



*Prime Parcel*

# CONTENTS

PAGE	POLICY
3	EQUAL OPPORTUNITIES POLICY
8	DRUG AND ALCOHOL POLICY
9	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY
11	ANTI-SOLICITATION POLICY
12	CHILD LABOUR POLICY
13	PREGNANCY AND MATERNITY POLICY
16	WORKING HOURS AND PAY POLICY

# 1. EQUAL OPPORTUNITIES POLICY

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## OUR COMMITMENT

PRIME PARCEL is committed to equality of opportunity in all its policies, practices and services. We aim to treat everyone equally, with the same attention, courtesy and respect regardless of their gender, marital or family status, sexual orientation, religious belief, age, disability, race or membership of the Travelling Community, in terms of providing services or accessing PRIME PARCEL services.

Equality of opportunity is an integral part of PRIME PARCEL overall policy and relies on the contribution of management and staff in ensuring the overall effectiveness of the application of the policy. While equal opportunities are formally assigned as an integral part of the responsibility of management, all staff are encouraged to promote equality for all in the workplace.

This policy seeks to ensure that PRIME PARCEL and the services provided:

- Are free from discrimination, sexual harassment, harassment or victimisation;
- Accommodates diversity across the nine grounds covered by the equality legislation and meets the needs that are specific to particular groups of customers;
- Makes reasonable accommodation to any independent contractor with disabilities;

and • Seeks to benefit all independent contractors, clients, employees, and third parties from across the nine grounds by promoting equality and implementing positive action where necessary.

PRIME PARCEL 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 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.

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## 1.1 DISABILITY AND RELIGIOUS ACCOMMODATION

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### 1.1.1 RELIGIOUS OBSERVANCE

PRIME PARCEL 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.

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### 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.

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## 1.2 ANTI-DISCRIMINATION

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### 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 Equal Status Acts 2000-2018 (‘the Acts’). They cover the nine grounds of gender, marital status, family status, age disability, sexual orientation, race, religion, and membership of the Traveller community. In addition, the Acts prohibit discrimination in the provision of accommodation services against people who are in receipt of rent supplement, housing assistance, or social welfare payments.

- Gender: this means man, woman or transsexual
- Civil status: includes single, married, separated, divorced, widowed people, [civil partners and former civil partners](#)
- Family status: this refers to the parent of a person under 18 years or the resident primary carer or parent of a person with a disability
- Sexual orientation: includes gay, lesbian, bisexual and heterosexual
- Religion: means religious belief, background, outlook or none
- Age: this does not apply to a person aged under 16
- Disability: includes people with physical, intellectual, learning, cognitive or emotional disabilities and a range of medical conditions
- Race: includes race, skin colour, nationality or ethnic origin
- Membership of the Traveller community.

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### 1.2.2 FORMS OF DISCRIMINATION

PRIME PARCEL considers all of the following forms of discrimination to be unacceptable:

Discrimination is defined as less favourable treatment. An employee is said to be discriminated against if they are treated less favourably than another is, has been or would be treated in a comparable situation on any of the above 9 grounds. To establish direct discrimination, a direct comparison must be made, for example, in the case of disability discrimination the comparison must be between a person who has a disability and another who has not, or between persons with different disabilities.

Indirect discrimination occurs when practices or policies that do not appear to discriminate against one group more than another actually have a discriminatory impact. It can also happen where a requirement that may appear non-discriminatory adversely affects a particular group or class of persons.

PRIME PARCEL 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.

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### 1.2.3 CONDITIONS OF SERVICE

PRIME PARCEL 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.

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#### 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 PRIME PARCEL, 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.

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#### 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.

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### 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.

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#### 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.

