis for the sustainability reporting for 2019.



<sup>\*</sup> For simplicity, some adjacent significant issues have been merged in this year's report: "Pollution to the sea" is incorporated under "Local pollution", "Integration" and "Equality" are merged, "Climate-efficient buildings" are entered under "Emissions-free and efficient transport and logistics" and "Enable circular solutions for customers and recipients" are entered under "Making life simpler for customers and recipients".

## Attractive and evolving workplace

## Why is the topic important?

Posten is committed to influencing employees' development, benefits, salaries and other factors that make Posten an attractive place to work. The ability to create an attractive workplace and maintain a good work culture is always on the agenda for Posten's managers.

## Overview of programmes and scope

PROGRAMME	NUMBER OF PARTICIPANTS
E-Learning	1,523
Working environment	
Apprentices	75
Aspiring Managers, 12 days of 8 hours	14
Trainee programme	10
First-line manager programme, 9 days of 8 hours	13
Total	1,630

In addition, there are 45 educational scholarships of unspecified scope.

## Permanent employees and temporary employees in the Group, broken down by country and gender

COUNTRY	PERMAN	NENT	TEMPORAR	RY	TOTAL
	Women	Men	Women	Men	
Norway	3,660	7,243	261	623	11,787
Sweden	284	1,100	34	164	1,582
Slovakia	22	289	5	58	374
Denmark	68	202	1	2	273
France	10	47	2	8	67
The Netherlands	13	37	4	6	60
The United Kingdom	14	29			43
Finland	13	25	1		39
Poland	11	11			22
Greece	5	7			12
Belgium		4			4
Germany	2	2			4
Hong Kong	2	1			3
Total	4,104	8,997	308	861	14,270

## Responsibility

Corporate Staff HR/HSE have the main responsibility for following up this goal in cooperation with managers and HR employees throughout the organisation.

#### **GRI** indicators

401-1: New employee hires and employee turnover

404-2: Programs for upgrading employee skills and transition assistance programs

404-3: Percentage of employees receiving regular performance and career development reviews

Total	4,412	9,858	14,270		
Part-time	1,303	1,436	2,739		
Full-time	3,109	8,422	11,531		
	Women	Men	Total		
NUMBER OF EMPLOYEES					

## 04 Fact booklet | Committed and competent employees

## New employees as a percentage

		IN NORW	VAY			
Age range	Number of men	Men as %	Number of women	Women as %	Total number	Number as %
Under 30 years old	189	40%	102	50%	291	43%
30 to 50 years old	220	47%	87	43%	307	45%
Over 50 years old	62	13%	15	7%	77	11%
Total	471	100%	204	100%	675	100%

OUTSIDE NORWAY						
Agerange	Number of men	Men as %	Number of women	Women as %	Total number	Number as %
Under 30 years old	101	30%	29	36%	130	31%
30 to 50 years old	203	60%	43	54%	246	58%
Over 50 years old	37	11%	8	10%	45	11%
Total	341	100%	80	100%	421	100%

## Resignation in number and turnover as a percentage

		IN NORW	AY			
Age range	Number of men	% Men	Number of women	% Women	Total number	Number as %
Under 30 years old	129	14%	62	10%	191	13%
30 to 50 years old	322	36%	142	24%	464	31%
Over 50 years old	452	50%	392	66%	844	56%
Total	903	100%	596	100%	1499	100%

OUTSIDE NORWAY						
Age range	Number of men	Men as %	Number of women	% Women	Total number	Number as %
Under 30 years old	69	19%	22	23%	91	20%
30 to 50 years old	214	58%	60	62%	274	59%
Over 50 years old	85	23%	14	15%	99	21%
Total	368	100%	96	100%	464	100%

## Health, safety and working environment

## Why is the topic significant?

HSE is consistently highlighted by our stakeholders as one of the most important topics for Posten and Bring. We have a significant impact on the safety, health and working environment of our employees, and our handling of this responsibility is important to several stakeholders.

## **Guidelines**

The Group has numerous and diverse tasks that affect the laws and regulations that apply specifically to the individual location. We undertake to comply with applicable laws and regulations and to act in accordance with the applicable cooperation arenas. Goals concerning sickness absence, disability, personal injuries, near-accidents and reported cases of harassment and discrimination are determined and reported upon.

