

# Company Policy Handbook

# Anti-Bribery & Anti-Corruption policy 1/4



## 1. What does your policy cover?

1.1 This anti-bribery policy exists to set out the responsibilities of and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

1.2 It also exists to act as a source of information and guidance for those working for PAINT Ltd (trading as Spotted Bee) It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## 2. Policy statement

2.1 PAINT Ltd (trading as Spotted Bee) is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. PAINT Ltd (trading as Spotted Bee) has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

2.2 PAINT Ltd (trading as Spotted Bee) will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

2.3 PAINT Ltd (trading as Spotted Bee) recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

## 3. Who is covered by the policy?

3.1 This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, sub-contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

3.2 In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

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3.3 Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

#### **4. Definition of bribery**

4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

4.4 Bribery is illegal. Anyone providing services for PAINT Ltd (trading as Spotted Bee) must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

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## 5. What is and what is NOT acceptable

5.1 This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

5.2 PAINT Ltd (trading as Spotted Bee) accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

it is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.

- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of £100).
- It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

5.3 Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

5.4 PAINT Ltd (trading as Spotted Bee) recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

5.5 As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.

5.6 The intention behind a gift being given/received should always be considered. If

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there is any uncertainty, the advice of the compliance manager should be sought.

5.7 Facilitation Payments and Kickbacks PAINT Ltd (trading as Spotted Bee) does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

5.8 PAINT Ltd (trading as Spotted Bee) does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

5.9 PAINT Ltd (trading as Spotted Bee) recognises that, despite our strict policy on facilitation payments and kickbacks, workforce may face a situation where avoiding a facilitation payment or kickback may put their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.



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- Create a record concerning the payment.
- Report this incident to your line manager.

5.10 Political Contributions PAINT Ltd (trading as Spotted Bee) will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

5.11 Charitable Contributions PAINT Ltd (trading as Spotted Bee) accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

5.12 Workforce must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

5.13 We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

### 6. Workforce Responsibilities

6.1 You must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

6.2 Workforce is equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

6.4 If an employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. If an independent contractor breaches this policy then PAINT Ltd (trading as Spotted Bee) will no longer be able to provide offers of work under their SLA.

### 7. What happens if I need to raise a concern?

7.1 This section of the policy covers 3 areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

7.2 How to raise a concern If you suspect that there is an instance of bribery or corrupt activities occurring in relation to PAINT Ltd (trading as Spotted Bee), you are

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encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director, or the Head of Governance and Legal.

7.3 PAINT Ltd (trading as Spotted Bee) will familiarise all workforce with its whistleblowing procedures so everyone can vocalise their concerns swiftly and confidentially.

7.4 What to do if you are a victim of bribery or corruption You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7.5 Protection If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, PAINT Ltd (trading as Spotted Bee) understands that you may feel worried about potential repercussions. PAINT Ltd (trading as Spotted Bee) will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

7.6 PAINT Ltd (trading as Spotted Bee) will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

7.7 If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

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## 8. Training and communication

8.1 PAINT Ltd (trading as Spotted Bee) will provide training on this policy as part of the induction process for everyone engaging with the company. Workforce will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

8.2 PAINT Ltd (trading as Spotted Bee)'s anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

8.3 PAINT Ltd (trading as Spotted Bee) will provide relevant anti-bribery and corruption training to employees, contractors, sub-contractors, etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

## 9. Record keeping

9.1 PAINT Ltd (trading as Spotted Bee) will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

## 10. Monitoring and reviewing

10.1 PAINT Ltd (trading as Spotted Bee)'s compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

10.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

10.3 Any need for improvements will be applied as soon as possible. Workforce are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager. 10.4 This policy does not form part of a contract of employment and PAINT Ltd (trading as Spotted Bee) may amend it at any time so to improve its effectiveness at combating bribery and corruption.



# Anti Discrimination Policy 1/3



## Our Commitment on Discrimination

PAINT Ltd (trading as Spotted Bee) are committed to eliminating unlawful discrimination and promoting equality and diversity in our own policies, practices and procedures and in influencing others to do the same in our dealings with Independent Contractors, clients, employees, and third parties.

We aim too treat everyone equally and with the same attention, courtesy and respect regardless of their age, disability, gender, marital status, race, racial group, colour, ethnic or national origin, nationality, religion, belief or sexual orientation.

We are committed to complying in both letter and spirit with all anti-discrimination legislation and associated codes of practice in force either now or in the future.

## Unlawful Grounds for Discrimination

Discrimination on any of the following grounds is unlawful:

- age (in respect of employment matters only)
- race, racial group, colour, ethnic or national origins;
- sex, gender, pregnancy, or marital status;
- political preference;
- disability;
- sexual orientation;
- religion or belief.

## Forms of Discrimination

The following are the kinds of discrimination, which are against the PAINT Ltd (trading as Spotted Bee) policy:

- (a) Direct discrimination, where a person is treated less favourably on the basis of a ground which is unlawful;
- (b) Indirect discrimination, where a provision, criterion or practice which seems to be lawful would create a significant disadvantage for a substantial number of one group of persons compared with other persons on the basis of an unlawful ground unless that provision, criterion, or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary;
- (c) Victimisation, where someone is treated less favourably than others because he or she has taken action in respect of discrimination on unlawful grounds;
- (d) Harassment, when unwanted conduct related to any unlawful ground takes place with the purpose or effect of creating an intimidating, hostile, degrading, humiliating, or offensive environment for any person. This is not limited to physical acts and may include verbal and non-verbal communications and gestures.

