# Annex 6

# Statutory Notification: proposed direction for revised Regulatory Accounting Guidelines (RAG)

Notification of proposed withdrawal of a direction and of proposal to give a new direction to impose requirements on Royal Mail under the proposed USP accounting condition in accordance with Section 53 of, and paragraph 4 of Schedule 6 to, the Postal Services Act 2011

#### **BACKGROUND**

- (A) On 27 March 2012, following consultation, Ofcom published a statement entitled "Securing the Universal Postal Service: Decision on the new regulatory framework" (the "2012 Statement") setting out various decisions relating to the new regulatory framework for the postal sector, including the imposition on the universal service provider of a USP accounting condition to make provision about the matters set out in section 39 of the Act.
- (B) At Annex 11 to the 2012 Statement, Ofcom also gave a direction in accordance with section 53 of, and paragraph 4 of Schedule 6 to, the Act and pursuant to powers in the above-mentioned USP accounting condition that the condition shall have effect by reference to Regulatory Accounting Guidelines set out in the Schedule to the direction.
- (C) On 27 January 2014, following consultation, Ofcom published a statement entitled "Updating the Regulatory Reporting Framework Statement USP Accounting Condition"<sup>2</sup>. Also on 27 January 2014, Ofcom separately published a notification entitled "Updating the Regulatory Reporting Framework Statutory Notification USP accounting condition"<sup>3</sup> (the "2014 Modification") in which Ofcom set out its decision to modify the USP accounting condition and the Regulatory Accounting Guidelines. The revised USP accounting condition and revised Regulatory Accounting Guidelines (clean copies as well as copies with tracked changes showing the updates) were set out in Annex 1 (the "USPAC Condition") and Annex 2 (the "RAG") to the 2014 Modification, respectively. The revisions took effect from the date of publication of the 2014 Modification.

#### **PROPOSALS**

1. Ofcom hereby proposes, in accordance with section 53 of, and paragraph 4 of Schedule 6 to, the Act—and pursuant to anticipated powers under the new USP accounting condition proposed by Ofcom to be imposed under section 39 of the Act on

<sup>&</sup>lt;sup>1</sup> http://stakeholders.ofcom.org.uk/binaries/consultations/review-of-regulatory-conditions/statement/statement.pdf

<sup>&</sup>lt;sup>2</sup> https://www.ofcom.org.uk/\_\_data/assets/pdf\_file/0020/71534/statement.pdf

<sup>&</sup>lt;sup>3</sup> https://www.ofcom.org.uk/ data/assets/pdf file/0033/79863/statutory-notification.pdf

Royal Mail specified in a separate notification in the accompanying consultation document—to withdraw the existing RAG and to give a new direction setting out specific requirements relating to that condition in a document to be known as the Regulatory Accounting Guidelines.

- 2. The proposed new Regulatory Accounting Guidelines are set out in the Schedule to this Notification, marked up against the existing RAG to show the changes which are being proposed to its substance, as shown in red text.
- **3.** The effect of, and Ofcom's reasons for making, these proposals are set out in the accompanying consultation document.

#### OFCOM'S DUTIES AND LEGAL TESTS

- **4.** Of com is satisfied that these proposals satisfy the general test in paragraph 4(2) of Schedule 6 to the Act.
- 5. In making these proposals, Ofcom has considered and acted in accordance with its principal duty in section 29 of the Act and its general duties in section 3 of the Communications Act 2003.

#### MAKING REPRESENTATIONS

- **6.** Representations may be made to Ofcom about the proposals set out in this Notification by no later than 1 June 2017.
- 7. Copies of this Notification and the accompanying consultation document have been sent to the Secretary of State in accordance with paragraph 5(1) of Schedule 6 to the Act.
- **8.** By virtue of paragraph 4(8) of Schedule 6 to the Act, Ofcom may give effect, with or without modifications, to a proposal with respect to which it has published a notification only if Ofcom has—
  - (a) considered every representation about the proposal that is made to Ofcom within the period specified in paragraph 6 of this Notification; and
  - (b) had regard to every international obligation of the United Kingdom (if any) which has been notified to Ofcom for this purpose by the Secretary of State.

#### **INTERPRETATION**

- **9.** Except insofar as the context otherwise requires, words or expressions shall have the meaning assigned to them in this Notification and otherwise any word or expression shall have the same meaning as it has been ascribed for the purpose of Part 3 of the Act or for the purpose of the USP accounting condition (as relevant).
- **10.** In this Notification—
  - (a) "2012 Statement" has the meaning given to it in recital (A) to this Notification;
  - **(b)** "2014 Modification" has the meaning given to it in recital (C) to this Notification:
  - (c) "Act" means the Postal Services Act 2011 (c.5);

- (d) "Ofcom" means the Office of Communications; and
- (e) "RAG" has the meaning given to it in recital (C) to this Notification; and
- (f) "Royal Mail" means Royal Mail Group Ltd, whose registered company number in England and Wales is 04138203, which is the current universal service provider for the purposes of section 39 of the Act.
- 11. For the purpose of interpreting this Notification—
  - (a) headings and titles shall be disregarded;
  - **(b)** expressions cognate with those referred to in this Notification shall be construed accordingly;
  - (c) the Interpretation Act 1978 (c. 30) shall apply as if this Notification were an Act of Parliament.
- **12.** The Schedule to this Notification shall form part of this Notification.

Signed by

David Brown

Director of Financial Economics, Ofcom

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A person duly authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002

31 March 2017

# **SCHEDULE**

# Regulatory Accounting Guidelines

## Issue No. 3

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#### **Section 1: Purpose**

- 1.1 The <u>USPAC Condition</u> imposes on <u>Royal Mail</u> (as the universal service provider\_designated by <u>OFCOM</u>) various obligations under section 39 of the <u>Act</u>. Pursuant to powers in the <u>USPAC Condition</u>, <u>OFCOM</u> are empowered from time to time to give such directions as they consider appropriate in relation to <u>Royal Mail</u>—
  - (a) maintaining a separation for accounting purposes between such different matters as <a href="OFCOM">OFCOM</a> may direct for such purposes as they may direct, including separation in relation to different services, facilities or products or in relation to services, facilities or products provided in different areas as well as the accounting methods to be used in maintaining the separation;
  - (b) complying with rules made by <u>OFCOM</u> in relation to those matters about the identification of costs and cost orientation, including the application of presumptions in the fixing and determination of costs and charges for any purpose as well as the publication of such accounts and other information relating to anything required to be done by <u>OFCOM</u> in this regard;
  - (c) complying with rules made by <u>OFCOM</u> about the use of cost accounting systems in relation to those matters, including the application of presumptions in the fixing and determination of costs and charges for any purpose as well as the publication of such accounts and other information relating to anything required to be done by <u>OFCOM</u> in this regard;
  - (d) securing that <u>Royal Mail</u>'s compliance with those systems is audited annually by a <u>Qualified Independent Auditor</u>, including <u>Royal Mail</u> meeting the costs of the audit; and
  - (e) otherwise in relation to Royal Mail's obligations under the USPAC Condition.
- **1.2** Pursuant to the obligation in USPAC 1.2.3 on Royal Mail to comply with any direction given by OFCOM from time to time under it, the regulatory requirements in any direction (including in these Guidelines) are enforceable via the USPAC Condition in accordance with the relevant procedures in the Act.
- 1.3 By definition in the <u>USPAC Condition</u>, the "Regulatory Accounting Guidelines" means the document so entitled and published by <u>OFCOM</u> (as amended from time to time) setting out such requirements as <u>OFCOM</u> may direct from time to time relating to the preparation, auditing, reporting and publication, of regulatory financial statements and other regulatory financial reports to be prepared and maintained by <u>Royal Mail</u> by or under the <u>USPAC Condition</u>. Additionally to the general direction-making power referred to in §1.1 above, the <u>USPAC Condition</u> makes express references to these Guidelines in prescribing specific requirements on <u>Royal Mail</u> imposed by means of a direction, such as those concerning the manner and form in which financial statements and information should be prepared and maintained, etc.
- **1.4** Accordingly, <u>OFCOM</u> has directed that the <u>USPAC Condition</u> shall have effect by reference to these Guidelines.

#### **Section 2: Definitions & Interpretation**

- **2.1** For the purpose of interpreting these Guidelines
  - except in so far as the context otherwise requires (including where a term of art in postal sector or in accounting profession is used), words or expressions shall have the meaning assigned to them in §2.2 and otherwise any word or expression in these Guidelines shall have the same meaning as it has been ascribed in, and for the purpose of, the USPAC Condition;
  - **(b)** headings and titles shall be disregarded;
  - (c) expressions cognate with those referred to in these Guidelines shall be construed accordingly;
  - (d) the Interpretation Act 1978 (c. 30) shall apply as if these Guidelines were an Act of Parliament:
  - subject to §2.1(f), references to "material", and cognate expressions, are references to the meaning of materiality as prescribed by the <u>Guiding Principle</u> concerning materiality in USPAC 1.7.2(h);
  - in relation to the identification of material changes for the purpose of complying with the requirements set out in USPAC 1.6.3, materiality shall be determined as follows—
    - (i) for all items of the Regulatory Accounting Methodology, a change in any item (including revenues, costs, assets, liabilities, and cash flows) in any of the financial statements and/or information required by or under the USPAC Condition shall be deemed to be material if the resultant percentage difference (be it positive or negative) exceeds 5%. The resultant percentage difference shall be calculated by taking the value of the non-compliant item and subtracting from it the value of the same item if calculated under the compliant approach ("Compliance Base Value"), and then dividing this result by the Compliance Base Value;
    - for the purposes of the National Costing Methodology and the Zonal Costing Methodology only, a change in any reported item of product, SPHCC, or Activity Cost shall be deemed to be material if the resultant percentage difference (be it positive or negative) exceeds 1%, unless the change itself is smaller than £0.5 million. The resultant percentage difference shall be calculated by reference to the Compliance Base Value; and
    - (iii) any determination of materiality under §2.1(f)(i) and (ii) shall be measured by reference to the most recent quarterly or annual financial statements and/or information, as applicable.

 $\bf 2.2$   $\,$  In these Guidelines, the following words or expressions shall have the meaning assigned to them below—

Word or expression	Meaning
"Activity Based Costing"	A costing system used to allocate the costs recorded in the <u>General Ledger</u> , together with any sources of data (where necessary), to products, through an intermediate step of allocating <u>Activity Costs</u> .
"ABC Model"	'Activity Based Costing Model', which is the costing system that Royal Mail uses to allocate the costs recorded in the General Ledger, together with any sources of data (where necessary), to its products, through an intermediate step of allocating Activity Costs.
"Activity <u>" or</u> <u>"</u> Activities"	Activities, tasks or work (whether operational or non- operational) which are required to be carried out in order to complete a <u>Business Process</u> .
"Activity Cost"	Total or unit costs attributed to an Activity.
"Activity Drivers"	Numeric values which are used to assign <u>Activity Costs</u> to <u>SPHCC</u> s in accordance with <u>National Costing Rule 9</u> where they relate to the <u>National Costing Methodology</u> or in accordance with <u>Zonal Costing Rule 9</u> where they relate to the <u>Zonal Costing Methodology</u> .
"Aggregate Costs"	Has the meaning given to it by <u>National Costing Rule 8</u> where it relates to the <u>National Costing Methodology</u> or by <u>Zonal Costing Rule 8</u> where it relates to the <u>Zonal Costing Methodology</u> .
"Attributable Non-operational Costs"	Has the meaning given to it by §8.24(b).
"Attributable Operational Costs"	Has the meaning given to it by §8.24(a).
"Avoidable First Class Costs"	Has the meaning given to it by <u>National Costing Rule 3</u> where it relates to the <u>National Costing Methodology</u> or by <u>Zonal Costing Rule 8</u> where it relates to the <u>Zonal Costing Methodology</u> .
"Avoidable Second Class Costs"	Has the meaning given to it by <u>National Costing Rule 3</u> where it relates to the <u>National Costing Methodology</u> or by <u>Zonal Costing Rule 3</u> where it relates to the <u>Zonal Costing Methodology</u> .
"Bulk Mail"	A retail service offered at a price which is subject to discounts related to volume of mail per mailing or presentation of mail, typically involving conveyance of more than 250 items per mailing.
"Business Process"	Operational Business Processes and Non-operational Business Processes.
"Class Costing"	The methodologies applied in the <u>National Costing</u> <u>Methodology</u> and the <u>Zonal Costing Methodology</u> to quantify the additional costs of processing certain classes of mail

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"Compliance Base Value" Has the meaning given to it under §2.1(f)(i) of these

Guidelines.

"Cost Centre" The basic unit of responsibility in an organisation for which

costs are accumulated, such as a production or service

location, function, Activity or item of equipment.

"Cost Element" A cost recorded in the General Ledger, such as basic pay,

overtime pay and National Insurance payments.

"Cost Matrix" A breakdown of the costs of the Reported Business

included in the calculation of the Financeability EBIT as shown in **Figure 7 of Appendix 1** of these Guidelines.

"Cost Type" Cost figures obtained after rearranging the relevant

categories of costs recorded in <u>Royal Mail</u>'s financial information, including the <u>General Ledger</u>, including aggregating or separating some of those costs.

"CPI" Consumer Price Index, which means the index of

consumer prices compiled by an agency or a public body on behalf of Her Majesty's Government or a governmental department (which is the Office for National Statistics at the time of publication of these Guidelines) from time to

time in respect of all items.

"CVE" 'Cost Volume Elasticity', which is the ratio of the variable

amount of time needed to process items of mail within a given Operational Business Process to the total amount of time needed to process those items of mail within that Operational Business Process, where variable time needed to process mail items is the time which varies in direct proportion to the volume of the mail items being

processed.

"DB Pension Service Costs" Costs of service contributions Royal Mail makes to its

defined benefits pension plans in any given period.

"Delivery Office" Part of Royal Mail's postal network (as defined by section

38(3) of the <u>Act</u>) that is responsible for the final sortation, <u>preparation and delivery</u> of mail items <del>and from which outdoor delivery of mail to delivery points. recipients is</del>

undertaken.

"Downstream Services Entity"

The group of Activities related to the processes of final sorting

in Inward Mail Centres, subsequent conveying, sequencing and delivery of mail to its final destination. The one entity within the

Four FREs which contains the

services (or products) as determined by Line B.

revenue less all the costs of products and services provided and Transformation Costs, before the deduction of interest and tax, also referred to as operating (loss) or

profit.

"End-to-end Only Products Entity" The one entity within the Four FREs which contains the

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"EPMU" 'Equi-Proportional Mark-Up', which has the meaning given to

it in <u>National Costing Rule 12</u> where it relates to the <u>National Costing Methodology</u> or by <u>Zonal Costing Rule 12</u> where it

relates to the Zonal Costing Methodology.

"FAC" 'Fully Allocated Cost', which is a costing methodology in

which all costs (including <u>Overheads but excluding any</u> form of return, such as return on sales) are allocated to

the outputs of the business.

"First Class" A product and/or service that aims to deliver the next working

day (including Saturday) after collection.

"Fixed Asset Register" A register or list of assets held for the purpose of production

of goods or rendering of services that are not held for the purpose of sale in the ordinary course of business. The list allows a company to keep track of details of each fixed asset, ensuring control and preventing misappropriation of assets. It also keeps track of the correct value of assets, which allows for computation of depreciation and for tax and insurance

purposes.

"Full Time EquivalentFTE"

The Full Time Equivalent which means staff headcount

for a period which is calculated by dividing total frontline staff hours worked in that period (including temporary and agency staff hours but excluding contractors' hours, and including overtime and scheduled attendance) by the total standard <u>full</u> time hours for that period; and adding the result to the average

headcount of the rest of the staff in that period.

"GDP" Gross Domestic Product, which means a measure of

economic activity that captures the value of goods and services that the UK produces during a given period.

"General Ledger"
The accounting ledger that contains the financial accounts

used by <u>Royal Mail</u> for the application of the <u>National Costing</u> Methodology and the Zonal Costing Methodology for the

Reported Business.

"General Overheads" Has the meaning given to it by National Costing Rule 8 where

it relates to the <u>National Costing Methodology</u> or by <u>Zonal</u> Costing Rule 8 where it relates to the Zonal Costing

Methodology.

"Gross Hours"

Total paid hours of frontline staff working in a given

Operational Business Process or Operational Business

Processes in a given period.

"Gross Hours Reduction" Reduction in Gross Hours in a given period compared

with the period prior to that period.

"IAS 19" International Accounting Standard 19 - Employee Benefits

(2011), which outlines the accounting requirements for employee benefits, including short-term benefits (e.g. wages and salaries, annual leave), post-employment benefits such as retirement benefits, other long-term benefits (e.g. long service

leave) and termination benefits.

"Inward Mail Centre"	The part of Royal Mail's mail centres in which the activities relating to the processes of final sorting of inward mail for delivery to the final addresses take place.		
"Line A"	Has the meaning given to it in USPAC 1.5.1 for the purpose of defining the Four FREs.		
"Line B"	Has the meaning given to it in USPAC 1.5.1 for the purpose of defining the Four FREs.		
"Line C"	Has the meaning given to it in USPAC 1.5.1 for the purpose of defining the Four FREs.		
"MCS"	'Mails Characteristics Survey', which is a survey conducted by Royal Mail of the mail product types and volumes within the mail traffic of the Reported Business.		
"National Costing Rule(s)"	The requirements in these Guidelines, in paragraphs 8.11 to 8.43, for the purpose of the <u>National Costing Methodology</u> .		
"NBV"	'Net Book Value', which is the historical cost of an asset less the associated accumulated depreciation.		
"Non-operational Business Processes"	The following business processes of the Reported Business as defined in the Costing Manual—		
	1. commercial;		
	2. support;		
	3. wholesale; and		
	business sustaining activities.		
"non-USO Products Entity"	The one entity within the <u>Four FREs</u> which contains the services (or products) as determined by <u>Line C</u> .		
"Operational Business Processes"	The following business processes of the Reported Business as defined in the Costing Manual—		
	1. access (collections);		
	<ol><li>outward processing;</li></ol>		
	3. network distribution;		
	regional distribution centres processing;		
	<ul><li>5. inward processing;</li><li>6. local distribution;</li></ul>		
	7. delivery – indoor;		
	8. delivery – indoor;		
	9. walk bundling centre;		
	10. perform mailroom management; and		
	11. international mail.		

"Operational Volumes"	Volume of a product going through the Pipeline
	measured by the Operational Volumes Method.
"Operational Volumes Method"	A method of measuring the volume of a product going through
	the Pipeline, by counting or sampling.
"Other Drivers"	Has the meaning given to it by §8.26(b), read together with National Costing Rule 11 where it relates to the National Costing Methodology or by §8.26(b), read together with Zonal Costing Rule 11 where it relates to the Zonal Costing Methodology.
"Overheads"	Costs which are either <u>General Overheads</u> or <u>Pipeline Overheads</u> have the meanings given to them by <u>National Costing Rule 8</u> where they relate to the <u>National Costing Methodology</u> or by <u>Zonal Costing Rule 8</u> where they relate to the <u>Zonal Costing Methodology</u> .
"Pipeline"	All the <u>Operational Business Processes</u> involved in <u>Royal Mail</u> 's provision of its products and/or services from collection to final delivery of the products and/or services.
"Pipeline Overheads"	Has the meaning given to it by <u>National Costing Rule 8</u> where it relates to the <u>National Costing Methodology</u> or by <u>Zonal Costing Rule 8</u> where it relates to the <u>Zonal Costing Methodology</u> .
"Planning Values"	Number of minutes needed to process 1000 items of mail within a given Operational Business Process, as derived from industrial engineering methods.
"POL"	'Post Office Limited' whose registered company number in England and Wales is 02154540, and any of its subsidiaries (as defined by section 1159 of the Companies Act 2006) or any of its subsidiary undertakings (as defined by section 1162 of the Companies Act 2006 and for which section Post Office Limited shall be treated as the parent undertaking).
"PPI"	'Printed Postage Impressions', which is pre-printed postage.
"PPIA"	'Properly Prepared In Accordance' with these Guidelines and the <u>Guiding Principles</u> set out under USPAC 1.7.2', which is an audit opinion that provides reasonable assurance that a financial statement and information, taken as a whole, have been prepared, in all material respects, in accordance with the detailed requirements prescribed by these Guidelines.
"Productivity"	The ratio of the Workload of a given Operational Business
	Process or Operational Business Processes in a given period to the Gross Hours of that Operational Business Process or those Operational Business Processes in that period.
"Proportional Factors"	Factors representing the proportion of the total volume of each <u>SPHCC</u> which uses the related <u>Activity</u> and determined in accordance with the <u>National Costing Rule 10</u> where they relate to the <u>National Costing Methodology</u> or in accordance with <u>Zonal Costing Rule 10</u> where they relate to the <u>Zonal Costing Methodology</u> .

	An analysis of the changes in a Financial Year, from the prior
	Financial Year, of all the costs of the Reported Business included in the calculation of the Financeability EBIT, between the effects of price, volume, efficiency and other factors, as shown in <b>Figure 8 of Appendix 1</b> of these Guidelines.
"Resource Drivers"	Numeric values which are used to attribute <u>Cost Types</u> to <u>Activities</u> and determined in accordance with <u>National Costing Rule 6</u> where they relate to the <u>National Costing Methodology</u> or in accordance with <u>Zonal Costing Rule 6</u> where they relate to the <u>Zonal Costing Methodology</u> .
"Revenue Derived Volumes"	Volume of a product going through the Pipeline measured by the Revenue Derived Method.
"Revenue derived Derived Mmethod"	A method of deriving the volume of a product going through the <u>Pipeline</u> , by dividing the revenue received for that product by the average unit price of that product, which is estimated by sampling.
"RMH Group"	RMH plc and any of its subsidiaries or holding companies, or any subsidiary of such holding companies (all as defined by section 1159 of the Companies Act 2006), or any group undertaking (as defined by section 1161 of the Companies Act 2006).
"Second Class"	A product and/or service that aims to deliver by the second or third working day (including Saturday) after collection.
"Short SPHCC"	'Short Sales Product Handling Characteristic Combinations', which are products and/or services sub-divided based on the relevant measured characteristics as prescribed by these Guidelines, apart from the characteristic referred to in paragraph 8.22(d) of these Guidelines.
"SPHCC"	'Sales Product Handling Characteristic Combinations', which are products and/or services sub-divided based on the relevant measured characteristics as prescribed by these Guidelines.
"Third Class"	A product and/or service that aims to deliver by later than the third working day (including Saturday) after collection.
"Transformation Costs"	Annually recurring costs which Royal Mail incurs in order to restructure its business and/or operations, including redundancy costs.
"Transfer Charge(s)" or "Transfer Price(s)"	The charge or price that one part of a business may charge to another part of the same business, for the products and/or services which the former provides to the latter.
" <del>UKLPI<u>U</u>KPIL</del> "	'UK Letters & Parcels, and International and Letters', which is an operating unit of Royal Mail.
"Upstream Services"	The group of Activities related to the collection, sorting and conveying of mail to the point where Downstream Services begin.
"USPAC Condition"	The USP accounting condition imposed on Royal Mail as set

out in the notification published by <u>OFCOM</u> at Annex 10 to the statement entitled 'Securing the Universal Postal Service' dated 27 March 2012, and as modified by <u>OFCOM</u> from time to time.

"V4 Format" Categorisation of products and/or services into a single billing

code or a group of similar billing codes.

"Weighting Factors" Factors representing the relative proportions of resources that

units of each <u>SPHCC</u> require from the related <u>Activity</u> and determined in accordance with the <u>National Costing Rule 10</u> where they relate to the <u>National Costing Methodology</u> or in accordance with <u>Zonal Costing Rule 10</u> where they relate to

the Zonal Costing Methodology.

"Weighted Volume Drivers" Has the meaning given to it by National Costing Rule 10

where it relates to the <u>National Costing Methodology</u> or by <u>Zonal Costing Rule 10</u> where it relates to the <u>Zonal Costing</u>

Methodology.

"Workload" A measure of weighted volume calculated by using weights

derived from the amount of time required for frontline staff to carry out the tasks, identified and measured by industrial engineering methods, in order to process the mail volumes presented in a given Operational Business Process in a given period, expressed relative to the time taken to process 1000 sequenced letters in all relevant Operational Business

Processes.

"Zone" A part of the United Kingdom (based on postcode sectors) for

which Royal Mail is using the same price for products and/or

services falling within the Reported Business.

"Zonal Costing Rule(s)" The requirements in these Guidelines for the purpose of the

Zonal Costing Methodology.

#### Section 3: Obligations relating to the Relevant Group under USPAC 1.3

**3.1** For the purpose of USPAC 1.3.2, <u>Royal Mail</u> must prepare the financial statements and information specified in **Column 1 of Table 1** by using the pro-forma corresponding to the statement or information as specified in **Column 2 of that Table** (including notes disclosing a breakdown and explanations of any material items).