Harassment is defined in section 14A(7) of the Acts as any form of unwanted conduct related to any of the discriminatory grounds which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

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#### YOU ARE ENTITLED TO BE TREATED EQUALLY IN RELATION TO THE PROVISION OF GOODS AND SERVICES:

The [Employment Equality Acts 1998–2015](#) outlaw discrimination in a wide range of employment and employment-related areas. These include recruitment and promotion; equal pay; working conditions; training or experience; dismissal and harassment including sexual harassment. The legislation defines discrimination as treating one person in a less favourable way than another person based on any of the following 9 grounds:

- Gender: this means man, woman or transsexual

- Civil status: includes single, married, separated, divorced, widowed people, [civil partners and former civil partners](#)
- Family status: this refers to the parent of a person under 18 years or the resident primary carer or parent of a person with a disability
- Sexual orientation: includes gay, lesbian, bisexual and heterosexual
- Religion: means religious belief, background, outlook or none
- Age: this does not apply to a person aged under 16
- Disability: includes people with physical, intellectual, learning, cognitive or emotional disabilities and a range of medical conditions
- Race: includes race, skin color, nationality or ethnic origin
- Membership of the Traveler community.

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.

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### 1.3.2 HARASSMENT

Harassment is defined in section 14A(7) of the Acts as any form of unwanted conduct related to any of the discriminatory grounds which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

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

Under the Employment Equality Acts 1998-2015, sexual harassment and harassment of an employee (including agency workers and trainees) in the workplace are against the law. This includes sexual harassment and harassment by:

- co-workers
- the employer
- clients, customers or other business contacts of the employer, including anyone the employer could reasonably expect the worker to come into contact with.

The Employment Equality Acts 1998-2015 define harassment as unwanted conduct which is related to any of the 9 discriminatory grounds. Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature. In both cases it is defined as conduct which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person and it is prohibited under the Acts.

The Department of Justice, Equality and Law Reform produced an updated Code of Practice on Sexual Harassment and Harassment in 2012. The code seeks to promote the development and implementation of policies and procedures which establish working environments free of sexual harassment and harassment and in which the dignity of everyone is respected. The provisions of the code are admissible in evidence and if relevant may be taken into account in any criminal or other proceedings before a court.

The code states that employers should adopt, implement and monitor a comprehensive, effective and accessible policy on sexual harassment and harassment. The policy should be devised in consultation with employees and trade unions and should set out what constitutes sexual harassment and harassment; who is responsible for implementing the policy; and how complaints will be dealt with.

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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.

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#### 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.

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.

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## 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.

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#### 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.

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#### 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, PRIME PARCEL 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.

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#### 1.4.3 FORMAL INVESTIGATIONS

PRIME PARCEL 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.

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.

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#### 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.

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#### 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.

PRIME PARCEL 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.

## 2. DRUG AND ALCOHOL POLICY

PRIME PARCEL 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 PRIME PARCEL nor operate a vehicle on behalf of PRIME PARCEL.

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### 2.1 ON-BOARDING SCREENING

Before any individual may supply or render any services to PRIME PARCEL 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.

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### 2.2 RANDOM SCREENING

Whilst contracting to PRIME PARCEL 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 PRIME PARCEL or a representative of our client at whose premises the services are being rendered or supplied.

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### 2.3 TESTING PROCESS

All screening tests undertaken by any individual in line with this policy shall be conducted at the expense of PRIME PARCEL by a suitably qualified & authorised independent Toxicologist on behalf of the third party appointed by either PRIME PARCEL or a client of PRIME PARCEL to conduct such screening tests. Results of all screening tests shall be available to the donor once they are made available to PRIME PARCEL.

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### 2.4 NON-NEGATIVE RESULT

Should the result of any screening test undertaken be 'Non-Negative' any agreement or contract for services with the independent contractor will be immediately terminated.

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### 2.5 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.

## 3. ANTI-BRIBERY AND ANTI-CORRUPTION

PRIME PARCEL is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. PRIME PARCEL 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. PRIME PARCEL 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. PRIME PARCEL 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.

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### 3.1 DEFINITION OF BRIBERY

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. 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. 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.

Bribery is illegal. Anyone providing services for PRIME PARCEL 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 business owner.

