



# Employee Handbook

## December 2021

This document contains important information that all employees should read and understand.

It is designed to guide you through the various policies and procedures that you may need to know or refer to during your employment with Bamboo.

It also serves to remind us all about the culture of Bamboo and how as employees we interact with each other and expect to be treated – with dignity, courtesy and respect.  
(We have not made specific mention of Covid-19 or the pandemic as this has been dealt with as part of our Business Continuity planning and response)

## DOCUMENT CONTROL

VERSION HISTORY			
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1	December 2021	Ewa Lewandowska	New version with refresh of procedures and reissue with new branding
ISSUE CONTROL			
Department Ownership:	People and Culture		
Exec Owner:	Head of People & Culture		
Business Owner:	General Counsel		
Approval Flow	Exco		
Committee(s):	-		
Board:	-		
Comments on or proposals for amendments to this document should be sent in writing to the executive owner identified above.			

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## ACKNOWLEDGEMENT AND RECEIPT

I have received and read a copy of the Employee Handbook (the "**Handbook**") produced by Bamboo Limited ("**Bamboo**"). I understand that I am responsible for following the policies and procedures set out in the Handbook and for asking questions about those policies and procedures if I do not understand any aspect of them.

I understand the Handbook is subject to regular review and may be supplemented, changed or superseded at any time. Any changes to the Handbook will be announced via email. It is my responsibility to ensure I familiarise myself with any changes made.

Any reference to the "**Handbook**" means the Handbook as supplemented, changed or superseded from time to time.

I acknowledge that this Handbook is not a contract between me and Bamboo. I also understand that if the terms of this Handbook differ from the terms of my employment contract with Bamboo or from any benefit scheme, the terms of my employment contract or benefit plan will prevail.

\_\_\_\_\_ Employee Name (please print)

\_\_\_\_\_ Employee Signature

\_\_\_\_\_ Date Signed

## HANDBOOK OVERVIEW

This Handbook applies to Bamboo's employees.

There are several things that are important to keep in mind about this Handbook. It contains only general information and guidelines and is non-contractual in nature. It does not form part of your employment contract. It is not intended to be comprehensive or address all the possible applications of, or exceptions to, the general policies and procedures described within it. For that reason, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or practice, then you should address specific questions to the People & Culture team. Please remember that it is your responsibility to become familiar with these policies and to comply with them.

Another key point to bear in mind is that a breach of the requirements set out in this Handbook could also, in some circumstances, be a breach of the FCA's Conduct Rules. Those rules are discussed in section 2.2 – compliance with them is fundamental to your role as a Bamboo employee.

## 1. Introduction

### 1.1. About Bamboo

Bamboo started offering consumer loans in 2014 with the aim of delivering sustainable, affordable, risk-price adjusted loans to customers in the mid-market who were under-served by traditional high street banks and building societies because of their thin or adverse credit history.

We wish to be seen by our customers and the wider financial services market as professional, transparent, ethical and compassionate in our approach and dealings with our customers and our counterparties. It is of paramount importance that we live and breathe these values in our everyday activities and take pride in Bamboo's collective integrity.

We chose the name 'Bamboo' to convey fresh new growth, dependability, simplicity and strength - qualities that reflect our aim to deliver affordable loans to our customers to support them in their daily lives and to be judged by them as fair, transparent and straightforward.

What we believe helps sets us apart from other lenders in our market is our advanced technology and digital origination and servicing platform. Also, our professionalism and human touch in interactions with customers and our extensive credit skills and experience. We have a mobile-friendly website that allows customers to easily manage payments and loan top-ups.

Our service is trusted by over 150,000 customers and we are proud to have been voted:

- '**Best Personal Loan Provider**' in 2017, 2018, 2019 and 2021 by Consumer Credit Awards;
- '**Customer Service Excellence**' in 2019 by Lending Awards;
- '**Treating Customers Fairly Champion**' in 2021 by Consumer Credit Awards;
- '**Alternative Lender of the Year – Specialist Consumer**' in 2020 by Credit Awards;
- '**Best Rebrand of the Year**' in 2020 by Credit Awards;

## 1.2. Branding

### Our Brand Ambassador

Our friendly panda ‘Boo’ is the character behind our brand, representing our core values of being helpful, non-judgemental, and efficient. The series of TV ads run in 2019 saw Boo brought to life as Bamboo’s brand ambassador. You can view our ads [here](#).

### Our “typical” customer

A UK resident, aged between 21 and 72 (at the start of the loan) and is looking for a loan between £1,000-£10,000.

## 1.3. Bamboo values

Our plan is to fully define and formalise our Bamboo values and then to embed them into everything that we do now and in the future.

We are proud of the Bamboo culture and are thrilled to see where we are heading with the help of our greatest asset – our employees.

## 1.4. Financial Conduct Authority

Bamboo is regulated by the FCA, and as such we are required to comply with their rules and regulations. In December 2019, Bamboo became subject to new rules, called the Senior Managers and Certification Regime (SM&CR). Its purpose is to ensure there are clear responsibility lines and strong controls in place. The new regime also focuses on reinforcing good conduct across the financial services industry through the use of Conduct Rules. All Bamboo staff are required to understand the Conduct Rules and how they apply to them. These Conduct Rules require us each to:

- act with integrity;
- act with due skill, care and diligence;
- be open and co-operative with the FCA and other regulators;
- pay due regard to the interests of customers and treat them fairly; and
- observe proper standards of market conduct.

These rules and the expectations underpinning them confirm what we have always expected of every employee at Bamboo.

There are additional Conduct Rules for Senior Managers.

On starting with Bamboo and regularly during your Bamboo career, we will remind you of the Conduct Rules and that we are all individually accountable for abiding by these rules at all times.

### 1.5. Equal opportunities

Bamboo is committed to ensuring equality of opportunity for existing and potential employees, by promoting a work environment free from discrimination in all areas, such as marital/civil partner status, pregnancy or maternity, religion or belief (including philosophical belief), race, colour, sexual orientation, gender, gender re-assignment, disability, age, nationality or ethnic or national origin (the "Protected Characteristics"). This policy is aligned to Bamboo's commitment to comply with employment equality legislation including the Equality Act 2010 and all relevant Codes of Practice.