## Employment and Training

At PAINT Ltd (trading as Spotted Bee), we will treat all Independent Contractors, staff

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and job applicants equally and fairly and not discriminate unlawfully against them. We will ensure, for example, that arrangements for recruitment and selection, terms and conditions of , access to training opportunities, access to and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, work allocation and any other SLA related activities do not constitute unlawful discrimination against any person or group of persons.

## **Recruitment**

We recognize the value of a diverse workforce and will take steps to ensure that:

- We recruit from the widest pool of qualified candidates possible;
- Opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- Selection criteria and processes do not discriminate unjustifiably on any of the unlawful grounds other than Where we are exercising permitted positive action;
- All recruitment agencies acting for the PAINT Ltd (trading as Spotted Bee) are aware of this policy and act in accordance with it.

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# Anti DiscriminAtion Policy 2/3



## Conditions of service

We will treat all independent contractors and staff equally and endeavour to create and maintain a working environment which is free from discrimination and harassment and which respects, wherever possible, the differing backgrounds and beliefs of Independent contractors and staff. Terms and conditions of service for independent contractors and staff will comply with antidiscrimination legislation. The provision of any independent contractors and staff benefit such as working hours, leave and maternity leave arrangements, performance appraisal schemes, bonus schemes, dress codes, or any other conditions of the SLA will not discriminate against any independent contractor or staff on any unlawful grounds. Where it is possible and reasonable to do so, the Firm will endeavour to provide appropriate facilities and conditions of service which take into account the specific needs of independent contractors and staff which arise from their ethnic or cultural background; gender; responsibilities as career's; disability; religion or belief; or sexual orientation.

## Independent Contractors, Suppliers, Agents, and Third Parties

Any decisions regarding the suitability of suppliers and contractors, agents or other third parties to provide goods or services to us or to our clients will be made in accordance with this policy and not on any of the unlawful grounds. All suppliers, Independent contractors, agents, or other third parties instructed by PAINT Ltd (trading as Spotted Bee), whether for itself or on behalf of clients, will be made aware of this policy and the need to adhere to it. Failure of any supplier, contractor, agent or other third party or of any of its staff to adhere to the principles set out in this policy or to carry out any discrimination on unlawful grounds will be investigated and appropriate action taken which may include immediate termination of our relationship with them.

## Clients

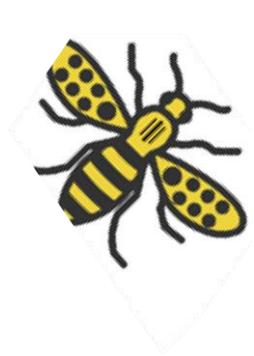
We are free to decide whether to accept instructions from any particular client, but any refusal to act or decision to terminate our services will not be based upon any unlawful grounds. We will not accept instructions from clients who contravene this policy. Where we are required by anti-discrimination legislation to do so and where it is reasonable we will make adjustments to our own working practices to accommodate the needs of any person falling under the appropriate anti-discrimination legislation. We will advise all clients of this policy on taking instructions from them. Where tenants or occupiers make requests under anti-discrimination legislation we will advise clients regarding the reasonableness of these requests; and where the client chooses not to comply with the request and we believe that non-compliance to be unlawful we will make our position clear to all parties in writing and reconsider whether to terminate our services.

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## **Promoting Equality and Diversity**

Just as we are committed to anti-discriminatory practices within our organisation we are also committed to promoting equality and anti-discrimination in areas in which we have influence. All Independent Contractors and staff will be informed of this policy and will be provided with training appropriate to their needs and responsibilities. All those who act on our behalf will be informed of this policy and will be expected to act in accordance with it when conducting business on our behalf. In all our dealings

# Anti Discrimination Policy 3/3



## Implementing the Policy

### Responsibility

Ultimate responsibility for implementing the policy rests with PAINT Ltd (trading as Spotted Bee). All our independent contractors, staff are expected to be aware and take notice of the provisions of our anti- discrimination policy and are responsible for ensuring compliance with it when fulfilling their duties or representing PAINT Ltd (trading as Spotted Bee). Acts of discrimination or harassment on any of the unlawful grounds or failure to comply with this policy by our independent contractors and staff will result in disciplinary action. Acts of discrimination or harassment on any of the unlawful grounds by those acting on behalf of the PAINT Ltd (trading as Spotted Bee) will lead to appropriate action including termination of employment or services where appropriate. Acts of discrimination or harassment on any of the unlawful grounds by clients or requests by clients for us to carry out any act of discrimination or harassment on any of the unlawful grounds will lead to termination of our service agreement with them.

### **Complaints of discrimination**

We will treat seriously, and, where appropriate, will take action regarding all complaints of discrimination or harassment on any of the unlawful grounds made by staff, clients, independent contractors or other third parties. All complaints will be investigated in accordance with our grievance or complaints procedure and the complainant will be informed of the outcome.

### **Protection and support for those involved**

Drivers who make complaints or who participate in good faith in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result.

If you believe you have suffered any such treatment you should inform your manager. If the matter is not remedied you should raise it formally. Any employee found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure will be subject to disciplinary action under our Disciplinary Procedure. Any independent contractor found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure may be subject to SLA termination.

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# Anti-harassment And Bullying Policy 1/4



## 1.1 Policy statement

The purpose of this policy is to ensure that all Drivers are treated and treat others with dignity and respect, free from any kind of harassment and bullying. All Drivers should take the time to ensure they understand what types of behaviour are unacceptable under this policy.