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### 3.2 ACCEPTABLE AND UNACCEPTABLE ACTIONS

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#### 3.2.1 GIFTS AND HOSPITALITY

PRIME PARCEL 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);
- 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, (usually in excess of £100); and
- It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the business owner.

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 business owner, who will assess the circumstances.

PRIME PARCEL 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. As good practice, gifts given and received should always be disclosed to the business owner. Gifts from suppliers should always be disclosed. The

intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the business owner should be sought.

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### 3.2.2 FACILITATION PAYMENTS

PRIME PARCEL 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. PRIME PARCEL does not allow kickbacks to be made or accepted.

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### 3.2.3 POLITICAL CONTRIBUTIONS.

PRIME PARCEL 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.

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### 3.2.4 CHARITABLE CONTRIBUTIONS.

PRIME PARCEL 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. Individuals must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. 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 business owner.

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## 3.3 INDEPENDENT CONTRACTOR RESPONSIBILITIES

Independent contractors must read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information provided. You are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy. If an independent contractor breaches this policy then PRIME PARCEL will no longer be able to provide offers of work under their SLA. 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 your OSM.

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## 3.4 RAISING CONCERNS

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to PRIME PARCEL, you are 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 OSM, regional manager or the business owner. You must notify PRIME PARCEL 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.

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

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 OSM or the business owner immediately.

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## 3.5 RECORD KEEPING

PRIME PARCEL 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.

## 4. ANTI-SOLICITATION POLICY

Our solicitation company policy outlines our restrictions for distributing materials and soliciting funds, donations and signatures in activities or groups. It is the policy of PRIME PARCEL to prohibit solicitation and distribution on its premises because when left unrestricted, such activities can interfere with the normal operations of PRIME PARCEL, can be detrimental to efficiency, can be annoying and can pose a threat to security. This policy does not refer to any kind of work-related matters. Discussions that fall under the purview of laws protecting unionizing are also excluded from this policy.

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### 4.1 SOLICITATION

Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company. These include but are not limited to:

- Seeking funds or donations for a non-profit organization
- Asking for signatures for a petition
- Selling merchandise or services
- Requesting support for a political candidate
- Engaging in religious proselytism.

Distribution refers to disseminating literature or material for commercial or political purposes.

Independent contractors may engage in solicitation and distribution under conditions. They may solicit:

- Participation (active or monetary) in organizing events for a colleague or another independent contractor. Those events include adoption/birth of a child, retiring, death, mourning and more;
- Support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company;
- Independent contractors may perform these actions during working hours or in our workplace as long as they do not cause large-scale problems with our everyday operations. For example, a Sub-Contractor may message their colleagues to solicit assistance for a cause.

We won't accept soliciting and distributing that hinders productivity or is disruptive, offensive or obscene. For example, we prohibit the following:

- Selling goods for personal profit;
- Requesting support or funding for political campaigns;
- Unauthorized posting of non-work related material on company bulletin boards;
- Solicitation or distribution of non-business literature towards customers, partners and vendors; or
- Proselytizing others to groups or initiatives that violate non-discrimination and equal opportunity policies.

No individual is obliged to assist with or participate in any of the aforementioned activities or organizations. Individuals should not be forced or harassed to support fund raising events, collections, purchasing of merchandise or other activities.

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### 4.2 CONSEQUENCES

If an independent contractor violates this policy then we may no longer be able to provide them with work in line with their SLA.

Issues that may trigger such actions include but are not limited to:

- Soliciting in our workplace during working hours for illegitimate reasons;
- Making colleagues uncomfortable by being overly persistent;
- Distributing materials that contain hate or other offensive speech; or
- Embezzling or mishandling donations for events or Causes.



## 5. CHILD LABOUR POLICY

PRIME PARCEL's '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.

PRIME PARCEL does not employ any person below the age of eighteen years at the workplace. PRIME PARCEL 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.