This policy applies to all applicants and employees, and prohibits discrimination, harassment and retaliation, whether engaged in by fellow employees, supervisors, managers, or by non-employees with whom the employee comes into contact in the course of employment (e.g. service providers or contractors). Conduct prohibited by this policy will not be tolerated: it is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events. We also expect all of us to naturally abide by these standards in their personal lives outside of work and have no wish to be associated with any individual who does not.

Bamboo's recruitment, employment and training practices will not be influenced or affected by any of the Protected Characteristics set out above or on the basis of personal background. All of our employment-related decisions will be based on cultural fit, merit, qualifications, and competence and implied in all of our contracts of employment is a commitment to equal pay for equal work.

This policy governs all areas of employment including hiring, promotion, transfer, assignment, compensation, discipline and termination. All compensation, evaluations, benefits etc. will be administered according to this policy.

Affected employees should report any kind of discrimination to the People & Culture team or alternatively, raise the issue as a grievance via the Grievance Policy. Any reports of discrimination, victimisation or harassment that are found to be false in

nature and maliciously made may result in the employee who made the false report being subject to disciplinary action.

#### 1.6. Dignity at work

We are committed to protecting the dignity of all those who work within Bamboo. In particular, we are committed to ensuring that our organisation is free from any form of bullying or harassment at work and that its work environment (including hybrid working arrangements) is conducive to operating a high-quality business in an atmosphere of mutual respect, safety and equality. It is important to Bamboo that each one of us is happy and comfortable in the work environment. No form of discrimination, bullying, harassment or inappropriate conduct within or in connection with the work of Bamboo will be tolerated. Complaints pursuant to this policy may be dealt with in a formal way or by alternative means, as described below. Any violation of this policy, including inappropriate actions or failure to act, may result in disciplinary action, up to and including termination, in accordance with Bamboo's Disciplinary Procedure.

Both Bamboo's management and its employees have responsibilities for creating and contributing to the maintenance of a work environment free from discrimination, bullying, harassment or inappropriate conduct. Employees also have an obligation to co-operate with the investigation of complaints of bullying or harassment in Bamboo.

The policy applies to any person working within Bamboo, including directors, temporary and agency workers.

This policy extends to behaviour which occurs outside Bamboo's premises, such as at social functions or training events, provided there is a connection with the work of Bamboo and its employees.

This Handbook defines bullying and harassment, and sexual harassment, and sets out the procedures that we have in place and will use should any of our employees make a complaint that they have been the victim of bullying, harassment or discriminatory treatment.

It is our individual and collective duty to look after each other and treat each other as we should wish to be treated.

Complaints by an employee pursuant to this policy will be treated with fairness, sensitivity, respect and (as far as possible) confidentiality for all parties concerned.

Any employee, who makes a complaint in good faith, supports a complainant, gives evidence in proceedings or gives notice of an intention to do any of the foregoing, will not be victimised or subject to sanction. Any employee accused of conduct pursuant to this policy will be treated with fairness and sensitivity.

Every one of us is responsible for safeguarding our own safety and welfare, as well as that of our colleagues who may be affected by an employee's actions, or omissions, while at work. It should be noted that it is up to each of us individually to decide what behaviour is unwelcome irrespective of the attitude of others to the matter.

For the purposes of this Handbook, the expression "bullying and/or harassment" should be read as including "bullying, harassment and/or sexual harassment".

#### **1.6.1. Bullying**

It is impossible to give an exhaustive definition of bullying, but it includes repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment which could reasonably be regarded as undermining the individual's right to dignity (and self-esteem) at work, making the individual feel uncomfortable or which might objectively be regarded as such.

An isolated incident of the behaviour as per the above definition may be an affront to dignity but as it is not "repeated" it is not considered to be bullying.

We also need to be reasonably tolerant of accidental and unintentional behaviour.

**The following is a non-exhaustive list of types of bullying:**

- Exclusion with negative consequences;
- Verbal abuse/insults;
- Intrusion – pestering, spying or stalking;
- Menacing behaviour;
- Intimidation;
- Aggression;
- Undermining behaviour;
- Excessive monitoring of work;
- Humiliation;

- Repeatedly manipulating a person's job content and targets; and
- Blame for things beyond the person's control.

It is important not to confuse the legitimate raising of performance or conduct issues by Management with either bullying or harassment. Any discussion should be clear and constructive.

### 1.6.2. Harassment

Again, it is impossible to exhaustively define what counts as "harassment", as what matters is the impact of the actions on the individual and how that would be generally regarded. However, it includes any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating a person's dignity (and self-esteem) or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

A single incident can amount to harassment. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to an individual's Protected Characteristics (as defined in 1.5 above). Harassment is unacceptable even if it does not fall within any of these categories.

Harassment includes situations where the victim does not have the relevant characteristics, but the harasser believes that the victim has that characteristic.

For the purposes of this section, "conduct" includes acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material. The following are some specific examples of the forms such conduct might take, but this list is non exhaustive:

- threatening, intimidating or hostile acts that relate to the Protected Characteristics or any other ground protected by law;
- epithets, slurs, quips, or negative stereotyping that relate to the Protected Characteristics or any other category protected by law;
- written or graphic material (including derogatory posters, cartoons, drawings, email, internet sites or other electronic communications) that denigrates or shows hostility or aversion toward an individual or group because of the Protected Characteristics or any other category protected by law and that is placed on walls, bulletin boards, or elsewhere on Bamboo's premises, or circulated or displayed in the workplace;

- "jokes", "pranks" or other forms of "humour" that are demeaning or hostile with regard to the Protected Characteristics or any other category protected by law;
- harassing posts, tweets, instant messages, text messages or other form of social media.