## Injuries, fatalities and sickness absence

	H1 value	H2 value	Fatalities	Sickness absence in per cent
Posten Group	4.4	7.8	0	5.9%
Posten Norge AS	4.2	6.9	0	6.6%
Mail Division	3.3	5.9	0	7.0%
E-Commerce and Logistics Division	5.6	8.4	0	6.4%
International Logistics Division	6.1	7.8	1	4.1%
Express Division	5.1	14.6	0	4.3%

POSTEN NORGE	Women	Men
Sickness absence	7.9%	6.0%
H1	4.2	4.2
H2	7.3	6.8

## **Responsibility:**

Management responsibility at all levels of the organisation, HSE-related problems are resolved on an ongoing basis at the lowest possible level.

Each manager is responsible for following up HSE according to Posten's management system and is responsible for implementing HSE measures in accordance with HSE/SMART plans and Posten's HSE routines.

Development work and long-term strategic work on HSE are centralised under Corporate Staff HR/HSE.

Out in the regions and business areas, there is also a local support apparatus for this field.

#### **GRI** indicators

403-1: Workers representation in formal joint management-worker health and safety committees

403-2: Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities

406-1: Incidents of discrimination and corrective actions taken

## **Diversity**

## Why is the topic significant?

The Group is committed to achieving a more even gender balance, especially at the management level. Previous studies conducted by PWC show that we are the group with the highest proportion of women in the management group among the 100 largest companies in Norway.

In 2020, we aim to have a proportion of employees with minority backgrounds that reflects the rest of society. We have several measures and a general focus on ensuring integration and equal opportunities for employees with minority backgrounds.

#### **Guidelines**

The Group's Recruitment Policy.

## Responsibility

Corporate Staff HR/HSE is responsible for identifying possible measures on a continuous basis, as well as implementing and measuring effects.

The annual evaluation is used to assess the effect of the measures. Through our measurements and reports, we see that our focus on the topic gives results.

## Average salary by employee groups

Average salary and share by employee groups	Women's salary as a share of men's
Employee	100.35%
Manager	100.43%
Senior Executive	114.37%

### **GRI** indicators

405-2: Ratio of basic salary and remuneration of women to men

405-1: Diversity of governance bodies and employees

## Gender distribution of employees and managers

	GROUP			
Permanent and temporary employees	Women	Men	Proportion of women %	Proportion of men %
Board of Directors	5	5	50%	50%
Managers	297	806	26.9%	73.1%
Employees	4,115	9,052	31.3%	68.7%
Total employees	4,412	9,858	30.9%	69.1%

## **Employees sorted by gender**

GROUP					
Age	Women	Men	Total		
Under 30 years old	492	1,314	1,806		
30 to 50 years old	1,496	4,301	5,797		
Over 50 years old	2,424	4,243	6,667		
Total	4,412	9,858	14,270		

## Sustainable supply chains

## Why is the topic significant?

Our key stakeholders expect us to have a high ethical standard in our supply chain. Our owner expects that we are a leader in the industry, that we have sufficient control and that we meet legal requirements (including for the provision of information and the obligation to ensure that standards are followed in the transport industry). Our customers require us to comply with their ethical standards and that we set the same requirements for suppliers as for our own carriers. They require that we have an active, systematic and documented risk management system for suppliers. External transport service providers are an integral part of our operations which makes this an important issue in our operations and in our efforts to achieve our Sustainable Development Goals.

Our main environmental challenges in the supply chain are related to transport services. These are greenhouse gas emissions that contribute to global warming: carbon dioxide, methane and nitrogen dioxide. Furthermore, there are other types of emissions that contribute to the worsening of the immediate environment such as nitrogen dioxides, carbon monoxide and hydrocarbon, as well as dust and noise.

## Responsibility

The HR management team has the professional responsibility for the subject area in the Group.

The centralised expert unit for HSE and sustainability in Corporate Staff ensures systematic group-wide solutions and coordinates work on corporate social responsibility in the supply chain.

Suppliers with group-wide agreements are monitored by the Corporate Staff purchasing department.

Follow-up of the transport providers in the divisions takes place in a collaboration between the division coordinator and the operational units that cooperate with the suppliers.

## 04 Fact booklet | Innovative and sustainable Development

Possible negative social impact from our transport providers is related to the health and safety of workers, working conditions (especially wages and working hours), neighbours and environments

#### **Guidelines**

The Group has a number of governing documents for the work. This includes the Code of Conduct, Group Purchasing Policy, Process Description for Sustainability in the Supplier Chain, Standard Process for Purchasing with Guides and Activity Plans, and Contract Templates.