Table 1: Pro-formas for the financial statements and information for the Relevant Group

Column 1: Financial statement/information referred to in USPAC 1.3.1		Column 2: Pro-forma specified in <b>Appendix 1</b> of these Guidelines
USPAC 1.3.1(a)	consolidated income statement	Figure 1, Appendix 1
USPAC- 1.3.1(b)	consolidated balance sheet statement	Figure 2, Appendix 1
USPAC- 1.3.1(c)	consolidated cash flow statement	Figure 3, Appendix 1
USPAC 1.3.1( <u>da</u> )	consolidated cash flow projection statement	Not applicable
USPAC 1.3.1( <u>eb</u> )	Strategic Business Plan	Figures 7, 8 and 11 of Appendix 1 Not applicable
USPAC- 1.3.1(f)	Reconciliation of consolidated income, balance sheet and cash flow statements with the consolidated accounts of RMH plc	Figures 1 , 2 and 3, Appendix 1
USPAC 1.3.1( <u>gc</u> )	Annual Budget	Figures 7, 8 and 11 of Appendix 1 Not applicable

**3.2** For the purpose of USPAC 1.3.3, Royal Mail must prepare each of the financial statements and information specified in **Column 1 of Table 2** in accordance with the additional requirements corresponding to the statement or information as prescribed by **Column 2 of that Table**.

Table 2: Additional requirements for the financial statements and information for the Relevant Group

	Financial statement/information in USPAC 1.3.1	Column 2: <b>Additional requirements</b> in these Guidelines
USPAC- 1.3.1(a)	consolidated income statement	<del>Not applicable</del>
USPAC- 1.3.1(b)	consolidated balance sheet statement	<del>Not applicable</del>
USPAC- 1.3.1(c)	consolidated cash flow statement	<del>Not applicable</del>

USPAC 1.3.1( <del>d</del> a)	consolidated cash flow projection statement	The rules in <b>Section 8</b> of the Guidelines shall apply.
		The <u>consolidated</u> cash flow projection statement shall include the following—
		<ul> <li>a) figures projected for the <u>Financial Quarter</u> for which the statement must be prepared together with the five <u>Financial Quarters</u> that follow that <u>Financial Quarter</u> showing the cash flows and the cash position for the <u>Relevant Group</u>.</li> </ul>
		b) an explanation of the key assumptions underpinning the scenarios referred toprepared in (a) above;
		<ul> <li>c) if <u>Royal Mail</u> changes its projections from one <u>Financial Quarter</u> to another, a reconciliation of the new projections to the previous projections, together with an explanation of the material changes;</li> </ul>
		d) figures showing the actual cash position of the Relevant Group at the beginning of the Financial Quarter in question, including a breakdown of material balances and movements in those balances since the beginning of the preceding Financial Quarter, together with an explanation of those material movements and differences with the projections for that preceding Financial Quarter;
		e) Royal Mail's assessment of the financial sustainability of the Relevant Group, including its identification of key risks that may affect that sustainability;
		f) a statement of financing facilities available to the Relevant Group as at the beginning of the Financial Quarter in question, together with information on the extent to which these facilities have been utilised;
		g) (i) the cash flows referred to in (a) above shall include at least the following—
		(1) 'EBITDA', namely revenue less all the costs of products and services provided before interest, tax, depreciation and amortisation;
		(2) pension costs <u>including DB Pension</u> <u>Service Costs</u> ;
		(3) working capital;
		(4) dividends;
		(5) investments;
		(6) capital expenditure and proceeds from disposals; and

(7) exceptional items, including

	redundancy, restructuring costs and Royal Mail's "Colleague share" share scheme Transformation Costs and any other operating and non-operating specific items; and  h) (k) if there are material presentational or methodological changes in the cash flow projections between the Financial Quarter in question and the preceding Financial Quarter, Royal Mail must restate the information relating to the latter together with explanatory notes. This additional requirement shall apply for the second Financial Quarter of the first Financial Year and subsequent Financial Quarters.
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1.3.1( <u>eb</u> )	

#### Strategic Business Plan

The rules in **Section 8** of the Guidelines shall apply.

The Strategic Business Plan shall include the following information in relation to the Relevant Group for each Financial Year forecast by Royal Mail—

- a) income statement, balance sheet and cash flow statement; and
- b) financial health metrics, including the metrics required by the covenants of loans and borrowing facilities, and the metrics considered in assessing and monitoring credit rating.

The Strategic Business Plan shall include a reconciliation of the income statement set out in (a) above to the income statements of UKPIL and the Reported Business. The reconciliation must include a reconciliation of the DB Pension Service Costs of the Relevant Group, UKPIL, and the Reported Business calculated on both the cash paid basis and in accordance with IAS 19.

The Strategic Business Plan shall include the information set out in (a) and (b) above, and the above-mentioned reconciliation, for the two Financial Years immediately preceding the first Financial Year forecast by Royal Mail.

The Strategic Business Plan shall include the following information forecast by Royal Mail in relation to the Reported Business for each of the same Financial Years forecast by Royal Mail in relation to the Relevant Group—

- c) revenues and costs of the Reported
   Business showing how the Financeability
   EBIT is calculated;
- d) breakdown of revenues and volumes in V4
   Format and showing separately any contingencies provided against the revenues of any products or product groups;
- e) Cost Matrix as shown in Figure 7 of Appendix 1 of these Guidelines;
- f) PVEO Analysis as shown in Figure 8 of Appendix 1 of these Guidelines;
- g) Workload calculations for all relevant
   Operational Business Processes including—
  - 1) reconciliation of Operational Volumes to
    Revenue Derived Volumes for each
    relevant Operational Business Processes
    and each relevant format;

- 2) mapping of Revenue Derived Volumes used in (g)(1) above to Revenue Derived Volumes provided under (d) above;
- 3) mapping of the Operational Volumes recorded to the Operational Volumes in (g)(1) above
- 4) breakdown of the recorded Operational
  Volumes in (g)(3) above by the Workload
  weighting categories, together with the
  calculations carried out and the
  assumptions made in preparing the
  Workload weighting category breakdown;
- 5) calculation of fixed and variable Workload for each Workload weighting category, setting out the following:
  - i. fixed and variable Workload weights for each Operational Business Process,
  - ii. fixed and variable Planning
    Values for each Operational
    Business Process,
  - iii. base overall Planning Value for a sequenced letter,
  - iv. CVEs for each Operational
    Business Process, and
  - v. number of working days; and
- 6) information in (g)(3) to (g)(5) above recalculated using the assumptions and categories adopted in the Strategic Business Plan submitted by Royal Mail to OFCOM on 14 May 2015, together with a mapping of the categories of the recorded Operational Volumes in (g)(3) above to the categories of the recorded Operational Volumes used in the Strategic Business Plan submitted by Royal Mail to OFCOM on 14 May 2015.
- h) Gross Hours Reduction, and Productivity
  calculations, broken down by the relevant
  Operational Business Processes and
  format;
- i) Gross Hours Reduction, and Productivity
  calculations provided under (h) above
  restated based on the definitions in the
  Strategic Business Plan submitted by Royal
  Mail to OFCOM on 14 May 2015;
- j) Headcount and FTEs broken down between frontline, management and other staff;
- k) explanation of the main assumptions and the key drivers used by Royal Mail in its forecasts of volumes, the Workload, revenues, costs, and Productivities of the Reported Business, including but not limited to economic growth (including GDP), inflation (including CPI), market developments, competition, pricing, sales and marketing initiatives, efficiency

- initiatives, Gross Hours Reduction, pay and pension arrangements, taxation, legislation, depreciation, and contingencies; and
- I) a statement of changes in the forecast revenues and costs between the Strategic Business Plan submitted by Royal Mail to OFCOM in the Financial Year in question and the most recent Strategic Business Plan submitted by Royal Mail to OFCOM prior to that; breaking down the changes in forecast revenues between key revenue streams, and breaking down the changes in forecast costs into key cost categories; and explaining and quantifying the impact of the main drivers of the changes including but not limited to the changes in assumptions with regard to economic growth (including GDP), inflation (including CPI), market developments, competition, pricing, sales and marketing initiatives, efficiency initiatives, Workload, Gross Hours Reduction, Productivity, pay and pension arrangements, taxation, legislation, depreciation, and contingencies.

The Strategic Business Plan shall include the information set out in (c), (d), and (e) above in relation to the Reported Business for the two Financial Years immediately preceding the first Financial Year forecast by Royal Mail.

The Strategic Business Plan must include sensitivity analyses of the key inputs which have a significant risk of deviating from the values assumed in the Strategic Business Plan. These analyses must include a restatement of the relevant calculations and outputs of the Strategic Business Plan assuming those risks materialise.

The Strategic Business Plan shall set outseparately the forecast of the revenues and operating expenditure of the Reported Businessfrom that of the Relevant Group. Thisrequirement shall come into effect from 1 April-2014.

Quarterly forecast of the revenues and operating expenditure of the Reported Business shall be provided alongside the quarterly incomestatement of the Reported Business required under USPAC 1.4.1(b).

If there are material presentational or methodological changes in the Strategic—Business Plan between the Financial Year inquestion and the preceding Financial Year, Royal Mail must restate the information relating to the latter together with explanatory notes. This additional requirement shall apply for the

		second and subsequent Financial Years.
USPAC- 1.3.1(f)	Reconciliation of consolidated income, balance sheet and cash flow statements with the consolidated accounts of RMH plc	Not applicable
USPAC	Annual Budget	<del>Not applicable</del>
1.3.1( <del>g</del> <u>c</u> )		The rules in <b>Section 8</b> of the Guidelines shall apply.
		The Annual Budget shall include the following information in relation to the Relevant Group—
		a) income statement, balance sheet and cash flow statement; and     b) financial health metrics, including the metrics required by the covenants of loans and borrowing facilities, and the metrics considered in assessing and monitoring credit rating.
		The Annual Budget shall include a reconciliation of the income statement set out in (a) above to the income statements of UKPIL and the Reported Business. The reconciliation must include a reconciliation of the DB Pension Service Costs of the Relevant Group, UKPIL, and the Reported Business calculated on both the cash paid basis and in accordance with IAS 19.
		The Annual Budget shall include the following information forecast by Royal Mail in relation to the Reported Business—
		c) revenues and costs of the Reported Business showing how the Financeability EBIT is calculated;
		d) breakdown of revenues and volumes in V4 Format and showing separately any contingencies provided against the revenues of any products or product groups;
		e) Cost Matrix as shown in Figure 7 of Appendix 1 of these Guidelines;
		f) PVEO Analysis as shown in Figure 8 of Appendix 1 of these Guidelines;
		g) Workload calculations for all relevant Operational Business Processes including—
		reconciliation of Operational Volumes to     Revenue Derived Volumes for each     relevant Operational Business Processes     and each relevant format;  mapping of Revenue Derived Volumes

- used in (g)(1) above to Revenue Derived Volumes provided under (d) above:
- 3) mapping of the Operational Volumes recorded to the Operational Volumes in (g)(1) above
- 4) breakdown of the recorded Operational
  Volumes in (g)(3) above by the Workload
  weighting categories, together with the
  calculations carried out and the
  assumptions made in preparing the
  Workload weighting category breakdown;
- 5) calculation of fixed and variable Workload for each Workload weighting category, setting out the following:
  - vi. fixed and variable Workload weights for each Operational Business Process,
  - vii. fixed and variable Planning

    Values for each Operational

    Business Process,
  - viii. base overall Planning Value for a sequenced letter,
  - ix. CVEs for each Operational
    Business Process, and
    x. number of working days; and
- 6) information in (g)(3) to (g)(5) above recalculated using the assumptions and categories adopted in the Strategic Business Plan submitted by Royal Mail to OFCOM on 14 May 2015, together with a mapping of the categories of the recorded Operational Volumes in (g)(3) above to the categories of the recorded Operational Volumes used in the Strategic Business Plan submitted by Royal Mail to OFCOM on 14 May 2015.
- h) Gross Hours Reduction, and Productivity

   calculations, broken down by the relevant
   Operational Business Processes and format;
- i) Gross Hours Reduction, and Productivity
  calculations provided under (h) above
  restated based on the definitions in the
  Strategic Business Plan submitted by Royal
  Mail to OFCOM on 14 May 2015;
- j) Headcount and FTEs broken down between frontline, management and other staff;
- k) explanation of the main assumptions and the key drivers used by Royal Mail in its forecasts of volumes, the Workload, revenues, costs, and Productivities of the Reported Business, including but not limited to economic growth (including GDP), inflation (including CPI), market developments, competition, pricing, sales and marketing initiatives, efficiency initiatives, Gross Hours Reduction, pay and

- pension arrangements, taxation, legislation, depreciation, and contingencies; and
- a statement of changes in the forecast revenues and costs between the Annual Budget submitted by Royal Mail to OFCOM in the Financial Year in question and the most recent Annual Budget submitted by Royal Mail to OFCOM prior to that; breaking down the changes in forecast revenues between key revenue streams, and breaking down the changes in forecast costs into key cost categories; and explaining and quantifying the impact of the main drivers of the changes including but not limited to the changes in assumptions with regard to economic growth (including GDP), inflation (including CPI), market developments, competition, pricing, sales and marketing initiatives, efficiency initiatives, Workload, Gross Hours Reduction, Productivity, pay and pension arrangements, taxation, legislation, depreciation, and contingencies.

The Annual Budget must include sensitivity analyses of the key inputs which have a significant risk of deviating from the values assumed in the Annual Budget. These analyses must include a restatement of the relevant calculations and outputs of the Annual Budget assuming those risks materialise.

#### Section 4: Obligations relating to the Reported Business under USPAC 1.4

**4.1** For the purpose of USPAC 1.4.2, <u>Royal Mail</u> must prepare the financial statements and information specified in **Column 1 of Table 3** by using the pro-forma corresponding to the statement or information as specified in **Column 2 of that Table** (including notes disclosing a breakdown and explanations of any material items).

Table 3: Pro-formas for the financial statements and information for the Reported Business

Column 1: Financial statement/information referred to in USPAC 1.4.1		Column 2: Pro-forma specified in <b>Appendix 1</b> of these Guidelines
USPAC 1.4.1(a)	Annual income statement	Figure 4 <u>1, 2, 7, 8,</u> Appendix 1
USPAC 1.4.1(b)	Quarterly income statement	Figure <del>52 and 7</del> , Appendix 1
USPAC 1.4.1(c)	Annual reconciliation of statements/information specified in USPAC 1.4.1(c)	Not applicable
USPAC 1.4.1(d)	Annual reconciliation of statements/information specified in USPAC 1.4.1(d)	Figure 93, Appendix 1
USPAC 1.4.1(e)	Annual capital employed statement	Figure <del>10</del> 4, Appendix 1
USPAC 1.4.1(f)	Annual reconciliation of statements/information specified in USPAC 1.4.1(f)	Figure 114, Appendix 1
USPAC 1.4.1(g)	Annual cash flow statement	Figure 125, Appendix 1
USPAC 1.4.1(h)	Annual reconciliation of statements/information specified in USPAC 1.4.1(h)	Figure 135, Appendix 1
USPAC 1.4.1(i)	Annual product profitability statement	Figure 14 <u>6</u> , Appendix 1
USPAC 1.4.1(j)	Quarterly product profitability statement	Figure 146, Appendix 1
USPAC 1.4.1(k)	Monthly revenue, cost and volume information statement	Not applicable Figures 15(a) and 15(b), Appendix 1
USPAC 1.4.1(I)	Quarterly revenue, cost and volume information statements	Figures 9, 10, 11 and 12, Appendix 1

**4.2** For the purpose of USPAC 1.4.3, <u>Royal Mail</u> must prepare the financial statements and information specified in **Column 1 of Table 4** in accordance with the additional requirements corresponding to the statement or information as prescribed by **Column 2 of that Table**.

Table 4: Additional requirements for the financial statements and information for the separated Reported Business

	Financial statement/information in USPAC 1.4.1	Column 2: <b>Additional requirements</b> in these Guidelines
USPAC 1.4.1(a) and (b)	Annual income statement and quarterly income statement	The rules in <b>Section 8</b> of the Guidelines concerning annual and quarterly income statements and product profitability statements shall apply.
		The annual and quarterly income statements shall include—
		a) Cost Matrix as shown in Figure 7 of  Appendix 1 of these Guidelines; b) The annual and quarterly income- statements shall set out a breakdown of items of revenue or cost in these statements, which Royal Mail categorises as other operating and non-operating specific itemsexceptional not included in the calculation of the Financeability EBIT in these statements,; together with explanations as to the nature of each item and the reasons why it each item arose; and c) adjustments made to re-state the DB Pension Service Costs from the basis in accordance with IAS 19 to a cash paid basis.  The annual income statement shall include—  a)d) PVEO Analysis as shown in Figure 8 of Appendix 1 of these Guidelines; and  e) a reconciliation of the total costs included in the following statements and information:  1) annual income statements set out in
		1) annual income statements set out in Figures 2 and 3 of Appendix 1 of these Guidelines; and  2) annual Cost Matrix as shown in Figure 7 of Appendix 1 of these Guidelines;  3) PVEO Analysis as shown in Figure 8 of Appendix 1 of these Guidelines; and  4) Technical appendices cost data as shown in Appendix 4 of these Guidelines.
		The annual income statement shall include a statement of <u>Transfer Charges</u> setting out each material <u>Transfer Charge</u> separately as shown in Figure 4 of Appendix 1 of these Guidelines.  The quarterly income statement shall include
		the revenues and costs of the Reported Business forecast by Royal Mail in accordance with the Strategic Business Plan, showing how the forecast Financeability EBIT is calculated.

		The quarterly income statement shall include a statement of <u>Transfer Charges</u> setting out each material <u>Transfer Charge</u> separately as shown in Figure 5 of Appendix 1 of these Guidelines.  Reyal Mail shall deliver to OFCOM The quarterly income statement required under USPAC 1.4.1(b) within 60 days after the end of the <u>Financial Quarter</u> for which they have been prepared; starting from the quarterly income statement for the second <u>Financial Quarter</u> of 2014-15. <u>Financial Year</u> . Royal Mail shall deliver the quarterly income statement for the <u>Financial Quarters</u> preceding the above-mentioned <u>Financial Quarter</u> within 90 days after the end of the <u>Financial Quarter</u> for which they have been prepared.
USPAC 1.4.1(c)	Annual reconciliation of statements/information specified in USPAC 1.4.1(c)	The rules in <b>Section 8</b> of the Guidelines concerning annual & quarterly income statements and product profitability statements shall apply.  The annual reconciliation shall set out each of the quarterly financial statements and information to be prepared for USPAC 1.4.1(b) and then reconcile the combined total of these four statements with the financial statement and information to be prepared for USPAC 1.4.1(a). Where there are any reconciling differences, Royal Mail must provide accompanying notes and explanations to describe these reconciling differences.
USPAC 1.4.1(d)	Annual reconciliation of statements/information specified in USPAC 1.4.1(d)	The rules in <b>Section 8</b> of the Guidelines concerning annual and quarterly income statements and product profitability statements shall apply.  The annual reconciliation shall be reconciled giving appropriate detail and explanation of any reconciling items. Each reconciliation shall include the following two steps as shown in <b>Figure 9-3 of Appendix 1</b> of these Guidelines—  (a) a reconciliation between the Reported Business and UKLPIUKPIL; and  (b) a reconciliation between UKLPIUKPIL and the Relevant Group.  In addition, Royal Mail must provide in the accompanying notes the detail of the material reconciling differences in the annual reconciliation.

USPAC 1.4.1(e)	Annual capital employed statement	The rules in <b>Section 8</b> of the Guidelines concerning annual capital employed statements shall apply.
		Royal Mail shall provide a A-breakdown of the total fixed asset NBV allocated to the Reported Business as a whole, by main asset classes.
		In addition, Royal Mail must provide in the accompanying notes the detail of long term debt and financing costs at the level of detail as described in the statutory accounts of the Royal Mail.
USPAC 1.4.1(f)	Annual reconciliation of statements/information specified in USPAC 1.4.1(f)	The rules in <b>Section 8</b> of the Guidelines concerning capital employed statements shall apply.
		The annual reconciliation shall be reconciled giving appropriate detail and explanation of any reconciling items. Each reconciliation shall include the following two steps as shown in Figure 11 4 of Appendix 1 of these Guidelines—
		(a) a reconciliation between the Reported Business and UKLPIUKPIL; and
		(b) a reconciliation between <u>UKLPIUKPIL</u> and the <u>Relevant Group</u> .
		In addition, Royal Mail must provide in the accompanying notes the detail of the material reconciling differences in the annual reconciliation.
USPAC 1.4.1(g)	Annual cash flow statement	The rules in <b>Section 8</b> of the Guidelines concerning annual cash flow statements shall apply.
USPAC 1.4.1(h)	Annual reconciliation of statements/information specified in	The rules in <b>Section 8</b> of the Guidelines concerning cash flow statements shall apply.
	USPAC 1.4.1(h)	The annual reconciliation shall be reconciled giving appropriate detail and explanation of any reconciling items. Each reconciliation shall include the following two steps as shown in Figure 13-5 of Appendix 1 of these Guidelines—
		(a) a reconciliation between the Reported Business and UKLPIUKPIL; and
		(b) a reconciliation between <u>UKLPIUKPIL</u> and the <u>Relevant Group</u> .
		In addition, Royal Mail must provide in the accompanying notes the detail of the material reconciling differences in the annual reconciliation.

USPAC 1.4.1(i)	Annual product profitability statement	The rules in <b>Section 8</b> of the Guidelines concerning income statements and product profitability statements shall apply.
		Royal Mail must prepare and maintain separate annual product profitability statements for each of the products specified in Column 2 of Table 5 as corresponding to the scope specified in Column 3 of that Table.
		Each of these statements shall only include the costs covered in the <u>National Costing Methodology</u> .
USPAC 1.4.1(j)	Quarterly product profitability statement	The rules in <b>Section 8</b> of the Guidelines concerning income statements and product profitability statements shall apply.
		Royal Mail must prepare and maintain separate quarterly product profitability statements for each of the products specified in Column 2 of Table 5-as corresponding to the scope specified in
		Column 3 of that Table.  Each of these statements shall only include the
		costs covered in the <u>National Costing Methodology</u> .
		Royal Mail shall deliver to OFCOM The quarterly-product profitability statement required under USPAC 1.4.1(j) within 60 days after the end of the Financial Quarter for which they have been prepared; starting from the quarterly product-profitability statement for the second Financial Quarter of 2014-15 Financial Year. Royal Mail shall deliver the quarterly product profitability statement for the Financial Quarters preceding the above mentioned Financial Quarter within 90-layer of the second of the Financial Quarter within 90-layer of the second of the Financial Quarter within 90-layer of the second of the Financial Quarter for
		days after the end of the <u>Financial Quarter</u> for which they have been prepared.
USPAC 1.4.1(k)	Monthly revenue and, volume and cost information statement	Not applicable
1.4.1(k)	eost-information statement	Royal Mail must prepare a reconciliation of the monthly Total workload for Processing and Total workload for Collection/Delivery reported in <b>Table 15(b)</b> , to the monthly Total volumes reported in <b>Table 15(a)</b> . The reconciliation must show how the workloads (including weightings) and the operational volumes are derived from the revenue derived volumes.
		Budgeted revenue, volume and cost information shall be provided from the second <u>Financial</u> Month of the <u>Financial Year</u> (the month of May) onwards, i.e. the first monthly reports of the <u>Financial Year</u> containing budget information shall be the reports for the the second <u>Financial Month</u> of the <u>Financial Year</u> (the month of May).
USPAC	Quarterly revenue, cost and	The rules in <b>Sections 8 and 9</b> of the Guidelines

		T
1.4.1(I)	volume information statements	shall apply.
		Quarterly revenue, volume and cost information statement shall include—
		a) actual and budgeted revenue and volume information for groups of products sold in each Financial Quarter, in the form set out in Figure 9 of Appendix 1 of these Guidelines;
		b) actual and budgeted cost metrics information for each Financial Quarter, in the form set out in Figure 10 of Appendix 1 of these Guidelines. Royal Mail shall provide an explanation of the variances included in the cost metrics report;
		c) Workload calculations for all relevant Operational Business Processes including—
		1) reconciliation of Operational Volumes to Revenue Derived Volumes for each relevant Operational Business Processes and each relevant format;
		2) mapping of Revenue Derived Volumes used in (c)(1) above to Revenue Derived Volumes provided under (a) above and (d) below;
		3) mapping of the Operational Volumes recorded to the Operational Volumes in (c)(1) above
		4) breakdown of the recorded Operational Volumes in (c)(3) above by the Workload weighting categories, together with the calculations carried out and the assumptions made in preparing the
		Workload weighting category breakdown; 5) calculation of fixed and variable Workload for each Workload weighting category, setting out the following:
		xi. fixed and variable Workload weights for each Operational Business Process, xii. fixed and variable Planning Values for each Operational
		Business Process,  xiii. base overall Planning Value for a  sequenced letter,  xiv. CVEs for each Operational
		Business Process, and xv. number of working days; and information in (c)(3) to (c)(5) above recalculated using the assumptions and
		categories adopted in the Strategic Business Plan submitted by Royal Mail to OFCOM on 14 May 2015, together with a mapping of the categories of the
		recorded Operational Volumes in (c)(3) above to the categories of the recorded Operational Volumes used in the

- Strategic Business Plan submitted by Royal Mail to OFCOM on 14 May 2015.

  d) actual revenue, cost, and volume information
- d) actual revenue, cost, and volume information for Short SPHCCs, and Transfer Prices between Upstream Services and Downstream Services for the products set out in Appendix 2 to these Guidelines, for each Financial Quarter, in the form set out in Figure 11 of Appendix 1 of these Guidelines;
- e) reconciliations of the total revenues and volumes included in the following statements and information—
  - 1) quarterly income statement set out in Figure 2 of Appendix 1 of these Guidelines;
  - 2) quarterly revenues and volumes information set out in Figure 9 of Appendix 1 of these Guidelines; and
  - 3) quarterly revenue, cost, and volume information for Short SPHCCs, in the form set out in Figure 11 of Appendix 1 of these Guidelines; and
- f) reconciliations of the total costs included in the following statements and information—
  - quarterly income statement set out in Figure 2 of Appendix 1 of these Guidelines;
  - 2) quarterly Cost Matrix set out in Figure 7of Appendix 1 of these Guidelines; and
  - 3) quarterly revenue, cost, and volume information for Short SPHCCs, in the form set out in Figure 11 of Appendix 1 of these Guidelines.