### 1.6.3. Sexual harassment

"Sexual harassment" is defined here as:

- any form of unwanted conduct related to sex (i.e. sexual advances, requests for sexual favours and other verbal, non-verbal or physical conduct of a sexual nature) where the conduct has the purpose or effect of either violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; or
- treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

In deciding whether conduct has the effect referred to above, Bamboo will take into account: (i) the perception of the person raising the complaint; (ii) the other circumstances of the case; and (iii) whether the complained-of conduct could reasonably be seen as being likely to have the effect described above.

Sexual harassment may involve individuals of the same or different genders.

Specific examples of the forms such conduct might take include but are not limited to:

- coerced sexual acts;
- express or implied demands for sexual favours in exchange for favourable reviews, assignments, promotions, continued employment or promises of continued employment;
- touching or assaulting an individual's body, or staring, in a sexual manner;
- graphic, verbal commentary about an individual's body or sexuality;
- unwelcome or offensive sexual jokes, sexual language, sexual epithets, sexual gossip, sexual comments, sexual inquiries, flirtations, advances or propositions communicated in any medium, including electronic;
- unwelcome flirtations, advances or propositions;

- continuing to ask an employee for a date after the employee has indicated that they are not interested;
- sex-based conduct that denigrates, ridicules, intimidates or is physically abusive of a person because of their sex such as derogatory or degrading abuse or insults which are gender-related; and
- the display in the workplace of graphic and sexually suggestive objects, pictures.

A single incident may constitute sexual harassment.

#### **1.6.4. Characteristics of harassment and sexual harassment**

To constitute sexual harassment or harassment the behaviour complained of must firstly be unwelcomed by the recipient. This distinguishes unwanted behaviour from friendly behaviour which is welcome or reciprocal. In addition, the behaviour, in order to constitute harassment or sexual harassment, must have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Employees should be sensitive to the impact their behaviour and/or actions may have on the feelings of others. It is the impact of unwanted behaviour on the recipient and not the intention of the perpetrator of such unwanted behaviour which determines whether harassment or sexual harassment has taken place. It is therefore important for all of us to understand that the intention of the perpetrator is irrelevant, the fact the perpetrator has no intention of bullying or harassing a victim is no defence.

Harassment and sexual harassment are unacceptable, whether perpetrated by superiors, peers, juniors, non-employees or by persons of the same sex or gender identification. In some circumstances, sexual harassment may be unlawful and, in such circumstances, Bamboo, where it is aware that such behaviour has occurred, will take the necessary steps to inform the appropriate authorities.

#### **1.6.5. Victimisation**

For the purposes of this Handbook, victimisation is broadly seen as being unfavourable treatment of someone who has made or is believed to have made or supported a complaint under the Equality Act.

It includes situations where a complaint has not yet been made but someone is victimised because it is suspected that he/she might make a complaint.

If an individual gives false evidence of victimisation or makes an allegation of victimisation in bad faith, then they will not be treated as being affected by victimisation for the purposes of the Equality Act.

### Responsibilities of management

Management and team leaders are required to:

- provide a good example by treating everyone in the workplace with dignity, courtesy and respect;
- promote awareness of Bamboo's policies and complaints procedures;
- be vigilant for signs of bullying, harassment and sexual harassment , take action before a problem escalates and investigate appropriately;
- respond sensitively to an employee who makes a complaint of bullying, harassment or sexual harassment;
- explain the procedures to be followed if a complaint of bullying, harassment or sexual harassment is made;
- treat the alleged perpetrator fairly including listening to their version of events;
- safeguard the employee making a complaint from victimisation for doing so; and
- monitor and follow up the situation after a complaint is made so such behaviour does not recur.

### Reasonable discipline and management is not bullying or harassment

Good management practices including the provision of constructive feedback and criticism of performance or conduct (intentional or unintentional) and reasonable discipline arising from the management of an employee's performance at work does not amount to bullying or harassment. For example, an employee whose performance is continuously signalled at a level below required targets or expectations or who is being picked up for a mistake may feel threatened and insecure in their work, but this in itself does not indicate bullying or harassment.

Similarly, actions taken which can be justified as regards the safety, health and welfare of employees should not be treated as bullying or harassment.

## 2. During your time with Bamboo

### 2.1. Culture

Bamboo's pre-employment interviews are to identify the skills, competencies and experience of candidates and importantly their cultural fit and suitability. Our purpose is to deliver sustainably affordable risk price adjusted loans to mid-market customers and provide our customers with excellent and empathetic service throughout their time with us and, in so doing, deliver positive outcomes for our customers, employees and owners.

We pride ourselves on the Bamboo culture, just some facets of this are: our integrity and our aim to do the right thing; our professionalism; our humanity in our interactions with all, whether customers, colleagues or counterparties; our quest to learn and improve; our team spirit and responsibility for each other; and our wish to enjoy our work and time at Bamboo with each other.

Together we can be strong, resilient and rigorous and build a great business. One that we are proud of and that we enjoy working for, alongside great colleagues and friends. Our standards and responsibilities to each other must never be allowed to slip.

### 2.2. The FCA's Principles, SMCR and the Conduct Rules

It is a privilege to be a business authorised and regulated by the Financial Conduct Authority (FCA).

To foster the development of strong customer-centric cultures within authorised firms, the FCA has a set of 11 principles that guide and inform its approach to regulation and which apply to each authorised firm and by extension to each individual within each authorised firm.

#### The FCA Principles of Business

<b>1</b> Integrity	A <i>firm</i> must conduct its business with integrity.
<b>2</b> Skill, care and diligence	A <i>firm</i> must conduct its business with due skill, care and diligence.
<b>3</b> Management and control	A <i>firm</i> must take reasonable care to organise and control its affairs responsibly and effectively, with adequate risk management systems.