This policy covers harassment or bullying which occurs both in and out of the workplace, such as on business trips or at events or work-related social functions. It covers bullying and harassment of and by all persons who work with the business including Drivers and also by third parties such as customers, suppliers or visitors to our premises.

All Drivers must treat colleagues and others with dignity and respect and should always consider whether their words or conduct could be offensive. Even unintentional harassment or bullying is unacceptable.

We will take allegations of harassment or bullying seriously and address them promptly and confidentially where possible. Harassment or bullying by an employee will be treated as misconduct under our Disciplinary Procedure. In some cases, it may amount to gross misconduct leading to summary dismissal.

Harassment or bullying by a Driver will lead to termination of their SLA.

We may amend this policy at any time or depart from it where we consider appropriate.

## 1.2 What the law says

The Equality Act 2010 prohibits harassment related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. For more information see our Equal Opportunities Policy.

The Protection from Harassment Act 1997 also makes it unlawful to pursue a course of conduct which you know or ought to know would be harassment, which includes causing someone alarm or distress.

Under the Health and Safety at Work Act 1974 all Drivers are entitled to a safe place and system of work.

Individuals, including Drivers may in some cases be legally liable for harassment of colleagues or third parties including customers and may be ordered to pay

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compensation by a court or employment tribunal. remove

### **1.3 Who is covered by the policy?**

This policy covers all individuals working with us or at any of our own, or customer premises irrespective of their status, level or grade. It therefore includes all Drivers, managers, directors, officers, consultants, contractors, trainees, homeworkers, casual and agency Drivers and volunteers.

### **1.4 What is harassment?**

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

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Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

### Harassment may include, for example:

- unwanted physical conduct or “horseplay”, including touching, pinching, pushing, grabbing, brushing past someone, invading their personal space, and more serious forms of physical or sexual assault;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless), and suggestions that sexual favours may further a career or that a refusal may hinder it;
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
- offensive or intimidating comments or gestures, or insensitive jokes or pranks;
- mocking, mimicking or belittling a person’s disability;
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- outing or threatening to out someone as gay or lesbian; or
- ignoring or shunning someone, for example, by deliberately excluding them from a conversation or a workplace social activity.

A person may be harassed even if they were not the intended “target”. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for him.

### **1.5 What is bullying?**

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

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Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- shouting at, being sarcastic towards, ridiculing or demeaning others;
- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate and/or derogatory remarks about someone's performance;
- abuse of authority or power by those in positions of seniority; or
- deliberately excluding someone from meetings or communications without good reason.

Legitimate, reasonable and constructive criticism of a person's performance or behaviour, or reasonable instructions given to individuals in the course of their service with us, will not amount to bullying on their own.

### **1.6 Informal steps**

If you feel you are being bullied or harassed, you should initially consider raising the problem informally with the person responsible, if you feel able. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

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If you are not certain whether an incident or series of incidents amount to bullying or harassment, you should initially contact your manager informally for confidential advice.

If informal steps have not been successful or are not possible or appropriate, you should follow the formal procedure set out below.

## 1.7 Raising a formal complaint

If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your manager, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns that person, you should refer it to another Senior Manager.

Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all Drivers and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

## 1.8 Formal investigations

We will investigate complaints in a timely and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation. You will be given a provisional timetable for the investigation. The investigator will arrange further meetings with you as appropriate throughout the investigation.

Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the

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outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser or bully who may also be accompanied by a colleague or trade union representative of their choice to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

Where your complaint is about someone other than an employee, such as another Driver , a contractor, customer, service user, supplier, or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours so as to avoid or minimise contact with the alleged harasser or bully.

It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of non-ity will be emphasised to them.

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At the end of the investigation, the investigator will submit a report to the person nominated to consider the complaint. They will arrange a meeting with you, usually within a week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting. A copy of the report and the findings will be given to you and to the alleged harasser.

### 1.9 Action following the investigation

If it is considered that harassment or bullying has occurred, prompt action will be taken to address it

Where the harasser or bully is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure.

Where the harasser or bully is a third party, appropriate action might include putting up signs setting out acceptable and unacceptable behaviour; speaking or writing to the person and/or their superior about their behaviour; or, in very serious cases, banning them from the premises or terminating a contract with them.

Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the alleged harasser or bully. It may be appropriate to arrange some form of mediation and/ or counselling, or to change the duties, working location or reporting lines of one or both parties.

Any Driver who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under our Disciplinary Procedure.

### There is intentionally no 1.10

### 1.11 Protection and support for those involved

Drivers who make complaints or who participate in good faith in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result.

If you believe you have suffered any such treatment you should inform your manager. If the matter is not remedied you should raise it formally using our Grievance Procedure or this procedure if appropriate.

Anyone found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure will be subject to disciplinary action under our Disciplinary Procedure.

### 1.12 Confidentiality and data protection

Confidentiality is an important part of the procedures provided under this policy. Everyone involved in the operation of the policy, whether making a complaint or

Policy Name: Anti-harassment and Bullying Policy  
Revision Date: 13th July 2020 Revision Number: 1.0

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involved in any investigation, is responsible for observing the high level of confidentiality that is required. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a “need to know” basis.

Information about a complaint by or about an employee may be placed on the employee’s personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.

### **1.13 Protection and support for those involved**

Drivers who make complaints or who participate in good faith in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result.

If you believe you have suffered any such treatment you should inform your manager. If the matter is not remedied you should raise it formally. Any employee found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure will be subject to disciplinary action under our Disciplinary Procedure. Any independent contractor found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure may be subject to SLA termination.