 Table 5: Product profitability statements

Column 1: Statement number	Column 2: <b>Products</b> specified by <u>OFCOM</u> to be contained in the statement referred to in Column 1	Column 3: <b>Scope</b> specified by <u>OFCOM</u> in relation to products specified in Column 2
1	Access products D+2 and later letters and large letters	Downstream Services Entity
2	Other Access products	
3	Business, Advertising, and Sustainable  Advertising Mail D+2 Letters and Large Letters	
4	Other <u>Bulk Mail products</u>	
		non-USO Products Entity
5	non-USO B2X Deferred Light (1kg - 2kg) PPS	
6	non-USO B2X Deferred Light (< 1kg) PPS	
7	non-USO International	
8	Other non-USO services	
9	USO single piece First Class letters sold via stamps payment channel	
10	USO single piece First Class large letters and parcels < 2kg sold via stamps payment channel	
11	USO single piece First Class large letters and parcels > 2kg sold via stamps payment channel	USO Products Entity
12	USO single piece Second Class letters sold via stamps payment channel	
13	USO single piece Second Class large letters and parcels < 2kg sold via stamps payment	

	channel	
14	<u>USO single piece Second Class large letters and parcels &gt; 2kg sold via stamps payment channel</u>	
<del>15</del>	USO single piece First Class products sold via non-stamps payment channel	
<del>16</del>	USO single piece Second Class products sold via non-stamps payment channel	
<del>17</del>	USO_Special Delivery products	
<del>18</del>	<u>USO</u> International	
<del>19</del>	Other <u>USO</u> services	
<del>20</del>	non-USO Special Delivery products	
<del>21</del>	non-USO B2X Deferred Heavy (>2kg) PPS	
<del>22</del>	Relay	End-to-end Only Products
<del>23</del>	PAF	<u>Entity</u>
24	International Contract Bulk	
<del>25</del>	Other end to end only products	

4.3 For the purpose of interpreting the full meaning of the products specified in Column 2 of Table 5, words or expressions shall be interpreted in accordance with Section 2 of these Guidelines but, where relevant, also read in conjunction with the market studies referred to in
 4.44.3 §9.15(a) that correspond to the product descriptions in question.

#### Section 5: Obligations relating to the separated Reported Business under USPAC 1.5

**5.1** For the purpose of USPAC 1.5.3, <u>Royal Mail</u> must prepare the financial statements and information specified in **Column 1 of Table 6** by using the pro-forma corresponding to the statement or information as specified in **Column 2 of that Table** (including notes disclosing a breakdown and explanations of any material items).

Table 6: Pro-formas for the financial statements and information for the separated Reported Business

Column 1: Financial statement/information referred to in USPAC 1.5.2		Column 2: Pro-forma specified in <b>Appendix 1</b> of these Guidelines
USPAC- 1.5.2(a)	Annual income statement	Figure 4, Appendix 1
USPAC- 1.5.2(b)	Quarterly income statement	Figure 5, Appendix 1
USPAC- 1.5.2(c)	Annual reconciliation of statements/information specified in USPAC 1.5.2(c)	<del>Not applicable</del>
USPAC 1.5.2( <u>da</u> )	Annual end to end income statement in respect of USO, non-USO and non-Mails	Figure 61, Appendix 1 (for statements to be published by USPAC 1.5.8); and
		Figure 72, Appendix 1 (for statements to be delivered to OFCOM by USPAC 1.5.10)
USPAC 1.5.2( <u>eb</u> )	Quarterly end to end income statement in respect of USO, non-USO and non-Mails	Figure 8 <u>2</u> , Appendix 1
USPAC- 1.5.2(f)	Annual capital employed statement	Figure 10, Appendix 1
USPAC- 1.5.2(g)	Annual cash flow statement	Figure 12, Appendix 1

**5.2** For the purpose of USPAC 1.5.4 and USPAC 1.6.1, <u>Royal Mail</u> must prepare the financial statements and information specified in **Column 1 of Table 7** in accordance with the additional requirements corresponding to the statement or information as prescribed by **Column 2 of that Table**.

Table 7: Additional requirements for the financial statements and information for the separated Reported Business

	Financial statement/information in USPAC 1.5.2	Column 2: <b>Additional requirements</b> in these Guidelines
USPAC- 1.5.2(a)	Annual income statement	The rules in <b>Section 9</b> of the Guidelines- concerning annual & quarterly income- statements shall apply.  The annual income statement shall set out a-
		breakdown of items of revenue or cost which

		Royal Mail categorises as exceptional in these statements, together with explanations as to the nature of each item and the reasons why it arose.
USPAC- 1.5.2(b)	Quarterly income statement	The rules in <b>Section 9</b> of the Guidelines- concerning annual & quarterly income- statements shall apply.  The quarterly income statement shall set out a- breakdown of items of revenue or cost which- Royal Mail categorises as exceptional in these- statements, together with explanations as to the- nature of each item and the reasons why it- arose.  Royal Mail shall deliver to OFCOM The quarterly- income statement within 60 days after the end of- the Financial Quarter for which they have been- prepared; starting from the quarterly income- statement for the second Financial Quarter of- 2014-15 Financial Year. Royal Mail shall deliver- the quarterly income statement for the Financial Quarters preceding the above-mentioned- Financial Quarter within 90 days after the end of- the Financial Quarter for which they have been- prepared.
USPAC- 1.5.2(c)	Annual reconciliation of statements/information specified in USPAC 1.5.2(c)	The annual reconciliation shall set out each of the quarterly financial statements and information to be prepared for USPAC 1.5.2(b) and then reconcile the combined total of these four statements with the financial statement and information to be prepared for USPAC 1.5.2(a). Where there are any reconciling differences, Royal Mail must provide accompanying notes and explanations to describe these reconciling differences.
USPAC 1.5.2( <u>da</u> )	Annual end to end income statement in respect of USO, non-USO and non-Mails	The rules in Section 8 of the Guidelines concerning income statements and product profitability statements and the rules in Section 9 of the Guidelines shall apply.
USPAC 1.5.2( <u>eb</u> )	Quarterly end to end income statement in respect of USO, non-USO and non-Mails	The rules in Section 8 of the Guidelines concerning income statements and product profitability statements and the rules in Section 9 of the Guidelines shall apply.  Reyal Mail shall deliver to OFCOM The quarterly end to end income statement within 60 days after the end of the Financial Quarter for which they have been prepared; starting from the quarterly end to end income statement for the second Financial Quarter of 2014-15 Financial Year. Royal Mail shall deliver the quarterly end to end income statement for the Financial

		Quarters preceding the above-mentioned Financial Quarter within 90 days after the end of the Financial Quarter for which they have been prepared.
USPAC- 1.5.2(f)	Annual capital employed statement	The rules in <b>Section 9</b> of the Guidelines- concerning annual capital employed statement- shall apply.
		Operational fixed assets utilised in the day to day trading operations of the business shall be included, but excluding properties the depreciation costs of which are not captured in the <u>FAC</u> product costing system in accordance with the <u>National Costing Methodology</u> , and working capital.  A breakdown of the total fixed asset <u>NBV</u> allocated to each of the <u>Four FREs</u> , by main asset classes.
USPAC- 1.5.2(g)	Annual cash flow statement	The rules in <b>Section 9</b> of the Guidelines- concerning annual cash flow statement shall- apply.  Trading cash flows and investment cash flows- related to operational fixed assets shall be-
		included.
USPAC- 1.6.2	Quarterly update of the Costing- Manual, and Quarterly update of the Accounting Methodology- Manual	Royal Mail shall publish a quarterly update of the Costing Manual within 60 days after the end of the Financial Quarter for which it has been prepared, starting from the update for the second Financial Quarter of 2014-15 Financial Year.  Royal Mail shall deliver the update for the Financial Quarters preceding the abovementioned Financial Quarter within 90 days after the end of the Financial Quarter for which they have been prepared.
		Royal Mail shall deliver to OFCOM a quarterly update of the Accounting Methodology Manual and any confidential information in a quarterly update of the Costing Manual that has been excluded from publication, within 60 days after the end of the Financial Quarter for which the updates in question have been prepared; starting from the update for the second Financial Quarter of 2014-15 Financial Year. Royal Mail shall deliver the updates for the Financial Quarters preceding the above-mentioned Financial Quarter within 90 days after the end of the Financial Quarter for which they have been prepared.

# Section 6: Obligations relating to the Costing Manual and the Accounting Methodology Manual under USPAC 1.6

**6.1** For the purpose of USPAC 1.6.1, <u>Royal Mail</u> must prepare, maintain and keep up-to-date the <u>Costing Manual</u> and the <u>Accounting Methodology Manual</u> in accordance with the general requirements set out in this **Section 6** concerning the <u>Costing Manual</u> and the <u>Accounting Methodology Manual</u>, respectively.

### **The Costing Manual**

#### **General requirements**

- 6.2 Royal Mail must comply with the rules in **Section 8** of the Guidelines concerning the <u>National Costing Rules</u> and the <u>Zonal Costing Rules</u>.
- 6.3 Subject to §6.4, Royal Mail must prepare, maintain and keep up-to-date the Costing Manual to a comprehensive level of detail to demonstrate compliance with the rules referred to in §6.2.
- 6.4 Royal Mail must prepare and present the Costing Manual in a manner that contains the level of detail necessary to allow a competent user of the Costing Manual with a reasonable degree of professional skill to reproduce the results of the National Costing Methodology and the Zonal Costing Methodology without the need for further instruction or interpretation.
- 6.5 Royal Mail must provide information to OFCOM for each separate material change to the Costing Manual in a format that is clear and transparent using the pro-formas set out in Appendix 3 of these Guidelines.

#### **Technical appendices**

- 6.6 OFCOM hereby direct that—
  - (a) for the purpose of USPAC 1.6.1, <u>Royal Mail</u> must include in the technical appendices of the <u>Costing Manual</u> the information prescribed in, and the manner required by the proforma specified in, **Appendix 4** of these Guidelines; and
  - (b) for the purpose of USPAC 1.6.6, the technical appendices of the <u>Costing Manual</u> that contain commercially confidential information to <u>Royal Mail</u> is prescribed as confidential for that purpose.

# **The Accounting Methodology Manual**

- 6.7 Royal Mail must in the Accounting Methodology Manual include all the detailed documentation of the Regulatory Accounting Methodology that Royal Mail is not required to document in the Costing Manual.
- 6.8 Royal Mail must prepare, maintain and keep up-to-date the Accounting Methodology Manual in accordance with §6.9 and to a comprehensive level of detail to demonstrate compliance with its obligation referred to in §6.7. Without prejudice to the generality of that obligation to include a comprehensive level of detail in the Accounting Methodology Manual, Royal Mail must include—
  - (a) a detailed description of the methodology followed in the identification of the relevant

Royal Mail costs for the Relevant Group and the Reported Business as a whole and each of the Four FREs; and

- (b) separate descriptions of the detailed <u>Regulatory Accounting Methodology</u> used by <u>Royal Mail</u> shall be provided for all the main items in the income statements, capital employed statement and cash flow statements, and including—
  - (i) a detailed description of the methodology used by <u>Royal Mail</u> to prepare the financial statements and information for the <u>Four FREs</u> and a mapping of all <u>Activities</u>, products and/or services to the <u>Four FREs</u>;
  - (ii)(i) a description of the data sources used to calculate inputs and allocations; and
  - (iii) the methodology and calculations used by <u>Royal Mail</u> to determine that the <u>Transfer Charges</u> are presented in sufficient detail to enable <u>OFCOM</u> to ensure that the calculated <u>Transfer Charges</u> follow the requirements in these Guidelines.
- 6.9 Royal Mail must prepare and present the Accounting Methodology Manual in a manner that contains the level of detail necessary to allow a competent user of the Accounting Methodology Manual with a reasonable degree of professional accounting skill, and when used in conjunction with the Costing Manual, to gain a clear understanding of how the financial statements and information required by or under the USPAC Condition have been prepared without the need for further instruction or interpretation.
- **6.10** Royal Mail must provide information to OFCOM for each separate material change to the Accounting Methodology Manual in a format that is clear and transparent using, the pro-formas as set out in **Appendix 3** of these Guidelines.

## **Section 7: Product Allocations for Accounting Separation**

- 7.1 For the purpose of USPAC 1.5.1(d), <u>OFCOM</u> hereby direct that <u>Royal Mail</u> must, as its starting point, allocate products across <u>Line A</u>, <u>Line B</u> and <u>Line C</u> as set out in <u>USPAC 1.5.1</u> in conformity with the allocations set out in <u>Appendix 2</u> of these <u>Guidelines</u>.
- 7.2 Subject to Royal Mail allocating its products and services in a manner consistent with the descriptions of Line A, Line B and Line C as set out in USPAC 1.5.1, Royal Mail may make changes to those product allocations for any Financial Year to which the USPAC Condition applies.
- 7.37.1 For the purpose of USPAC 1.4.7(b), OFCOM hereby direct that, in relation to product profitability statements numbered 1 and 31 in Column 1 of Table 5 in Section 4 of these Guidelines, Royal Mail is only required to publish the combined figures for Access products < 2kg and Access products > 2kg.
- <u>7.2 Royal Mail</u> must specify in the Accounting Methodology Manual every product and service that falls into each product profitability statement in <u>Column 1</u> of <u>Table 5</u> in <u>Section 4</u> of these <u>Guidelines and every product and service that falls into each product group financial reportingentity allocated to the <u>Four FREs</u>required by <u>USPAC 1.5.2(a)</u> and <u>1.5.2(b)</u>, together with any changes <u>Royal Mail</u> may make pursuant to <u>§7.2</u> above.</u>
- 7.47.3For the avoidance of doubt, any changes Royal Mail may make to the product and service allocations referred to in §7.2, for any Financial Quarter or Financial Year to which the USPAC Conditions apply For the avoidance of doubt, such changes by Royal Mail shall be treated as a change subject to the obligation referred to in §6.10.

## **Section 8: Regulatory Accounting Methodology**

**8.1** Royal Mail must ensure that the Regulatory Accounting Methodology complies with the detailed rules set out in this **Section 8**, which relate to the allocation and apportionment of costs, revenues, assets and cash flows for the Reported Business.

# Annual & quarterly ilncome statements and product profitability statements

#### Introduction

8.2 Royal Mail must ensure that its preparation of any income statement or product profitability statement for the Reported Business required by or under the USPAC Condition complies with the rules set out below.

# Levels of preparation

- 8.3 Royal Mail must ensure, for the purposes of USPAC 1.4.1(a), and (i), and (i), that annual income statements, and annual reconciliations of such income statements, and annual product profitability statements are prepared to the level of Financeability EBIT, and EBIT as defined in the statutory financial statements of RM plc.
- 8.4 Royal Mail must ensure, for the purposes of USPAC 1.4.1(b), and (c), and (j) that quarterly income statements, and annual reconciliations of such income statements, and quarterly product profitability statements are prepared to the level of Financeability EBIT, and EBIT as defined in the statutory financial statements of RM plcoperating profit/(loss) before exceptional items.

## **Revenue Accounting**

- 8.5 References to "revenue" in this **Section 8** are references to external and internal turnover used in the preparation of any income statement or product profitability statement. External and internal turnover shall consist of income for products and/or services arising from the fair value of the consideration received or receivable for products and/or services provided as part of the operational trading of the Reported Business.
- 8.6 To recognise revenue, <u>Royal Mail</u> must follow the revenue recognition accounting policies adopted by <u>Royal Mail</u> as part of their compliance with the accounting standards used in producing its audited annual statutory accounts.
- **8.7** Revenue shall be assigned directly to the appropriate products and/or services using the relevant information in <u>Royal Mail</u>'s billing systems, and shall be consistently applied across all products and/or services, including stamped and metered mail.
- 8.8 Where it is not possible to directly allocate revenue to products and/or services, <u>Royal Mail</u> must use its best endeavours to find the most appropriate and objective driver to apportion the revenue to product and to document this apportionment of revenue in the <u>Accounting Methodology Manual</u>.
- 8.9 Royal Mail must report the revenue by showing the following separately—
  - (a) external revenues relating to the sales of any product or service outside of the Relevant

### Group; and

**(b)** internal revenues (resulting from <u>Transfer Charges</u>) relating to the sales of any product or service within the Relevant Group.

#### **Volumes**

**8.10** Royal Mail must follow National Costing Rule 13 as the sole basis for traffic measurement used in the financial statements and information.

## Costing

## National Costing Methodology

- **8.11** Royal Mail must
  - ensure that the <u>National Costing Methodology</u> complies with the <u>National Costing</u> Rules set out in this **Section 8**;
  - (b) document the National Costing Methodology in the Costing Manual; and
  - (c) apply the <u>National Costing Methodology</u> to all the costs of the products and/or services of the Reported Business.

## **National Costing Rules**

## National Costing Rule 1: Activity Based Costing ('ABC')

- **8.12** The National Costing Methodology shall—
  - (a) be based on Activity Based Costing;
  - (b) identify—
    - (i) all the <u>Activities</u> that the <u>Reported Business</u> performs as part of its <u>Operational Business Processes</u>;
    - (ii) all the products and/or services and <u>SPHCC</u>s which the <u>Reported Business</u> provides;
  - (c) calculate <u>Activity Costs</u>, using appropriate <u>Resource Drivers</u>, and ensure that the costs of the resources which each <u>Activity</u> consumes are attributed to that <u>Activity</u>; and
  - (d) assign <u>Activity Costs</u>, using appropriate <u>Activity Drivers</u>, to all the products and/or services and <u>SPHCC</u>s which are provided as a result of, or are supported by, that particular <u>Activity</u>. The assignment of <u>Activity Costs</u> shall be undertaken in one of the following two ways—
    - (i) attributing, where a direct causal link between an <u>Activity</u> and the relevant products and/or services and <u>SPHCC</u>s can be identified and used as the basis for assigning costs; or
    - (ii) allocating, where no direct causal link can be identified between an Activity and

the relevant products and/or services and <u>SPHCC</u>s, and instead a reasonable assumption shall be made to assign the <u>Activity Costs</u> to the relevant products and/or services and <u>SPHCC</u>s.

## National Costing Rule 2: Operational reality

8.13 As far as is practicable, the <u>National Costing Methodology</u> shall reflect the trading operations of <u>Royal Mail</u> as they are undertaken with the exception of <u>National Costing Rule 3</u> below concerning <u>Class Costing</u>, but subject to the additional requirements of the <u>Zonal Costing</u> Rules.

## National Costing Rule 3: Class Costing

#### **First Class mail**

- **8.14** <u>Class Costing</u> shall be applied to all <u>Avoidable First Class Costs</u> which meet the following criteria—
  - (a) the costs would be avoided, if <u>Royal Mail</u> were not to offer <u>First Class</u>, but the current operational specifications of all other products and/or services were to remain unchanged<sup>4</sup>; and
  - (b) the costs exclude any incremental costs which would be incurred, if all <u>Second Class</u> using the <u>First Class Activities</u> were to be processed alongside other <u>Second Class</u>.

## **Avoidable First Class Costs**

- 8.15 All <u>Avoidable First Class Costs</u> shall be attributed only to <u>First Class</u>. <u>Avoidable First Class</u> <u>Costs</u> may include, but is not limited to, the following <u>Cost Types</u>—
  - (a) accommodation:
  - (b) shift pay allowance; and
  - (c) plant and machinery non-running time costs.

#### Second Class mail

- **8.16** Class Costing shall be applied to all Avoidable Second Class Costs which meet the following criteria—
  - (a) the costs would be avoided, if <u>Royal Mail</u> were not to offer <u>First Class</u> or <u>Second Class</u>, but the current operational specifications of <u>Third Class</u> were to remain unchanged; and
  - (b) the costs exclude any incremental costs which would be incurred, if all <u>Third Class</u> using <u>First Class</u> or <u>Second Class Activities</u> were to be processed alongside other <u>Third Class</u>.

#### **Avoidable Second Class Costs**

**8.17** All Avoidable Second Class Costs shall be attributed only to Second Class. Avoidable

<sup>&</sup>lt;sup>4</sup> For example, that <u>Second Class</u> mail would continue to be collected and delivered six days a week.

### Second Class Costs may include, but is not limited to, the following Cost Types—

- (a) accommodation;
- (b) shift pay allowance; and
- (c) plant and machinery non-running time costs.

## National Costing Rule 4: General Ledger costs and Cost Types

8.18 The relevant categories of costs recorded in <u>Royal Mail</u>'s financial records (including the financial statements and information required by or under the <u>USPAC Condition</u>), including in the <u>General Ledger</u>, may be aggregated into a set of <u>Cost Types</u> before attributing those costs to <u>Activities</u>. <u>Cost Types</u> shall be selected such that each represents the costs of a single key resource being utilised (e.g. staff, machines, accommodation, vehicles).

## National Costing Rule 5: Activities

**8.19** Where appropriate (and to the extent possible), <u>Business Processes</u> shall be divided into <u>Activities</u>.

## National Costing Rule 6: Resource Drivers

- 8.20 All costs aggregated into <u>Cost Types</u> shall be attributed to the <u>Activities</u> which cause those costs to be incurred. Where a <u>Cost Type</u> is incurred as a result of more than one <u>Activity</u>, <u>Resource Drivers</u> shall be used to attribute an appropriate share of the <u>Cost Type</u> to each <u>Activity</u>.
- **8.21** The Resource Driver for each Cost Type shall be—
  - (a) based on the resource consumption giving rise to the <u>Cost Type</u> (e.g. staff hours, machine hours, accommodation footprint, vehicle hours); and
  - **(b)** quantified based on appropriate operational and financial data.

#### National Costing Rule 7: Products and SPHCCs

- **8.22** Where applicable, each product and/or service, or a group of similar products and/or services, shall be divided into a range of <u>SPHCC</u>s which identifies, and differentiates between, all the applicable and relevant measured characteristics which affect how processing an item of that product and/or service, or group of products and/or services, incurs costs. The measuring characteristics shall, as a minimum, include the following—
  - (a) format (e.g. letter, large letter, packet, etc.);
  - (b) class (e.g. <u>First Class</u>, <u>Second Class</u>, <u>Third Class</u>, etc.);
  - (c) payment method (e.g. stamped, metered, account, PPI, etc.); and
  - (d) handling (e.g. mechanised versus manual, etc.).
- **8.23** The National Costing Methodology shall apply a cost to the whole range of SPHCCs. For the avoidance of doubt, Royal Mail may use additional measuring characteristics.

## National Costing Rule 8: Activity Costs

- 8.24 The National Costing Methodology shall assign an appropriate share of each Activity Cost to each of the relevant SPHCCs as set out below. To determine how an Activity Cost shall be assigned to the relevant SPHCCs, it shall first be determined into which one of the following categories the Activity Cost falls—
  - (a) Attributable Operational Costs: Activity Costs within a single Operational Business

    Process which have a direct causal link to the processing of some or all of the SPHCCs;
  - (b) Attributable Non-operational Costs: Activity Costs which are directly related to certain products and/or services, but are not part of the Operational Business Processes; and
  - (c) Aggregate Costs: Activity Costs, or a proportion of an Activity Cost, which are assigned in aggregate to notional SPHCCs and not incorporated into the unit costs of other SPHCCs, for the following reasons
    - the costs do not follow the handling characteristics which are used to define <a href="SPHCC">SPHCC</a>s (see National Costing Rule 7); or
    - the costs relate to <u>Activities</u> carried out on behalf of other <u>Royal Mail</u> business units for products and/or services that do not result in external revenues attributed to the <u>Reported Business</u>, and do not relate to any of the products and/or services of the <u>Reported Business</u>. These costs shall be included in the costing covered by the <u>National Costing Methodology</u> to ensure reconciliation of costs and data integrity.
  - (d) Overheads, which shall be classed either—
    - (i) if the Activity Costs relate to one or more Operational Business Processes which do not have a direct causal link to any of the SPHCCs being processed, as Pipeline Overheads; or
    - (ii) if the <u>Activity Costs</u> relate to <u>Non-operational Business Processes</u>, as <u>General</u> Overheads.

