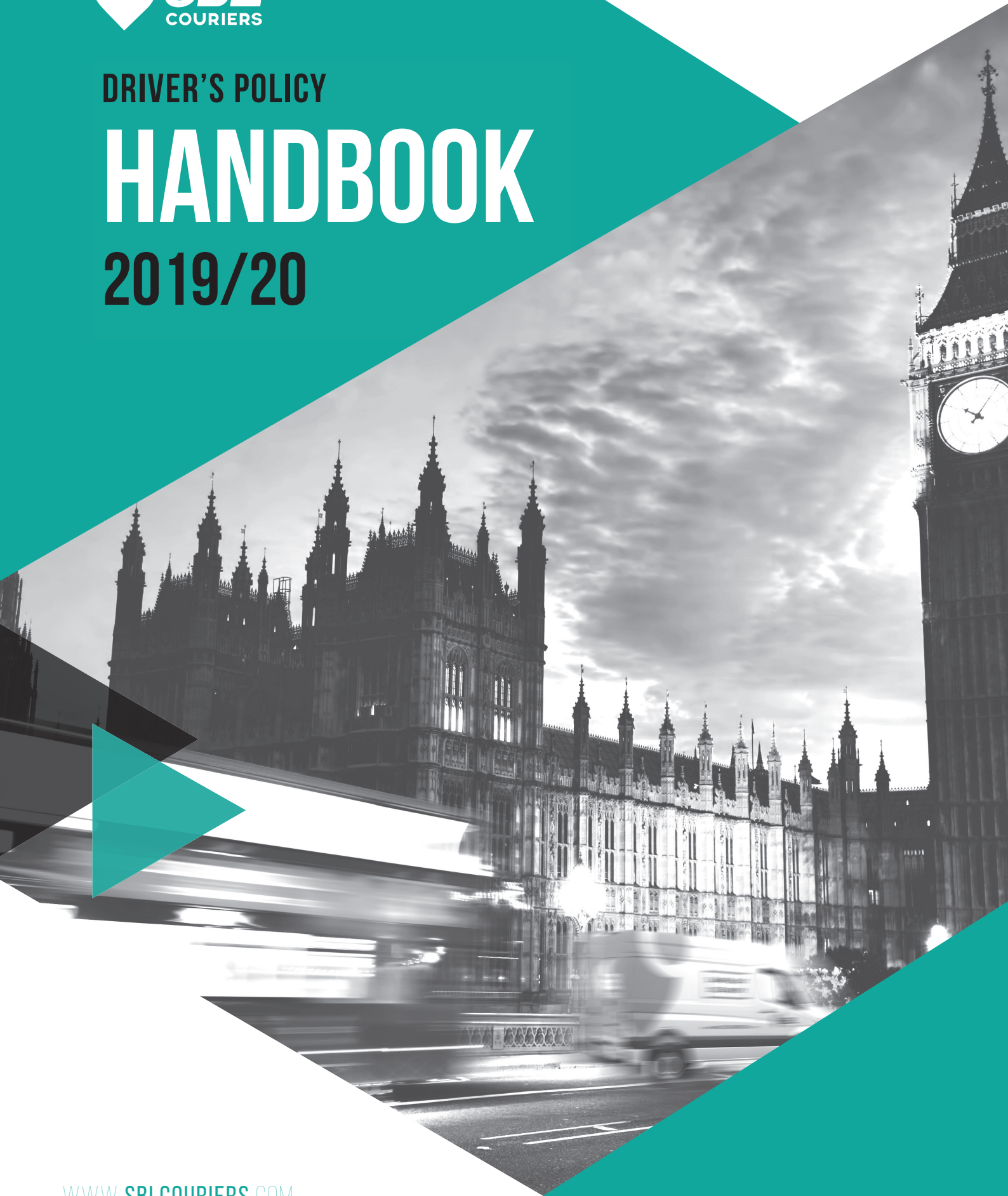




DRIVER'S POLICY

HANDBOOK

2019/20



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DIVERSITY & EQUAL OPPORTUNITIES POLICY

1. POLICY STATEMENT

Silva Brothers Logistics is committed to supporting, developing and promoting diversity and equality in all of its Service Providers and aims to establish an inclusive culture free from discrimination and based on the values of fairness, dignity and respect. The Service will support and develop staff through providing everyone with access to facilities, personal and career development opportunities on an equal basis regardless of race, national or ethnic origin, disability, age, gender, sexual orientation, transgender identity or religion/belief.