<b>4</b> Financial prudence	A <i>firm</i> must maintain adequate financial resources.
<b>5</b> Market conduct	A <i>firm</i> must observe proper standards of market conduct.
<b>6</b> Customers' interests	A <i>firm</i> must pay due regard to the interests of its <i>customers</i> and treat them fairly.
<b>7</b> Communications with clients	A <i>firm</i> must pay due regard to the information needs of its <i>clients</i> , and communicate information to them in a way which is clear, fair and not misleading.
<b>8</b> Conflicts of interest	A <i>firm</i> must manage conflicts of interest fairly, both between itself and its <i>customers</i> and between a <i>customer</i> and another <i>client</i> .
<b>9</b> Customers: relationships of trust <sup>1</sup>	A <i>firm</i> must take reasonable care to ensure the suitability of its advice and discretionary decisions for any <i>customer</i> who is entitled to rely upon its judgment.
<b>10</b> Clients' assets	A <i>firm</i> must arrange adequate protection for <i>clients'</i> assets when it is responsible for them.
<b>11</b> Relations with regulators	A <i>firm</i> must deal with its regulators in an open and cooperative way, and must disclose to the <i>FCA</i> <sup>1</sup> appropriately anything relating to the <i>firm</i> of which that regulator would reasonably expect notice.

### Conduct Rules

The FCA's individual Conduct Rules apply to each and every one of us and are designed to underpin the Principles. People & Culture, together with the Legal & Compliance team, provide regular training on the Conduct Rules for all employees. Any breach of the Conduct Rules is taken very seriously by Bamboo. In some cases, breaches have to be reported to the FCA. It is important to be aware that the FCA does not just look at conduct in the workplace when assessing whether a Conduct Rule has been breached. Rule 1, regarding the importance of acting with integrity,

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<sup>1</sup> Principles 9 and 10 are greyed as these does not apply directly to Bamboo as we do not advise customers and are a lender and not holding client assets. However, conducting ourselves appropriately in our dealings with our customers and listening to our customers to earn their trust is of paramount importance.

can be breached by someone involved in (for example) bullying, fraud or sexual harassment, even if that behaviour does not take place in the office or has nothing to do with the employee's specific role within the business.

The Conduct Rules are as follows:

Rule 1: You must act with integrity.

Rule 2: You must act with due care, skill and diligence.

Rule 3: You must be open and cooperative with the FCA and other regulators.

Rule 4: You must pay due regard to the interests of customers and treat them fairly.

Rule 5: You must observe proper standards of market conduct.

Senior managers who hold a "Senior Management Function" (for example, they are a director or act as the company's Money Laundering Reporting Officer (MLRO)) are subject to additional Conduct Rules and receive personalised training regarding that. These additional Conduct Rules are:

Rule 1: You must take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively.

Rule 2: You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with the relevant requirements and standards of the regulatory system.

Rule 3: You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively.

Rule 4: You must disclose appropriately any information of which the FCA would reasonably expect notice.

### **2.3. Personal information**

Upon joining, you will be asked to complete a list of forms; this is to ensure we fulfil certain legal requirements associated with your employment and so that we have appropriate contact details in case of any emergency, etc. Should any of your details

change during your employment with Bamboo please ensure you update PeopleHR<sup>2</sup> promptly (see point 2.6 below).

#### **2.4. Employment and background checks**

Bamboo is committed to complying with its legal obligations as an employer in the financial services industry in its handling of personal data of customers and under financial crime and anti-money laundering legislation. In addition to pre-employment checks, we conduct ongoing employment screening to ensure that Bamboo continues to comply with its legal obligations and, that our employees have the required skills to perform their roles and that they act with integrity.

We carry out employee and personal fraud checks, criminal record checks (where appropriate), and credit checks at the time of employment, and for some on an annual basis thereafter. This ensures that we are meeting financial crime and anti-money laundering requirements and also ensures the integrity and ongoing suitability of our employees for employment in the financial services sector. Most of these checks will be performed by our third-party supplier, currently HireRight, subject to the employee's prior consent and the results are held subject to the strictest confidentiality.

Where an employee fails to consent to such checks or to satisfy any of these checking procedures, it may be necessary to put restrictions on the employee's work or take disciplinary action or terminate their employment.

#### **2.5. Fraud and CIFAS**

##### Fraud

We all have a responsibility to protect Bamboo, our employees, and customers against fraud and financial crime. This includes external fraud carried out by people outside Bamboo and internal fraud, committed by or with the help of anyone who works for us, whether on a permanent or temporary contract, or through an agency or as a contractor. Fraud includes such matters as stealing customer data, manipulating bonus or other reward schemes, facilitating fraudulent applications or making unauthorised changes to customer data. Everyone who works for us is expected to co-operate fully with any fraud or financial crime investigation that takes place, if we ask them to do so. If we believe anyone who is employed by us has

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<sup>2</sup> PeopleHR is self-service software system and app we use with you to simplify our record keeping and various administrative tasks such as holiday booking

committed fraud or financial crime, we will investigate thoroughly and if necessary, invoke our Disciplinary Policy. They may also be reported to the police, which could result in criminal prosecution.

#### CIFAS

Bamboo is committed to protecting our reputation and our people from dishonest individuals and criminal activity. We are a member of CIFAS – the UK's Fraud Prevention Service which operates an employee fraud database designed to prevent the re-employment of employees who have acted dishonestly in other financial organisations. This database is designed to capture and therefore prevent future instances of internal fraud. Internal fraud for the purpose of the database can be defined as, a member of staff who dishonestly makes false representation, or wrongfully fails to disclose information, or abuses a position of trust for personal gain, or causes loss to others.

The database can be used in two ways:

- to search the details of people seeking employment with us on a permanent or temporary basis to make sure they have not acted dishonestly elsewhere; and
- to list the names of any of our employees whom we know, or suspect have acted dishonestly during their employment.

Please note the following:

- fraud prevention databases have been established to allow employers to share data on their employment fraud cases;
- should our investigations identify fraud or the commission of any other criminal offence by an employee (on the employee's part) when applying for or during the course of their employment with us, we will record the details of this on the relevant fraud prevention databases; and
- this information may be accessed from the UK and other countries and used by law enforcement agencies and by us and other organisations to prevent fraud.

Cifas search does not leave any mark on your credit file.

For further information please refer to our Fair Processing Notice available under the following [link](#).