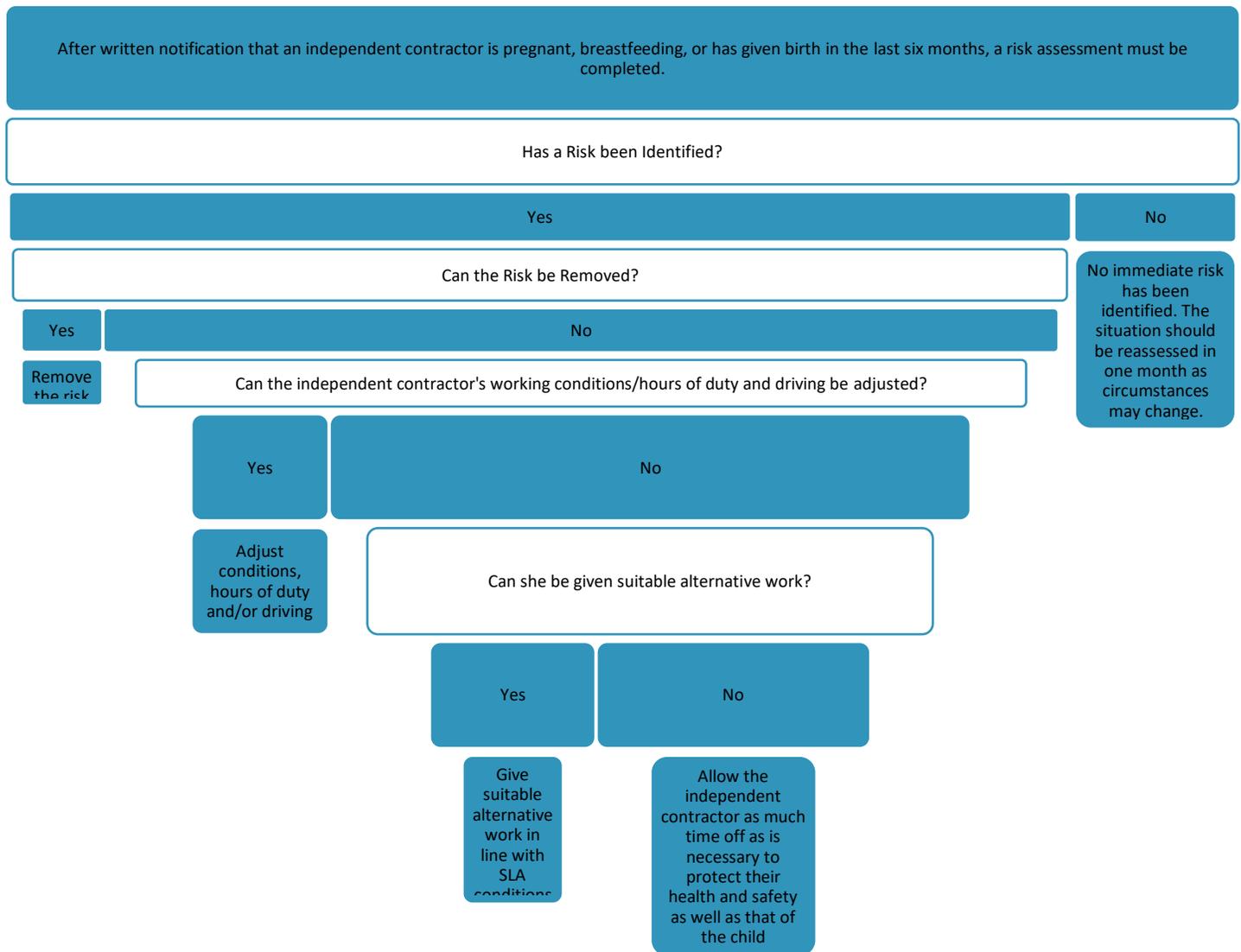
PRIME PARCEL is committed to checking and maintaining records regarding the age of all independent contractors engaged to provide services. Minors are not permitted in vehicles during working hours, or in the warehouse as workers. There is zero tolerance policy towards breach of this policy. Individual 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.