# Road Safety Awareness 1/4



## Speed

- The speed limit is a limit not a target.
- In some road conditions including fog, rain and traffic flow, driving or riding at the speed limit could be too fast.
- The national Speed limit on single carriage roads is 60 mph. However, the average free flow speed is 48 mph on these roads.

## Country roads

- Read the road ahead, anticipate potential hazards and brake before the bend not into it.
- Look out for hidden dips, upcoming bends blind summits and concealed entrances. Always drive at a speed which will allow you to stop in a distance you can see to be clear.

## Fatigue

- Remember the risks if you have to get up unusually early to start a long drive. Try to avoid a long trip between midnight and six am when you are likely to feel sleepy.
- If you start to feel sleepy, find a safe place to stop (not the hard shoulder of a motorway). Drink two cups of coffee or a high-caffeine drink and have a rest for 10 to 15 minutes to allow time for the caffeine to kick in.
- Plan your journey to include a 15 minute break every 2 to 3 hours.

## Mobile phones

- Put your phone away before starting a journey, this way you won't be tempted to use it.
- Don't contact someones mobile if you know they are driving or riding.
- Make a pledge to not use your phone whilst driving or riding via RAC's be phone smart.

## Drink driving

- If you had too much to drink last night, you could be over the limit in the morning and you are not in a legal state to drive one of our vehicles. It is not acceptable to come in to drive when you are over the limit.
- If you are planning to drink alcohol, plan how to get home without driving. Agree a

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designated driver, save a taxi

number in your phone, or find out about public transport routes and times.

- Remember being only down the road is not an excuse to drive or ride under the influence of alcohol. A large proportion of all drink driving crashes occur within three miles of the start of the journey.

## **Drug driving**

- Driving under the influence of drugs is extremely dangerous and negatively affects your abilities. Your perception of time and distance is distorted, resulting in poor concentration and control of the vehicle.
- A sense of overconfidence can develop which can result in high risk behaviour, including speeding and aggressive manoeuvres.
- Once the affects of a drug has worn off the user still may feel fatigue, affecting concentration levels and driving or riding abilities.

## Road Safety Awareness 2/4



### Speeding

When driving, a few miles per hour can mean the difference between life and death. The faster someone drives, the less time they have to stop if something unexpected happens.

If you kill someone while speeding, you will have to live with the long-term emotional consequences.

### Speed limits are there for a reason.

#### The facts

- Speed is one of the main factors in fatal road accidents.
- Fatal accidents are 4 times as likely on rural 'A' roads as urban 'A' roads.
- 3,121 people were killed or seriously injured in accidents where 'exceeding the speed limit' or 'travelling too fast for the conditions' was recorded as a contributory factor by the police.

#### The law

- You must not drive faster than the speed limit for the type of road and your type of vehicle.
- The speed limit is the absolute maximum and it doesn't mean it's safe to drive at this speed in all conditions.

### Mobile Phones

#### The facts

- Drivers using a hands-free or handheld mobile phone are slower at recognising and reacting to hazards.

#### Research shows:

- You are 4 times more likely to be in a crash if you use your phone.
- Your reaction times are 2 times slower if you text and drive than if you drink drive, and this increases to 3 times if you use a handheld phone.
- Even careful drivers can be distracted by a call or text – and a split-second lapse in concentration could result in a crash. At 30 mph a car travels 100 feet in 2.3 seconds.

#### The law

- It's illegal to use a handheld mobile when driving – including using your phone to follow a map, read a text or check social media.

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- It is also illegal to use a handheld phone or similar device when supervising a learner driver.
- These both apply even if you're stopped at traffic lights or queuing in traffic.
- You can only use a handheld phone if you are safely parked, or need to call 999 or 112 in an emergency and it's unsafe or impractical to stop.
- If you're caught using a handheld phone while driving, you'll get 6 penalty points on your licence and a fine of £200.
- If you get just 6 points in the first 2 years after passing your test, you will lose your licence.
- Using a hands-free device (for example, for navigation) is not illegal. However, if this distracts you and affects your ability to drive safely, you can still be prosecuted by the police.
- Always wear a seat belt, and wear it correctly so it can offer you the best protection in a crash. You are twice as likely to die in a car crash if you do not. Even on short journeys, familiar journeys and at low speeds, not wearing a seat belt can be fatal.
- Put your phone away before driving so you won't be tempted to use it – make the glove compartment the phone compartment. Pull over if you need to
- Adjust a hands free device or check your map.
- Driving too close to the car in front, undertaking and failing to signal are widely accepted as examples of bad driving. However, driving too fast is also poor
- Driving. It is a contributory factor in hundreds of deaths and thousands of injuries every year. Consider the emotional consequences of injuries and
- Deaths caused to others due to driving at excessive speeds and crashing. If you cause a crash you will have to live with these consequences.

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# Road Safety Awareness 3/4



## Look out for vulnerable road users:

- Look out for cyclists, motorcyclists and horse riders. make eye contact where possible to show you have seen them. use your indicators to signal intention and look out for their signals.
- Give cyclists, motorcyclists and horse riders plenty of space when overtaking them. Don't accelerate rapidly, sound your horn or rev your engine when passing horses and watch out for sudden movements by the horse.
- Always check for cyclists and motorcyclists when opening your car door, pulling out at a junction, or when doing a manoeuvre.
- Advanced stop lines at lights allow vulnerable road users to get to the front and increase their visibility. You must stop at the first white line reached if the lights amber or red. When the green signal shows allow the other road user time and space to move off.