This policy builds on the foundation of equality and anti-discrimination legislation and strives, not only to comply with legal requirements, but to use these to ensure that Silva Brothers Logistics endeavours to exemplify best practice.

Silva Brothers Logistics values diversity and recognises that the organisation is greatly enhanced by the different range of backgrounds, experiences, views, beliefs and cultures represented within its staff. The Service aims to embrace diversity in all of its activities and acknowledges that variety and difference are intrinsic to the success and future development of its business.

Silva Brothers Logistics values, People, Pride and Professionalism, underpin the Diversity and Equality policy and are integral to Silva Brothers Logistics becoming an Provider of choice.

Silva Brothers Logistics expects all Services Providers, contractors and agency staff to act in accordance with this Policy.

2. AIM

The aim of this Policy is to build a fully inclusive organisation. This will be achieved by:

- Making the best use of the range of talent and experience available within the workforce and potential workforce
- Building a culture that encourages dialogue
- Silva Brothers Logistics and Service Providers fulfilling their legal obligations

3. PRINCIPLES

The principles of the diversity and equal opportunities policy are:

- to develop and promote a culture of diversity and equality throughout the organisation;
- to develop and promote a culture of fairness, integrity and dignity;
- to support all Service Providers, regardless of race, national or ethnic origin, age, disability, gender, sexual orientation, gender reassignment, religion or belief;
- to prevent all forms of unlawful discrimination;
- to deal with all forms of discrimination consistently, promptly and effectively;
- to ensure that the Diversity and Equality policy influences and informs the culture of The Service.

4. SCOPE

The policy applies to all applicants for posts with Silva Brothers Logistics, to all Service Providers on a full time or part-time basis, on permanent or temporary contracts, to agency staff and contractors.

5. LEGISLATIVE FRAMEWORK

This Policy is underpinned by legislation, which places individual responsibilities on Service Providers, users/visitors as well as Silva Brothers Logistics, this includes:

- Human Rights Act 1998
- The Civil Partnership Act 2004
- The Gender Recognition Act 2004
- The Equality Act 2006
- Equality Act 2010

The above list is not exhaustive and will be reviewed regularly.

Under the above Equality legislation it is unlawful to:

- discriminate directly against anyone and treat him/her less favourably than others because of a protected characteristic they have or are thought to have (perception discrimination), or because they associate with someone who has a protected characteristic (discrimination by association).;
- discriminate indirectly against anyone by applying a criterion, provision or practice which particularly disadvantages people who share a protected characteristic;
- subject someone to harassment related to a relevant protected characteristic (pregnancy and maternity



and marriage and civil partnership are excluded);

- victimise someone because s/he has made, or intends to make, a complaint or allegation or has given or intends to give evidence in relation to a complaint of discrimination;
- discriminate against someone in certain circumstances because of a protected characteristic after the working relationship has ended.

The protected characteristics are:

- age
- disability
- gender
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sexual orientation

6. DEFINITIONS

EQUAL OPPORTUNITIES

Equal opportunities is a principle that emphasizes that opportunities in the Company, education and other areas are available to all. Equal Opportunities in particular relates to a Legal Framework, which makes it illegal to discriminate against people because of a protected characteristic they have.

DIVERSITY

Diversity is a broader concept that builds upon the progress made through equal opportunities. Everyone is different and diversity is about recognising, respecting and valuing the differences we each bring to work.

Equal opportunities and diversity work together by identifying and addressing any inequalities and barriers faced by people and by valuing, learning and benefiting from the diverse cultures in society and our staff.

DIRECT DISCRIMINATION

Direct discrimination occurs when an individual is treated less favourably than another because of a protected characteristic they have.

DISCRIMINATION BY ASSOCIATION

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

PERCEPTION DISCRIMINATION

This is direct discrimination against an individual because others think they possess a protected characteristic. It applies even if the person does not actually possess the protected characteristic.



INDIRECT DISCRIMINATION

Indirect discrimination occurs when a provision, criterion or practice is applied universally, but its effect disadvantages people who share a protected characteristic.