# 6. PREGNANCY AND MATERNITY POLICY

## 6.1 RISK ASSESSMENTS

In accordance with the Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999, PRIME PARCEL are required to conduct suitable and sufficient assessments of risks to the health and safety of its independent contractors. In order to facilitate this any contractor affected by this policy, as either a new or expectant mother, must notify the company of their status. A new or expectant mother is a woman who is pregnant, has given birth within the last six months or is breastfeeding.

Once PRIME PARCEL has been notified of the independent contractor’s status, a new and expectant risk assessment will be completed ASAP, and then at regular intervals throughout the pregnancy or, in the case of a New Mother, until Breast feeding has ceased. Ongoing risk assessments are required because pregnancy and motherhood can be dynamic experiences and the needs of individual contractors may vary throughout the process.



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## 6.2.1 ADDITIONAL FACTORS RELEVANT TO THE RISK ASSESSMENT

Each individual may experience pregnancy and motherhood differently but some of the common issues to be aware of when conducting a risk assessment are:

- **Hormonal changes** e.g. morning sickness, breastfeeding;
- **Physiological changes** e.g. increase in blood pressure may lead to balance being affected;
- **Physical changes** e.g. Joints and or ligaments may loosen causing pain or discomfort, Increased tiredness, Increasing physical size may affect the ability to wear personal protective clothing, require workplace adjustments, present manual handling implications;
- **Behavioural changes** e.g. regular visits to the toilet, mobility (movement ), dexterity and co-ordination maybe affected;
- **Mental stress** e.g. anxieties may arise about the normal development of the foetus, if the birth was by caesarean section, if the child was still born;
- **Posture** - possibilities of pain and discomfort due to backache, particularly in the lower back, varicose veins in the legs;
- **Post-op Caesarean Section** - consider restricted duties, reduced Manual Handling/ Lifting ability increased Manual Handling requirements;
- **Raised Blood pressure** - frequent and longer rest breaks, extra time for antenatal examinations;
- **Increased tiredness** - may be unable to work long hours and/or shifts;
- **Work space** - may need more space due to increasing physical size and girth (Trip hazards) accessible toilet facilities;
- **Physical Agents** - Electric shock risks, Low frequency (especially whole body) vibration, Excessive movement, Manual handling activities - lifting, bending, stretching, twisting and/or carrying, Ionising radiation(breast milk contamination), Temperature extremes - hot and cold, Postures and movement (mental/physical fatigue), Hyperbaric (high pressure) atmospheres;
- **Possible Effects of Physical Hazards** - increased tiredness and fatigue, increased chance of miscarriages due to actions which cause the placenta to detach from the womb, increased risk of premature births and low birth weights.

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## 6.2.2 POTENTIAL RISK REDUCTION MEASURES

PRIME PARCEL are committed to promoting the health and safety of every individual we work with. Following a risk assessment, we may be able to make the following changes for relevant independent contractors:

- Alternative working conditions
- Changing the hours of working
- Finding suitable alternative work

Our ability to facilitate the above may depend upon the number of contracts we are currently fulfilling and the nature of the work requested by our customers.

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## 6.3 MATERNITY PAY

Independent contractors do not qualify for statutory maternity pay as this is only applicable to employees. However, independent contractors may be eligible for maternity allowance depending on the number of weeks that they have been self-employed and the amount of National Insurance paid. Further information is available on the government's website.

<https://www.gov.uk/maternity-allowance/eligibility>

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## 6.4 MATERNITY LEAVE

As an independent contractor, in line with the SLA, there is no obligation to accept any work offered by PRIME PARCEL. At any time, an expectant mother may decide to begin an extended period of leave due to pregnancy – there is no requirement to wait until a specific stage in the pregnancy. As a matter of good practice, independent contractors should notify their OSM that they intend to take this leave with as much notice as possible so that alternative arrangements can be made for any allocated work.