**Spotted Bee Emergency Number : 0161 \*\*\* \*\*\*\***

## Vehicle Safety, Security & Equipment Policy

### 1. General Principle

PAINT Ltd (trading as Spotted Bee) are committed to ensuring that both our company fleet and those vehicles owned and operated by our employees, contractors or agents is as safe as possible. This policy is to ensure that vehicle safety equipment requirements are documented and managed in a consistent way in order to improve our WRRR (work related road risk) safety record. Ensuring the most appropriate safety equipment is fitted to all vehicles is the joint responsibility of senior management, operations, drivers and owners of vehicles used to render services to PAINT Ltd (trading as Spotted Bee).

The driver of each vehicle plays a key role in providing feedback to ensure the most appropriate equipment is fitted and that any defects are reported as soon as they occur.

### 2. Who is covered by this policy

This policy applies to all staff, contractors, agents or persons rendering services to PAINT Ltd (trading as Spotted Bee) responsible for any aspect of the procurement, fitment, maintenance and use of a vehicle and its safety equipment.

### 3. Our Responsibilities

PAINT Ltd (trading as Spotted Bee) will endeavour to ensure that any person whom

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utilises a road vehicle in any context in the rendering of services to PAINT Ltd (trading as Spotted Bee) shall:

- Hold and continue to hold a valid driving license covering as a minimum the class of vehicle being used, where applicable this shall be verified via periodical checks (of no more than 6 months) of the drivers licence status using the online check service provided by the DVLA in the UK.
- Has no greater amount than 6 (six) penalty points displayed on their driving licence.
- Is trained in the use of any safety or additional equipment fitted to the vehicle prior to first using the vehicle.
- Understands the process for checking the vehicle safety equipment.
- Understands the process of the daily vehicle walk round check
- Understands the process for reporting any defects to the vehicle or its equipment.

We shall also ensure that any vehicle owned by PAINT Ltd (trading as Spotted Bee) and issued to any party for the purposes or the providing of a service to PAINT Ltd (trading as Spotted Bee) in any context shall if not fitted to the vehicle as standard equipment by the manufacturer contain as a minimum the following safety equipment:

- 5KG fire extinguisher
- First Aid Kit
- Safety/Warning Triangle
- High Visibility Jacket
- Emergency Torch/Light

## Road Safety Awareness 4/4



### 4.. Your Responsibilities

As a person using a road vehicle in which services are rendered to One Motion, regardless of vehicle ownership you understand your responsibility to ensure the vehicle is fitted with as a minimum the following safety equipment:

- 5KG fire extinguisher
- First Aid Kit
- Safety/Warning Triangle
- High Visibility Jacket
- Emergency Torch/Light

In the event the vehicle does not contain any of this equipment or you are aware of a defect with the equipment you understand this must be reported to the vehicles owner/Operator (Rob Galkoff) immediately and any missing or defective equipment must be replaced within 48 hours of the report of the defect or missing equipment.

### 5. Vehicle Security

The security of any vehicle used to render a service to PAINT Ltd (trading as Spotted Bee) and the vehicles contents contents are paramount and you therefore understand that there is a requirement to at all times ensure the vehicle is locked when unattended and that a security key chain or similar key retaining device must be used at all times whilst services are rendered. You also understand and agree that although vehicle security is paramount this should not come before the safety and security of any driver, user, or passenger of the vehicle nor any member of the public.

***Together, we all share the responsibility of our personal safety, the safety of our colleagues, the safety of our vehicles, the safety of other road users, the safety of pedestrians and the safety of our customers and their families.***

***We have no excuse.***

***There are NO short-cuts.***

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# Pay Policy 1/2



## Background

Amazon is committed to conducting its business in a lawful and ethical manner. This policy details minimum earning standards, which DSPs must comply with in addition to all applicable laws. This policy also highlights key working hour requirements specified in GB domestic Drivers' Hours Rules. This policy applies to all Amazon DSPs including AMZL & GSF offering services in UK and is effective February 2019. DSPs are expected to adhere to all applicable regulations including any cases where the regulations are more restrictive than the provisions of this policy.

This policy is split into four sections

i) basic requirements, ii) payments, iii) deductions and iv) working hours.

Each section further specifies legal/contractual requirements and Amazon policy.

## Basic Requirements

### Invoices:

Delivery Associates ("DAs") must raise an invoice to the DSP who engages them for all fees. DSPs should support DAs to generate invoices where necessary. The invoice issued when paying DAs must include the below details, as well as any additional details required by any applicable regulations:

- Unique tax reference number (UTR)
- DSP company name, address and contact information
- Invoice date
- Delivery Associates / Ltd. Company name and address
- DA VAT and UTR numbers (where relevant)
- A clear description of all charges and deductions
- Each incentive payment/deduction must be shown separately, clearly stated and easily identifiable
- The total fees payable

**Minimum fees - Training:** After all deductions other than tax, DAs must receive an hourly amount equivalent to at least the then current National Living Wage for induction training, ride along days and any other training they undertake with DSPs.

**Minimum fees - Services:** After all deductions other than tax, DAs must receive an hourly amount equivalent to at least £9.50/hr for non-London routes and £10.50/hr for London routes.

Policy Name: Pay Policy

Revision Date: 2nd August 2020 Revision Number: 1.1

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**Payment Terms:** All DAs will be paid weekly and on the Thursday after two weeks in arrears i.e the work week finishes on Sunday 2nd August 2020, the DA will be paid Thursday 20th August 2020; however, DSPs should not delay any payments beyond 30 days of engagement or services offered. DA contract (SLA) must specify the payments terms.