#### **GRI** indicators

414-1: New suppliers that were screened using social criteria

414-2: Negative social impacts in the supply chain and actions taken

## **Emissions-free transport and logistics**

## Why is the topic significant?

Almost all of the key persons interviewed believe that the Group's efforts to reduce its carbon footprint is one of the most important environmental contributions we make, and believe that this work will become more important in the future. Our customers are increasingly making higher demands on how we work to reduce our climate impact in negotiations. For example, the City of Oslo has ambitious climate targets on a European scale, which may have an impact on requirements in municipal tenders.

## **Guidelines**

Goals for the Group and the business areas are drawn up on a yearly basis as well as up to 2025. Environmental work is also defined in a separate environmental policy and strategy supported by action plans. In 2012, the Group had full climate accounts that included all companies, which is why this was chosen as the base year

GROUP					
Emissions are converted to tonnes of CO2 equivalents	2018	2019			
Road	102,441	104,709			
Buildings	351	233			
Total Scope 1 Group	102,792	104,942			
Electricity (location based)	8,850	8,754			
Electricity (market-based)	-	-			
District heating	2,384	1,845			
Total Scope 2 Group (location based)	11,234	10,599			
Total Scope 2 Group (market-based)	2,384	1,845			
Road	199,475	192,724			
Rail	7,374	6,189			
Air	30,350	25,672			
Water	52,962	62,634			
Business travel	3,193	2,774,012			
Total Scope 3 Group	293,354	289,992			
Total Emissions Group (market-based)	398,530	396,779			

<sup>&</sup>quot;Sources for emissions factors are the Department for Environment, Food & Rural Affairs' (DEFRA) collection of emissions factors." Emissions factors are tank-to-wheel (TTW). For "Electricity (location-based)", the Nordic production mix in 2015 has been used. For district heating, factors from DNV GL have also been used. The consolidation method pursuant to the GHF protocol is "organisational control".

## Responsibility

The HSE and Sustainability department in the Corporate Staff HR/HSE unit ensures a systematic, group-wide re-use of good solutions and a unified approach.

A group-wide environmental network of environmental resource persons from all business areas also ensures that experience and best practice are shared across the organisation.

The environmental objective is followed up in quarterly reporting, Business Review, management KPI maps and PLUSS reviews.

The Board of Directors and Group management regularly evaluate the status and risk profile of environmental work and any ongoing initiatives.

The climate footprint of our own and hired transport is measured annually through a reporting system and audited by an external third party.

Energy consumption and energy efficiency measures are monitored at each location and in collaboration with Corporate Staff Property. The Group buys Guarantees of Origin for all its energy consumption in Norway. Sweden and Denmark.

#### **GRI** indicators

305-1: Direct (Scope 1) GHG emissions

305-2: Energy indirect (Scope 2) GHG emissions

305-3: Other indirect (Scope 3) GHG emissions

305-4: GHG emissions intensity

308-1: New suppliers that were screened using environmental criteria

308-2: Negative environmental impacts in the supply chain and actions taken

## **Local pollution**

## Why is the topic significant?

Our activities contribute to significant local pollution, noise and greenhouse gas emissions. Municipalities, local communities and interest organisations are important stakeholders that follow and set requirements for such local environmental impact.

## **Guidelines**

The environmental work is defined in a separate environmental policy and goals are prepared for the Group and the business areas.

The Group works in accordance with yearly environmental action plans\* in the business areas and the work is followed up through quarterly reports, business reviews, management KPI charts and PLUSS reviews.

The Board of Directors and Group management team are continuously updated on the status and risk profile of environmental work and any ongoing initiatives

## Responsibility

The HSE and Sustainability department in the Corporate Staff HR/HSE unit ensures a systematic, group-wide re-use of good solutions and a unified approach.

A group-wide environmental network that consists of environmental resource persons from all business areas also ensures that experience and best practice are shared across the organisation.

The action plans will be followed up by the divisions and revised once a year, the first time in Q4 2020.

#### **GRI** indicator

305-7: Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions

## Nitrogen oxides, sulphur oxides, and other significant emissions to air

	SO2	NOx	NMVOC	со	PM
Buildings	0.1	0.3	0	0	0
Self-owned vehicles	1.9	192.5	202	1208	136
Subcontractors 1	107.9	2,632.2	263	73,512	145
Total	110	2,825	465	74,720	282

<sup>\*</sup>Sources for emissions factors are the Department for Environment, Food & Rural Affairs' (DEFRA) collection of emissions factors.