HARASSMENT

Harassment is unwanted and unwanted behaviour related to a protected characteristic and makes a person feel intimidated or humiliated.

SEXUAL HARASSMENT

It is unlawful to harass a person (an applicant or employee) because of that person's sex. Harassment can include "sexual harassment" or unwelcome sexual advances, requests for sexual favours, and other verbal or physical harassment of a sexual nature.

Harassment does not have to be of a sexual nature, however, and can include offensive remarks about a person's sex. For example, it is illegal to harass a woman by making offensive comments about women in general.

Both victim and the harasser can be either a woman or a man, and the victim and harasser can be the same sex.

Although the law doesn't prohibit simple teasing, offhand comments, or isolated incidents that are not very serious, harassment is illegal when it is so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted).

The harasser can be the victim's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer, such as a client or customer.

VICTIMISATION

Victimisation is where someone is treated less favourably because they have made a complaint about discrimination or harassment or have given evidence relating to a complaint.

7. RESPONSIBILITIES

It is essential that all Service Providers of Silva Brothers Logistics to behave with dignity, courtesy and respect and to act in a non-discriminatory manner at all times.

SILVA BROTHERS LOGISTICS

Silva Brothers Logistics has a legal responsibility for demonstrating that it treats all groups of Service Providers fairly in its practices. This includes promoting good relationships between different groups of Services Providers and ensuring equality of opportunity.

To achieve this The Service will:

- Gather information on the profile of our Service Providers practices, such as recruitment; Consult and trade unions about how our services and practices could be improved



- Assess the impact of current and proposed Service Providers policies, practices and services
- Identify priorities and set equality objectives
- The Directing Board will monitor progress through the Equality Impact Assessment process and support the implementation of action plans.

This will enable Silva Brothers Logistics to achieve its aim of a healthy work-life balance for all staff, improve retention and prevent under-utilisation of some staff.

Service Providers and job applicants, will receive no less favourable treatment on the grounds of race, national or ethnic origin, religion or belief, gender, sexual orientation, gender reassignment, disability or age.

All of this is in line with Silva Brothers Logistics Diversity and Equality Strategy which has the overall aim of:

- Improving Delivery through Diversity - to ensure diversity and equality is our reality and habit with a view to improving our business.

Silva Brothers Logistics Delivery Plan sets out how The Insolvency Service will deliver its diversity and equality strategy through the achievement of these outcomes (in accordance with The Cabinet Office's guidance on Diversity Delivery Plans issued October 2008).

The actions are intended to comply with the legal requirements to meet or exceed good practice under the seven equality strands of race, gender, transgender, sexual orientation, disability, age and religion or faith. Since Silva Brothers Logistics is committed to ensuring diversity and equality is our reality and habit, this delivery plan goes beyond the separate equality strands to also specifically include flexible working patterns of staff (part-time and home-working), which facilitate the recruitment and progression of Service Providers with domestic responsibilities.

MANAGERS

Will ensure that all members of staff within Silva Brothers Logistics receive the appropriate diversity and equality training.

Will investigate all matters of alleged discrimination, harassment and inappropriate behaviour promptly and thoroughly.

Will ensure that selection and appointment procedures, performance management processes, Service Providers development opportunities and disciplinary and grievance processes are fairly and consistently applied to all Service Providers.

Will ensure that diversity and equality issues are considered as part of Silva Brothers Logistics planning processes.

In case of pregnancy, the manager on site should facilitate the driver allocating smaller routes and or send support.



SERVICE PROVIDERS

Legal responsibilities also extend to Service Providers, and Silva Brothers Logistics therefore expects all Service Providers, to act in accordance with this Policy when delivering Silva Brothers Logistics's business.

Service Providers are expected to treat colleagues and every service user fairly and with respect.

All Service Provider should deliver their work to the highest standard and that means adapting as much as possible to the specific needs of each individual service user and working in a supportive way with colleagues.

Every Service Provider is an essential member of a team and should feel able to develop their skills and play their part fully in the organisation.

Service Provider should actively encourage non-discriminatory practices and challenge any incidences of behaviour that fail to comply with this policy.

HUMAN RESOURCES

Will ensure the incorporation of this policy's principles into all other Insolvency Service policies and procedures.

Will provide appropriate diversity and equality awareness training for all Service Providers.