#### National Costing Rule 9: Activity Drivers

- The assignment of <u>Activity Costs</u> to <u>SPHCC</u>s shall be undertaken using appropriate <u>Activity Drivers</u> which shall be identified and quantified based on the following rules—
  - (a) each <u>Activity Cost</u> shall be assigned to all the <u>SPHCC</u>s which that <u>Activity</u> directly contributes to, or indirectly supports; and
  - (b) <u>Activity Drivers</u> shall reflect the relative proportions of the <u>amount of work workload</u> which the totality of all the units of each <u>SPHCC</u> creates for the related <u>Activity</u>.
- **8.26** Three types of <u>Activity Drivers</u> shall be used—
  - (a) Weighted Volume Drivers (see National Costing Rule 10): These drivers represent the relative amount of workworkload of processing all the units of each SPHCC taking into account the proportion of the total number of units which consume the relevant Activity.

- **(b)** Other Drivers (see National Costing Rule 11): These drivers shall be used for costs which are directly linked to a factor other than mail traffic in the Pipeline (e.g. certain network distribution costs which depend on vehicle runs).
- (c) <u>EPMU</u> (see <u>National Costing Rule 12</u>): <u>EPMU</u> methods which allocate costs based on the relative proportions of the costs which have already been assigned to the relevant SPHCCs.
- **8.27 Table 8** below shows how each type of <u>Activity Cost</u> shall be assigned to <u>SPHCC</u> (which is illustrated by a tick in the Table).

**Table 8: Activity Cost assignment to SPHCC** 

	Attributable Operational Costs and Attributable Non- operational Costs	Overheads	Aggregate Costs
Weighted Volume Drivers	✓		
Other Drivers	✓		✓
EPMU		✓	

### National Costing Rule 10: Weighted Volume Drivers

- **8.28** <u>Weighted Volume Drivers</u> shall incorporate two types of factors for each relevant attributable <u>Activity Cost</u>, namely—
  - (a) <u>Proportional Factors</u>, which represent the proportion of the total volume of each <u>SPHCC</u> which uses the related <u>Activity</u>; and
  - (b) <u>Weighting Factors</u>, which represent the relative proportions of <u>amount of</u> work<del>workload</del> that units of each SPHCC require from the related Activity.
- **8.29** <u>Proportional Factors</u> referred to in **§8.28(a)** shall be based on operational data collected using representative measurements of total volumes (including statistical sampling techniques where necessary).
- **8.30** Depending on the nature of the <u>Activity</u>, one or more of the following variables may be used as a determinant of the <u>amount of workworklead</u> to calculate the <u>Weighting Factors</u>
  - time (needed to carry out the <u>Activity</u>): where appropriate, industrial engineering studies must be carried out in accordance with relevant ISO standards;
  - **(b)** weight: appropriate operational data must be used; and
  - (c) size: appropriate operational data must be used.
- 8.31 Royal Mail must carry out for each Financial Year a review to ascertain which Proportional

- <u>Factors</u> and <u>Weighting Factors</u> need to be reviewed and, if necessary, must update them to ensure that they continue to reflect operational reality accurately.
- **8.32** To identify the <u>Proportional Factors</u> and the <u>Weighting Factors</u> which may need adjusting referred to in **§8.31**, <u>Royal Mail</u> must consider what (if any) changes have occurred during the <u>Financial Year</u> in question in the following areas—
  - (a) working practices;
  - (b) technology; and
  - (c) SPHCCs mix (relative volumes).
- **8.33** Royal Mail may carry out ad hoc event-driven reviews and updates if necessary.

## National Costing Rule 11: Other Drivers

- 8.34 Other Drivers shall be used for costs (certain Attributable Operational Costs and all Attributable Non-operational Costs and Aggregate Costs) which are directly linked to a factor other than mail traffic in the Pipeline.
- **8.35** Other Drivers shall be defined in a way which appropriately reflects the causal link with that factor.

## National Costing Rule 12: Equi-Proportional Mark-Up ('EPMU')

- **8.36** EPMU shall be used for allocating Overheads by treating them in the following manner—
  - (a) <u>Pipeline Overheads</u> shall be allocated to all, and only, those <u>SPHCC</u>s which are processed by that element of the Pipeline; and
  - **(b)** General Overheads shall be allocated to all SPHCCs which are processed through the Pipeline.
- 8.37 <u>EPMU</u> shall be applied for each of the <u>Activity Costs</u> within <u>Overheads</u> separately, and be based only on the proportions of the <u>Attributable Operational Costs</u> and the <u>Attributable Non-operational Costs</u>, once they have been attributed. <u>EPMU</u> applications shall not take account of any other costs already allocated using <u>EPMU</u> ("non-nested" approach).

#### National Costing Rule 13: Traffic measurement

- **8.38** Royal Mail must use the Revenue derived Derived method of traffic measurement, whereby the traffic volume for products and/or services is calculated by dividing the total revenue of the products and/or services by the average unit price of them, in the National Costing Methodology.
- **8.39** The measurement method used for each <u>SPHCC</u> shall be applied consistently within the <u>National Costing Methodology</u> and over time.

#### National Costing Rule 14: Operational data and sampling

8.40 All operational data used by the <u>National Costing Methodology</u> shall be regularly reviewed and, where necessary, updated to ensure the accuracy of costing and its consistency with the operational reality (see National Costing Rule 2).

8.41 Royal Mail must ensure that all sampling used by the National Costing Methodology is applied by a qualified professional statistician as such sampling must be based on statistical techniques regarded as appropriate for such purposes. The reference to a "qualified professional statistician" is a reference to a person with the relevant statistical knowledge and expertise, who shall have a qualification in statistics from a recognised professional body, such as the Royal Statistical Society in the United Kingdom.

## National Costing Rule 15: Data integrity

- 8.42 The integrity of financial and operational data used for the <u>National Costing Methodology</u> shall be preserved by adequate checks and controls, which shall include reconciliation of total cost data at appropriate points in the <u>National Costing Methodology</u>.
- 8.43 The total amount of input costs relating to any element of the <u>National Costing Methodology</u> shall be equal to the total amount of output costs relating to that element. In particular, the following total figures shall be reconciled to each other—
  - (a) the total costs in the General Ledger;
  - **(b)** the total Activity Costs; and
  - (c) the total costs of all SPHCCs.

## **Zonal Costing Methodology**

- 8.44 Royal Mail must
  - ensure that the <u>Zonal Costing Methodology</u> complies with the <u>Zonal Costing Rules</u> set out in this **Section 8**;
  - (b) document the Zonal Costing Methodology in the Costing Manual; and
  - (c) apply the Zonal Costing Methodology where Royal Mail uses different prices for products and/or services falling within the Reported Business for different parts of the United Kingdom, but only where the provision of such products and/or services are subject to obligations under regulatory conditions (as defined by section 28(2) of the Act).

## **Zonal Costing Rules**

#### Zonal Costing Rule 1: Activity Based Costing ('ABC')

The National Costing Rule 1 shall apply and the reference in that Rule to the National Costing Methodology is to be read as a reference to Zonal Costing Methodology.

## Zonal Costing Rule 2: Operational reality

- **8.46** The National Costing Rule 2 shall apply and references in that Rule to
  - the <u>National Costing Methodology</u> is to be read as a reference to <u>Zonal Costing Methodology</u>; and
  - (b) National Costing Rule 3 is to be read as a reference to Zonal Costing Rule 3.

## Zonal Costing Rule 3: Class costing

**8.47** The National Costing Rule 3 shall apply.

## Zonal Costing Rule 4: Zonal General Ledger costs and Cost Types

8.48 Non-staff costs attributed to the <u>Delivery Office</u> shall be broken down by <u>Cost Type</u>. (For the avoidance of doubt, any differences relating to a geographic area in these <u>Cost Types</u> shall be included in the <u>Zonal Costing Methodology</u> in accordance with <u>Zonal Costing Rule 16</u>.). Subject to that qualification, the <u>National Costing Rule 4</u> shall apply.

## Zonal Costing Rule 5: Activities

**8.49** The National Costing Rule 5 shall apply.

## Zonal Costing Rule 6: Resource Drivers

**8.50** The National Costing Rule 6 shall apply.

## Zonal Costing Rule 7: Zonal Products and SPHCCs

- **8.51** Royal Mail must attribute costs to products and/or services falling within the Reported Business referred to in **§8.44(c)** by sub-dividing them into SPHCCs in accordance with the following measured characteristics—
  - (a) format (e.g. letter, flat, packet, etc.);
  - (b) class (e.g. First Class, Second Class, Third Class, etc.); and
  - (c) payment method (e.g. stamped, metered, account, PPI, etc.); and
  - (d) handling (e.g. mechanised versus manual, etc.).
- **8.52** For the avoidance of doubt, <u>Royal Mail</u> may use additional measuring characteristics, provided that the measured characteristics referred to in **§8.51** are used.

#### Zonal Costing Rule 8: Activity Costs

- 8.53 The National Costing Rule 8 shall apply and references in that Rule to
  - the <u>National Costing Methodology</u> is to be read as a reference to <u>Zonal Costing Methodology</u>; and
  - **(b)** National Costing Rule 3 is to be read as a reference to Zonal Costing Rule 7.

#### Zonal Costing Rule 9: Activity Drivers

- 8.54 The National Costing Rule 9 shall apply and references in that Rule to
  - the <u>National Costing Methodology</u> is to be read as a reference to <u>Zonal Costing Methodology</u>;
  - **(b)** National Costing Rule 10 is to be read as a reference to Zonal Costing Rule 10;

- (c) National Costing Rule 11 is to be read as a reference to Zonal Costing Rule 11; and
- (d) National Costing Rule 12 is to be read as a reference to Zonal Costing Rule 12.

## Zonal Costing Rule 10: Weighted Volume Drivers

**8.55** The National Costing Rule 10 shall apply.

## Zonal Costing Rule 11: Other Drivers

**8.56** The National Costing Rule 11 shall apply.

## Zonal Costing Rule 12: Equi-proportional Mark-up ('EPMU')

**8.57** The National Costing Rule 12 shall apply.

#### Zonal Costing Rule 13: Zonal Traffic measurement

- 8.58 The <u>National Costing Rule 13</u> shall apply and references in that Rule to the <u>National Costing Methodology</u> are to be read as references to <u>Zonal Costing Methodology</u>.
- 8.59 With the commencement of the second <u>Financial Quarter</u> of the first <u>Financial Year, Royal Mail</u> must ensure that any <u>MCS</u> sampling used for estimating costs in relation to <u>Zones</u> for downstream services must include all volumes associated with the downstream services. References to downstream services for that purpose are references to services relating to the final sortation conducted at the <u>Inward Mail Centre</u> and <u>Delivery Offices</u>, and the conveyance of mail items from the <u>Inward Mail Centre</u> to final delivery destination.

## Zonal Costing Rule 14: Zonal Operational data and sampling

- **8.60** Subject to **§§8.61-8.63**, the <u>National Costing Rule 14</u> shall apply and references in that Rule to
  - the <u>National Costing Methodology</u> is to be read as a reference to <u>Zonal Costing Methodology</u>; and
  - (b) National Costing Rule 2 is to be read as a reference to Zonal Costing Rule 2.
- **8.61** Royal Mail must review its operational data for the estimation of costs of products and/or services falling within the Reported Business referred to in **§8.44(c)**. In addition, Royal Mail must update its estimation of such costs to ensure that it is consistent with—
  - (a) the updated values of the explanatory variables<sup>5</sup> of the relevant cost functions (e.g. postcode sector volumes, number of delivery points, area, volume delivered per delivery point and proportion of business delivery);
  - (b) the updated variable coefficients<sup>6</sup> of the relevant cost functions (updated variable coefficients<sup>7</sup>);

\_

<sup>&</sup>lt;sup>5</sup> The reference to an explanatory variable is a reference to a variable which is used to explain or to predict changes in the value of another variable.

<sup>&</sup>lt;sup>6</sup> The reference to a variable coefficient is a reference to figure multiplied with a variable or an unknown quantity in an algebraic formula.

<sup>&</sup>lt;sup>7</sup> Ibid.

- (c) the updated mapping of postcode sectors, <u>Delivery Offices</u>, and <u>Inward Mail Centres</u> to Zones; and
- (d) the updated differentials in costs for each <u>Zone</u> arising from geographic differentials in pay rates and other input costs.

Except for the first <u>Financial Year</u>, <u>Royal Mail</u> must comply with these obligations before the start of every <u>Financial Year</u>. In relation to the first <u>Financial Year</u>, <u>Royal Mail</u> must comply with these obligations by the end of that <u>Financial Year</u>.

- 8.62 Where regressions<sup>8</sup> are used to estimate the costs referred to in §8.61, Royal Mail must include in the <u>Costing Manual</u> information demonstrating that the regressions<sup>9</sup> are statistically valid. <u>Royal Mail</u> must ensure that such regressions are derived by a qualified professional econometrician using data in accordance with the <u>Zonal Costing Rules</u>. The reference to a "qualified professional econometrician" is a reference to a person with the relevant knowledge and expertise in econometrics, who is qualified in the application of mathematics and statistical methods to economic data.
- 8.63 Royal Mail must ensure that all sampling used for the estimation of costs referred to in §8.61 is applied by a qualified professional statistician as such sampling must be based on statistical techniques regarded as appropriate for such purposes. The reference to a "qualified professional statistician" is a reference to a person with the relevant statistical knowledge and expertise, who shall have a qualification in statistics from a recognised professional body, such as the Royal Statistical Society in the United Kingdom. Royal Mail must include in the Costing Manual information demonstrating that the sampling is statistically valid.

## Zonal Costing Rule 15: Zonal Data consistency

- The <u>National Costing Rule 15</u> shall apply and references in that Rule to the <u>National Costing Methodology</u> are to be read as references to <u>Zonal Costing Methodology</u>.
- **8.65** Royal Mail must also ensure that the following figures are reconciled to each other—
  - (a) any estimated costs for the postcode sectors served by each <u>Delivery Office</u> shall be reconciled with the total relevant costs of that <u>Delivery Office</u>; and
  - (b) geographically de-averaged costs used for estimating costs in relation to <u>Zones</u> shall be reconciled with the corresponding costs to be derived under <u>National Costing Rule 15</u>.

## Zonal Costing Rule 16: Geographic cost reflectivity

**8.66** Royal Mail must ensure that its estimation of costs in relation to Zones includes all material differences between costs that vary by each geographical area encompassed by the Zone in question.

<sup>&</sup>lt;sup>8</sup> The reference to a regression is a reference to a relationship between the mean value of a random variable and the corresponding values of one or more independent variables.

<sup>&</sup>lt;sup>9</sup> Ibid.

## Zonal Costing Rule 17: Postcode sector cost estimation

**8.67** Royal Mail must, where it uses estimates of costs in relation to postcode sectors as inputs for estimating costs in relation to Zones, use actual postcode sector data.

## Zonal Costing Rule 18: Amendment of Zones

- **8.68** Royal Mail must comply with the following rules in relation to defining and amending Zones—
  - (a) for the first <u>Financial Year</u>, the total number of <u>Zones</u> shall not exceed four; and
  - (b) Royal Mail must review the boundaries of Zones and Royal Mail may define new or additional Zones, provided that Zones having the similarly estimated unit costs shall always be treated as part of the same Zone.

Except for the first <u>Financial Year</u>, <u>Royal Mail</u> must comply with the obligation in **§8.68(b)** before the start of every <u>Financial Year</u>. In relation to the first <u>Financial Year</u>, <u>Royal Mail</u> must comply with that obligation by the end of that <u>Financial Year</u>.

## Zonal Costing Rule 19: Reconciliation of zonal and national cost estimates

- **8.69** Royal Mail must review changes in its estimation of costs in relation to Zones to ensure that
  - in deriving each unit cost estimate, the estimated total postcode sector volumes and estimated total volumes in relation to <u>Zones</u> both equal the total national volumes derived under <u>National Costing Rule 15</u>, and
  - (b) the average unit costs in relation to <u>Zones</u> derived from the volumes referred to in §8.69(a) remains equal to the corresponding average unit costs derived under the National Costing Methodology.

Except for the first <u>Financial Year</u>, <u>Royal Mail</u> must comply with these obligations before the start of every <u>Financial Year</u>. In relation to the first <u>Financial Year</u>, <u>Royal Mail</u> must comply with these obligations by the end of that <u>Financial Year</u>.

## **Exceptional Transformation costs**Costs

- 8.70 Royal Mail must account for all exceptional costs Transformation Costs arising from the trading operations of Royal Mail relevant to the Reported Business which are not already included in the National Costing Methodology. Royal Mail must account for Transformation Costs such exceptional costs in the annual income statements and product profitability statements for the Reported Business. Examples of such exceptional costs are the costs of Royal Mail's "Colleague Share" share scheme, redundancy and restructuring costs.
- **8.71** Royal Mail must allocate the <u>Transformation Costsexceptional costs</u> referred to in **§8.70** to the <u>Reported Business</u> by using an appropriate cost driver. The basis of the allocation concerned shall be set out in the Accounting Methodology Manual.

#### **Transfer Charges**

8.72 Royal Mail must ensure that the following types of Transfer Charges between the Reported Business and the rest of the Relevant Group are applied in compliance

- 8.73 Transfer Charges <u>between</u> the Relevant Group <u>and the rest of RMH Group; and</u>
- 8.74
- **8.75** Transfer Charges <u>between the Reported Business and the rest of the Relevant Group.</u>
- 8.76
- 8.778.73 For §8.72(a) and (b), a <u>Transfer Charge</u> shall be calculated on an arm's length basis for each product and/or service provided. For the avoidance of doubt, the Transfer Charges between the Four FREs within the Reported Business shall be applied in accordance with the relevant rules set out in Section 9 concerning Transfer Prices.
- 8.788.74 Royal Mail must set a <u>Transfer Charge</u> for the provision of each product and/or service\_ between the Reported Business and the rest of the Relevant Group.—
  - (a) between the Relevant Group and the rest of RMH Group; and
  - (b) between the Reported Business and the rest of the Relevant Group.
- 8.79 The <u>consolidated</u> income statement for the <u>Relevant Group</u> shall include the <u>Transfer</u> <u>Charges</u> between the <u>Relevant Group</u> and the rest of <u>RMH Group</u>.
- 8.808.75 All income statements for the <u>Reported Business</u> shall include the <u>Transfer Charges</u> between the <u>Reported Business</u> and the rest of <u>Relevant Group</u>.
- 8.818.76 Subject to §§8.77-78, Royal Mail must calculate a Transfer Charge on an arm's length basis in accordance with §8.72(a) and (b) by securing that—
  - (a) if the product and/or service provided is provided to persons other than RHM Groupitselfthe Relevant Group, the Transfer Price shall be equivalent to the price charged to those persons;
  - **(b)** if the product and/or service is provided to the <u>RHM GroupRelevant Group</u> by other persons, the <u>Transfer Price</u> shall be equivalent to the price charged by those persons; and
  - (c) if the product and/or service does not fall within §8.76(a) or (b), the <u>Transfer Price</u> shall be equal to the <u>FAC</u> of that product and/or service plus a mark up of 10% on FAC.
- **8.828.77** Royal Mail is not required to set a <u>Transfer Price</u> for the services provided by central finance, human resources, and purchasing and customer management services which are used by <u>UKLPIUKPIL</u> and are managed centrally.
- 8.838.78 Royal Mail must apply the rule referred to in §8.76(c) in relation to any use of its vehicles, where the use of vehicles is shared between the Reported Business and the rest of the Relevant Group.
- **8.848.79** Royal Mail must provide a statement setting out all <u>Transfer Charges</u> as part of the notes to the annual and quarterly income statements.
- **8.80** Royal Mail must include in the Accounting Methodology Manual a detailed description of the approach and the assumptions used for the calculation of the <u>Transfer Charges</u>.

#### **Cost Matrix**

- 8.858.81 The cost lines included in the Cost Matrix must be based on the mapping to the General Ledger which was applied in the Cost Matrix prepared as part of Royal Mail's Strategic Business Plan submitted by Royal Mail to OFCOM on 14 May 2015, with the exception of the guidance given in notes 2, 3 and 4 to Figure 7 of Appendix 1 of these Guidelines.
- 8.82 When changes to the mapping of the Cost Matrix to the General Ledger are necessary, the Cost Matrix shall include the details and the impact of those changes and the reasons for those changes.

## **PVEO Analysis**

- 8.83 The PVEO Analysis for a Financial Year in question shall be prepared in compliance with the following rules:
  - Price related cost changes in the Financial Year in question from the prior Financial Year must be calculated by multiplying the costs in the prior Financial Year (excluding all non-recurring items captured by §8.83(c)) by the percentage change in an appropriate inflation index during the Financial Year in question from the prior Financial Year.
  - (b) Volume related cost changes in the Financial Year in question from the prior Financial Year must be calculated as the sum of the following changes:
    - Year in question from the prior Financial Year, calculated by multiplying the percentage change in the Workload in the Financial Year in question from the prior Financial Year by the relevant costs in the prior Financial Year excluding non-recurring items (captured by §8.83(c)) and subsequently inflated using the inflation index used in §8.83(a).
    - (ii) the changes in the Financial Year in question from the prior Financial Year in all the costs related to POL and international terminal dues; and
    - (iii) any other cost changes in the Financial Year in question from the prior Financial Year related to changes in mail volume.
  - (c) Other cost changes must encompass all the cost changes in excess of £5 million related to non-recurring items in the Financial Year in question and the prior Financial Year.
  - Efficiency related cost changes shall be the remaining change in the cost in the Financial Year in question from the prior Financial Year, after all the cost changes in §§8.83(a), (b) and (c) have been deducted from the total change in costs in the Financial Year in question from the prior Financial Year.

## **Pension costs**

8.868.84 Any pension contributions made by Royal Mail to its pension schemes, including DB

Pension Service Costs, which is included in the income statement, the PVEO Analysis, and
Cost Matrix shall be measured on a cash paid basis.

# Annual cCapital employed statements

#### Introduction

- 8.878.85 Royal Mail must ensure that the preparation of the annual capital employed financial statement for the Reported Business complies with the rules set out in §§8.8286-8.120124.
- 8.888.86 The annual capital employed statement shall include operational assets and net working capital (net value of current assets and current liabilities).
- 8.898.87 The annual capital employed statement shall represent the closing balances of the items as at the end of the <u>Financial Year</u> to which the annual capital employed statement relates.
- 8.908.88 All the assets and liabilities which are wholly related to the operations and trading of products and services of the Reported Business shall be included in the annual capital employed statement.
- 8.918.89 Those assets and liabilities which are partly related to the operations and trading of products and services of the Reported Business shall be apportioned to the Reported Business in compliance with the rules set out in §§8.8690-8.120124.

#### Non-current assets

8.928.90 Royal Mail must include in the annual capital employed statement the non-current assets specified in (and in the manner prescribed in) §§8.8791-8.97101.

Fixed assets (property, plant and equipment)

- 8.938.91 The value of the fixed assets shall be based on the historical costs and depreciation records kept in the Fixed Asset Register.
- 8.948.92 The value of the fixed assets shall be consistent with the values reported in the statutory accounts and the depreciation costs calculated by the <a href="National Costing">National Costing</a> Methodology.
- 8.958.93 Royal Mail must include a note to the annual capital employed statement setting out the main asset categories together with their associated NBV, costs and depreciations.
- 8.968.94 The allocation of fixed assets which are wholly or partly used by the products and/or services of the Reported Business shall be based on the relative extent to which those assets are used by the products and/or services concerned, where applicable consistent with the allocation of corresponding depreciation charges in the National Costing Methodology.
- 8.978.95 If a <u>Transfer Price</u> is charged to the <u>Reported Business</u> by the rest of <u>Royal Mailthe</u>

  <u>Relevant Group</u> for the use of a fixed asset, that fixed asset shall be excluded from the annual capital employed statement of the <u>Reported Business</u>.
- 8.988.96 Any internal transfer of fixed assets shall be disclosed in the notes to the annual capital employed statement.

#### Intangible assets

- 8.998.97 The categorisation of intangible assets for the Reported Business shall be consistent with the categorisation in the Royal Mail plc's statutory accounts.
- **8.1008.98** Royal Mail is not required to include goodwill in intangible assets.
- 8.1018.99 The allocation of software, master franchise licences and customer listing assets shall be based on the relative extent to which such assets are used by the products and/or services of the Reported Business.

Other non-current assets

- 8.1028.100 Subject to §8.97101, Royal Mail may include in aggregate other non-current assets.
- **8.1038.101** Royal Mail must include a note to the annual capital employed statement setting out the main items included in other non-current assets.

#### **Current assets**

8.1048.102 Royal Mail must include in the annual capital employed statement the current assets specified in (and in the manner prescribed in) §§8.99103-8.110114.

Trade and other receivables

- **8.105**8.103 Trade and other receivables shall include prepayments.
- **8.1068.104** Prepayments shall be allocated based on the allocation of the costs of the associated products and/or services.
- **8.1078.105** Trade receivables shall be allocated based on the revenues of the products and/or services to which they relate.
- **8.108**8.106 Royal Mail must include a note to the annual capital employed statement setting out details of the amount of any bad debt provisions allocated to trade receivables.
- 8.1098.107 Royal Mail may include in aggregate other receivables, but Royal Mail must include a note to the annual capital employed statement setting out the main items included in other receivables.