**Bank transfer:** DA fees must be paid must be paid to the DA's individual bank account via bank transfer.

## Payments

**Bring Your Own Device (BYOD):** All payments made for BYOD must be shown separately on the DA invoice to the DSP. DSPs must pay DAs: **£1.80** per route if the DA uses their own phone, data plan, charger, case and cradle. The DSP should pay the driver the full BYOD subsidy, or **£0.95** per route if the DSP provides phone however the DA uses their own data plan, charger, case and cradle. The DSP should pay the DA for data and peripherals cost only, or **£0.85** per route if the DSP provides charger case, cradle and data plan and the DA uses their own device. the DSP should pay the DA for the device costs only or **£0.75** per route if the DSP provides phone, charger, case and cradle and the DA uses their own data plan. The DSP should pay the DA for the use of their data plan only.

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## Pay Policy 2/2



*If DSPs are providing phone, data package and peripherals (charger, cradle and case), they may retain the BYOD payment.*

**Mileage:** DSPs must pay 100% of the then current mileage rate paid by Amazon to their DAs and show it separately on the invoice. Administrative charges should not be deducted for issuing fuel cards or for other purposes.

**Incentive payments:** e.g. At least 90% of performance/quality incentives related to concessions such as DPMO (Defects Per Million Opportunities) FTDS (First Time Delivery Success), DNR (Delivered Not Received), PHR (Preference Honor Rate), peak incentive and rescue routes approved by Amazon must be paid to DAs and shown separately on the invoice. Incentives related to team achievements must also be paid to POCs (dispatchers).

**Service delays/disruptions compensation:** as paid by Amazon in case of operational delays or disruptions must be paid to DAs and shown separately on the invoice.

### Deductions

The only permitted deductions are those listed below. No other deductions from DA earnings are permitted.

Security deposits: DSPs should not withhold a security deposit, unless:

- there is a separate van rental agreement that allows the DSP to do so, and
- the van rental agreement must state the amount and maximum retention period of the security deposit, and
- the security deposit should not exceed £500 and 80% of it must be returned after any applicable deductions no later than 14 days after DA ceases service or returns the van. The remaining 20% can be kept as security deposit to cover for any traffic fines and this must be returned after any applicable deductions no later than 35 days after DA leaves, and

Damages: Vehicle damages actual costs.

Van rental and insurance: DSPs may deduct reasonable van rental and insurance costs from DAs' invoices. Fines: speeding, parking or other driving fines incurred by the DA (up to the amount of those fines).

Substitution of Services: DSPs may deduct an agreed substitution amount from the DA who requires support, which must be paid in full to the DA who rescued the route. This arrangement must be agreed with the DA in the SLA (DA contract) and shown separately on the invoice.

### Working Hour requirements

Policy Name: Pay Policy

Revision Date: 2nd August 2020 Revision Number: 1.1

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DSPs must adhere to all applicable regulations on working hours in relation to their DAs and any other personnel, including the GB domestic Drivers' Hours Rules.

**Working hour daily limits:** DSPs should ensure that DAs do not drive more than 10 hours or work more than 11 hours on any day.

**Working hour weekly limit:** DAs must not offer delivery services for more than 60hrs/week.

**Minimum break time per day:** DAs are free to take breaks when and for how long they want (provided reasonable given the services they have agreed to provide), but DSPs should ensure that, as a minimum, DAs take a break of at least the 30 minutes rest after they have been on the road for 5:30hrs and a total of at least 45 minutes if they have been on the road for 8:30hrs.

**Minimum rest time between consecutive working days:** 10 hours. **Record Keeping:** DSPs must record DA hours on a weekly record sheet. **Maximum consecutive working days per week:** 6 days/week.

e.g. payments (route fees, BYOD, incentive payments) and deductions (van rental, insurance, damages).

The minimum hour net pay specified by Amazon is subject to change. The rate mentioned here under "Minimum fees - Services" is valid as of Jan 2019. Please seek advice of your DSP Account Manager for the latest rate.

Please liaise with your DSP Account Manager for the latest mileage rate.



# Drug And Alcohol testing policy



## 1. General principle

PAINT Ltd (trading as Spotted Bee) continually strives to conduct our business activities in a way which will achieve the highest possible standard of health and safety for our employees, contractors, clients and members of the public. As the core of our business is based around road based transport we recognise that we can contribute to a safe, healthy and productive work environment by adopting a zero tolerance policy on the use of alcohol & illegal drugs in the workplace, preventing drug and alcohol problems, by raising awareness, by identifying problems at the earliest stage and by offering support to those who have a problem.

Our policy is designed to ensure that no persons under the influence of illegal drugs or alcohol does supply or render services to PAINT Ltd (trading as Spotted Bee) nor operate a vehicle on behalf of PAINT Ltd (trading as Spotted Bee).

## 2. Who is covered by this policy?

This policy applies to all of our employees as well as subcontractors (including agency and self-employed), consultants and employees of other organisations when working on our sites and premises or the sites and premises of our clients on our behalf.

## 3. Employee/Contractor On-Boarding Screening

Before any individual may supply or render any services to PAINT Ltd (trading as Spotted Bee) in any context either as an employee, subcontractor or personnel of a subcontractor a Drug & Alcohol screening test must be performed and a negative sample provided.

## 4. Random Screening

Whilst contracting to or under the employ of PAINT Ltd (trading as Spotted Bee) there shall be a continued requirement for each individual to agree to undertake random drug & alcohol screening tests for the purpose of verifying compliance with this policy when requested by either a representative of PAINT Ltd (trading as Spotted Bee) or a representative of our client at whose premises the services are being rendered or supplied.