Will support managers in implementing the policy.

Will ensure that recruitment advertising, selection and appointment procedures, performance management processes and disciplinary grievance processes are fair and transparent and are consistently applied.

Will produce and monitor diversity and equality data and will publish the findings of monitoring activity.

8. APPLICATION OF THE POLICY

RECRUITMENT AND SELECTION

- Recruitment advertising will encourage applications from all sectors of the community reflecting Silva Brothers Logistics's commitment to diversity and equality ;
- recruitment advertising will appear in publications appropriate to the audience capable of producing the best candidates;
- job descriptions, person specifications and recruitment advertisements will be written on the basis of the essential and justifiable requirements of the position;
- shortlisting, appointment and rejection decisions will be transparent and justifiable and will be supported by written comments.



GRADING AND PROMOTION

- All grading and promotions criteria and procedures will be free from prejudice and must be applied equitably and consistently.

PERFORMANCE MANAGEMENT

- Probation and performance management procedures will be clear and transparent and will be applied fairly across all Service Providers.

9. ADVICE AND COMPLAINTS

All Service Providers who believe they have been subjected to discrimination or harassment have the right to seek redress.

Service Providers may seek advice from their line manager, Human Resources or Trade Union representative. Complaints should be submitted in accordance with Silva Brothers Logistics's Grievance Procedure.

Verbal or physical abuse by anybody will not be tolerated. The Service may Stop providing work to who are found to be abusive.

10. POLICY FRAMEWORK AND SUPPORT

Silva Brothers Logistics has also developed a number of other policies and practices in support of the achievement of an organisational culture free from unfair bias, discrimination and harassment. In particular Silva Brothers Logistics's Race, Disability and Equality Schemes and action plans to address inequality. Also, the Service's Dignity at Work Policy.

COMMUNICATION

This policy will normally be available on Silva Brothers Logistics's hand book. This policy will be included in induction.

MONITORING

Statistics will be gathered to monitor equality across all aspects of Insolvency Service processes and will be used to inform future practice.



CONFIDENTIALITY

Any information disclosed to Silva Brothers Logistics in relation to diversity and equality issues will be kept strictly confidential in accordance with legislative requirements.

11. POLICY REVIEW

This policy will be reviewed at regular intervals to ensure it remains in line with legislation and Silva Brothers Logistics's organisational principles.

SECURITY BADGES AND PERSONAL PROTECTIVE EQUIPMENT POLICY (PPE)

All Drivers Must to have the following:

- ✓ **YELLOW high Visibility Vest**
- ✓ **Safety Shoes** (Steel Toe Cap)
- ✓ **Key chain**
- ✓ **Have your ID Badge**

If you are short or any of the above, please contact your OSM.

Safety footwear, high visibility vests, ID badge and key chains are mandatory in the Delivery Station during all activities.

If you lose or forget your badge you will not be able to access the UK AMZL Systems. You must make sure your badge is on display.



ID Badge



Hi-vis clothes



Protective boots



SBL COURIERS GDPR CONSENT FORM

POLICY STATEMENT

It is the policy of **Silva Brothers Logistics** to protect personally identifiable information (**PII**) of its Service Providers and volunteers. The electronic restrictions and safeguards outlined in this policy provide guidance for Service Providers and volunteers that have access to **PII** retained by the **Silva Brothers Logistics** and its Costumers to ensure compliance with state and federal regulations. **Silva Brothers Logistics** may also share or allow the use of that information with our partners/clients.

DEFINITIONS

A. Personally Identifiable Information (PII) is any information pertaining to an individual that can be used to distinguish or trace a person's identity. Some information that is considered PII is available in public sources such as telephone books, public websites, etc. This type of information is Public PII and includes:

1. First and Last name
2. Address
3. Work telephone number
4. Work e-mail address
5. Home telephone number
6. General educational credentials
7. Photos and video.

In contrast, **Protected PII** is defined as any one or more of types of information including, but not limited to:

1. Social security number
2. Username and password
3. Passport number
4. Credit card number
5. Clearances
6. Banking information
7. Biometrics
8. Data and place of birth
9. Mother's maiden name
10. Criminal, medical and financial records
11. Educational transcripts
12. Photos and video including any of the above

I have reviewed and acknowledge the local workforce development board's Personally Identifiable Information Policy and agree that all necessary steps will be taken to ensure the privacy and confidential nature of all personally identifiable information to protect such information from unauthorized disclosure.