## 2.6. Change in circumstances

Bamboo encourages openness and honesty, therefore if you experience any change of circumstances that may be relevant to your continued employment with us, or experience financial difficulties, you should discuss this with your manager or the People & Culture team without delay.

## 2.7. Personal appearance

Dress, grooming and personal cleanliness standards contribute to the morale of all employees and affects the business image we project to customers and visitors.

During business hours, you are expected to present a clean and neat appearance and to dress according to the requirements of your position.

Occasions may arise, such as client visits, in which employees may be asked by their manager to make a special effort regarding personal appearance. In such situations, you are expected to present an appropriate business appearance, even if your position normally allows more casual attire.

## 2.8. Salary and payslips

Salaries are processed on the penultimate working day of the month. If your first employment day is after payroll cut-off date, which is around 15<sup>th</sup> of the month, your first pay will be processed in the following month and will be backdated accordingly; please speak to People & Culture if you are unsure or if this may cause you any financial hardship.

Please ensure you provide us with correct bank details and keep those up to date throughout your employment with us.

Two days before payroll is processed, payslips are released electronically via a secure payroll portal operated by HWB Accountants. You will receive an email once the payslips are uploaded into the portal. The portal will allow you to view your payslips, as well as P60s.

## 2.9. Company property

You may not, except in the proper performance of your duties or with our permission (for example when working from home), remove from Bamboo's premises any property belonging to us or relating to our affairs, or make any copies of documents

or records relating to our affairs. You will make all reasonable efforts to protect and maintain any property provided to you by us for carrying out your duties.

Non-compliance with this may result in a formal action, up to and including dismissal.

## **2.10. Probation period**

The aim of probation is to ensure all new employees are, within a reasonable period of time, able to gain a full understanding of the requirements of the post and to achieve a satisfactory level of performance. Your contract of employment will specify the duration of your probation period.

Where possible, regular reviews will be carried out to monitor your performance and progress during the probationary period. In particular these reviews will consider the performance of duties, timekeeping and attendance. These review meetings will allow both parties to raise any issues as and when they arise. At the conclusion of your probationary period, your progress will be assessed. If the probationary period of employment has progressed satisfactorily then you will be informed by your manager and receive a follow up letter from People & Culture. This is when you will receive further details on any additional benefits that you may be eligible after passing your probation period.

If the probation period has not been satisfactory, whether due to poor performance, timekeeping and/or attendance but it is agreed there is potential to improve, probation may be extended. An extension will normally be for a further period of three months (but may be longer or shorter) and during this time the employee will be offered any reasonable support and training. In such circumstances you will be advised, in writing, of the duration and the reason for the extension. At the end of the additional probation period a decision will be made as to your continued employment, or a further extension may be considered if applicable.

If an employee fails to reach satisfactory standards during the original or extended probation period, the contract of employment may, after suitable warning, be terminated.

## **2.11. Fob and YubiKey**

### **Fob**

Upon joining the Southampton Office or the London Office, you will be issued with a fob giving you access to the office in which you work (each office has a separate fob). If you are frequently visiting both offices, please speak to the IT Support Manager to

programme your fob for access to both offices. You should not lend your fob to any of your colleagues and your fob should only ever be used by you. Each day, upon your arrival, you should always swipe your fob to enter the office regardless of whether the door is already open – no tailgating. This is important as by swiping your fob the system records exactly who has entered the office and therefore creates a register of employees present in case of a fire or other evacuation emergency.

Should you lose your fob, please notify People & Culture team immediately so we can disable the lost fob to prevent any unauthorised access to the office and issue you with a new fob.

### YubiKey

Bamboo takes information security and data protection very seriously: these are significant risks for businesses such as ours that receive and store large amounts of customer data. We are currently using Okta as our Sign-On solution to help with secure user authentication for our employees

A requirement of using the service is to use Multi Factor Identification (MFA), which can be a mobile app or a hardware token. Those employees who are not able to use the app, or do not want to use it, will be issued with a physical token, called YubiKey, which is a USB device designed to help with secure authentication. Please speak to People & Culture to discuss this further.

## **2.12. Absence**

### Notification

Bamboo values good attendance at work and is committed to improving the general wellbeing of its employees to achieve this. Although we aim to secure regular attendance, we do not expect employees to attend when they are unwell or in a family or household emergency.

Your manager/team leader should be notified as early as possible if absence from work is anticipated for hospitalisation and/or other medical treatment. If you are unable to attend work due to sickness or injury, your manager/team leader must be notified by telephone before your normal start time or as soon as possible on the first day of absence, if possible, indicating a date of return. You should make the notification personally unless impossible due to the nature of the illness when you should arrange for someone else to call on your behalf. During prolonged periods of absence, your manager should be kept informed of progress and an expected date

of return. Any employee who has been absent due to sickness and is found not to have been genuinely ill will be subject to disciplinary action, which could include dismissal.

Upon return, you will be required to complete a return to work interview with your manager and, if applicable, with a member of People & Culture.

If there is a different notification procedure in your team to the one described above, your team leader or manager will advise you accordingly.

## 2.13. Benefits

Any benefits offered by Bamboo, apart from your basic salary and those required by law, are provided at Bamboo's discretion. There is no contractual entitlement to them. Bamboo reserves the right to alter the cover or benefit, as well as to cease the provision (without replacement or compensation) at any time.

### 2.13.1. Pension

#### Enrolment

You will be auto enrolled into our Group Pension scheme from the beginning of the first full month after the completion of your probation period, or earlier if required by law. Bamboo's pension provider is AEGON.

Once you are enrolled, you will receive an email from Retiready, with login details. Retiready is a portal operated by AEGON, which allows you to monitor your pension contributions. If you have not received the email within one month from the enrolment month (generally the fifth month from joining), please check your Spam/Junk mailbox.

The standard employee contribution is 5% (five per cent) of basic salary. For the level of employer contribution, please refer to your contract of employment. Should you wish to increase your pension contribution, please speak to People & Culture.

Occasionally individuals request permission to opt out. This is legally permitted but we discourage it.