## Waste from own activities

## Why is the topic significant?

Through its own operations, the Group produces waste of various types and in different quantities. When sorting this waste and through the selection of waste disposal companies, Posten and Bring can help to recycle a large proportion of the waste produced.

### **Guidelines:**

The Group sorts according to the fractions that apply to each municipality. The most important fractions are wood, paper, cardboard, food waste, EE waste, plastic, packaging plastic, glass and metal.

## Waste and management

[Tonnes of waste]	Reuse/recycling	Energy recovery	Packaging (paper, cardboard and wood)
Hazardous waste	104	0	0
Non-hazardous waste	3200	177	4975

## Responsibility:

Waste is monitored locally at each unit.

All units enter figures into their own follow-up system and are part of the climate accounts that are followed up annually

## **GRI** indicator

306-2: Waste by type and disposal method

## Innovation effects of the Group's purchases

## Why is the topic significant?

Posten and Bring's size and range of services means that the Group has a significant level of annual purchasing. Some of these purchases may be crucial for companies developing new technology or products. We have also developed new mail solutions in collaboration with other players.

### **Guidelines:**

To ensure that the purpose is adhered to, Group Purchasing has the following processes/instruments:

- · Best practice purchasing process
- Group-wide purchasing policy
- Group-wide regulation
- · Code of Conduct for suppliers

In those cases where this is above the threshold value of NOK 4.1 million (applies to purchasing covered by the Act on Public Procurement) and/or group-wide/strategic to the Group, it must go through a strategic purchasing process run by Group Purchasing.

## Responsibility:

Group Purchasing is responsible for meeting the Group's needs based on the divisions' input.

Group Purchasing has a proven purchasing process that is intended to ensure predictability for the stakeholders involved.

Purchasing is carried out through a structured process that is predictable for the suppliers and which ensures competition in the market. If a client has an idea of a new way of meeting a need, Group Purchasing facilitates this through its purchasing process. Several procurement cases have a focus is on simplifying and/or improving solutions rather than exerting price pressure. In other cases, the suppliers have innovated with regards to their goods or services. This is uncovered by the Group through dialogue with the market, which is an important part of the purchasing process.

#### **GRI** indicator

Text reporting and/or separate indicator

## Making life simpler for customers and recipients

## Why is the topic significant?

The Norwegian post and logistics market is constantly changing. Letter volumes in Norway are declining, while new services and players characterise a growing logistics market. We aim to simplify and increase the value of trade and communications for people and enterprises in the Nordic region. Posten's central value proposition is highlighted as the contribution to a simpler everyday life for customers and recipients through both existing and new services. For customers and recipients, delivery quality, availability and simplicity are essential. New solutions and players can both help and challenge Norway Post's position.

## **Guidelines**

Vision and other strategy are documented in a strategy document that is formally decided upon by the Board. The strategy is also logically linked to the Group's long-term financial plan with the consequences it has on financial goals and resources. This in turn forms the basis for specific action plans that have been prepared by division and business area, which are included in business reviews and strategic reviews.

## Responsibility

The vision has been prepared by Group Management and shall permeate the entire organisation. To ensure this, the vision and the rest of the strategy are continuously communicated at all stages in the organisation. Working with the topic is also a key element of the leadership role at all levels.

#### **GRI** indicator

Reputation measurement, Innovation measurements

## Threat monitoring and preparedness

## Why is the topic significant?

The Group's work on crisis preparedness is important in order to avert threats and protect employees and third parties in the event of unforeseen events. This work is considered to be significant given the scope of Posten and Bring's locations, employees and activities.

### **Guidelines**

Posten's primary requirements etc. are described in Group Policy Security and Preparedness, and in Group Regulations. Furthermore, there is extensive documentation of guidelines and arrangements, inter alia requirements for frequency for several control tasks and exercises.

Status of the preparedness area risk assessments, quality of plans and exercises are reported to HR and safety at the turn of the year. All key figures are reported to Group Management in the half-year and annual reports. Reports shall also be sent twice a year to the Internal Control Committee. Moreover, central audits are carried out, such as follow-up of the security work.

Criminal acts must be reported to the security department, other serious incidents shall be reported down the line. A crisis management organisation has been established, both centrally and regionally, to deal with crisis situations.

The level of security and preparedness is followed up by local and central inspections.

## Responsibility

The Group has a central security department organised in the Corporate Staff HR and HSE. The department works on, inter alia, threat monitoring, risk analyses, preventative security, preparedness and crime follow-up. Security contacts coordinate the work at the divisional level. Out in the regions, and at the largest units, security contacts support management and take care of operational security and preparedness.