I further agree that all personally identifiable information will be stored in an area that is physically safe from access by unauthorized persons at all times and be managed with appropriate information technology (IT) services and designated locations. Access to any personally identifiable information through program and grant activity will be restricted to only those individuals who need access in their official capacity to perform duties in connection with the scope of work.

PRINTED NAME

SIGNATURE

DATE



DRUG AND ALCOHOL POLICY



POLICY STATEMENT

- **Silva Brothers Logistics** is committed to providing a safe, healthy and productive workplace.
- **Silva Brothers Logistics**'s daily activities involve the use of machinery and vehicles with the potential to maim or kill during operation.
- The use of alcohol and other drugs adversely affects work performance and safety.
- **Silva Brothers Logistics** recognises the right of any person to expect that their personal safety will not be jeopardized by an accident caused by substance abuse, and that this right overrules any wish on the part of an individual to have illegal substances present in their body.
- Accordingly, **Silva Brothers Logistics** maintains a policy of ZERO TOLERANCE to substance abuse (both drugs and alcohol) during working hours.

SERVICE PROVIDERS RESPONSIBILITY

Silva Brothers Logistics has a legal responsibility to their Service Providers, their subcontractors, their customers, and the community to maintain a safe and healthy work environment throughout their operations.

Every Silva Brothers's Logistics manager is therefore responsible for the implementation of this Policy.

SERVICE PROVIDERS AND SUBCONTRACTOR RESPONSIBILITY

All Service Providers, contractors and subcontractors have a responsibility to present themselves for work unimpaired by alcohol or other drugs. By law, drivers of prime movers must have a zero blood alcohol level whilst driving.

Service Providers and subcontractors are not permitted to drink alcoholic beverages or to take drugs that have not been prescribed on medical grounds, while at work, during meal breaks, or on company premises.

Any service Provider or subcontractor taking prescribed medication must seek a written opinion from a medical practitioner as to whether such medication may affect his or her ability to operate mechanical equipment safely and to perform any other work related duties.

The Service Providers or subcontractor must provide such opinion to the **Silva Brothers Logistics** if requested, ANY SERVICE PROVIDERS OR SUBCONTRACTOR WHO IS FOUND DURING WORKING HOURS TO BE IN BREACH OF THIS POLICY WILL BE DEEMED TO HAVE COMMITTED AN ACT OF SERIOUS AND WILFUL MISCONDUCT AND MAY HAVE THEIR CONTRACT TERMINATED IMMEDIATELY.



Any Service Provider or subcontractor found to be buying, selling, or in possession of illegal drugs or paraphernalia used for substance abuse on **Silva Brothers Logistics** premises or in **Silva Brothers Logistics** vehicles shall be deemed to have committed an act of gross misconduct and shall be liable to summary dismissal.

PROCEDURES

Where a Service Provider or subcontractor is assessed to be in breach of this policy, then

- The Service Provider or subcontractor will be informed of the risk to their own safety and the safety of others.
- The Service Providers's supervisor or subcontractor will invite a health and safety representative to be present during initial discussions with the Service Provide or subcontractor.
- The Supervisor will arrange for the Service Provider or subcontractor to undergo for a drug and/or alcohol test to be conducted by trained personnel. The costs for all such tests shall be at the expense of **Silva Brothers Logistics** and the results shall be made available to the Service Provider or subcontractor and to **Silva Brothers Logistics**.

NO SERVICE PROVIDER OR SUBCONTRACTOR SHALL REFUSE

No Service Provider or subcontractor shall refuse a request by **Silva Brothers Logistics** for a blood and/or urine sample and/or saliva and/or breath analysis for an alcohol or drug test. If is the case then the opportunity or provision of work can be suspended.

Further failure to undergo testing shall be deemed as a positive test result, and the Service Provider or subcontractor concerned shall be liable to summary suspension of the ability to provide Services for the company.



ANTI-SOLICITATION POLICY



1. POLICY STATEMENT

The non-solicitation policy outlines the agreement that any ex-Service Provider of Silva Brothers Logistics or its subsidiary companies shall not contact any employee, contractor or Service Provider of the Company for any business enterprise for a period of 1 year (12 months) from the final date of Providing Services with the Company.