## 5. Testing process

All screening tests undertaken by any individual in line with this policy shall be conducted at the expense of INSERT COMPANY NAME by a suitably qualified & authorised independent Toxicologist on behalf of the third party appointed by either PAINT Ltd (trading as Spotted Bee) or a client of PAINT Ltd (trading as Spotted Bee) to conduct such screening tests.

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Results of all screening tests shall be available to the donor once they are made available to PAINT Ltd (trading as Spotted Bee).

#### **5. Non-Negative result**

Should the result of any screening test undertaken be 'Non-Negative' any employee shall be immediately suspended from any duties pending an investigation in line with our disciplinary procedure.

Should the result of any screening test undertaken be 'Non-Negative' any contractor will be required to reimburse PAINT Ltd (trading as Spotted Bee) for the cost of the screening test and any agreement or contract for services immediately terminated.

#### **6. Right to appeal**

The donor shall have the right to appeal where in the situation that the onsite testing equipment may be defective; samples will then be sent to an approved Laboratory. Further costs/penalties may be incurred subject to result.

## Drug and Alcohol testing consent form



I hereby agree, upon a request made under the drug/alcohol testing policy of PAIN'T Ltd (trading as Spotted Bee), to submit to a drug or alcohol test and to furnish a sample of my urine, breath, and/or swab for analysis. I understand and agree that if I at any time refuse to submit to a drug or alcohol test under SLA agreement, or if I otherwise fail to cooperate with the testing procedures, I will be subject to immediate termination. I further authorise and give full permission to have the Company Alere Toxicology send the specimen or specimens so collected to a laboratory for a screening test for the presence of any prohibited substances under the policy, and for the laboratory or other testing facility to release any and all documentation relating to such test to the PAIN'T Ltd (trading as Spotted Bee) and/or to any governmental entity involved in a legal proceeding or investigation connected with the test. Finally, I authorise PAIN'T Ltd (trading as Spotted Bee) to disclose any documentation relating to such test to any governmental entity involved in a legal proceeding or investigation connected with the test.

I understand that only duly-authorized Company officers, employees, and agents will have access to information furnished or obtained in connection with the test; that they will maintain and protect the confidentiality of such information to the greatest extent possible; and that they will share such information only to the extent necessary to make SLA decisions and to respond to inquiries or notices from government entities.

I will hold harmless PAIN'T Ltd (trading as Spotted Bee), its company contracted business partners, and any testing laboratory & collection officer the Company might use, meaning that I will not sue or hold responsible such parties for any alleged harm to me that might result from such testing, including loss of work or any other kind of adverse job action that might arise as a result of the drug or alcohol test, even if a PAIN'T Ltd (trading as Spotted Bee) or laboratory representative makes an error in the administration or analysis of the test or the reporting of the results. I will further hold harmless PAIN'T Ltd (trading as Spotted Bee), its Sample collection officer, and any testing laboratory that PAIN'T Ltd (trading as Spotted Bee) might use for any alleged harm to me that might result from the release or use of information or documentation relating to the drug or alcohol test, as long as the release or use of the information is within the scope of this policy and the procedures as explained in the paragraph above.

This policy and authorization have been explained to me in a language I understand, and I have been told that if I have any questions about the test or the policy, they will be answered.

**I UNDERSTAND THAT PAIN'T Ltd (trading as Spotted Bee) WILL REQUIRE A DRUG SCREEN AND/OR ALCOHOL TEST UNDER THIS POLICY WHENEVER I AM INVOLVED IN AN ON-THE-JOB ACCIDENT OR INJURY UNDER CIRCUMSTANCES**

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**THAT SUGGEST POSSIBLE INVOLVEMENT OR INFLUENCE OF DRUGS OR ALCOHOL IN THE ACCIDENT OR INJURY EVENT. ALSO, I UNDERSTAND THAT I WILL BE SUBJECT TO RANDOM DRUG SCREEN AND/OR ALCOHOL TEST UNDER THIS POLICY AND I AGREE TO SUBMIT TO ANY SUCH TEST.**

### **Data Protection**

Within the terms of the UK Data Protection Act (DPA) we are required to inform you of the information that we collect about you. Some of the information is regarded as sensitive data as defined in the DPA. The test result, any medical information you have disclosed and the reason for the test are of sensitive nature. The fact that you have been tested is not regarded as sensitive information.

# Child Labour Policy



## Introduction

The foundation of the PAINT Ltd (trading as Spotted Bee) “Child Labour Policy” is based on the Company’s commitment to find practical, meaningful, and culturally appropriate responses to support the elimination of such labour practices. It therefore endorses the need for appropriate initiatives to progressively eliminate these abuses.

## Policy

PAINT Ltd (trading as Spotted Bee) does not employ any person below the age of eighteen years at the workplace. PAINT Ltd (trading as Spotted Bee) prohibits the use of child labour and forced or compulsory labour at all its units. No individual contractor is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

## Implementation

This policy is publicly available throughout the Company and is clearly communicated to all employees and independent contractors in our policy manual. The implementation of the policy is the responsibility of the unit’s human resources department and the security staff, who do not permit minors to enter the warehouse as workers. There is zero tolerance policy towards its breach. Individual contracts and other records, documenting all relevant details of the contractors, including age, are maintained at all units and are open to verification by any authorised personnel or relevant statutory body.

## Monitoring & Audit

Periodic assessment is conducted. The human resources department undertakes random checks of records annually.

## Review

Following its initial adoption, this child labour policy statement will be reviewed by the business owner on a regular basis and may be amended from time to time.