## Information security

## Why is the topic significant?

Information security is essential to support the Group's ability to deliver its services and to ensure privacy for customers and mail recipients. In line with the Group's development and use of new, digital solutions, the need to secure an increasing amount of data that is collected and managed by the Group is highlighted. A general development in society is increased expectations to the information security area from the authorities, customers and citizens. The need to maintain the trust for Group's data processing activities is increasing, therefore the information security and privacy are emphasized as essential areas to prioritise.

## **Guidelines:**

The Group has implemented an Information Security Management System (ISMS) based on the Information Security Forum (ISF) Standard of Good Practice.

The ISMS consist of management approved Corporate Information Security Policy, Corporate Rules and a set of guidelines to support implementation.

## Responsibility:

The CEO has the overall responsibility for Information Security in the Group. The executive responsibility lies with the EVP for IT and Digitalization. This is where the CISO. Directorof Information Security is organized and where the responsibility for maintenance of rules and governing documents for information security is placed.

Compliance responsibility lies with line management

## **GRI** indicator

418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data

## **Anti-corruption and competition considerations**

## Why is the topic significant?

The Group is a trusted player, which entails a duty of care in all markets in which the Group operates. Violation of anti-corruption and competition laws can have serious consequences for the Group and the individuals involved.

The Group has zero tolerance for violations of the aforementioned legislation and works actively to ensure that employees carry out their work in an ethical and justifiable manner, in accordance with legislation and internal guidelines.

## **Guidelines**

The overall principles for integrity-related work are outlined in the Group's Code of Conduct, an integrity handbook and in separate Group policies. These principles are put into operation via regulations and group-wide tools, including instructions.

The Group has developed an integrity program in which the integrity standard, including the topics of anti-corruption and competitive practices, is expressed. All of the Group's operations are obliged to implement the programme to ensure that its managers and employees safeguard the integrity standard.

## Responsibility:

Compliance responsibility lies with line management

#### **GRI** indicator

205-1: Operations assessed for risks related to corruption

205-2: Communication and training about anti-corruption policies and procedures

205-3: Confirmed incidents of corruption and actions taken

206-1: Legal actions for anticompetitive behavior, anti-trust, and monopoly practices

## 04 Fact booklet | Profitable growth and competitive value development

The Group's manuals and policies are tools for all the Group's employees in the ongoing work to ensure integrity. The Code of Conduct and integrity handbook are available in Norwegian, Swedish and English. The former is also available in English. The decision whether to translate these into other languages is considered each year.

To ensure that all relevant employees have sufficient knowledge of the competition rules and adhere to them, we have the handbook entitled "Posten and Bring's 10 competition law commandments". This is printed in Norwegian and English, and is available on the Group's intranet.

## Responsibility

The Code of Conduct and dilemma training are also part of Posten's and Bring's management training.

The legal director has overall responsibility for ensuring that the integrity standard has the proper content and that it is known within the Group. This involves creating and maintaining group-wide instruments, such as guidelines, e-learning programmes, manuals and training courses. The instruments should contribute to increased understanding of and compliance with the standard.

A network of local resources in each division and subsidiary ensures that there is adequate information about group-wide measures and that these are implemented locally.

The legal director is also responsible for administering and operating the group-wide whistleblowing scheme.

In the whistleblowing scheme the legal director reports to the CEO, and can - when deemed necessary - report directly to the Chair of the Board of Directors. The Group's whistleblowing scheme reports semi-annually to the Board of Directors' audit committee, to the internal control committee and to the CEO. The reports detail the number and type of cases received, the results of these as well as the measures and activities taken into effect and implemented. In addition, an annual statement is given to the Group's Working Environment Committee of Posten Norge AS.

Throughout 2019, the legal director, as the Group's compliance officer, has explained the status of compliance work to Group management. Such accounts take place on a semi-annual basis and address the topics of anti-corruption and competition law, as two of several topics.

## **Driving force for sustainable framework conditions**

## Why is the topic significant?

In our stakeholder analysis, it emerges that we are perceived as a serious player. Therefore, several also point out that stricter regulation of the logistics industry as a whole will benefit the Group by imposing similar responsibilities on competitors to those that we already take. Another case of important government dialogue is related to the regulation of other industries that affect our ability to achieve our goals, such as the need for more freight by rail, to achieve established emission targets.