For more information on retirement savings, the scheme, portal usage etc, please follow the following [link](#).

### Tax relief

The relief at source method is used for personal contributions for pension savings. An employee's personal contributions are paid to AEGON (pension provider) net of basic rate tax.

Any employees paying tax at a higher or additional tax rate should follow this [link](#) for more information on claiming the rest of their tax relief.

### Transferring pensions

If an employee wishes to transfer their old pension into their Bamboo pot, this can be done via the Retiready portal. For further information on this, please follow this [link](#). For any further assistance, please call the AEGON support team on 0345 608 1680.

Before you take any such action you are strongly recommended to take professional advice from a pension consultant. Bamboo does not provide any financial advice.

#### **2.13.2. Life assurance**

To check your eligibility for life insurance, please refer to your contract of employment. You should consider who you wish to nominate as the potential beneficiary and let the People & Culture team know and review that information should your personal circumstances change.

#### **2.13.3. Perkbox**

Perkbox is a lifestyle discounts and offers portal. All employees who have passed their probation will be automatically enrolled into the portal. Please allow two working days to receive login details (please check your Junk/Spam box). If you have not received an email, please contact People & Culture.

#### **2.13.4. Dental insurance**

Upon completion of your probation period, you will be eligible to enrol into the Bamboo-funded dental insurance up to a Family level. The insurance offers 100% NHS charges reimbursement. More details will be provided to you on passing your probation.

#### 2.13.5. Discounts

We have secured a few discounts with retailers in the close proximity to the Southampton office. If you mention you work for Bamboo you will receive the following discounts:

- Starbucks – 10%
- Costa – 10%

#### 2.13.6. Holiday

Your holiday entitlement is stated in your contract of employment. You should take your holidays at regular periods throughout the working year and all holiday entitlement must be taken by 31<sup>st</sup> December in the calendar year in which it is accrued. At Bamboo's sole discretion and with written permission from your manager/team leader, a maximum of five days may be carried over into the following holiday year, to be taken by the end of March (the equivalent of five days will be pro rata for employees working part-time hours). There will be no payment made in lieu of any untaken holidays. All holiday absences must be pre-authorised by your manager/team leader via PeopleHR.

Holidays will be approved on a “first come, first served” basis but Bamboo reserves the absolute right to decline to agree to a holiday request if operational requirements make such a decision necessary. The maximum holiday duration that may be requested is two working weeks (ten days holiday for full time employees). Anything above this amount needs to be pre agreed with your manager. You are not permitted to take holidays without giving prior notice and any days so taken may be treated as unauthorised absence.

Additionally, Bamboo may specify certain days over the Christmas period when holiday leave must be taken.

#### 2.14. Adverse weather and transport disruption

Bamboo understands that employees may face difficulties attending work and returning home during periods of transport disruption, such as strike action, or adverse weather. You are expected to make every effort to attend the office, without putting your personal safety at risk. Bamboo reserves the right to treat time off in such circumstances as holiday or unpaid leave.

Bamboo is committed to both protecting the health and safety of all its employees and causing minimal disruption to its services as a company. If it is unavoidable for you to be absent from the workplace, it may be possible to agree alternative arrangements with your manager/team leader (at the manager's discretion) such as:

- work from home (if applicable);
- make the lost time up;
- take annual leave; or
- take unpaid leave;

or a combination of the above (usually when the adverse situation is prolonged).

In certain circumstances, such as where schools/nurseries close without warning owing to adverse weather, you may be unexpectedly required to provide/arrange care for your dependants. In those circumstances, please refer to Time Off for Dependants policy available on SharePoint.

## 2.15. **PeopleHR**

PeopleHR is a cloud-based HR system and is designed to enable self-servicing by the employee. You can make holiday requests, as well as manage your personal information.

It is essential that you always keep your personal information up to date. This includes details of next of kin, home address or phone number.

Upon joining, you should have received an email from PeopleHR allowing you to login for the first time. It is recommended that you save that link in your Bookmarks for easy access. If you have not received this email, please contact the People & Culture Team.

Below are instructions for the most common actions.

### Holiday requests

Log in to PeopleHR. Click the tab titled "Me" and then the tab titled "Planner"; this will show you the current year calendar. You can also access the following year's planner by clicking on the designated arrows alongside the date at the top of the Planner.

To make your holiday request, you will need to find the date(s) which you would like to book off, by clicking on the relevant day. In the row “Holidays” select the day you would like to request holiday by clicking on the “plus” on that day.

A box will appear that will ask you to specify whether you would like “A day or more” or “Less than a day” and you will need to click whichever is applicable for you. If you would like more than one day, you should then choose the “Start Date” and “End Date”. If less than a day, you will need to specify a proportion of a day you wish to request. In the box below, you can write additional comments, for example reason for leave, but this is not required.

Your Manager/Team Leader will be able to accept or reject the request and you will receive an email notifying you of it.

#### Sickness

Only your Manager and the People & Culture team can enter a period of sickness absence in PeopleHR. You will need to complete the Return To Work questionnaire on PeopleHR upon your return to work: failure to do so promptly may result in a formal disciplinary action as we must keep accurate absence records. Your Manager and People & Culture will receive email notification with a link to populate relevant information.

#### Personal details

Your personal details will be entered in PeopleHR by People & Culture at the beginning of your employment. If any of the details change throughout your employment with Bamboo, you will need to update that information.

To do so, click the tab titled “Me” and then the tab titled “Contacts”. This tab will allow you to update your address, mobile number, email address and your emergency contacts (preferably your next of kin). It is essential that you keep these details up to date yourself and it is solely your responsibility to ensure this is done.

To access PeopleHR, please follow the link below:

<https://bamboo.peoplehr.net>

## 2.16. Expenses

### 2.16.1. Eyesight tests

Bamboo pays towards the cost of an eye test for all employees. The maximum amount that can be claimed for an eye test is £30.00. If the eye test shows that corrective lenses are necessary for display screen equipment (“DSE”) work, Bamboo will contribute up to a further £75.00 towards the cost of spectacles.