The Policy includes, but is not limited to:

- Contacting any contractors (independent or otherwise) on behalf of any other business
- Offering incentives/bribes to any member of staff or Service Providers of any part of the Company in return for offers of employment, additional business or any other reasons.

2. CONFIDENTIALITY

- The Confidentiality clause in the Contract of Services extends for a further 12 months after the final date of Services with the Company
- On no account should current Service Provider be asked to breach confidentiality while they remain providing Services for the Company but someone no longer working within the company.
- Service Providers must report any such approaches by a previously Provider to their Line Manager and/or Senior Manager (as applicable)
- Where the Official Secrets Act has been signed (or any other Confidentiality statement as applicable by contract), this must also be adhered to for the duration of the agreement.

3. METHODS OF CONTACT

Previous Service Providers are prohibited from contacting current Service Providers and/or contractors in the following ways (this list is not exhaustive):

- Phone calls (records or not)
- Email ▪ Fax ▪ Hard copy letter
- Social media including LinkedIn
- Via a 3rd party i.e. recruitment agencies, job matching
- Physical meeting with the express intention of solicitation



ANTI-BRIBERY & ANTI-CORRUPTION POLICY



1. WHAT DOES YOUR POLICY COVER?

1.1 This anti-bribery policy exists to set out the responsibilities of **SBL Couriers** 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 **SBL Couriers**. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. POLICY STATEMENT

2.1 SBL Couriers is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. **SBL Couriers** 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 SBL Couriers 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 SBL Couriers 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 Service Providers (whether temporary, fixed-term, or permanent), consultants, 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 Service Providers, 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.

Signed as a deed by contractor:

DATE / /



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. Service Providers 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.

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 Gifts and hospitality **SBL Couriers** 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:

- a.** 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.
- b.** It is not made with the suggestion that a return favour is expected.
- c.** It is in compliance with local law.
- d.** It is given in the name of the company, not in an individual's name.
- e.** It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).

Signed as a deed by contractor:

DATE / /



- f.** 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).
- g.** It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h.** It is given/received openly, not secretly.
- i.** It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j.** It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of £100).
- k.** 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 SBL Couriers 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 there is any uncertainty, the advice of the compliance manager should be sought.

5.7 Facilitation Payments and Kickbacks **SBL Couriers** 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 SBL Couriers 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 SBL Couriers recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a.** Keep any amount to the minimum.
- b.** Ask for a receipt, detailing the amount and reason for the payment.
- c.** Create a record concerning the payment.
- d.** Report this incident to your line manager.

Signed as a deed by contractor:

DATE / /



5.10 Political Contributions **SBL Couriers** 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 **SBL Couriers** 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 Service Providers 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. SERVICE PROVIDER RESPONSIBILITIES

6.1 As an Service Provider for **SBL Couriers**, you must ensure that you read, understand, and comply with the information contained within this policy.

6.2 All Service Providers and those under our Supervision are 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 any Service Providers breaches this policy, they will face disciplinary action and could face termination of contract for misconduct. **SBL Couriers** has the right to terminate a contractual relationship with an Service provider if they breach this anti-bribery policy.

7. WHAT HAPPENS IF I NEED TO RAISE A CONCERN?

THIS SECTION OF THE POLICY COVERS 3 AREAS:

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

Signed as a deed by contractor:

DATE / /



7.1 HOW TO RAISE A CONCERN

7.1a How to raise a concern If you suspect that there is an instance of bribery or corrupt activities occurring in relation to **SBL Couriers**, 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 line manager, the compliance manager, the director, or the Head of Governance and Legal.

7.1b **SBL Couriers** will familiarise all Service Providers with its whistleblowing procedures so Service Providers can vocalise their concerns swiftly and confidentially.

7.2 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.

7.3 PROTECTION

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

7.4 **SBL Couriers** 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.

7.5 Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

7.6 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.

8. COMMUNICATION

8.1 **SBL Couriers**'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.

Signed as a deed by contractor:

DATE / /



9. RECORD KEEPING

9.1 SBL Couriers 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 SBL Couriers'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. Service Providers 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 an Service Provider's contract for Service Provider and **SBL Couriers** may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

Signed as a deed by contractor:

DATE / /