Cash and cash equivalent

- **8.1108.108** The categorisation of cash and cash equivalents for the <u>Reported Business</u> shall include items that are maintained for the purpose of financing business operations and to enable trading of the products and/or services in the <u>Reported Business</u>.
- **8.1118.109** Overdrafts shall be netted off against cash and cash equivalents.
- 8.1128.110 Cash and cash equivalents that are managed centrally within the Relevant Group shall be allocated to the Reported Business to identify the cash requirements for the purpose of financing the operations and trading of the products and/or services of the

#### Reported Business.

- **8.1138.111** The cash requirements of the <u>Reported Business</u> shall be determined based on the operating cash flows and capital expenditure commitments identified to the Reported Business by the rules in these Guidelines.
- **8.1148.112** The cash requirements of the <u>Reported Business</u> may be estimated based on the actual operating and capital expenditures.
- **8.1158.113** Royal Mail must include a note to the annual capital employed statement setting out the main items included in cash and cash equivalents.

Other current assets

8.1168.114 Royal Mail may include in aggregate other items in other current assets, but Royal Mail must include a note to the annual capital employed statement setting out the main items included in other current assets.

#### **Current liabilities**

8.1178.115 Royal Mail must include in the annual capital employed statement at least the current liabilities specified in (and in the manner prescribed in) §§8.112116-8.120124.

Trade and other payables

- 8.1188.116 The allocation of trade payables between the <u>Reported Business</u> and the rest of <u>Royal Mail</u> shall be based on the allocation of the costs of the <u>Activities</u>, products and/or services to which they relate.
- **8.1198.117** Trade and other payables shall include deferred income. The allocation of deferred income between the <u>Reported Business</u> and the rest of <u>Royal Mail</u> shall be based on the allocation of the corresponding income.
- **8.1208.118** Royal Mail may include in aggregate other items in other payables, but Royal Mail must include a note to the annual capital employed statement setting out the main items included in other payables.

Financial liabilities

- **8.1218.119** Financial liabilities shall include interest bearing loans (with less than a year maturity), leases and derivative financial liabilities.
- **8.1228.120** The allocation of financial liabilities between the <u>Reported Business</u> and the rest of the <u>Relevant Group</u> shall be carried out as follows—
  - (a) An analysis of the loans shall be undertaken to identify whether the loans have been obtained in relation to a specific asset or group of assets, in which case, the loan shall be allocated based on the allocation of the corresponding asset or group of assets. If the loan does not relate to a specific asset or group of assets, it must be allocated to the <a href="Reported Business">Reported Business</a> using the same basis used for the allocation of cash and cash equivalents.
  - **(b)** The allocation of lease liabilities to the Reported Business shall be based on the

allocation of the assets to which the associated leases relate.

**8.1238.121** Royal Mail must include a note to the annual capital employed statement setting out the details of the facilities (for example, due date, interest rates, etc.).

Provisions and other current liabilities

- **8.124**8.122 The allocation of provisions and other current liabilities to the <u>Reported Business</u> shall be based on the costs and <u>Activities</u> to which those provisions and other current liabilities relate.
- 8.1258.123 Where possible, allocation of provisions and other current liabilities to the Reported Business shall be based on the allocation of related costs and activities to the Reported Business.
- 8.1268.124 Royal Mail may include in aggregate provisions and other current liabilities, but Royal Mail must include a note to the annual capital employed statement setting out the main items included in provisions and other current liabilities.

## Annual cCash flow statements

- 8.1278.125 Royal Mail must ensure that the preparation of the annual cash flow statement for the Reported Business complies with the rules set out in §§8.122126-8.123127.
- **8.1288.126** The annual cash flow statement shall include all operational cash flows of the Reported Business.
- **8.1298.127** The allocation of cash flow items to the <u>Reported Business</u> shall be consistent with the allocation of costs and revenues in the corresponding income statements, or the allocation of assets and liabilities in the corresponding capital employed statements.

## **Section 9: Separation Methodology**

## Introduction

**9.1** Royal Mail must ensure that the Regulatory Accounting Methodology complies with the detailed rules set out in this **Section 9**, which relate to the separation, allocation and apportionment of costs, revenues, assets and cash flows between the any Four-FREs and product groups within the Reported Business.

## **Annual & quarterly ilncome statements**

9.2 Royal Mail must ensure that its preparation of any income statement for the Four FREsany product groups complies with the rules set out in §§9.3-9.1513.

## Levels of preparation

- 9.3 Royal Mail must ensure, for the purposes of USPAC 1.5.2(a), and (d), that annual income statements and annual end to end income statements in respect of USO, non-USO and non-Mails are prepared to the level of Financeability EBIT.
- **9.4** Royal Mail must ensure, for the purposes of USPAC 1.5.2(b), (c) and (e), that quarterly income statements, annual reconciliations of such income statements and quarterly end to end income statements in respect of USO, non-USO and non-Mails are prepared to the level of Financeability EBIT operating profit/(loss) before exceptional items.

## **Apportionment of revenues**

- 9.5 References to "revenue" in this **Section 9** are references to external and internal turnover used in the preparation of any income statement. External and internal turnover shall-consist of income for products and/or services arising from the fair value of the consideration received or receivable for products and/or services provided as part of the operational -trading of the Four FREsReported Business.
- 9.6 Revenues shall be allocated to products and/or services in accordance with Section 7 of these Guidelines.

## **Apportionment of costs**

- **9.7** Costs shall be allocated across the Four FREsany product groups within the Reported Business as follows—
  - (a) All <u>SPHCC</u>s in the <u>National Costing Methodology</u> shall be mapped to one or more of the <u>Four FREs</u>.
  - (b)(a) The costs which are within the scope of the National Costing Methodology shall be allocated to the Four FREsproduct groups in accordance with the National Costing Methodology. Where SPHCCs are mapped to more than one of the Four FREsproduct group, the basis of the allocation of the SPHCC costs concerned shall be included in the National Costing Methodology and set out in the Costing Manual.
  - (c)(b) Transformation Costshe exceptional costs referred to in §8.70 shall be allocated

to the <u>Four FREsproduct groups</u> using an appropriate underlying driver. The basis of the allocation concerned shall be set out in the <u>Accounting Methodology</u> Manual.

## **Transfer Pricing between separated entities**

9.8 Where one of the <u>Four FREs</u> provides a product or service to one or more other of the <u>Four FREs</u>, <u>Royal Mail</u> must determine a <u>Transfer Price</u> for that product or service.

# Transfer Pricing across Line A Transfer Pricing between Upstream Services and Downstream Services

9.9 Where products and/or services within the <u>USO Products Entity</u> use the services whose costs are allocated to the <u>End-to-end Only Products Entity</u>, the <u>Transfer Prices</u> shall be determined by applying a mark-up of 10% to the <u>FAC</u> costs of the products and/or services concerned of the <u>End-to-end Only Products Entity</u>.

## **Transfer Pricing across Line B**

9.109.8 Where products and/or services within the <u>USO Products Entity</u> and the <u>non-USO Products Entity</u> use the services whose costs are allocated to <u>Downstream Services</u>

<u>Entity</u>, the <u>Transfer Prices</u> between the <u>Upstream Services</u> and the <u>Downstream Services</u> shall be determined in compliance with the rules set out in §§9.119-9.1513.

## Equivalence pricing

- 9.119.9 Where there are appropriate comparable <u>Access</u> products and/or services provided by <u>Royal Mail</u> to external customers, <u>Royal Mail</u> must apply the equivalence pricing approach referred to §9.12-10 in determining <u>Transfer Prices</u>.
- 9.129.10 The equivalence pricing approach means—
  - (a) An appropriate comparable <u>Access</u> product and/or service shall be identified for the internal product and/or service for which the <u>Transfer Price</u> is to be determined.
  - (b) The operational and <u>Activity</u> differences between the internal product and/or service for which the <u>Transfer Price</u> is to be determined, and the appropriate comparable product or service shall be identified.
  - (c) The <u>FAC</u> differences of the operational and <u>Activity</u> differences referred to in §9.1210(b) above shall be identified in a manner consistent with the <u>National</u> Costing Methodology.
  - (d) The <u>Transfer Price</u> shall be determined as the sum of the price of the appropriate comparable <u>Access</u> product and/or service, the <u>FAC</u> differences referred to in
    - §9.1210(c) plus a mark up of 10% on those FAC differences.
- 9.139.11 Royal Mail may use prices for First Class Access products and/or services, provided that the equivalence pricing approach referred to §9.12\_10 is followed and that they have—

- (a) sufficient sales volumes to form a statistically valid basis for the calculation of the FAC of the product and/or service in question; and
- **(b)** material sales volumes.

Where <u>Royal Mail</u> wishes to use prices for <u>First Class Access</u> products and/or services but is unable to satisfy **§9.1311(a) and (b)**, <u>Royal Mail</u> must use the price for the most comparable <u>Second Class Access</u> products and/or services.

## Cost-plus pricing

9.149.12 Where there are no appropriate comparable <u>Access</u> products and/or services, <u>Royal Mail</u> must set the <u>Transfer Price</u> as equal to the <u>FAC</u> of the product and/or service in question plus a mark up of 10% on that FAC.

#### Grouping

- 9.159.13 Single <u>Transfer Prices</u> may be applied to groups of products and/or services, provided that all of the following requirements are met—
  - (a) in determining such groups, <u>Royal Mail</u> must only include products and/or services in a group that fall within the same market definition as out in the following market studies—
    - (i) Market study decisions on wholesale & packets markets published in November 2010<sup>10</sup>.
    - (ii) Market study proposals on retail markets published in March 2011<sup>11</sup>.
    - (iii) Market study proposals on international outbound mail market published in May 2011<sup>12</sup>.
  - (b) in determining such groups, <u>Royal Mail</u> must not include in a group products and/or services that have materially different handling characteristics as defined in the Costing Manual.
  - (c) in determining such groups, <u>Royal Mail</u> must not include in a group products and/or services that are subject to different obligations under regulatory conditions (as defined by section 28(2) of the <u>Act</u>).

# **Annual capital employed statement**

- **9.16** Royal Mail must ensure that the preparation of the annual capital employed statements for each of the Four FREs complies with the rules set out below set out in §§9.17-9.39.
- **9.17** The format of the annual capital employed statements for each of the <u>Four FREs</u> shall be the same as that for the annual capital employed statement provided for the <u>Reported</u> Business as a whole.

12 Ibid

<sup>&</sup>lt;sup>10</sup> http://www.nationalarchives.gov.uk/webarchive/communications-media.htm

<sup>11</sup> Ibid

- 9.18 The annual capital employed statement for each of the <u>Four FREs</u> shall represent the closing balances of the items as at the end of the <u>Financial Year</u> to which the annual capital employed statement for each of the <u>Four FREs</u> relates.
- 9.19 Royal Mail must ensure that the allocation of the annual capital employed statement items to the Four FREs is consistent with—
  - (a) the allocation of costs and revenues in the corresponding income statements of the Four FREs; and
  - (b) the allocation of annual capital employed statement items to the Reported Business as a whole.

but where there is a conflict between the rules in §9.19(a) and (b), Royal Mail must give priority to the rule in §9.19(a).

#### Non-current assets

9.20 Royal Mail must include in the annual capital employed statement for each of the Four FREs the non-current assets specified in (and in the manner prescribed in) §§9.21-9.24.

Fixed assets (property, plant and equipment)

- 9.21 The allocation of each fixed asset to the <u>Four FREs</u> shall be consistent with the extent to which the fixed asset is used by the <u>Activities</u>, products and/or services identified to each of the <u>Four FREs</u>. If a fixed asset is used solely by the <u>Activities</u>, products and/or services identified to one of the <u>Four FREs</u>, the fixed asset shall be allocated to that entity. Where a fixed asset is used by the <u>Activities</u>, products and/or services identified to more than one of the <u>Four FREs</u>, the value of the fixed asset concerned shall be apportioned between the relevant <u>Four FREs</u> using an appropriate basis which is consistent with the basis for apportioning depreciation costs in the National Costing Methodology.
- **9.22** The basis of allocation of fixed assets to the <u>Four FREs</u> shall also be consistent with the basis of allocation of fixed assets to the <u>Reported Business</u> as a whole.
- 9.23 Royal Mail must include a note to the annual capital employed statement for each of the Four FREs setting out the main asset categories together with their associated NBV, costs and depreciations.

Intangible assets

9.24 The categorisation of intangible assets for the <u>Four FREs</u> shall be consistent with the categorisation used in the annual capital employed statement of the <u>Reported Business</u> as a whole.

#### Current assets

9.25 Royal Mail must include in the annual capital employed statement for each of the Four-FREs the current assets specified in (and in the manner prescribed in) §§9.26-9.31.

Trade and other receivables

9.26 Trade and other receivables shall include prepayments.

- **9.27** Prepayments shall be allocated to the <u>Four FREs</u> based on the allocation of the costs of the associated products and/or services.
- **9.28** Trade receivables shall be allocated to the <u>Four FREs</u> based on the revenues of the products and/or services to which they relate.

#### Cash and cash equivalent

- 9.29 Overdrafts shall be netted off against cash and cash equivalents.
- **9.30** Cash and cash equivalents must be allocated to each of the <u>Four FREs</u> in accordance with their cash requirements for the purpose of financing the operations and trading of the products and/or services of the entity in question.
- **9.31** The cash requirements of each of the <u>Four FREs</u> may be estimated based on the actual operating and capital expenditures allocated to each of the <u>Four FREs</u>.

#### **Current liabilities**

9.32 Royal Mail must include in the annual capital employed statement for each of the Four FREs the current liabilities specified in (and in the manner prescribed in) §§9.33-9.39.

#### Trade and other payables

- **9.33** The allocation of trade payables shall be based on the allocation of the costs of the <u>Activities</u> or products and/or services to which they relate.
- **9.34** Trade and other payables shall include deferred income. The allocation of deferred income shall be based on the allocation of the corresponding income.

#### Financial liabilities

- 9.35 Financial liabilities shall include interest bearing loans (with less than a year maturity), leases and derivative financial liabilities
- 9.36 The allocation of financial liabilities between the Four FREs shall be carried out as follows—
  - An analysis of the loans must be undertaken to identify whether the loans have been obtained in relation to a specific asset or asset group, in which case the loan shall be allocated to the <u>Four FREs</u> based on the allocation of the corresponding asset or asset group to the <u>Four FREs</u>. If the loan relates to the <u>Reported Business</u> as a whole, it shall be allocated to all the <u>Four FREs</u> using the same basis used for the allocation of cash and cash equivalents.
  - (b) The allocation of lease liabilities to the <u>Four FREs</u> shall be based on the allocation of the assets to which the associated leases relate.
- 9.37 Royal Mail must include a note to the annual capital employed statement setting out the details of the facilities (for example, due date, interest rates, etc.).

#### Provisions and other current liabilities

- **9.38** The allocation of provisions and other current liabilities to the <u>Four FREs</u> shall be based on the costs and the Activities to which the provisions and other current liabilities relate.
- **9.39** Royal Mail may include in aggregate provisions and other current liabilities for each the Four FREs, but Royal Mail must include a note to the annual capital employed statement setting out the main items included in provisions and other current liabilities.

## **Annual cash flow statement**

- 9.40 Royal Mail must ensure that the preparation of the annual cash flow statements for each of the Four FREs complies with the rules set out below set out in §§9.41-9.42.
- 9.41 The annual cash flow statement shall include all operational cash flows of the Four FREs.
- 9.42 Royal Mail must ensure that the allocation of the annual cash flow statement items to the Four FREs is consistent with
  - the allocation of costs and revenues in the corresponding income statements of the <u>Four FREs</u> or the allocation of assets and liabilities in the corresponding capital employed statements of the <u>Four FREs</u>; and
  - (b) the allocation of annual cash flow statement items to the Reported Business as a whole.

but where there is a conflict between the rules in §9.42(a) and (b), Royal Mail must give priority to the rule in §9.42(a).

## **Section 10: Auditing**

**10.1** For the purpose of USPAC 1.3.4, <u>Royal Mail</u> must secure an appropriate audit opinion by a <u>Qualified Independent Auditor in respect of the financial statements and information specified in **Column 1 of Table 9** on the basis specified in **Column 2 of that Table**.</u>

Table 9: Auditing bases directed for the purpose of USPAC 1.3.4

Column 1: Fi	nancial statement/information referred to in USPAC 1.3.1	Column 2: Auditing basis
USPAC- 1.3.1(a)	<u>consolidated</u> income statement	<u>PPIA</u>
USPAC- 1.3.1(b)	consolidated balance sheet statement	<u>PPIA</u>
USPAC- 1.3.1(c)	consolidated cash flow statement	<u>PPIA</u>
USPAC- 1.3.1(d)	consolidated cash flow projection statement	Not applicable
USPAC- 1.3.1(e)	Strategic Business Plan	Not applicable
USPAC- 1.3.1(f)	Reconciliation of consolidated income, balance sheet and cash flow statements with the consolidated accounts of RMH plc	<u>PPIA</u>
USPAC- 1.3.1(g)	Annual Budget	<del>Not applicable</del>

10.210.1 For the purpose of USPAC 1.4.4, Royal Mail must secure an appropriate audit opinion by a Qualified Independent Auditor in respect of the financial statements and information specified in Column 1 of Table 10 on the basis specified in Column 2 of that Table.

Table 10: Auditing bases directed for the purpose of USPAC 1.4.4

Column 1: F 1.4.1	inancial statement/information referred to in USPAC	Column 2: Auditing basis
USPAC 1.4.1(a)	Annual income statement (including Cost Matrix and PVEO Analysis)	<u>PPIA</u>
USPAC 1.4.1(b)	Quarterly income statement (including Cost Matrix)	Not applicable
USPAC 1.4.1(c)	Annual reconciliation of statements/information specified in USPAC 1.4.1(c)	Not applicable
USPAC 1.4.1(d)	Annual reconciliation of statements/information specified in USPAC 1.4.1(d)	PPIA
USPAC	Annual capital employed statement	<u>PPIA</u>

1.4.1(e)		
USPAC 1.4.1(f)	Annual reconciliation of statements/information specified in USPAC 1.4.1(f)	<u>PPIA</u>
USPAC 1.4.1(g)	Annual cash flow statement	<u>PPIA</u>
USPAC 1.4.1(h)	Annual reconciliation of statements/information specified in USPAC 1.4.1(h)	Not applicable
USPAC 1.4.1(i)	Annual product profitability statement	<u>PPIA</u>
USPAC 1.4.1(j)	Quarterly product profitability statement	Not applicable
USPAC 1.4.1(k)	Monthly revenue and volume information statement	Not applicable
USPAC 1.4.1(I)	Quarterly revenue, cost and volume information statements	Not applicable

For the purpose of USPAC 1.5.5, Royal Mail must secure an appropriate audit opinion by a Qualified Independent Auditor in respect of the financial statements and information specified in Column 1 of Table 11 on the basis specified in Column 2 of that Table.

Table 11: Auditing bases directed for the purpose of USPAC 1.5.5

Column 1: Fil 1.5.2	nancial statement/information referred to in USPAC	Column 2: Auditing basis
USPAC- 1.5.2(a)	Annual income statement	<u>PPIA</u>
USPAC- 1.5.2(b)	Quarterly income statement	<del>Not applicable</del>
USPAC- 1.5.2(c)	Annual reconciliation of statements/information specified in USPAC 1.5.2(c)	<del>Not applicable</del>
USPAC 1.5.2( <del>d</del> <u>a</u> )	Annual end to end income statement in respect of USO, non-USO and non-Mails	<u>PPIA</u>
USPAC 1.5.2( <u>eb</u> )	Quarterly end to end income statement in respect of USO, non-USO and non-Mails	Not applicable
USPAC- 1.5.2(f)	Annual capital employed statement	<u>PPIA</u>
USPAC 1.5.2(g)	Annual cash flow statement	<u>PPIA</u>

# **Appendix 1**

# **Pro-formas**

# Figure 1: Consolidated income statement and reconciliation to RMH plc consolidated accounts

Consolidated income statement annual

power Fork Subsidy Payment  Inue  Ile costs excluding ColleagueShare and restructuring costs Ibution and conveyance operating costs In operating costs In of post tax profit/(loss) from joint ventures and associates  Interpretation costs operating exceptional items Interpretation costs operation Interpretation costs irrunation Interpretation costs Interpretation costs operation Interpretation costs Interpretation costs Interpretation costs operating exceptional items Interpretation costs operating exceptional items Interpretation costs operating exceptional items Interpretation costs of property, plant and equipment Interpretation costs of associate company Interpretation costs Interpretation costs operating exceptional items Interpretation costs operating except	Relevant Group	POL and other- reconciling items	RMH-plc- consolidated
Continuing operations			
<del>Turnover</del>	<del>)()()</del>	<del>XXX</del>	<del>XXX</del>
Network Subsidy Payment	XXX	XXX	XXX
Revenue	ж	<del>xxx</del>	жж
People costs excluding ColleagueShare and restructuring costs	XXX	<del>xxx</del>	XXX
Distribution and conveyance operating costs	<del>)()()</del>	<del>xxx</del>	<del>xxx</del>
Other operating costs	XXX	<del>XXX</del>	XXX
Share of post tax profit/(loss) from joint ventures and associates	XXX	<del>xxx</del>	XXX
Operating profit/(loss) before exceptional items	<del>)()()</del>	<del>xxx</del>	XXX
Modernisation costs – operating exceptional items	<del>)()()</del>	<del>xxx</del>	<del>xxx</del>
ColleagueShare – 'share' scheme value	XXX	<del>xxx</del>	XXX
<del>dividend</del>	XXX	<del>xxx</del>	XXX
business transformation	<del>)()()</del>	<del>xxx</del>	<del>хж</del>
Restructuring costs	XXX	<del>xxx</del>	XXX
<del>Impairments</del>	***	<del>xxx</del>	<del>ххх</del>
Operating profit //loss) after modernisation costs before other operating exceptional items	XXX	<del>xxx</del>	XXX
1 01 11 1	<del>200</del>		<del>&gt;&gt;&gt;</del>
	<del>100</del>		XXX
	<del>xxx</del>		XXX
Profit on disposal of associate company	<del>xxx</del>		XXX
Profit/(Loss) before financing and taxation	<del>)()(</del>	XXX	жж
Finance costs	XXX	<del>xxx</del>	XXX
Finance income	XXX	<del>xxx</del>	XXX
Net pensions interest	<del>)00</del>	<del>xxx</del>	жж
Profit/(Loss) before taxation	XXX	жж	XXX
Taxation charge	XXX	<del>xxx</del>	XXX
Profit/(Loss) for the financial year from continuing operations	<del>)()()</del>	жж	XXX
(Loss)/profit attributable to:			
Equity holder of the parent company	XXX	<del>xxx</del>	XXX
Non-controlling interest	<del>)()(</del>	<del>xxx</del>	XXX

Figure 2: Consolidated balance sheet statement and reconciliation to RMH plc consolidated accounts

## Consolidated balance sheet statement annual

	Relevant Group	POL and other reconciling items	RMH plc- consolidated
Non-current assets			
Property, plant and equipment	×××	<del>ххх</del>	***
Leasehold land payment	XXX	<del>xxx</del>	<del>ххх</del>
Goodwill	<del>ххх</del>	жж	<del>ххх</del>
Intangible assets	<del>ххх</del>	жж	<del>ххх</del>
Investments in joint ventures and associates	<del>ххх</del>	жж	<del>ххх</del>
Financial assets – pension escrow investments	<del>ххх</del>	жж	<del>ххх</del>
investments	×××	<del>ххх</del>	***
<del>derivatives</del>	<del>ххх</del>	жж	<del>ххх</del>
Other receivables	×××	<del>ххх</del>	***
Deferred tax assets	<del>ххх</del>	жж	<del>ххх</del>
	×××	жж	×××
Non-current assets held for sale	жж	жж	жж
Current assets			
<del>Inventories</del>	<del>xxx</del>	жж	***
Trade and other receivables	<del>XXX</del>	<del>xxx</del>	<del>XXX</del>
<del>Income tax receivable</del>	<del>XXX</del>	<del>xxx</del>	<del>XXX</del>
Financial assets - investments	<del>XXX</del>	<del>xxx</del>	<del>XXX</del>
<del>derivatives</del>	<del>xxx</del>	жж	***
Cash and cash equivalents	XXX	жж	<del>XXX</del>
	XXX	<del>xxx</del>	***
<del>Total assets</del>	жж	<del>ххх</del>	XXX
Current liabilities			
Trade and other payables	<del>XXX</del>	жж	<del>XXX</del>
Financial liabilities – interest bearing loans and borrowings	<del>XXX</del>	<del>xxx</del>	<del>XXX</del>
obligations under finance lease and hire purchase contracts	<del>XXX</del>	<del>xxx</del>	<del>XXX</del>
<del>derivatives</del>	<del>XXX</del>	<del>xxx</del>	<del>XXX</del>
<del>Income tax payable</del>	<del>xxx</del>	жж	***
Provisions	XXX	XXX	XXX
	<del>xxx</del>	жж	<del>xxx</del>
Non-current liabilities			
Financial liabilities - interest bearing loans and borrowings	XXX	XXX	XXX
obligations under finance lease and hire purchase contracts	XXX	XXX	XXX
<del>derivatives</del>	XXX	<del>XXX</del>	XXX
Provisions	XXX	XXX	XXX
Retirement benefit obligation – pension deficit	XXX	XXX	XXX
Other payables	XXX	XXX	XXX
Deferred tax liabilities	XXX	XXX	XXX
	XXX	XXX	XXX
Total liabilities	XXX	XXX	XXX
Net liabilities	<del>XXX</del>	<del>XXX</del>	<del>XXX</del>
Equity			
Share capital			
Share premium	XXX	***	XXX
Retained earnings	XXX	<del>XXX</del>	XXX
Reserves	XXX	<del>XXX</del>	XXX
Equity attributable to equity holder of parent company	XXX	XXX	XXX
Non-controlling interest	XXX	XXX	XXX
Total equity	жж	<del>XXX</del>	<del>XXX</del>