## **Guidelines**

The Group has a separate entity that is responsible for the work on regulatory conditions for the postal business. The work takes place both nationally and internationally, and includes, inter alia:

- Dialogue with the Norwegian Ministry of Transport and Communications (SD) on overall framework conditions
- Dialogue with SD and Nkom concerning specific matters
- Reporting to Nkom, including delivery times and annual product accounts
- Active participation in the Universal Postal Union and industrial organisations at EU level
- Membership and participation in Spekter and NHO Logistics and Transport, as well as their European organisations
- Consultation responses and other contributions on political matters of importance to the Group

## Responsibility:

The Ministry of Transport and Communications (SD) is responsible for the postal legislation in Norway, including the scheme for the government procurement of commercially non-viable postal services

The Norwegian Communications Authority (Nkom) monitors whether the Group is fulfilling its imposed obligations as set out in the Postal Services Act, regulations and licenses.

The Group must also deal with other relevant authorities that are of significance to our operations, including our corporate social responsibility activities

Furthermore, the Group is influenced by regulations adopted internationally, including by the EU and by the Universal Postal Union (UPU).

## Socio-economic influence

## Why is the topic significant?

The NFD's return requirement is a considerable expectation for Posten. With this expectation comes a continuous need for consideration of which investments to make, be they in employee development or to reach Posten's climate goals. Posten's size entails significant contributions to local and social value creation, also outside the Nordic core market.

Reporting on socio-economic impact is a way of highlighting how the Group creates and distributes economic value, not only to the owner, but to other stakeholders and society as a whole.

Posten's contribution to economic growth and productivity, through technological modernisation and innovation, can be linked to the UN Sustainability Goal 8 "Decent Work and Economic Growth", and in particular to sub-goals 8.1 and 8.2.

## **GRI** indicator:

201-1: Direct economic value generated and distributed

## **Our partners**

If the world is to achieve the United Nations Sustainable Development Goals, cooperation is essential. Work must take place across national borders, sectors, and between business and government.

These are some of our partners:



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Together we have greater impact

- Tone Wille

## 04 Fact Book | GRI Index

## **GRI-index**

TITLE	PAGE OF REPORT	PAGE OF FACT BOOKLET	EXTERNAL ATTESTATION
102-1 Name of the organization		4	
102-2 Activities, brands, products, and services	6, 13		
102-3 Location of headquarters	6		
102-4 Location of operations	6		
102-5 Ownership and legal form	18		
102-6 Markets served	6		
102-7 Scale of the organization		4	
102-8 Information on employees and other workers		4, 8	
102-9 Supply chain		10	
102-10 Significant changes to the organization and its supply chain	No significant changes in 2019		
102-11 Precautionary Principle or approach	61		
102-12 External initiatives		4	
102-13 Membership of associations		4	
102-14 Statement from senior decision-maker	24		
102-16 Values, principles, standards, and norms of behavior	22		
102-18 Governance structure	18		
102-40 List of stakeholder groups		6	
102-41 Collective bargaining agreements	37		
102-42 Identifying and selecting stakeholders		6	
102-43 Approach to stakeholder engagement		6	
102-44 Key topics and concerns raised		7	
102-45 Entities included in the consolidated financial statements	163		
102-46 Defining report content and topic Boundaries		5	
102-47 List of material topics		5	
102-48 Restatements of information	No significant changes in 2019		
102-49 Changes in reporting		4	
102-50 Reporting period		4	
102-51 Date of most recent report		4	
102-52 Reporting cycle		4	
102-53 Contact point for questions regarding the report		4	
102-54 Claims of reporting in accordance with the GRI Standards		4	
102-55 GRI content index		4	
102-56 External assurance		4	