If no work is accepted by an independent contractor, during a period in excess of 28 days, the SLA will be terminated as there is no ongoing requirement to provide offers of work. Should the independent contractor wish to continue working with PRIME PARCEL following any prolonged period of absence, the OSM will be able to advise on whether there are sufficient levels of available work to facilitate this.

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## 6.5 ANTENATAL APPOINTMENTS

If an independent contractor wishes to have a day off to attend pregnancy-related appointments then they should notify the OSM of non-availability to work following the usual process. As independent contractors are paid a day rate for work provided, no payment will be made in relation to this non-working day. Independent contractors may also wish to attend appointments during the course of their working day. They should notify their OSM if they intend to take an unusually long break during the day so that route progress reports reflect this but are otherwise entitled to do so as long as working hours regulations are not breached.

## 7. WORKING HOURS AND PAY POLICY

### 7.1 WORKING HOURS

PRIME PARCEL 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, PRIME PARCEL have implemented a Working Hours and Pay Policy.

With regards to the service hours and extent of service hours provided by the service provider, PRIME PARCEL adhere to the regulations through the use of technology and utilisation of clients' software and 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:

Domestic Rules	DSP Policy
<b>Start Time</b> The time at which a contractor arrives under "the canopy" at the loading depot to collect his or her first parcel.	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: -on a public road -off-road if not during duty time	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.
<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.	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.
<b>Breaks and Continuous Driving</b> It is the responsibility of the contractor to ensure that they comply with the 30 minute break during their working day.	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. Service Providers are responsible for ensuring that the required breaks are taken.
<b>Daily Rest Periods</b>	Service providers' weekly schedule will be monitored to ensure they do not provide any consecutive day's service in excess of 6 days. In addition, service providers will be advised that they cannot provide any service in excess of 63 hours in one week (inclusive of breaks).

### 7.2 INVOICES

Independent contractors are required to submit weekly invoices for their services. Payment for such services will be provided between 10-14 days. All invoices submitted to PRIME PARCEL must contain:

- 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
- The total fees payable

PRIME PARCEL are able to assist with the provision of compliant invoices via a self-billing agreement, if required.

### 7.3 ALTERNATIVE WORK SCHEDULES

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.

PRIME PARCEL runs a 7-day operation based on our clients' needs, this gives drivers the option to work a range of working schedules in order to best suit their needs. *Example, Work 4 days consecutive, 2 days rest – Alternatively 5 days consecutive, with 1 day rest and a further 4 days' work with 2 days rest etc.* We request that all contractors provide the OSM at least 7 days' notice of their preferred working schedule, and days of unavailability, so that we can accommodate this where possible.

### 7.4 PAYMENT RATES

PRIME PARCEL are committed to ensuring that all service providers are treated fairly. Details of the applicable payment rates are detailed in the rate card below but PRIME PARCEL adheres to the following principles:

- Incentive payments are reflective of the payments received from the client; these payments are paid either in full or as a percentage to the contractor and will be disclosed as and when they are available by the customer
- Additional hourly payments or late payments are paid solely at the discretion of the company; these will be communicated during the day.
- Early finish of routes will not incur a deduction from the route allocation payment, however a contractor may be asked to continue working to assist in the completion of another route and to complete the hours that they are contracted for in that duty period.
- Any deductions (traffic violations, van damage etc.) are calculated on actual costs and agreed via a non-mandatory deduction form.

SERVICE TYPE:	HOURS:	RATE:	ADDITIONAL SERVICE TYPE:	HOURS:	RATE:
Hourly Rate	1	€13			
Standard Parcel	8	€104			
Standard Parcel	9	€117			
Standard Parcel	10	N/A			
Standard Parcel - Large Van	8	N/A			
Standard Parcel - Large Van	9	N/A	TRAINING TYPE:	HOURS:	RATE:
Standard Parcel - Large Van	10	N/A	Ride along	9	€117
			Classroom Training	9	€117