In order to claim, an Eye Test and Spectacles Claim form will need to be completed by the optician and employee and submitted to Head of People & Culture together with the relevant receipts. The form can be found under the following [link](#).

### 2.16.2. Petty cash

The Finance Department can reimburse you immediately for Bamboo related purchases up to the value of £10. These purchases are mostly, but not limited to, kitchen products (such as milk).

If you purchase any products for Bamboo use, you should always obtain a receipt, as without this the claim will not be reimbursed.

### 2.16.3. Other expenses

If your role requires frequent business-related expenditure, you will be set up on the company expense system. Expenses should be submitted no more than once a fortnight unless the claimed amount is over £500.

Further details will be emailed by Finance to relevant employees on joining the expense system.

## 2.17. Clear desk policy

Bamboo operates a clear desk policy to protect customer and employee personal data and business sensitive and confidential information. Therefore, your desk must be kept clear when you leave the office, and any paperwork must be securely locked away. Breach of the Clear Desk Policy may result in a formal disciplinary action.

The objective of the Clear Desk Policy is to set guidelines which maintain a working environment where access to data is controlled, confidential information is protected and to remove any risk associated to this, as well as to reduce fire hazards.

The reasons we apply this policy include:

- it enables us to protect our customers and employees' data;
- it ensures compliance with data protection regulations about keeping personal data secure;
- it emphasizes and reinforces your accountability for personal data and confidential information in your care; and
- studies have shown that a tidy desk reduces stress on employees.

The requirements are quite straightforward; at the end of the working day you are expected to tidy your desk, and anything associated with the day to day responsibilities of your role.

It is your responsibility to clear your desk at the end of the day.

No portable storage media should be present at any workstation within the office.

## **2.18. Smoking and vaping, alcohol, drugs**

### **2.18.1. Smoking and vaping**

Smoking and vaping is prohibited in all of our premises - this includes the areas immediately outside the entrances to our office buildings. If you smoke or vape, please do this only in designated areas.

### **2.18.2. Drugs and alcohol**

Drug and alcohol misuse have the potential to damage the health and wellbeing of our employees and threaten the success of our business. We will take disciplinary action, up to and including dismissal, for the following serious offences:

possessing, using or selling or being under the influence of controlled drugs or "legal highs" or being under the influence of alcohol on Bamboo's premises, the premises of a business with whom Bamboo is doing business, or anywhere else when representing Bamboo; or

drinking alcohol on our premises (except when authorised by senior management).

If Bamboo establishes that an employee has an alcohol or drug dependency, we may refer the employee to a specialist adviser (e.g. Occupational Health). Employees who suspect that they have a drug or alcohol dependency are encouraged to inform People & Culture so that appropriate support can be arranged.

We will use reasonable efforts to provide appropriate support as we determine necessary to any employee who is undergoing treatment for an alcohol or drug problem. Employees on a rehabilitation programme that has been notified to and approved by People & Culture will usually be subject to normal sickness/absence rules. However, a referral to support services or the initiation of a rehabilitation programme does not preclude Bamboo from taking disciplinary action against an employee for the reasons set out above.

#### **2.19. Employee referral**

Bamboo offers an Employee Referral Bonus to promote the referral of high calibre candidates. If an employee is the first to refer a candidate to Bamboo who is subsequently hired, the employee will be eligible to receive such bonus. A quarter of the bonus will be paid upon employment and the remainder will be paid to the employee after the referred individual has completed their probation period. The amount will be prorated should the referred employee be part-time. Anyone in a managerial position or above is not eligible for this bonus.

Please refer to People & Culture for more details on this.

#### **2.20. Mandatory training**

As a regulated financial services business, we expect employees to undertake certain training and/or e-learning modules.

Currently Bamboo requires employees to complete e-learning courses, with modules appropriate to their role. The modules need to be completed within two weeks from the employment start date and then completed on an ongoing annual basis, a reminder of which will be sent to you in advance.

You will be allowed sufficient time to complete such training and/or e-learning as necessary and anyone who does not comply with the requirements may be subject to disciplinary action.

#### **2.21 Workplace behaviour**

Please keep the office clean and tidy. We ask that you throw away rubbish, stack used items in the dishwasher and think twice before eating hot food at your desk. If you are listening to music or taking part in a call or video conference in an open-plan space, please use your headphones. Employees should not take photographs or

recordings of other people or other peoples' belongings in the office, or anywhere else when representing Bamboo, without the permission of the people concerned.

### **3. Data protection and confidential information**

Bamboo handles millions of items of personal data in relation to its customers and also holds personal data in relation to its employees and contractors. "Personal data" includes name, address, contact details, bank details, photographs, ID documents and anything else which could allow an individual person to be identified. Your work will almost certainly involve you processing personal data and it is vital that you keep all personal data safe and confidential. You must take every precaution to avoid losing personal data, including by deleting it or sending it to/sharing it with someone not entitled to see it, irrespective of whether that is intentional or not. Allowing personal data to become out of date or corrupted is also a data breach. We require you to take particular care when sending personal data outside Bamboo – you should check with your line manager that all appropriate confidentiality and data handling arrangements are in place with any third party receiving the data.

It is vital that any loss or inadvertent disclosure of personal data or other confidential information (or any corruption of that data) is immediately notified as an Incident under the Incident Management Procedure, which can be found under the following [link](#) - this is a condition of your employment. You must also contact your line manager as quickly as possible to alert them to what has happened.

Please read the Data Protection Policy, it can be found under this [link](#).

We also require that:

1. If you use a laptop, mobile phone or other device for work and personal data relating to Bamboo's customers or employees is accessible via that laptop or device, then you must ensure that the laptop or device is password protected and otherwise kept secure so that only you (or an authorised Bamboo employee or contractor) has access to it.
2. If you lose your laptop or other device as mentioned above, you must alert your line manager immediately, even if you believe that there has been no loss of personal data.
3. You do not store any personal data on Dropbox, Jira or Slack and do not send personal data by email or other electronic communication outside Bamboo without first checking that the addressee details are correct and ensuring that the

communication is password protected or sent in a zipped file or in some other form which allows the personal data to be protected.