## Working Hours and Pay Policy 1/3



### 1. Service Hours

PAINT Ltd (trading as Spotted Bee) ensure they operate in line with all regulatory and legislative policies as well as in accordance with their client contractual agreements and policy and procedural requirements; therefore, in the interest of their service providers' safety and welfare, PAINT Ltd (trading as Spotted Bee) have implemented a Service Hours and Pay Policy.

With regards to the service hours and extent of service hours provided by the service provider, PAINT Ltd (trading as Spotted Bee) adhere to the principles of the GB domestic Rules and, through the use of technology and utilisation of clients' software have implemented standard operating procedures to monitor the amount of service hours provided, together with contingencies to minimise the risk of any breach to the rules. The table below illustrates the processes implemented against the required principles:

GB Domestic Rules	DSP Policy
The GB domestic drivers' hours rules apply to most passenger-carrying vehicles and goods vehicles that don't have to follow the EU rules	This policy will apply to ALL commercial vehicles engaged in providing delivery services.
<b>Duty Time</b> If an individual works as a driver for a company then duty time is any working time. If the individual is self-employed then duty time is only time spent driving the vehicle or doing other work related to the vehicle or its load.	The service provider's duty time will be calculated from the point they trigger their UTR time at the location in which they commence services.
<b>Daily Driving Limit</b> You must not drive for more than 10 hours in a day: <ul style="list-style-type: none"><li>• on a public road</li><li>• off-road if not during duty time</li></ul>	Service Providers will be advised of the daily driving limit via the POC briefings.  Monitoring of service hours will be conducted and service providers who may be at risk of exceeding the service hours will be advised to return to their service location.

Policy Name: Working Hours and Pay Policy  
Revision Date: 2nd August 2020 Revision Number: 1.1

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<p><b>Daily Duty Limit</b> You must not be on duty for more than 11 hours in any working day. This limit doesn't apply on any working day when you don't drive.</p>	<p>Daily duty hours will be monitored and root cause analysis carried out on any services provided that continually exceed the stipulated duty time. Notwithstanding the above, service providers will retain responsibility for monitoring their own hours and ensuring that the daily limit is not breached.</p>
<p><b>Breaks and Continuous Driving</b> After 5 hours 30 minutes of driving there must be a break of at least 30 minutes for rest and refreshment</p>	<p>Service Providers will be reminded during service briefings about the importance of taking breaks throughout their duty time and of the safety risks of continuous driving.</p> <p>Service Providers are responsible for ensuring that the required breaks are taken.</p>
<p><b>Daily Rest Periods</b></p>	<p>Service providers' weekly schedule will be monitored to ensure they do not provide any consecutive day's service in excess of 6 days.</p> <p>In addition, service providers will be advised that they cannot provide any service in excess of 63 hours in one week (inclusive of breaks).</p>

# Working Hours and Pay Policy 2/3



## 2. Remuneration

PAINT Ltd (trading as Spotted Bee) are committed to ensuring that all service providers are treated fairly. Details of the applicable payment rates are detailed in the rate card but PAINT Ltd (trading as Spotted Bee) adheres to the following principles:

- All invoices are itemised
- Mileage payments are reflective of the payments received from the client
- Incentive payments are reflective of the payments received from the client
- Any deductions (traffic violations, lost uniforms, damage etc.) are calculated on actual costs

## 3. Alternative Work Schedule Policy

At certain times through the engagement you may be asked to provide services from another customer location, if this happens and is requested by the customer you will still receive the day rate as per the SLA, and may also be reimbursed for mileage at the rate prescribed by the customer.

Alternative working may and can happen as there is a requirement to the customer to fulfil the contract.

This does not include:

1. Routine travel to and from place of work unless stated or agreed prior to travel.
2. Unpaid rest breaks when no work is done.
3. Time spent travelling outside normal working time
4. Training such as non-job related evening or day courses
5. Leave due to sickness, annual leave, maternity leave, accrued leave.

PAINT Ltd (trading as Spotted Bee) run a 7-day operation based on our clients' needs, this gives drivers the option to several working schedules in order to best suit their needs.

Example, Work 4 days consecutive, 4 days rest – Alternatively 5 days consecutive, with 1 day rest and a further 4 days work with 2 days rest - Alternatively 5 days consecutive, with 2 days rest and a further 5 days work with 2 days rest etc.

We request that all contractors provide the OSM at least 7 days' notice of their working schedule so we can accommodate their needs where possible.



## Working Hours and Pay Policy 3/3



### PAINT Ltd (trading as Spotted Bee) Pay Policy

Service Type	Hours	Rate
Standard Parcel	8	£85.50 per day
Standard Parcel	9	£85.50 per day
Standard Parcel	10	£85.50 per day
Standard Parcel - Large Van	8	£85.50 per day
Standard Parcel - Large Van	9	£85.50 per day
Standard Parcel - Large Van	10	£85.50 per day
Hyperzone	9	£85.50 per day
Ridealong	9	£85.50 per day
Classroom Training	9	>£73.89

Additional Payments	Hours	Rate
Rescue	2	£10
Rescue	4	N/A
Rescue	6	N/A
Redelivery	2	N/A
Redelivery	4	N/A
Redelivery	6	N/A
Transportation Standard Van	2	N/A
Transportation Standard Van	4	N/A
Transportation Standard Van	6	N/A
Missort Delivery	2	N/A
Missort Delivery	4	N/A
Missort Delivery	6	N/A

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Mailsort Pickup/Dropoff	6	N/A
Late Departure	1	£10.00
BYOD	Daily	£1.50 (£1.80 (incl VAT))

Incentive Payments	Threshold	Payment
DPMO	0-300	tbc by amazon
	301-450	tbc by amazon
	451-800	tbc by amazon

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