TITLE	PAGE OF REPORT	PAGE OF FACT BOOKLET	OMISSIONS	EXTERNAL ATTESTATION
Emissions-free and efficient transport, and logistics				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	41	11		Yes
103-2 The management approach	41	11		Yes
103-3 Evaluation	42			Yes
GRI 305 Emissions 2016				
305-1 Direct (Scope 1) GHG emissions		11		Yes
305-2 Energy indirect (Scope 2) GHG emissions		11		Yes
305-3 Other indirect (Scope 3) GHG emissions		11		Ye
305-4 GHG emissions intensity		11		Ye
GRI 308 Supplier Environmental Assessment 2016				
308-1 New suppliers that were screened using environmental criteria	38			Ye
308-2 Negative environmental impacts in the supply chain and actions taken	38		Data is unavailable on the number of suppliers found to have a significant negative environmental impact or on the number of suppliers where impro- vements have been agreed	Ye
Health, safety and working environment				
GRI 103 Management Approach 2016	36			
103-1 Explanation and boundary of topic	36	9		Ye
103-2 The management approach	36	9		Yes
103-3 Evaluation	38			Ye
GRI 403 Occupational Health and Safety 2016				
403-1 Workers representation in formal joint manage- ment-worker health and safety committees	37		Information is unavaila- ble other than for own employees	Ye
403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities		9	a) The Group does not report the frequency of occupational diseases (ODR) and lost working days (LDR) b) Information is unavailable for injury and accident statistics on gender only for employees outside Norway. c) The Group does not have full HSE statistics available to workers who are not their own employees since the number of hours worked for these is not registered in the HR system.	Ye
GRI 406 Non-discrimination 2016				
406-1 Incidents of discrimination and corrective actions taken	36			Yes
Attractive and evolving workplace				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	33	7		Ye
103-2 The management approach	33	7		Yes
103-3 Evaluation	33			Yes

TITLE	PAGE OF REPORT	PAGE OF FACT BOOKLET	OMISSIONS	EXTERNAL ATTESTATION
GRI 401 Employments 2016				
401-1 New employee hires and employee turnover		8		Yes
GRI 404 Training and education 2016				
404-2 Programs for upgrading employee skills and transition assistance programs		8		Yes
404-3 Percentage of employees receiving regular performance and career development reviews	34		The Group's follow-up review solution does not register gender or employee category, and the proportion of employees is not available. No changes are planned for this.	Yes
Information security				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	48	15		Yes
103-2 The management approach	48	15		Yes
103-3 Evaluation	48			Yes
GRI 418 Customer Privacy 2016				
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	49			Yes
Working conditions in the supply chain				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	38	10		Yes
103-2 The management approach	38	10		Yes
103-3 Evaluation	39			Yes
GRI 414 Supplier Social Assessment 2016				
414-1 New suppliers that were screened using social criteria	38			Yes
414-2 Negative social impacts in the supply chain and actions taken	38		Data is unavailable on the number of suppliers found to have a significant negative social impact or on the number of suppliers where improvements have been agreed. No changes are planned for this.	Yes
Socio-economic influence				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	61			Yes
103-2 The management approach	61			Yes
103-3 Evaluation	16			Yes
GRI 201 Economic Performance 2016				
201-1 Direct economic value generated and distributed	66			Yes
Anti-corruption and competition considerations				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	52	15		Yes
103-2 The management approach	53	15		Yes
103-3 Evaluation	54			Yes

TITLE	PAGE OF REPORT	PAGE OF FACT BOOKLET	OMISSIONS	EXTERNAL ATTESTATION
GRI 205 Anti-corruption 2016				
205-1 Operations assessed for risks related to corruption	53			Yes
205-2 Communication and training about anti-corruption policies and procedures	54			Yes
205-3 Confirmed incidents of corruption and actions taken	54			Yes
GRI 206 Anti-competitive Behavior 2016				
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	48			Yes
Diversity				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	35	9		Yes
103-2 The management approach	35	9		Yes
103-3 Evaluation	35			Yes
GRI 405 Diversity and Equal Opportunity 2016				
405-2 Ratio of basic salary and remuneration of women to men		10		Yes
GRI 405 Diversity and Equal Opportunity 2016				
405-1 Diversity of governance bodies and employees		10	Data is unavailable on employees' ethnic back- grounds.	Yes
Making life simpler for customers and recipients				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	47	14		Yes
103-2 The management approach	47	14		Yes
103-3 Evaluation	47			Yes
Local pollution				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	43	12		Yes
103-2 The management approach	43	12		Yes
103-3 Evaluation	43			Yes
GRI 305 Emissions 2016				
305-7 Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions		12	The Group does not report on the emission of persistent organic pollutants (POP), volatile organic compounds (VOC) and harmful air pollution (HAP). The Group has no activities that cause significant emissions of these, and this part of the indicator is therefore not relevant.	Yes
Driving force for sustainable framework conditions				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	51	17		Yes
103-2 The management approach	51	17		Yes
103-3 Evaluation	51			Yes