# Figure 3: Consolidated cash flow statement and reconciliation to RMH plc consolidated accounts

Consolidated cash flow statement (annual)

	Relevant Group	POL and other- reconciling items	RMH plc- consolidated
Cash flow from operating activities			
Operating profit before exceptional items	жж	жж	<del>xxx</del>
Adjustment for:	XXX	<del>xxx</del>	<del>ххх</del>
Depreciation and amortisation	ххх	<del>ххх</del>	жж
Share of post tax profit from joint ventures and associates	XXX	<del>xxx</del>	<del>ххх</del>
Working capital and other non-cash movements:	XXX	<del>xxx</del>	<del>xxx</del>
<del>Increase in inventories</del>	XXX	<del>xxx</del>	<del>xxx</del>
<del>Decrease in receivables</del>	XXX	<del>xxx</del>	<del>xxx</del>
<del>Decrease in payables</del>	XXX	<del>xxx</del>	XXX
<del>Increase in client receivables</del>	ххх	<del>ххх</del>	<del>ххх</del>
Increase/(decrease) in client payables	ххх	<del>ххх</del>	<del>ххх</del>
Net increase in derivative assets	жж	<del>ххх</del>	жж
Increase in non-exceptional provisions	жж	жж	<del>ххх</del>
Cash paid in respect of retirement benefit obligations in excess of that charged in operating profit	XXX	XXX	жж
Cash payments in respect of operating exceptional items (see note (a) below):	XXX	<del>xxx</del>	<del>xxx</del>
ColleagueShare/business transformation payments	×××	<del>xxx</del>	<del>XXX</del>
Other	<del>xxx</del>	<del>xxx</del>	<del>xxx</del>
Cash outflow from operations	×××	жж	жж
Income tax paid	×××	XXX	×××
Net cash outflow from operating activities	***		ж
Cash flows from investing activities	***	XXX	***
Dividends received from joint ventures and associates	×××	***	***
Finance income received	<del>2002</del>	<del>xxx</del>	***
Proceeds from sale of property, plant and equipment	<del>****</del>	***	×××
Proceeds from disposal of associate company	<del>****</del>	×××	×××
Purchase of property, plant and equipment	<del>****</del>	***	×××
Acquisition of businesses	<del>2002</del>	<del>xxx</del>	<del>2002</del>
Purchase of intangible assets	×××	×××	×××
Payment of deferred consideration in respect of prior years' acquisitions	<del>2002</del>	<del>xxx</del>	×××
Net sale/(purchase) of financial assets investments (non-current)	XXX	×××	***
Net proceeds from financial assets investments (current)	***	***	XXX
Net cash inflow/(outflow) from investing activities			
Net cash outflow before financing activities	XXX XXX	<del>2004</del>	**** ***
Cash flows from financing activities			
Finance costs paid	XXX	<del>xxx</del>	**** ***
Payment of capital element of obligations under finance lease contracts	XXX	×××	
Cash received on sale and leasebacks	XXX		<del>XXX</del>
<del>Cash received on sale and leasebacks</del> New loans	XXX	XXX	XXX
	XXX	XXX	<del>XXX</del>
Repayment of borrowings	XXX	XXX	XXX
Net cash inflow from financing activities	XXX		XXX
Net increase/(decrease) in cash and cash equivalents	жж	<del>xxx</del>	жж
Effect of exchange rates on cash and cash equivalents	<del>XXX</del>	<del>xxx</del>	<del>xxx</del>
Cash and cash equivalents at the beginning of the period	<del>XXX</del>	<del>XXX</del>	<del>xxx</del>
Cash and cash equivalents at the end of the period	жж	XXX	***

Figure 41: Reported Business annual income statement - For publication Annual income statement

	USO Mail	Other	Total Reported Business
	£m	£m	£m
Revenues	xx	xx	xx
Operating costs	xx	xx	xx
People costs (with DB Pension Service Costs on cash paid basis)	xx	xx	xx
Depreciation, amortisation and impairments	xx	xx	xx
Other operating cost	xx	xx	xx
Operating profit/(loss)	xx	xx	xx
Transformation costs	xx	xx	xx
Financeability EBIT	xx	XX	XX
Other operating specific items			xx
Non-operating specific items			xx
EBIT			xx
Financeability EBIT as % of total revenues	x%	x%	x%
Volumes (million items)	XX	XX	XX

#### Income statement annual

	USO Products	Non USO Products	Total upstream	Downstream- Services	Total excluding End to end only products	End-to-end only- products	Total Reported Business
Revenues-	<del>xx</del>	<del>XX</del>	<del>XX</del>	<del>xx</del>	**	**	**
Transfer-charges	**	**	××	**	<del>xx</del>	**	××
Operating costs	**	<del>XX</del>	××	**	<del>XX</del>	**	<del>xx</del>
People costs	XX	XX	XX	××	<del>xx</del>	××	××
Depreciation, amortisation and impairments	<del>xx</del>	**	<del>XX</del>	**	**	**	**
Other operating cost	<del>xx</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>xx</del>
Transfer charges	<del>XX</del>	××	××	<del>xx</del>	**	<del>XX</del>	<del>xx</del>
Operating profit/(loss)	<del>XX</del>	××	××	××	××	××	**
Operating exceptional items	××	××	XX	XX	××	XX	××
Modernisation costs	<del>xx</del>	ж	<del>××</del>	<del>XX</del>	**	<del>XX</del>	**
Other	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>xx</del>	<del>xx</del>
EBIT	<del>XX</del>	<del>××</del>	<del>XX</del>	**	**	**	<del>xx</del>
EBIT as % of total revenues	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>
Volumes	××	**	**	**	<del>××</del>	**	<del>xx</del>

#### Statement of transfer charges - annual

		Between Relevant Group & other RMH						Between Four FREs							
	gr	group entities Relevant Group		Ac	ross Line	eΑ	Across Line B								
										US	O produ	cts	Non-	USO proc	lucts
Service(s)/product(s) transfer-priced	<del>P1</del>	<del>P2</del>	P3	P4	P5	P6	<del>P7</del>	P8	<del>P9</del>	P10	P11	P12	P13	P14	P15
Total transfer revenue	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
Unit transfer price (where applicable)	XXX	XXX	XXX	XXX	XXX	жж	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
Volume (where applicable)	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
	Equivaler	- Equivaler	- Equivalen	Equivalen	Equivalen	Equivalen	Equivalen	Equivalen	- Equivalen	Equivalen	Equivalen	Equivalen	Equivalen-	Equivalen	Equivaler
	ce or	ce or	ce or	ce or	ce or	<del>ce or</del>	ce or	ce or	<del>ce or</del>	<del>ce or</del>	ce or	ce or	ce or	ce or	ce or
Approach Equivalence or Cost plus?	Cost-plus	Cost-plus	Cost-plus	Cost plus	Cost plus	Cost plus	Cost plus	Cost-plus	Cost plus	Cost-plus	Cost plus	Cost plus	Cost plus	Cost-plus	Cost-plus
Equivalent service/product used as basis (where applicable)	<del>E1</del>	<del>E2</del>	<del>E3</del>	<del>E</del> 4	£5	<del>E6</del>	<del>E7</del>	<del>E8</del>	<del>E9</del>	<del>E10</del>	E11	<del>E12</del>	<del>E13</del>	<del>E14</del>	<del>E15</del>
Total revenue of RM equivalent product (where applicable)	<del>xxx</del>	XXX	<del>xxx</del>	<del>xxx</del>	XXX	<del>xxx</del>	<del>XXX</del>	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
Unit market price (where applicable)	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
Source of market price	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
Equivalence adjustments (where applicable)	ww	1004	100	100/	1007	1004	ww	1004	1001	1001	1004	ww	1001	1001	1001

#### Notes

Where the equivalent service being used for transfer pricing is not sold in discrete units, the alternative basis for pricing must be stated

Where the equivalent product or service being used for transfer pricing has multiple prices (e.g. to reflect different Sales Product Handling Characteristics) the different prices used, and the basis of their application for transfer pricing, must be stated.

Where a cost-plus basis for transfer pricing is being used, the source and, where applicable, basis of derivation of the relevant unit costs must be stated

Figure 52: Reported Business quarterly and annual income statement - Confidential Quarterly income statement

	USO Mail	Non USO Mail	Non Mails	Total Reported Business	Total Reported Business
	Actual	Actual	Actual	Actual	Budget
	£m	£m	£m	£m	£m
Revenues	xx	xx	xx	xx	xx
Operating costs	xx	xx	xx	xx	xx
People costs (with DB Pension Service Costs on cash paid basis)	xx	xx	xx	xx	xx
Depreciation, amortisation and impairments	xx	xx	xx	xx	xx
Other operating cost	xx	xx	xx	xx	xx
Operating profit/(loss)	xx	xx	xx	xx	xx
Transformation costs	xx	xx	xx	xx	xx
Financeability EBIT	xx	xx	xx	XX	xx
Other operating specific items				xx	xx
Non-operating specific items				xx	xx
EBIT				xx	xx
Financeability EBIT as % of total revenues	х%	x%	x%	х%	x%
Volumes (million items)	xx	XX	XX	xx	xx

#### Income statement quarterly

	USO Products	Non USO	Total- upstream	Downstream- Services	Total excluding End-to-end- only products	End to- end only	Total- Reported Business
Revenues-	××	** **	××	××	××	××	××
<del>Transfer charges</del>	**	AA AA	**	**	**	**	**
		<del>XX</del>					
<del>Operating costs</del>	XX		××	XX	××	××	××
People costs	××	××	××	××	××	××	××
Depreciation, amortisation and impairments	××	××	××	××	××	××	××
Other operating cost	**	<del>XX</del>	**	**	**	××	**
Transfercharges	××	××	××	××	××	××	××
Operating profit/(loss)	XX	<del>XX</del>	××	××	**	**	<del>xx</del>
Operating exceptional items	××	××	××	××	××	××	××
Modernisation costs	<del>xx</del>	**	**	××	**	**	**
Other	XX	××	××	××	××	××	××
EBIT	**	**	××	××	**	××	<del>XX</del>
EBIT as % of total revenues	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>×%</del>	<del>x%</del>	<del>×%</del>
Volumes	**	<del>XX</del>	<del>××</del>	<del>××</del>	**	**	<del>××</del>

Figure 6: Annual end to end income statement (published version)

## Income statement published end to end annual

	<del>USO Mail</del>	Other	Total- Reported Business
Revenues	**	<del>XX</del>	<del>XX</del>
<del>Transfer charges</del>	**	<del>XX</del>	<del>xx</del>
Operating costs	××	XX	XX
People costs	**	<del>XX</del>	<del>XX</del>
Depreciation, amortisation and impairments	××	<del>XX</del>	XX
Other operating cost	<del>XX</del>	<del>XX</del>	<del>xx</del>
Transfer charges	**	<del>XX</del>	<del>xx</del>
Operating profit/(loss)	<del>XX</del>	**	<del>xx</del>
Operating exceptional items	<del>XX</del>	<del>XX</del>	<del>XX</del>
Modernisation costs	××	<del>XX</del>	XX
Other	<del>XX</del>	<del>xx</del>	<del>xx</del>
EBIT	××	<del>XX</del>	<del>XX</del>
EBIT as % of total revenues	<del>x%</del>	<del>x%</del>	<del>x%</del>
Volumes	XX	<del>XX</del>	XX

# Figure 7: Annual end to end income statement (confidential version)

Income statement confidential end to end annual

	<del>USO Mail</del>	Non USO Mail	Non Mails	Total Reported Business
Revenues	**	<del>XX</del>	<del>XX</del>	<del>xx</del>
Transfer charges	××	<del>xx</del>	<del>xx</del>	××
Operating costs	<del>××</del>	<del>xx</del>	<del>xx</del>	××
People costs	**	<del>XX</del>	<del>XX</del>	<del>xx</del>
Depreciation, amortisation and impairments	××	<del>xx</del>	<del>xx</del>	××
Other operating cost	××	<del>xx</del>	<del>xx</del>	××
Transfer charges	××	<del>xx</del>	<del>xx</del>	**
Operating profit/(loss)	<del>XX</del>	<del>XX</del>	**	<del>xx</del>
Operating exceptional items	XX	**	<del>××</del>	<del>××</del>
Modernisation costs	**	<del>XX</del>	**	**
Other	<del>XX</del>	<del>XX</del>	**	<del>xx</del>
EBIT	<del>)(X</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>
EBIT as % of total revenues	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>
Volumes	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>

## Figure 8: Quarterly end to end income statement

Income statement end to end quarterly

	USO Mail	Non USO Mail	Non Mails	Total Reported Business
Revenues	<del>XX</del>	**	**	**
Transfer charges	XX	<del>XX</del>	××	<del>xx</del>
Operating costs	XX	<del>XX</del>	××	**
People costs	<del>XX</del>	<del>XX</del>	××	<del>xx</del>
Depreciation, amortisation and impairments	XX	<del>XX</del>	××	<del>xx</del>
Other operating cost	XX	<del>XX</del>	××	<del>xx</del>
Transfer charges	XX	<del>XX</del>	××	<del>xx</del>
Operating profit/(loss)	XX	<del>××</del>	**	<del>XX</del>
Operating profit/(loss) as % of total revenues	<del>*%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>
Volumes	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>

Figure 93: Reconciliation of the annual income statement of the Reported Business to the Relevant Group

	Reported Business	Other operations and adjustments	UKPIL	Other units, eliminations and recharges	Relevant Group
	£m	£m	£m	£m	£m
Revenues	xx	xx	xx	xx	xx
Operating costs	XX	xx	XX	xx	xx
People costs (with DB Pension Service Costs on cash paid basis)	xx	xx	xx	xx	xx
Depreciation, amortisation and impairments	xx	xx	xx	xx	xx
Other operating cost	xx	xx	xx	xx	xx
Operating profit/(loss)	xx	xx	xx	xx	xx
Transformation costs	xx	xx	xx	xx	xx
Financeability EBIT	XX	xx	xx	xx	xx
Other operating specific items	xx	xx	xx	xx	xx
Non-operating specific items	xx	xx	xx	xx	xx
EBIT	xx	xx	xx	xx	xx
Financeability FDIT as 9/ of total revenues	0/	un/	un/	07	07
Financeability EBIT as % of total revenues	x%	x%	x%	x%	x%
Volumes (million items)	xx	xx	xx	xx	xx

#### Income statement reconciliation annual

	Total Reported Business	Other- operations	UKLPI	Other units, eliminations and recharges	Relevant Group
Revenues-	<del>xx</del>	<del>xx</del>	<del>XX</del>	<del>xx</del>	<del>xx</del>
Transfer charges	<del>XX</del>	<del>XX</del>	<del>xx</del>	<del>XX</del>	<del>XX</del>
<del>Operating costs</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>XX</del>	<del>XX</del>
<del>People costs</del>	<del>xx</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>
Depreciation, amortisation and impairments	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Other operating cost	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>
Transfercharges	**	**	**	<del>XX</del>	**
Operating profit/(loss)	**	<del>XX</del>	**	<del>XX</del>	<del>××</del>
Operating exceptional items	**	<del>xx</del>	**	<del>XX</del>	<del>xx</del>
Modernisation costs	××	XX	XX	XX	XX
Other	**	<del>xx</del>	**	<del>XX</del>	<del>XX</del>
<del>EBIT</del>	**	**	**	<del>XX</del>	**
EBIT as % of total revenues	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>	<del>x%</del>
Volumes	**	<del>XX</del>	<del>××</del>	<del>XX</del>	**

# Figure 10: Annual capital employed statement

Capital employed statement annual

	USO Products	Non USO Products	Total- upstream	Downstream Services	Total excluding End-to-end only products	End-to-end only- products	Total Reported Business
Assets	XX	XX	XX	××	××	XX	XX
Fixed assets	××	××	××	××	××	<del>xx</del>	××
Tangible assets	××	XX	XX	XX	XX	××	XX
Goodwill and Intangible assets	**	<del>XX</del>	**	<del>XX</del>	<del>XX</del>	**	<del>XX</del>
Other non current assets	XX	XX	XX	<del>XX</del>	<del>XX</del>	XX	XX
Current assets	××	XX	××	××	××	××	××
Trade and other receivables	××	XX	XX	××	××	**	XX
Cash and cash equivalents	××	XX	××	××	××	××	XX
Other current assets	<del>××</del>	××	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>××</del>	<del>xx</del>
Current liabilities							
Trade and other payables	**	ж	**	<del>××</del>	<del>xx</del>	**	<del>xx</del>
Financial liabilities	××	XX	XX	XX	XX	××	XX
Provisions and other current liabil ities	<del>XX</del>	ж	**	<del>XX</del>	<del>××</del>	<del>××</del>	<del>xx</del>
Capital employed (total assets less c urrent liabilities)	XX	××	<del>xx</del>	**	<del>××</del>	**	<del>XX</del>
ROCE	**	××	**	**	<del>××</del>	<del>xx</del>	<del>xx</del>

Figure 414: Reported Business capital employed statement and reconciliation to the Relevant GroupReconciliation of the capital employed statement to the Relevant Group

	Reported Business	Other operations / Adjustments	UKPIL	Other operations / Adjustments	Relevant Group
	£m	£m	£m	£m	£m
Non-current assets	xx	xx	xx	xx	xx
Tangible assets	XX	XX	XX	XX	XX
Goodwill and Intangible assets	XX	XX	XX	xx	xx
Other non current assets	xx	xx	xx	xx	xx
Current assets	xx	xx	xx	xx	xx
Inventories	xx	xx	xx	xx	xx
Trade and other receivables	xx	xx	xx	xx	xx
Cash and cash equivalents	xx	xx	xx	xx	xx
Other current assets	xx	xx	xx	xx	xx
Total assets	xx	xx	xx	xx	xx
Current liabilities	xx	xx	xx	xx	xx
Trade and other payables	xx	xx	xx	xx	xx
Financial liabilities	xx	xx	xx	xx	xx
Provisions and other current liabilities	xx	xx	xx	xx	xx
Capital employed (total assets less current liabilities)	xx	xx	xx	xx	xx
Non-current liabilities					xx
Financial liabilities					xx
Retirement benefit obligation – pension deficit					xx
Provisions and other non-current liabilities					xx
Total liabilities					xx
Net assets (total assets less total liabilities)					xx
Total equity					xx

Capital employed statement reconciliation annual

	Total Reported Business	Other- operations	UKLPI	Other units, eliminations and recharges	Relevant Group
<del>Assets</del>	<del>XX</del>	<del>XX</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
<del>Fixed assets</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	**	<del>xx</del>
Tangible assets	<del>xx</del>	<del>xx</del>	**	**	<del>xx</del>
Goodwill and Intangible assets	××	XX	XX	XX	<del>xx</del>
Other non current assets	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Current assets	<del>xx</del>	**	<del>××</del>	**	<del>xx</del>

Trade and other receivables	XX	XX	XX	XX	<del>xx</del>
Cash and cash equivalents	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Other current assets	××	XX	XX	XX	××
Current liabilities					
Trade and other payables	XX	XX	XX	XX	<del>xx</del>
Financial liabilities	XX	XX	XX	XX	<del>xx</del>
Provisions and other current liabilities	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Capital employed (total assets less current liabilities)	<del>xx</del>	<del>xx</del>	**	<del>xx</del>	**
Non current liabilities					
Financial liabilities					<del>xx</del>
<del>Provisions</del>					<del>xx</del>
Retirement benefit obligation – pension deficit					××
Other payables					<del>xx</del>
Deferred tax liabilities					××
Total liabilities					<del>ж</del>
Net liabilities					<del>xx</del>
Total equity					XX

Figure 425: Reported Business cash flow statement and reconciliation to the Relevant Group Annual cash flow statement

	Reported Business	Other operations / Adjustments	UKPIL	Other operations / Adjustments	Relevant Group
	£m	£m	£m	£m	£m
EBIT before Transformation Costs with pension costs on IFRS basis	xx	xx	xx	XX	xx
Pension cost adjustment from IFRS to cash basis	XX	XX	XX	XX	XX
EBIT before Transformation Costs with pension costs on cash paid basis	XX	XX	XX	XX	XX
Adjustment for: Depreciation and amortisation	VV	VV	VV	VV	VV
Share of post-tax profit from associates	XX	XX	xx xx	XX	XX
Other	xx xx	xx xx	XX	xx xx	xx xx
Other	**	^^	^^	**	**
EBITDA before Transformation Costs	XX	XX	XX	XX	XX
Adjustment for working capital movements:	7.7.		, , , , , , , , , , , , , , , , , , ,	7.7.	<i>~</i> ~
Inventories	XX	xx	xx	xx	xx
Receivables	xx	xx	xx	xx	xx
Payables	xx	xx	xx	xx	xx
Other	xx	xx	xx	xx	xx
Transformation Costs cash flow	xx	xx	xx	xx	xx
Tax	xx	xx	xx	xx	xx
Other operating activities	xx	xx	xx	xx	xx
Cash flow from operating activities	xx	xx	xx	xx	xx
Investment income	xx	xx	xx	xx	xx
Purchase of assets	xx	xx	xx	xx	xx
Purchase of business interests	xx	xx	XX	xx	xx
Disposals of assets	xx	xx	XX	xx	xx
Disposals of business interests	xx	xx	xx	xx	xx
Other investing activities	xx	xx	xx	xx	xx
Cook flor Cook to college at the					
Cash flow from investing activities	XX	XX	XX	XX	XX
Finance costs	VV	VV	VV	VV	VV
Repayment of capital element of finance leases	XX	XX	XX	XX	XX
Sale and leaseback	XX	XX	XX	XX	XX
New loan and borrowings proceeds	xx xx	xx xx	xx xx	xx xx	xx xx
Repayment of loans and borrowings	XX	XX	XX	XX	XX
Dividends paid to equity holders of parent company	XX	XX	XX	XX	XX
Other dividends	XX	XX	XX	XX	XX
Other financing activities	XX	xx	XX	xx	xx
Cash flow from financing activities	xx	xx	xx	xx	xx
-					
Net increase/(decrease) in cash and cash equivalents	xx	xx	xx	xx	xx
Effect of exchange rates on cash and cash equivalents	xx	xx	xx	xx	xx
Cash and cash equivalents at start of the year	xx	xx	xx	xx	xx
Cash and cash equivalents at end of the year	XX	XX	XX	XX	XX

### Cash flow statement annual

	USO Products	Non USO Products	<del>Total</del> <del>upstream</del>	Downstream- Services	Total excluding- End-to-end-only products	End to end only products	Total Reported Business
Operating profit/(loss) before exceptional items  Add back non cash costs	<del>XX</del>	<del>XX</del>	<del>XX</del>	**	<del>xx</del>	<del>XX</del>	<del>xx</del>

<del>Depreciation</del>	**	**	**	××	<del>xx</del>	<del>xx</del>	<del>xx</del>
<del>Pension Charge</del>	**	XX	**	××	<del>xx</del>	××	<del>xx</del>
Share of profit of joint venture and associates	<del>xx</del>	××	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Operating earnings before non-cash costs	<del>XX</del>	ж×	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	××
<del>Less cash outflows</del>							
Working capital and other non cash movements							
Trade and other receivables	<del>xx</del>	XX	<del>xx</del>	<del>xx</del>	<del>xx</del>	××	<del>xx</del>
Cash and cash equivalents	<del>xx</del>						
Other current assets	<del>xx</del>	XX	<del>xx</del>	<del>xx</del>	<del>xx</del>	××	<del>XX</del>
Trade and other payables	<del>xx</del>						
Financial liabilities	<del>xx</del>	XX	<del>xx</del>	<del>xx</del>	<del>xx</del>	××	<del>XX</del>
Provisions and other current liabilities-	<del>xx</del>	××	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Pension cash contribution							
Ongoing	<del>xx</del>	××	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Net cash outflow from operating activities	<del>XX</del>	ж×	<del>xx</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>	<del>XX</del>
Purchase of intangibles and fixed asset investments	**	**	**	**	<del>xx</del>	<del>xx</del>	<del>xx</del>
Purchases of property, plant and equipment	**	XX	**	××	<del>xx</del>	××	<del>xx</del>
Proceeds from disposals of property, plant and equipment	<del>XX</del>	XX	**	××	<del>xx</del>	<del>XX</del>	<del>XX</del>
Cash flows from other investment activities	<del>XX</del>	ж×	<del>xx</del>	<del>xx</del>	<del>xx</del>	**	<del>xx</del>
Net cash outflow from operating and investment activities	<del>xx</del>	ж	**	××	<del>xx</del>	**	××
Exceptional cash flow-	<del>XX</del>	ж×	<del>XX</del>	**	××	**	××
Operational financing costs paid	<del>xx</del>	ж×	**	<del>XX</del>	××	<del>XX</del>	<del>xx</del>
Net cash outflow after exceptional items and financing costs	<del>XX</del>	ж	**	<del>xx</del>	××	**	××

