

EQUAL OPPORTUNITIES POLICY 1/5



OUR COMMITMENT

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 to 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.

1.1 DISABILITY AND RELIGIOUS ACCOMMODATION

1.1.1 RELIGIOUS OBSERVANCE

PAINT Ltd (Trading as Spotted Bee) is committed to providing equal opportunities to all engaged independent contractors. Therefore, we will endeavour to facilitate requests for religious accommodation; if you require time off or a temporary adjustment to your normal scheduled working pattern due to a religious observance, we would request that you advise your OSM with as much notice as possible (at least one week) in order that we can look to cover any deliveries that would have been provided to you during that time period.

Although we will try to facilitate this request our ability to do so cannot be guaranteed; if you have a continuing need for time off for religious observance which significantly impacts on our operation and ability to meet our service requirements, it may be necessary for us to consider whether we can continue to engage you as a Driver.

1.1.2 DISABILITIES AND HEALTH CONDITIONS

If you require adjustments due to a disability or health condition in order to be able to fulfil your contract with us to undertake driving and deliveries, you should not hesitate to speak to your OSM. We will endeavour to make any such adjustments in order to ensure that your ongoing health is not put at risk whilst you are driving for us.

Although we will try to facilitate this request our ability to do so cannot be guaranteed; if we are unable to make the adjustments necessary or your disability or health significantly impacts on our operation and ability to meet our service requirements, it may be necessary for us to consider whether we can continue to engage you as a Driver.

1.2 ANTI-DISCRIMINATION

1.2.1 UNLAWFUL GROUNDS FOR DISCRIMINATION

Discrimination on any of the following grounds is unlawful. They are considered to be “protected characteristics” under The Equality Act 2010:

- Age (employment only)
- Disability
- Gender reassignment, sex, pregnancy, maternity
- Race
- Religion, belief, or political preference
- Sexual orientation, marital or civil partnership status

Policy Name: Equal Opportunities Policy
Revision Date: 2nd August 2020 Revision Number: 1.0

Spotted Bee is the trading name of PAINT Ltd who are registered in England & Wales, Company Number 10202500. PAINT Ltd provide Last Mile Delivery Solutions for Amazon in the United Kingdom and our policies and procedures reflect their requirements. Should any driver or associate be unsure of any policy, they should seek clarification from a Manager or Director.

EQUAL OPPORTUNITIES POLICY 2/5



1.2.2 FORMS OF DISCRIMINATION

PAINT Ltd (Trading as Spotted Bee) considers all of the following forms of discrimination to be unacceptable:

- **DIRECT DISCRIMINATION**, where a person is treated less favourably on the basis of a ground which is unlawful;
- **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;
- **VICTIMISATION**, where someone is treated less favourably than others because he or she has taken action in respect of discrimination on unlawful grounds;
- **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.

1.2.3 CONDITIONS OF SERVICE

PAINT Ltd (Trading as Spotted Bee) will not discriminate against any of the independent contractors we work with and will 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. Terms and conditions of service for independent contractors will comply with antidiscrimination legislation.

1.2.4 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.

1.2.5 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.

1.3 ANTI-HARASSMENT AND BULLYING

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

Policy Name: Equal Opportunities Policy
Revision Date: 2nd August 2020 Revision Number: 1.0

Spotted Bee is the trading name of PAINT Ltd who are registered in England & Wales, Company Number 10202500. PAINT Ltd provide Last Mile Delivery Solutions for Amazon in the United Kingdom and our policies and procedures reflect their requirements. Should any driver or associate be unsure of any policy, they should seek clarification from a Manager or Director.

EQUAL OPPORTUNITIES POLICY 3/5



1.3.1 UNLAWFUL HARASSMENT

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.

1.3.2 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.

Unlawful harassment 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 assault;
- 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.

1.3.3 SEXUAL HARASSMENT

Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. An individual does not have to have previously objected to someone's behaviour for it to be considered unwanted.

Sexual harassment may include, for example:

- Unwanted physical conduct;
- 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;
- 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); or
- Continued suggestions for social activity after it has been made clear that such suggestions are unwelcome.

1.3.4 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. Bullying can take the form of physical, verbal and non-verbal conduct.

Policy Name: Equal Opportunities Policy
Revision Date: 2nd August 2020 Revision Number: 1.0

Spotted Bee is the trading name of PAINT Ltd who are registered in England & Wales, Company Number 10202500. PAINT Ltd provide Last Mile Delivery Solutions for Amazon in the United Kingdom and our policies and procedures reflect their requirements. Should any driver or associate be unsure of any policy, they should seek clarification from a Manager or Director.

EQUAL OPPORTUNITIES POLICY 4/5



Bullying may include, for 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.

1.4 COMPLAINTS PROCEDURE

If, as an independent contractor, you believe that you have been harassed, bullied, or discriminated against then the following methods of remediation are available. If you are not certain whether an incident or series of incidents amount to bullying, discrimination, or harassment, you should initially contact your OSM informally for confidential advice.

1.4.1 INFORMAL PROCESS

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 OSM, who can provide confidential advice and assistance in resolving the issue formally or informally.

1.4.2 FORMAL PROCESS

If you wish to make a formal complaint about discrimination, bullying or harassment, you should submit it in writing to your OSM, 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 a regional manager or the business owner.

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, PAINT LTD (Trading as Spotted Bee) 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.

1.4.3 FORMAL INVESTIGATIONS

PAINT Ltd (Trading as Spotted Bee) 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 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.

Policy Name: Equal Opportunities Policy
Revision Date: 2nd August 2020 Revision Number: 1.0

Spotted Bee is the trading name of PAINT Ltd who are registered in England & Wales, Company Number 10202500. PAINT Ltd provide Last Mile Delivery Solutions for Amazon in the United Kingdom and our policies and procedures reflect their requirements. Should any driver or associate be unsure of any policy, they should seek clarification from a Manager or Director.

EQUAL OPPORTUNITIES POLICY 5/5



Where your complaint is about someone other than an employee, such as another independent contractor, a 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 confidentiality will be emphasised to them.

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.

1.4.4 INVESTIGATION CONSEQUENCES

If the investigation concludes that harassment, discrimination, 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.

1.4.5 ANTI-RETALIATION

Any independent contractor that makes a complaint or participates 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 OSM. If the matter is not remedied you should raise it using the complaints procedure at 1.4.2.

PAINT LTD (Trading as Spotted Bee) will not tolerate retaliation for good faith participation in this policy. 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. We reserve the right to terminate an SLA between ourselves and 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.