TITLE	PAGE OF REPORT	PAGE OF FACT BOOKLET	OMISSIONS	EXTERNAL ATTESTATION
Innovation effects of Posten's purchasing				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	45	13		Yes
103-2 The management approach	45	13		Yes
103-3 Evaluation	45			Yes
Waste from your activities and terminals				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	44	12		Yes
103-2 The management approach	44	12		Yes
103-3 Evaluation	44			Yes
GRI 306 Effluents and Waste 2016				
306-2 Waste by type and disposal method		12		Yes
Threat monitoring and preparedness				
GRI 103 Management Approach 2016				
103-1 Explanation and boundary of topic	48	14		Yes
103-2 The management approach	48	14		Yes
103-3 Evaluation	48	Yes		Yes



Statsautoriserte revisorer Ernst & Young AS

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Medlemmer av Den norske revisorforening

Til Styret i Posten Norge

## Uavhengig attestasjonsuttalelse om Postens bærekraftsrapportering for 2019

Vi har gjennomgått Posten sin bærekraftsrapportering for 2019, som består av områdene referert til i selskapets GRI Standards-indeks på side 18-22 i selskapets vedlegg til årsrapporten for 2019 som er kalt «Faktahefte: Bærekraft i Posten». Vi har vurdert om informasjonen som blir presentert i Postens bærekraftsrapportering for 2019 bygger på relevante kriterier i standardene for bærekraftsrapportering fra Global Reporting Initiative GRI Standards, alternativ «core».

## Ledelsens ansvar for Postens bærekraftsrapportering for 2019

Ledelsen er ansvarlig for utarbeidelsen av Postens bærekraftsrapportering for 2019, og for slik intern kontroll som ledelsen finner nødvendig for å muliggjøre utarbeidelsen av Postens bærekraftsrapportering for 2019 i overenstemmelse med kriteriene i GRI Standards uten vesentlig feilinformasjon, verken som følge av misligheter eller feil.

## Vår uavhengighet og kvalitetskontroll

Vi er uavhengige av selskapet slik det kreves i lov og forskrift, og har overholdt våre øvrige etiske forpliktelser i samsvar med disse kravene. Vi anvender internasjonal standard for kvalitetskontroll (ISQC 1) og opprettholder et omfattende system for kvalitetskontroll inkludert dokumenterte retningslinjer og prosedyrer vedrørende etterlevelse av etiske krav, faglige standarder og gjeldende lovmessige og regulatoriske krav.

#### Revisors oppgaver og plikter

Vår oppgave er å gi uttrykk for en mening om Postens bærekraftsrapportering for 2019 på bakgrunn av vår gjennomgang. Vi har gjennomført oppdraget i samsvar med ISAE 3000 – «Attestasjonsoppdrag som ikke er revisjon eller forenklet revisorkontroll av historisk finansiell informasjon». Denne standarden krever at vi planlegger og gjennomfører kontrollhandlinger for å kunne avgi en uttalelse med moderat sikkerhet for at foretaket har vurdert og konkludert på Postens bærekraftsrapportering for 2019. Standarden krever videre at vi skal kontrollere utvalgte deler av materialet som utarbeidelsen av Postens bærekraftsrapportering for 2019 bygger på, herunder om det er samsvar mellom selskapet vurdering og konklusjon og det underliggende materialet, samt at rapporteringen er utarbeidet i tråd med relevante kriterier for bærekraftsrapportering etter GRI Standards.

Vårt arbeid har bestått av følgende aktiviteter:

- Gjennomgang av Postens prosess for utarbeidelse av bærekraftsrapporten for å
  opparbeide oss en forståelse av hvordan samfunnsansvaret ivaretas i praksis i
  virksomheten.
- Intervjuet rapporteringsansvarlige for å opparbeide en forståelse av prosessen for utarbeidelse av bærekraftsrapporten
- På stikkprøvemessig grunnlag verifisert informasjon i bærekraftsrapporten mot grunnlagsdata og annen informasjon utarbeidet av Posten.



 Evaluert helheten i informasjonen i bærekraftsrapporten og om den bygger på kriteriene i GRI Standards, herunder kontrollert konsistens i informasjonen opp mot selskapets GRI Standards-indeks.

Vi mener at våre kontrollhandlinger gir et forsvarlig grunnlag for vår uttalelse.

## Konklusjon

Basert på vårt arbeid beskrevet i denne rapporten er vi ikke blitt oppmerksom på noe som gir grunn til å tro at Postens bærekraftsrapportering for 2019 ikke i all vesentlighet er utformet i samsvar med kriteriene i GRI Standards eller inneholder vesentlige feil og mangler. Indikatorer omfattet av vår attestasjonsuttalelse fremgår av selskapets GRI Standards-indeks.

Oslo, 26. mars 2020 ERNST & YOUNG AS

Eirik Tandrevold

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