Figure 13: Reconciliation of the annual cash flow statement to the Relevant Group

Cash flow reconciliation annual

	Total Reported Business	Other- operations	UKLPI	Other units, eliminations and recharges	Relevant Group
Operating profit/(loss) before exceptional items	<del>xx</del>	××	<del>××</del>	××	**
Add back non cash costs					
<del>Depreciation</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Pension Charge	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Share of profit of joint venture and associates	<del>xx</del>	××	<del>××</del>	<del>xx</del>	**
Operating earnings before non-cash costs	××	××	××	××	××
Less cash outflows					
Working capital and other non cash movements					
Trade and other receivables	<del>xx</del>	<del>xx</del>	<del>××</del>	**	××
Cash and cash equivalents	<del>××</del>	**	××	<del>xx</del>	××
Other current assets-	<del>xx</del>	<del>xx</del>	<del>××</del>	**	××
Trade and other payables-	<del>××</del>	<del>xx</del>	<del>××</del>	<del>xx</del>	***
Financial liabilities	<del>xx</del>	<del>xx</del>	**	**	**
Provisions and other current liabilities-	<del>xx</del>	<del>xx</del>	<del>××</del>	**	××
Pension cash contribution					
Ongoing	<del>xx</del>	××	<del>xx</del>	××	××
Net cash outflow from operating activities	<del>××</del>	<del>xx</del>	**	××	××
Purchase of intangibles and fixed asset investments	<del>××</del>	××	**	××	××
Purchases of property, plant and equipment	<del>xx</del>	××	<del>xx</del>	××	××
Proceeds from disposals of property, plant and equipment	<del>xx</del>	<del>xx</del>	<del>xx</del>	××	**
Cash flows from other investment activities	<del>xx</del>	**	××	××	<del>xx</del>
Net cash outflow from operating and investment activities	<del>××</del>	<del>xx</del>	<del>xx</del>	××	××
Exceptional cash flow	<del>xx</del>	<del>××</del>	<del>xx</del>	<del>xx</del>	<del>xx</del>
Net cash outflow after exceptional items and financing costs	<del>XX</del>	××	<del>XX</del>	××	××

Figure 146: Annual and quarterly product profitability statements

	Product group 1	Product group 2	 Product group n
	£m	£m	£m
Revenues	xx	xx	xx
Operating costs	xx	XX	xx
People costs (with DB Pension Service Costs on cash paid basis)	xx	xx	xx
Depreciation, amortisation and impairments	xx	xx	xx
Other operating cost	xx	xx	xx
Operating profit/(loss)	xx	xx	xx
Transformation costs	xx	xx	xx
Financeability EBIT	xx	XX	xx
Financeability EBIT as % of total revenues	x%	x%	x%
Volumes (million items)	xx	xx	xx

# Product profitability statement—split by Line B annual and quarterly

		Prod	<del>Total</del>	
		<del>Upstream</del>	Downstream	Product X
Revenues	L.	XX	XX	XX
Transfer charges		XX	XX	××
Operating costs				<del>xx</del>
People costs		XX	××	××
Depreciation, amortisation and impairments		xx	XX	<del>xx</del>
Other operating cost			XX	<del>xx</del>
Transfer charges				<del>xx</del>
Operating profit/(loss)		XX	XX	XX
Volumes		XX	XX	XX

### Product profitability statement - not split by Line B annual and quarterly

	<b>Total Product</b>
	×
Revenues	<del>XX</del>
Transfer charges	<del>xx</del>
Operating costs	XX

People costs	XX
Depreciation, amortisation and impairments	<del>XX</del>
Other operating cost	XX
Transfer charges	<del>xx</del>
Operating profit/(loss)	XX
Volumes	××

Figure 7: Cost Matrix

Figure 7. Cost Matrix	B 2	B 2		
		Prior Financial	Current	Current
	Quarter or	Quarter or	Financial	Financial
	Year (DB	Year (DB	Quarter or	Quarter or
	Pension	Pension	Year (DB	Year (DB
	Service Costs	Service Costs	Pension	Pension
	on IAS 19	on cash paid	Service Costs	Service Costs
	basis)	basis)	on cash paid	on IAS 19
	£m	£m	basis)	basis) £m
	EIII	£III	£III	EIII
Processing & Regional Logistics	xx	xx	xx	xx
Delivery	xx	xx	xx	xx
Network Road Operations	xx	xx	xx	xx
RDC Operation	xx	xx	xx	xx
Frontline people costs	xx	xx	xx	xx
Other/Managers	xx	xx	xx	xx
Operations	xx	xx	xx	xx
Commercial	xx	xx	xx	xx
Technology	xx	xx	xx	xx
Property	xx	xx	xx	xx
Central Admin	xx	xx	xx	xx
Centrally Held (see Note 2)	xx	xx	xx	xx
Total people costs	xx	xx	xx	xx
Collection Delivery & Conveyance Charges (see Note 3)	xx	xx	xx	xx
International Terminal Dues (see Note 4)	xx	xx	xx	xx
Vehicle Fleet & Fuel	xx	xx	xx	xx
Total Distribution & Conveyance Costs	xx	xx	xx	xx
Property	xx	xx	xx	xx
Romec FM Costs	xx	xx	xx	xx
IT & Communication	xx	xx	xx	xx
Depreciation & Amortisation	xx	xx	xx	xx
Total Infrastructure Costs	xx	xx	xx	xx
Audit, Assurance, Consulting, Marketing & Legal	xx	xx	xx	xx
Compensation	xx	xx	xx	xx
Staff & Agents Related Costs & Consumables	xx	xx	xx	xx
Bad Debts and Bank Charges	xx	xx	xx	xx
Low Value Assets, Other Outsourcing, Stamp Production	xx	xx	xx	xx
POL costs	xx	xx	xx	xx
Other External Costs	xx	xx	xx	xx
Internal Charges	xx	xx	xx	xx
Budget Contingency	xx	xx	xx	xx
Total Other Operating Costs	xx	xx	xx	xx
Unallocated non-people costs	xx	xx	xx	xx
Total non-people costs	xx	xx	XX	xx
Total costs before Transformation Costs				
Total costs before transformation costs	XX	xx	XX	xx
Project specific costs	xx	xx	xx	xx
Voluntary redundancy - Frontline	xx	xx	xx	xx
Voluntary redundancy - Management	xx	xx	xx	xx
Voluntary redundancy - Other staff	xx	xx	xx	xx
Business tranformation payments	xx	xx	xx	xx
Other Transformation Costs	xx	xx	xx	xx
Transformation Costs	XX	xx	XX	XX
Tabel and a office Transfer working Contra				
Total costs after Transformation Costs	xx	XX	XX	xx

- All pay related costs in this category, including pension costs, must be re-allocated to pay cost categories above it.
   This must exclude 'International Terminal Dues' shown separately in the line below it.
- 4. This shall comprise delivery charges from foreign postal and delivery companies for delivery of mail exported from the UK.

<sup>1.</sup> The cost lines included in the Cost Matrix must be based on the mapping to the General Ledger which was applied in the Cost Matrix prepared as part of Royal Mail's 2015 Strategic Business Plan submitted to OFCOM on 14 May 2015, with the exception of the following items in notes 2, 3 and 4 below.

### Figure 8: PVEO Analysis

rigule 6. FVLO Allalysis										
	Prior Financial Year	Prior Financial Year	Prior Financial Year	Price	Prior Financial Year	Volume related	Efficiency related	Current Financial Year		Inflation rate used for
	(DB Pension Service	non-recurring items	underlying costs (DB	related changes	inc. Price related	changes	changes	non-recurring items	(DB Pension Service	Price related changes
	Costs on cash paid		Pension Service Costs		changes				Costs on cash paid	(see note 5)
	basis)		on cash paid basis)						basis)	
	£m	£m	£m	£m	£m	£m	£m	£m	£m	%
Processing & Regional Logistics (Frontline)	xx	xx	xx	xx	xx	XX	xx	xx	xx	x
Delivery (Frontline)	xx	xx	XX	xx	xx	XX	xx	XX	xx	х
Network Road Operations (Frontline)	xx	xx	XX	xx	xx	XX	xx	xx	xx	х
RDC Operation (Frontline)	xx	xx	XX	xx	xx	XX	xx	xx	xx	х
Other/Managers	xx	xx	xx	xx	xx	xx	xx	xx	xx	x
Operations	xx	xx	XX	xx	xx	xx	xx	xx	xx	x
Commercial	xx	xx	xx	xx	xx	XX	xx	xx	xx	x
Technology	xx	xx	XX	xx		xx		xx	xx	x
Property	XX	xx	XX	XX	XX	XX		XX	xx	x x
Central Admin	xx	xx	XX	xx		XX		xx	xx	x
Centrally Held (see Note 2)	XX		XX	XX	XX	XX		xx	XX	, ,
Total people costs	XX	XX	XX	XX		XX		XX	XX	^
Total people costs	AA	AA	AA	AA	AA	AA	***	AA	AA	
Collection Delivery & Conveyance Charges (see Note 3)	xx	xx	xx	xx	xx	xx	xx	xx	xx	v
International Terminal Dues (see Note 4)	XX	XX	XX	XX	xx	XX	XX	xx	XX	× ×
Vehicle Fleet & Fuel	XX XX	XX	XX	XX	XX	XX	XX	XX	XX	` .
Total Distribution & Conveyance Costs	XX XX	XX		XX		XX		XX	XX	` ` \
•			XX						****	x
Property	xx	xx	xx	XX		xx		XX	xx	X
Romec FM Costs	xx	XX	XX	xx	xx	XX	xx	XX	xx	X
IT & Communication	XX	XX	XX	XX		xx		xx	xx	X
Depreciation & Amortisation	XX	XX	XX	XX		XX		xx	xx	X
Total Infrastructure Costs	XX	xx	XX	XX	xx	xx	XX	XX	XX	X
Audit, Assurance, Consulting, Marketing & Legal	XX	XX	XX	XX		XX		XX	XX	Х
Compensation	XX	XX	XX	XX	xx	XX	xx	XX	XX	Х
Staff & Agents Related Costs & Consumables	XX	xx	XX	XX	XX	XX	XX	XX	XX	х
Bad Debts and Bank Charges	XX	xx	XX	XX	XX	XX	XX	XX	XX	х
Low Value Assets, Other Outsourcing, Stamp Production	XX	xx	XX	xx	XX	XX	XX	XX	XX	х
POL costs	XX	XX	XX	XX	xx	XX	xx	XX	xx	х
Other External Costs	XX	XX	XX	XX	xx	XX	xx	XX	xx	х
Internal Charges	xx	xx	XX	xx	xx	XX	xx	xx	xx	х
Budget Contingency	XX	xx	XX	xx	xx	XX	xx	xx	xx	х
Total Other Operating Costs	xx	xx	XX	xx	xx	XX	xx	XX	xx	х
Unallocated non-people costs	xx	xx	XX	xx	xx	XX	xx	XX	xx	х
Total Non People costs	XX	XX	XX	XX	xx	XX	XX	XX	XX	
Total costs before Transformation Costs	xx	xx	XX	xx	xx	xx	xx	xx	xx	
Transformation Costs	xx	xx	xx	xx	xx	xx	xx	xx	xx	x
Total costs after Transformation Costs	XX	XX	XX	XX	xx	XX	XX	XX	xx	

### Guidance

<sup>1.</sup> The cost lines included in the PVEO Analysis must be based on the mapping to the General Ledger which was applied in the Cost Matrix prepared as part of Royal Mail's 2015 Strategic Business Plan submitted to OFCOM on 14 May 2015, with the exception of the following items in notes 2, 3 and 4 below.

<sup>2.</sup> All pay related costs in this category, including pension costs, must be re-allocated to pay cost categories above it.

<sup>3.</sup> This must exclude 'International Terminal Dues' shown separately in the line below it.

<sup>4.</sup> This shall comprise delivery charges from foreign postal and delivery companies for delivery of mail exported from the UK.

<sup>5.</sup> Royal Mail must provide a description, including the source, of the inflation rates used.

Figure 9: Quarterly revenues and volumes summary

	Revenue - Financial Year to date					Volume - Financial Year to date				
			Financial Y	ear to date				Financial Ye	ear to date	
		Prior	01		01		Prior	01		01
	Actual	Financial Year	% Variance	Rudgot	% Variance	Actual	Financial Year	% Variance	Rudget	% Variance
	Actual	iedi	variance	Budget	Variance	ACIUAI	iedi	variance	Budget	variance
A. Letters & Large Letters										
Single Piece	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Bulk Mail (RM24 & 48)	xx	xx	xx	XX	XX	xx	xx	xx	xx	xx
Bulk Mail (Other)	xx	xx	xx	XX	xx	xx	xx	XX	xx	XX
Tracked	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Tracked Returns	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Special Delivery	xx	xx	xx	XX	XX	xx	xx	XX	xx	XX
Elections	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX
Other	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX
Total End to End Inland	хх	ХХ	ХХ	ХХ	хх	ХХ	ХХ	ХХ	хх	хх
Total Access	хх	ХХ	хх	ХХ	хх	ХХ	хх	ХХ	хх	ХХ
International Export	XX	XX	XX	XX	xx	XX	XX	XX	xx	XX
International Import	XX	XX	XX	XX	xx	XX	XX	XX	xx	XX
Total International	XX	XX	XX	ХХ	XX	XX	XX	XX	XX	XX
Unaddressed	ХХ	ХХ	хх	ХХ	хх	ХХ	хх	XX	хх	ХХ
TOTAL Letters & Large Letters	хх	хх	хх	хх	хх	хх	хх	хх	хх	хх
B. Parcels										
Single Piece	xx	xx	xx	XX	XX	xx	xx	XX	xx	XX
Bulk Mail (RM24 & 48)	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Bulk Mail (Other)	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Tracked	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Tracked Returns	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Special Delivery	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Other	xx	XX	XX	xx	xx	XX	XX	xx	xx	xx
Total End to End Inland	хх	хх	хх	хх	XX	хх	хх	хх	хх	хх
Total Access	хх	хх	хх	хх	хх	хх	хх	хх	хх	хх
International Export	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX
International Import	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX
Total International	хх	ХХ	ХХ	ХХ	хх	ХХ	ХХ	ХХ	хх	хх
TOTAL Parcels	хх	хх	хх	хх	хх	хх	хх	хх	хх	хх
C =A + B. Total Reported Business										
Single Piece	xx	xx	xx	XX	xx	xx	xx	XX	xx	XX
Bulk Mail (RM24 & 48)	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Bulk Mail (Other)	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Tracked	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Tracked Returns	xx	xx	xx	XX	XX	xx	xx	XX	xx	xx
Special Delivery	xx	XX	XX	xx	xx	XX	XX	XX	xx	xx
Elections	xx	XX	XX	xx	xx	XX	XX	XX	xx	xx
Other	xx	xx	xx	XX	XX	xx	xx	XX	xx	xx
Total End to End Inland	хх	хх	хх	хх	хх			хх	хх	хх
Total Access	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX
International Export International Import	XX	XX		XX	xx	XX		XX	XX	XX
Total International	XX VV	XX VV	XX	XX	XX	XX VV	XX	xx	XX	XX
Unaddressed	XX XX	XX XX	XX XX	XX XX	XX XX	XX XX		XX XX	XX XX	XX XX
TOTAL Reported Business	XX	XX	XX	XX	XX	XX		XX	XX	XX
D. Outside Reported Business and within UKPIL										
Parcelforce Worldwide  TOTAL Outside Penested Business and within LIVEII	XX	XX		XX	XX	XX		XX	XX	XX
TOTAL Outside Reported Business and within UKPIL	хх	ХХ	ХХ	XX	ХХ	ХХ	ХХ	ХХ	хх	XX
E. = C + D. UKPIL	1									
TOTAL UKPIL	хх	хх	хх	хх	хх	хх	хх	хх	хх	хх
										_

Figure 15(a): Monthly revenue and volume information statements

Financial Year	
Financial Period	

						_					
			Revenue	)			-		Volume		
		YTD						YTD			
	YTD	Prior		YTD		¥.	<del>TD</del>	Prior		YTD	
	Actual	Year	%Var	Budget	%Var	Act	ual	Year	%Var	Budget	%Var
	1										
Products		1		1			-				
First Class - Stamp											
First Class - Meter											
First Class - Account											
Second Class - Stamp											
Second Class - Meter											
Second Class - Account											
Breakdown of Bulk Mail products											
Breakdown of Access products (also broken down											
into CDA and Non CDA)											
Into CDA and Non CDA											
Breakdown of non-USO parcels, Tracked, Special											
Delivery, and remaining addressed inland products											
betwery, and remaining addressed initial products											
Total Addressed Inland products											
Other (see breakdown below)											
<del>Door to Door</del>											
International (see breakdown below)											
Ancilliary/Elections/Other (see breakdown below)											
TOTAL											
	-										
Other											
<del>Breakdown</del>											
TOTAL											
	•										
International											
<del>Breakdown</del>											
TOTAL											
Ancilliary/Elections/Other											
<del>Breakdown</del>											
TOTAL											
			-								
Analysis by format						_					
Letters and large letters End to end inland											
Letters and large letters Access											
Letters and large letters International											
Parcels End to end inland											
<del>Parcels Access</del>											
<del>Parcels International</del>											
<del>Parcels Parcelforce</del>											
<del>Unaddressed mail</del>											
TOTAL											

Figure 10: Quarterly cost metrics

	Financial Quarter					Financial Year to date					
	Actual	Prior year	%	Budget	%	Actual	Prior year	%	Budget	%	
		Ť	Variance	_	Variance		·	Variance	Ţ	Variance	
Delivery Volumes (operational) (m)	VV	VV	VV	VV	VV	VV	VV	VV	VV		
Workload (m)	XX	xx	xx	xx	xx	xx	xx	xx	xx	XX	
• ,	XX	XX	XX	XX	XX	XX	XX	XX	xx	XX	
Gross Hours (k)	XX	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Workload % change	XX	XX	XX	XX	XX	xx	xx	XX	xx	XX	
Gross hours % change	XX	XX	XX	XX	xx	XX	xx	xx	XX	XX	
Productivity % change	XX	XX	XX	хх	XX	XX	XX	xx	XX	XX	
Processing											
Volumes (operational) (m)	XX	XX	XX	XX	XX	XX	xx	XX	XX	XX	
Workload (m)	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Gross Hours (k)	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	
Workload % change	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Gross hours % change	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Productivity % change	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	
Subtatel (Delivery & Breassing)											
Subtotal (Delivery & Processing) Volumes (operational) (m)	xx	VV	xx	xx	VV	xx	VV	xx	xx	VV	
Workload (m)		xx			xx		xx			XX	
* *	XX	XX	xx	xx	XX	XX	xx	xx	xx	XX	
Gross Hours (k)	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	
Workload % change	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	
Gross hours % change	XX	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Productivity % change	XX	XX	XX	хх	XX	XX	XX	xx	XX	XX	
RDCs											
Volumes (operational) (m)	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	
Workload (m)	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	
Gross Hours (k)	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	
Workload % change	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	
Gross hours % change	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	
Productivity % change	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	
Regional Logistics Volumes (operational) (m)	XX	xx	xx	xx	XX	xx	xx	xx	xx	xx	
Workload (m)											
* *	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	
Gross Hours (k)	XX	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Workload % change Gross hours % change	xx xx	xx xx	xx xx	xx xx	xx xx	xx xx	xx xx	xx xx	xx xx	xx xx	
Productivity % change	XX	XX	XX	xx	XX	xx	xx	xx	XX	XX	
Other		1		1				1	1		
Volumes (operational) (m)	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Workload (m)	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Gross Hours (k)	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Workload % change	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	
Gross hours % change	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	
Productivity % change	XX	XX	XX	XX	XX	XX	XX	xx	XX	XX	
Total											
Volumes (operational) (m)	xx	xx	xx	xx	XX	xx	xx	xx	xx	xx	
Workload (m)	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Gross Hours (k)	XX	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Workload % change	xx	xx	xx	xx	xx	xx	xx	xx	xx	XX	
Gross hours % change		AA	^^					xx		XX	
GLOSS HOULS /0 CHAILEE	xx	xx	xx	XX	XX	XX	XX	^^1	XX		
Productivity % change	xx xx	xx xx	xx xx	xx xx	xx xx	xx xx	xx xx	XX	xx xx	XX	
Productivity % change	xx	xx				xx	xx			xx	
_										XX	
Productivity % change	xx	xx				xx	xx			xx	
Productivity % change  Number of working days	xx	xx				xx	xx			xx	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)	xx	xx	xx	xx	хх	xx	xx	xx	хх		
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings	xx	xx	xx	xx	xx	xx	xx xx	xx	xx	xx	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings Other Cost Savings  Total	xx xx xx	xx xx xx xx	xx xx xx xx	xx xx xx xx	xx xx xx xx	xx xx xx xx	xx xx xx xx	xx xx xx xx	xx xx xx xx	XX XX XX	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings Other Cost Savings	xx xx xx	xx xx xx	xx xx xx	xx xx xx	xx xx xx Other (inc. timing,	xx xx xx	xx xx xx	xx xx xx	xx xx xx	xx xx	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings Other Cost Savings  Total  Reported Business Headcount Bridge for the Financial Quarter (no. of people)	xx xx xx xx xx xx	xx xx xx xx xx xx xx XX	xx xx xx xx Leavers; Retiremen t	xx xx xx xx Leavers; Attrition	xx xx xx Other (inc. timing, transfers)	xx xx xx xx xx Actual Headcount	xx xx xx xx xx xx	xx xx xx xx XX	xx xx xx xx Budget	xx xx xx xx <b>%Var</b>	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings Other Cost Savings  Total  Reported Business Headcount Bridge for the Financial Quarter (no. of people)  Fixed Term Full Time	xx xx xx xx xx xx xx xx xx	xx	xx xx xx xx Leavers; Retiremen t xx	xx xx xx xx Leavers; Attrition	xx xx xx Other (inc. timing, transfers)	xx xx xx xx Actual Headcount	xx xx xx xx xx xx xx xx	xx xx xx xx xx	xx xx xx xx Budget	xx xx xx %Var	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings Other Cost Savings Total  Reported Business Headcount Bridge for the Financial Quarter (no. of people)  Fixed Term Full Time Fixed Term Part Time	xx xx xx xx xx xx	xx xx xx xx xx Leavers; VR xx xx	xx xx xx Leavers; Retiremen t	xx xx xx Leavers; Attrition	xx xx xx Other (inc. timing, transfers) xx xx	xx xx xx xx Actual Headcount xx xx	xx xx xx xx xx  Prior Year xx xx	xx xx xx xx %Var	xx xx xx Budget	xx xx xx %Var	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings Other Cost Savings  Total  Reported Business Headcount Bridge for the Financial Quarter (no. of people)  Fixed Term Full Time Fixed Term Part Time Permanent Full Time	xx	xx	xx xx xx xx  Leavers; Retiremen t xx xx xx	xx	xx xx xx xx  Other (inc. timing, transfers) xx xx xx xx	xx xx xx xx xx xx Actual Headcount xx xx xx	xx	xx	xx	xx xx xxx xxx <b>%Var</b> xxx xx	
Productivity % change  Number of working days  Cost Savings from Initiatives (£m)  Hours Reduction Cost Savings Other Cost Savings  Total  Reported Business Headcount Bridge for the Financial Quarter (no. of people)  Fixed Term Full Time Fixed Term Part Time	xx xx xx xx xx xx	xx xx xx xx xx Leavers; VR xx xx	xx xx xx Leavers; Retiremen t	xx xx xx Leavers; Attrition	xx xx xx Other (inc. timing, transfers) xx xx	xx xx xx xx Actual Headcount xx xx	xx xx xx xx xx  Prior Year xx xx	xx xx xx xx %Var	xx xx xx Budget	xx xx xx %Var	

# Figure 15(b): Monthly cost information statements

Financial Year	
Financial Period	

			Month				Y	ear to da	te	
		Prior					Prior	l		
	Actual	Year	<del>%Var</del>	Budget	<del>%Var</del>	Actual	Year	%Var	Budget	%Va
Reported Business staff	1									
Headcount								1		
Full Time Equivalent (as defined in paragraph 2.2)										
Processing productivity	1									
Productivity % change								1	1	
Workload % change										
Gross hours % change-										
Total workload										
Total gross hours										
Total 61033 110413										
Delivery/Collection productivity										
Productivity % change								1		
Workload % change										
Gross hours % change										
<del>Total workload</del>										
<del>Total gross hours</del>										
Total productivity (Processing/Delivery/Collection)	1					<u> </u>				l.
Productivity % change								1	1	
Workload % change										
Gross hours % change										
Total workload										
<del>Total gross hours</del>										
-	1							l		
Transformation Table prophers of Mail Courters										
Total number of Mail Centres										
Number of Mail Centre closures										
Number of Mail Centre openings										
Total number of fully modernised Delivery Offices										
Voluntary Redundancy costs ('VR')										
Operating and capital expenditure on transformation										
excluding VR										

Figure 11: Short SPHCC revenue, cost and volume data

	Short SPHCC 1		Short S	PHCC 2	
	YTD Actual	YTD Prior	YTD Actual	YTD Prior	
		Year		Year	İ
Format	xx	xx	xx	xx	İ
Weight Step	xx	xx	xx	xx	İ
Class	xx	xx	xx	xx	İ
Payment method	xx	xx	xx	xx	İ
Scorecard category	xx	xx	xx	xx	İ
Product group	xx	xx	xx	xx	İ
Sales product	xx	xx	xx	xx	İ
V4 category	xx	xx	xx	XX	İ
Volume	xx	xx	xx	XX	İ
Revenue, £	xx	xx	xx	XX	İ
People costs, £	xx	xx	xx	xx	İ
Depreciation, amortisation & impairments, £	xx	xx	xx	xx	ĺ
Other operating costs, £	xx	xx	xx	xx	ĺ
Total operating costs, £	XX	xx	xx	XX	İ
Transformation costs, £	xx	xx	xx	xx	İ
Total operating costs inc. Transformation Costs, £	xx	xx	xx	xx	İ
Separated/Non-Separated (see Appendix 2 for Short SPHCCs to be separated)	xx	xx	xx	xx	İ
Transfer price (from Downstream Services to Upstream Services), £	xx	xx	xx	xx	İ
Upstream revenue, £	xx	xx	xx	xx	İ
Upstream total operating costs, £	xx	xx	xx	xx	İ
Upstream total operating costs inc. Transformation Costs, £	xx	xx	xx	xx	İ
Downstream revenue, £	xx	xx	xx	xx	ĺ
Downstream total operating costs, £	xx	xx	xx	xx	ĺ
Downstream total operating costs inc. Transformation Costs, £	xx	xx	xx	xx	ĺ

 Short S	PHCC n
YTD Actual	YTD Prior
	Year
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
XX	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx
xx	xx

# Appendix 2: Product Allocations for Accounting Separation Products subject to upstream/downstream transfer pricing<sup>13</sup>

Mailrooms Bespoke Collection Swapshot Mail Collect Safebox Special Delivery Return to Sender Non USO Sales Agents Response Services 1st Sales Agents Response Services 2nd Sales Agents Royal Mail 24 Sales Agents Royal Mail 48 Sales Agents Royal Mail 24 (sort 8) Sales Agents Royal Mail 48 (sort 8) Sales Agents Royal Mail 48 Presort Flat Rate Sales Agents Misc ABB Services Sales Agents Advertising Mail High Sort 1st Sales Agents Advertising Mail High Sort 2nd Sales Agents Advertising Mail High Sort Economy Sales Agents Sustainable Advertising Mail Intermediate Low Sort les Agents Advertising Mail Low Sort Eco Sales Agents Business Mail High Sort 1st Sales Agents Business Mail High Sort 2nd Sales Agents Business Mail High Sort Economy Sales Agents Business Mail Low Sort 2nd Sales Agents Business Mail Low Sort Economy Sales Agents Business Mail Unsorted 1st Sales Agents Business Mail Unsorted 2na Sales Agents Publishing Mail High Sort 1st Sales Agents Publishing Mail High Sort 2nd Sales Agents Sustainable Advertising Mail Low Sort Economy Sales Agents Advertising Mail Low Sort OCR 1st Sales Agents Advertising Mail Low Sort CBC 2nd Sales Agents Business Mail Unsorted Advance OCR 1st Sales Agents Advertising Mail Unsorted 1st Soles Agents Advertising Mail Unsorted 1st Soles Agents Advertising Mail Unsorted 2nd Soles Agents Advertising Catalogue Mail Advertising Mail High Sort 1st Direct Advertising Moil High Sort 1st Residue Advertising Mail High Sort 2nd Direct Advertising Mail High Sort 2nd Residue Advertising Mail High Sort Economy Direct Advertising Mail High Sort Economy Residue
Advertising Mail Low Sort BC 1st
Advertising Mail Low Sort BC 2nd Advertising Mail Low Sort BC Economy Advertising Mail Low Sort OCR 1st Advertising Mail Low Sort OCR 2nd Advertising Mail Low Sort OCR Econ Advertising Mail Multi Stage Advertising Mail Unsorted 1st Advertising Mail Unsorted 2nd Advertising Mail Unsorted OCR 1st Advertising Mail Unsorted OCR 2nd Advertising Mail Unsorted Barcode 1st Advertising Mail Unsorted Barcode 2<sup>nd</sup>

Advertising Mail Unsorted Plus Barcode 1st Advertising Mail Unsorted Plus Barcode 2nd Advertising Mail Unsorted Plus OCR 1st Advertising Mail Unsorted Plus OCR 2nd Advertising with Response Advertising Mail High Sort With Response Economy Direct Advertising Mail Response Business Mail High Sort 1st Direct Business Mail High Sort 1st Residue Business Mail High Sort 2nd Direct Business Mail High Sort 2nd Residue Business Mail High Sort Economy Direct Business Mail High Sort Economy Residue Business Mail Low Sort BC 1st Business Mail Low Sort BC 2nd Business Mail Low Sort BC Economy Business Mail Low Sort OCR 1st Business Mail Low Sort OCR 2nd Business Mail Low Sort OCR Economy Business Mail Unsorted OCR 1st Business Mail Unsorted OCR 2nd Business Mail Unsorted BC 1st Business Mail Unsorted BC 1st Business Mail Unsorted BC 2nd Business Mail Unsorted Plus Barcode 1st Business Mail Unsorted Plus Barcode 2nd Business Mail Unsorted Plus OCR 1st Business Mail Unsorted Plus OCR 2nd Business Mail Unsorted 1st Business Mail Unsorted 2nd Business Mail Unsorted Advance OCR 1st Business Mail Unsorted Advance OCR 2nd Publishing Mail High Sort 1st Direct
Publishing Mail High Sort 1st Residue
Publishing Mail High Sort 2nd Direct Publishing Mail High Sort 2nd Residue Publishing Mail ILDW Sort 1st
Publishing Mail Low Sort 1st
Publishing Mail Low Sort 2nd
Publishing Premium
Sustainable Advertising Mail High Sort Entry 1st Direct
Sustainable Advertising Mail High Sort Entry 1st Residue

Sustainable Advertising Mail High Sort Entry 2nd Direct Sustainable Advertising Mail High Sort Entry 2nd Residue Sustainable Advertising Mail High Sort Entry Economy Direct
Sustainable Advertising Mail High Sort Entry Economy Residue

Sustainable Advertising Mail High Sort Intermediate 1st Sustainable Advertising Mail High Sort Intermediate 1st Sustainable Advertising Mail High Sort Intermediate 2nd

Sustainable Advertising Mail High Sort Intermediate 2nd Sustainable Advertising Mail High Sort Intermediate

Sustainable Advertising Mail High Sort Intermediate Economy Residue

Sustainable Advertising Mail Low Sort Entry BC 1st Sustainable Advertising Mail Low Sort Entry BC 2nd Sustainable Advertising Mail Low Sort Entry BC 2nd Sustainable Advertising Mail Low Sort Entry BC Economy Sustainable Advertising Mail Low Sort Entry OCR 1st Sustainable Advertising Mail Low Sort Entry OCR 2nd

Sustainable Advertising Mail Low Sort Entry OCR Economy Sustainable Advertising Mail Low Sort Intermediate BC 1st Sustainable Advertising Mail Low Sort Intermediate BC Sustainable Advertising Mail Low Sort Intermediate BC

Sustainable Advertising Mail Low Sort Intermediate OCR

Sustainable Advertising Mail Low Sort Intermediate OCR

Sustainable Advertising Mail Low Sort Intermediate OCR Economy

Business Sorted Bespoke Advertising Mail Low Sort EIB 1c
Advertising Mail Low Sort Mailmark 2nd
Business Mail Low Sort Mailmark 1st Business Mail Unsorted Mailmark 1st Business Mail Unsorted Mailmark 2nd Advertising Mail Unsorted Mailmark 2nd Business Mail Low Sort Mailmark 2nd Business Mail Low Sort Mailmark 2nd Business Mail Low Sort Mailmark Economy Sustainable Advertising Mail Low Sort Interm

Sustainable Advertising Mail Low Sort Intermediate EIB 2C Sustainable Advertising Mail Low Sort Intermediate

Mailmark 1c

Mailmark Economy
Publishing Mail Low Sort Mailmark 1c Direct
Publishing Mail Low Sort 1C EIB Publishing Mail Low Sort Mailmark 2nd Advertising Mail Unsorted Mailmark 1st Sustainable Advertising Mail Low Sort Entry EIB 1c Sustainable Advertising Mail Low Sort Entry Mailmark 2nd Sustainable Advertising Mail Low Sort Entry Mailmark

Advertising Mail Low Sort Mailmark Economy Business Mail 1st Class Advanced Mailmark Letters Rusiness Mail 2nd Class Advanced Mailmark Letters Advertising Mail Unsorted 1C
Advertising Mail Unsorted 2C
Business Mail Low Sort 2C Mailmark ND

Advertising Mail Catalogue High Sort Economy Advertising Mail Catalogue High Sort Economy Residues

Diversion (Del at Another Address) Freepost Name Government Postage General Flection Flection Streetsor Election Sort Large User Priority Response Services Large User Response Barcode

Royal Mail 24 Daily Rate Royal Mail 48 Flat Rate Floor Fees Pouch Services

Large User Response Services

Priority Response Services
Private Boxes Delivery to Normal Address 12 Months Private Boxes Delivery to Normal Address 6 Months

Private Boxes Early Collection 12 Months Private Boxes Locked 12 Months Private Boxes Cocked 12 Months
Private Boxes Standard Service 12 Months
Private Boxes Standard Service 6 Months
Private Boxes Transfer to PO Box 12 Months

Private Boxes Transfer to PO Box 6 Months Private Boxes Standard Service Monthly Private Boxes Staliand Service Worthly Private Boxes Delivery to Normal Address Monthly Private Boxes Transfer to PO Box Monthly Response Service Barcode Response Services Standard

Retention of Mail (Business only) Rural Carriage of Goods Rural Newspaper Delivery Service Rural Roadside Locked P Letter Boxes

Surcharges (Business) Surcharges (Mailmark) Timed Delivery Poll Card Mailing Option

Do Not Redirect Courier Service (Bespoke) Royal Mail 24 (sort 8) Flat Rate Royal Mail 48 (sort 8) Flat Rate Royal Mail 24 (sort 8) Daily Rate Royal Mail 48 (sort 8) Daily Rate

Priority Response Services Licence Freepost Name Licence Priority Services Registered Plus Licence 1500

Large Priority Response Licence Royal Mail 24 (presorted)

Royal Mail 24 (presorted)
Santa Mail
Collection from Private PO Box Safebox Royal Mail Tracked Returns 24

Royal Mail Tracked Returns 48 Tracked Returns Enhancements 1c Tracked Returns Enhancements 2c Postal Voting Pre Sorted Delivery Early Extraction Early Collect Response Services Plus Business Mail Secure

Sales Related Fees Response Service Licence Market Reach

<sup>&</sup>lt;sup>13</sup> We have set out here a full list of products currently sold by Royal Mail, which are reported within PPS 3, PPS 4 and PPS 8. However, we expect that not all those listed products will be necessary for our proposed new targeted separation requirements. We are seeking to capture within the scope of the targeted separation all relevant letter and large letter sorted and unsorted bulk products within PPS 3, PPS 4 and PPS 8. We seek stakeholders' views on which of the products we have set out in the full list in Appendix 2 would be relevant for those purposes. We will take account of responses to this question in finalising that list in making our decision on this matter.

### Allocations of products and/or services to the Four FREs

In the event of conflict between the following product allocations and Royal Mail's published universal service products listing, Royal Mail must give priority to the latter in allocating products and services to the Four FREs.

	Line A	Line A	
Line C	Line C		
NGC and the transfer of the control of the Unit of the Charles	Non-USO products (also separated by Line B below)	End to and only products. Mails (not concreted by	End to and enhanceducte, non-Maile (not concreted
USO products (also separated by Line B below)	See Note 1	End to end only products - Mails (not separated by Line B)	End to end only products - non-Mails (not separated- by Line B)
1st Class Stamp 1st Class Stamp RM Signed For	Business Mail High Sort 1st class	Royal Mail 24 > 2kg	PAF Products
Prepaid Stationery 1st	Business Mail High Sort 2nd class- Business Mail High Sort Economy-	Royal Mail 48 > 2kg Royal Mail Tracked 48 > 2kg	AMC Product- Postbuses-
2nd Class Stamp	Business Sorted Bespoke-	Royal Mail Tracked 24 > 2kg	Data Services
2nd Class Stamp RM Signed For- Prepaid Stationery 2nd	Advertising Mail High Sort 1st class- Advertising Mail High Sort 2nd class-	Reyal Mail Tracked Returns 24 > 2kg- Reyal Mail Tracked Returns 48 > 2kg-	Sameday Relay (inc Branch Direct and Parts Express)
Parcels-2ND <2kg	Advertising Mail High Sort Economy	Advertising Mail Heavyweight-Econ > 2kg- Publishing Mail High Sort 2nd > 2kg-	External and Internal Warehousing
1st Class Franking 1st Class Franking RM Signed For-	Advertising Mail Big Book Econ < 2kg- Advertising Mail Heavyweight-Econ < 2kg-	Business Mail Unsorted > 2kg	Parcelforce IB Other IB Revenue
1st Class Account	Bespoke Advertising Mail Big Book Econ- Advertising Mail Multi Stage	Freepost (all variants) >2kg	<del>POL</del> UKPIL Intra Revenue
4st Class Account RM Signed For Sales Agents Standard Tariff 1st	Advertising Mail Multi Stage Business Mail Low Sort 1st class-	Business Reply Plus> 2kg Business Reply >2kq	Stamps & Collectibles
2nd Class Franking 2nd Class Franking RM Signed For	Business Mail Low Sort 2nd Class	Unaddressed Mail Sales Agents Unaddressed Mail	Consultancy & Agency Work International Mailshets Online
2nd Class Account	Advertising Mail Low Sort 1st class- Advertising Mail Low Sort 2nd Class-	Special Delivery 9am Stamp	<del>Maiisneis Online</del>
2nd Class Account RM Signed For	Publishing Mail High Sort 1st class	Special Delivery 9am Franking	
Sales Agents Standard Tariff 2nd- Special Delivery Next Day Stamp-	Publishing Mail High Sort 2nd class- Publishing Mail Low Sort 1st class-	Special Delivery 9am Account Special Delivery Guaranteed Returns	
Special Delivery Prepaid Stationery	Publishing Mail Low Sort 2nd Class-	Special Delivery Next Day Account	
Special Delivery Next Day Franking Proof of Delivery	Publishing Premium Business Mail Unserted 1st class	Sales Agents Special Delivery Application of Indicia	
Recorded Delivery	Business Mail Unsorted 2nd class Advertising Mail Unsorted 1st Class	International Destination Sort- International Mailing Options	
Keepsafe Lecal Collect	Advertising Mail Unsorted 1st Class- Advertising Mail Unsorted 2nd class-	International Mailing Options International Bundle Sort	
Return to Sender USO	Advertising with Response	International Zone Sort	
RLB Postings (Belfast) Articles for the Blind	Royal Mail 24 parcels < 2kg account Royal Mail 48 parcels < 2kg account	International Format Sort- International No Sort-	
Poste Restante	Royal Mail Tracked 48 < 2kg	International Bulk Mail-	
Unofficial Redirections- Surcharges (Social)	Royal Mail Tracked 24 < 2kg Royal Mail Tracked Returns 24	Contract Airsure Airsure plus Compensation	
Redirection Business and Social	Royal Mail Tracked Returns 48	International Contract Signed for	
Aerogrammes Aircard	Freepost Plus and Standard Freepost Name	Large Mail Order Returns > 2kg	
Airmail	Admail		
Articles for the Blind-Air- Surface Mail	Business Reply Plus Business Reply Standard		
International Signed For & Signed For Plus-	Postal Voting		
Inward Airmail Inward Registered	Sales Agents Business Reply- Business Collections		
Inward Surface Mail	Collection from Locked Private Box		
Inward Surface Insured/Registered- Inward Air Prime Registered & Express-	Mail-collect		
Franking Machine Resetting	Safebox Special Delivery		
	Bespokes Callers Service		
	Mailroom Consultancy & Management		
	Newspaper Registration Fee		
	Pouch Services		
	Business Keepsafe Rural Carriage of Goods		
	Rural Newspaper Delivery Service		
	Rural Roadside Locked P Letter Boxes- Selectapost		
	Timed Delivery		
	Safebox Pre-Sorted Delivery		
	Early Extraction		
	Early Collect Business Mail Secure		
	Market Reach		
	Return to Sender Non USO- Santa Mail		
	Government Postage General Election		
	Surcharges (Business) Private Bexes		
	Collection from Private PO Box		
	Diversion (Del at Another Address)  Do Not Redirect		
	Airpacks		
	British Forces Mail (Outward) British Forces Mail (Inward)		
	International Admail		
	IBRS Import Swiftair & Swiftair Plus		
	Airsure & Airsure Plus		
	<del>Direct Entry</del> 3 Islands		
	International Goods Returns		
	International Redirection Large Mail Order Returns < 2kg		
	· ·		
	Line B		
Downstream services (access products below and downstream elements of USO and non-USO products-	Line B		
above) - See Note 2			
Network Access Premium 70			
Network Access 70			
Network Access 70 Tray Network Access 1400 Premium			
Network Access 1400			
Network Access Misserts Network Access Under Volume Bags			
Network Access COP extraction			

### **Appendix 3**

# **Material change pro-formas**

Royal Mail must—

- (a) in relation to any material change to the <u>Costing Manual</u>, use the pro-forma set out in **Table 12-A** of this **Appendix 3**; or
- (b) in relation to any material change to the <u>Accounting Methodology Manual</u>, use the proforma set out in **Table 13-B** of this **Appendix 3**;
- (c) in relation to the combined effect of all the material changes to the Costing Manual and the Accounting Methodology Manual on Short SPHCCs, use the pro forma set out in Table C of this Appendix 3; and
- (d) in relation to the combined effect of all the material changes to the Costing Manual and the Accounting Methodology Manual on the Reported Business quarterly income statements, use the pro forma set out in **Figure 2 of Appendix 1** of these Guidelines.

In using these pro-formas, Royal Mail must ensure that—

- (a) the description of the change is explained in a manner that can be easily understood by a reader who does not have a detailed technical knowledge of <u>Royal Mail</u>'s operations and systems (e.g. avoiding acronyms and technical jargon to the greatest extent possible);
- (b) in giving reasons for the change, a brief explanation of the available options for change and Royal Mail's assessment of those options are provided; and
- (c) in stating the compliance with these Guidelines, a reference to the relevant obligations in these Guidelines and an explanation of how Royal Mail considers that the change complies with these obligations.

# Table 12A: Material changes to the Costing Manual

**Downstream Services** 

Description of o	change:					
Date change ef	fective from:					
Area of the Nat	ional Costing Methodo	ology or Zonal	Costing Meth	odology affe	cted:	
Area of the Pipe	eline affected:					
Reasons for ch	ange:					
Compliance wit	h the Regulatory Acco	ounting Guideli	nes:			
		(a)	(b)	(c)	(c) / (a)	
Items affected		Value before change	Value after change	Difference	% difference	Comments
Total costs of the Reported Business						
Activity Costs	Activity 1					
	Activity 2					
	<u></u>					
	Activity x					
SPHCC Costs	SPHCC 1					
	SPHCC 2					
	<u></u>					
	SPHCC x					
Cost-of- products- and/or- services	Total					
Costs of	<u>USO</u> products					
products and/or	Access products					
services	non-USO products (remainder)					
<u>Pipeline</u>	<u>Upstream Services</u>					
<u>costs</u>	Downstream Services					

# Table 13B: Material changes to the Accounting Methodology Manual

Description of ch	nange:				
Date change effe	ective from:				
Reasons for cha	nge:				
Compliance with	the <u>Regulatory A</u>	sccounting Guide	lines:		
Income stateme	ent: material cha	<del>-</del>			
	(a)	(b)	(c)	(c) / (a)	
Reported Item	Value before change	Value after change	Difference	% difference	Comments
Item 1					
Item 2					
Item x					
0	- 1 - 1 - 1 - 1 1	-4			
Capital employ	ed statement: ma		(.)	(-) ((-)	
December 111	(a)	(b)	(c)	(c) / (a)	0
Reported Item	Value before change	Value after change	Difference	% difference	Comments
Item 1					
Item 2					
Item x					
Coch flow state	ement: material c	hangas			
Casil llow state		<del>-</del>	(a)	(a) / (a)	
Departed Hors	(a)	(b)	(C)	(c) / (a)	Commonto
Reported Item	Value before change	Value after change	Difference	% difference	Comments
Item 1					
Item 2					
Item x					
Notes to the etc		al abanasa			
	tements: materi	ai changes			
Reported Item Item 1	Notes				
Item 1					
Item x					
ILCIII V					

<u>Table C: Combined effect of all material changes to the Costing Manual and the Accounting Methodology Manual</u>

		<u>(a)</u>	<u>(b)</u>	<u>(c)</u>	(c) / (a)	
		Value before change	Value after change	Difference	% difference	Comments
Revenues	Short SPHCC 1					
	Short SPHCC 2					
	<u></u>					
	Short SPHCC x					
	Total					
<u>Costs</u>	Short SPHCC 1					
	Short SPHCC 2					
	<u></u>					
	Short SPHCC x					
	Total					

# Appendix 4: Information to be included in the pro-forma's for the technical appendices of the Costing Manual

### (a) Annual information required in the technical appendices submitted for the Financial Year

### **Data Template A**

Scope: all SPHCCs with a non-zero FAC or traffic volume in the year

Significant digits: to minimise the impact of rounding errors please provide all data to the maximum number of significant figures allowed by the RM system

					RDT Volume	Total FAC (£)	Unit FAC (p)
SPHCC Group	SPHCC Code	SPHCC	Sales Product	Mon-mails Flag	FY	FY	FY
		Description	Code Description				

### **Data Template B**

Scope: all Activities with a non-zero value in the year

Significant digits: to minimise the impact of rounding errors please provide all data to the maximum number of significant figures allowed by the RM system

				Cost (£)
Activity Code	Activity	Pipeline	Attribute	FY
	Description	Segment	Description	

# Data Template C

Scope: all Activities whose cost is allocated by the application of PFs and WFs (excluding "class activities")

Significant digits: to minimise the impact of rounding errors please provide all data to the maximum number of significant figures allowed by the RM system

	PF %	WF
SPHCC Code	FY	FY
S	SPHCC Code	

### **Data Template D**

Scope: all "class activities" whose PFs and WFs are assigned by reference to another "source activity" on the basis of class
Significant digits: to minimise the impact of rounding errors please provide all data to the maximum number of significant figures allowed by the RM system

			Should Class adopt PF of source Activity	Should Class adopt WF of source Activity
Activity Code of Class Activity	Activity Code of Source Activity	Class	Yes = 1, No = 1	Yes = 1, No = 1

## Data Template E

Scope: list all activities whose cost is allocated on an EPMU basis

Activity Code
e.g. HD0104XX

### Data Template F

Scope: all SPHCC x Activity combinations with a non-zero total FAC in any quarter

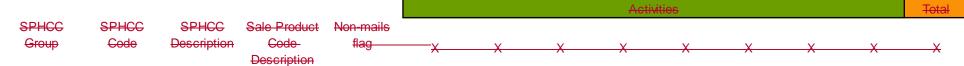
Significant digits: to minimise the impact of rounding errors please provide all data to the maximum number of significant figures allowed by the RM system

		FAC (£)
Activity Code	SPHCC Code	FY

### (a) Quarterly information required in the technical appendices submitted for each Financial Quarter

### Data Template G





### Data Template H

Scope: Revenue-derived traffic volume per SPHCC per Activity

SPHCC SPHCC Sale Product Non-mails

Group Code Descrip Code flag X

tion Description

### Data Template I

Scope: Unit cost per SPHCC per Activity

								Auth	<del>itios</del>				<del>TUtal</del>
SPHCC	SPHCC	SPHCC	Sale Product	Non-mails									
Group	Code	<del>Descrip</del> tion	Code- Description	flag	X	X	X	X	X	X	X	X	X