## 4. Wellbeing

### 4.1. Stress at work

We are committed to tackling the causes of work-related stress and to providing appropriate support to staff suffering from stress, on a confidential basis where appropriate. This commitment extends to maintaining a working environment that aims to protect the psychological as well as physical health of all our employees, wherever possible.

Psychological health problems can include stressors from an employee's personal life. The pressures and demands this entail are often unavoidable. It can also include the often unavoidable pressure of working life, with each job bringing its own demands. A controllable level of pressure can be healthy and benefit performance, but excessive and sustained levels of stress may be damaging to your health.

We recognise that what triggers stress and the capacity to deal with stress varies from person to person.

We all have a responsibility to take reasonably practicable steps to minimise our own stress levels and not to contribute to those of our colleagues. We also have a legal responsibility to comply with Health and Safety at Work legislation regarding stress management. Please advise your line manager or People & Culture of any concerns you may have about work-related stress.

Bamboo will cooperate with any employee experiencing excessive and sustained work-related stress to explore whether we can agree changes to their work that may alleviate stress. This might include the possibility of alternative employment within Bamboo or a change to working pattern.

The following principles apply to our approach to dealing with stress:

- Employees are encouraged to recognise mistakes and advise their line manager quickly - early attention to a mistake allows it to be rectified faster, and a problem shared is generally a problem halved. We all make mistakes, and we can learn from them;
- Bamboo aims to provide a positive and preventative approach to stress, based on open communication, rather than a punitive one;

- Any stress-management strategies will be conducted with respect for individual confidentiality and in accordance with relevant law.

#### **4.2. Employee assistance programme**

We recognise that sometimes you may face certain challenges in your work and home life that are difficult to deal with. We subscribe to a confidential and professional life management service which provides you with a qualified counsellor who can offer personal support for any practical or emotional challenges you may be facing. More details of this service are available from the People & Culture team.

### **5. Health and safety policy**

#### Purpose of policy

Bamboo takes health and safety issues seriously and is committed to protecting the health and safety of its employees and all those affected by its business activities or who attend our premises. This policy is intended to help us achieve this by clarifying who is responsible for health and safety matters and what those responsibilities are.

#### Who is responsible for health and safety

Achieving a healthy and safe workplace is a collective task shared between Bamboo and its employees. This policy and the rules contained in it apply to all of us, irrespective of seniority, tenure and working hours, including, directors, consultants and contractors and agency workers.

Bamboo's Health and Safety representative is the Head of People & Culture. If you have any questions or concerns about health and safety, please address them to the Health and Safety representative.

#### Bamboo's responsibilities

- Taking reasonable steps to safeguard the health and safety of employees, people affected by Bamboo's business activities and people visiting its premises;
- Identifying health and safety risks and finding ways to manage or mitigate them;
- Providing a safe and healthy place of work and safe entry and exit arrangements, including and during an emergency situation;
- Providing adequate information, instruction, training and supervision to enable all staff to do their work safely, to avoid hazards and to contribute positively to their own health and safety at work;

- Ensuring any health and safety representatives receive appropriate training to carry out their functions effectively;
- Regularly monitoring and reviewing the management of health and safety at work, making any necessary changes and bringing those to the attention of all employees.

#### Responsibilities of all employees

- Take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions;
- Co-operate with the Health and Safety representative and Bamboo generally to enable compliance with health and safety requirements;
- Comply with any health and safety instructions and rules, including instructions on the safe use of equipment and attend any applicable training;
- Report all health and safety concerns to the Health and Safety representative promptly, including any potential risk, hazard or malfunction of equipment, however minor or trivial it may seem; and
- Co-operate in Bamboo's investigation of any health and safety incident or accident.

#### Responsibilities relating to equipment

- Use equipment as directed, following any instructions given by management or contained in any operating manual or instructions for use or in any relevant training;
- Report promptly any fault with, damage to or concern about any equipment to the Health and Safety representative;
- Ensure the health and safety equipment is not interfered with, turned off or removed; for example: fire extinguishers, smoke alarms and CCTV; and
- Do not attempt to repair equipment unless suitably trained and authorised.

#### Responsibilities relating to accidents and first aid

- Promptly report any accident at work involving personal injury, however trivial, to the Health and Safety representative so that details can be recorded in the Accident Book and cooperate in any associated investigation;
- Familiarise themselves with the full details of first aid facilities and trained first aiders, which are displayed on the notice board in the Breakout Room in Southampton, on the Stationery cupboard in London and otherwise available from the Health and Safety representative;

- If an accident occurs, call for the first aider, giving name, location and brief details of the problem and call emergency services, if appropriate.

#### Responsibilities relating to national health alerts

If an epidemic, pandemic or other public health emergency affects Bamboo, employees must comply with all instructions issued by Bamboo in connection with that, including quarantine, social distancing, the wearing of masks and other steps put in place to minimise infection and transmission.

#### Responsibilities relating to emergency evacuation and fire

##### We require employees to:

- Familiarise themselves with the instructions about what to do if there is a fire, such instructions being displayed on the notice boards in every room in Southampton, next to the stationery cupboard in London and also being available from the Health and Safety representative;
- Ensure they are aware of the location of fire extinguishers, fire exits and alternative ways of leaving the building in an emergency;
- Comply with the instructions of fire wardens if there is a fire, suspected fire or fire alarm (or a practice drill for any of these scenarios);
- Co-operate in fire drills and take them seriously (ensuring that any visitors to the building do the same) - fire drills will be held at least once every 12 months;
- Ensure that fire exits, or fire notices or emergency exit signs are not obstructed or hidden at any time;
- Notify the Health and Safety representative immediately of any circumstances (for example, impaired mobility) which might hinder or delay evacuation in a fire. This will allow the Health and Safety representative to discuss a personal evacuation plan for you, which will be shared with the fire wardens and colleagues working near you.

##### On discovering a fire, all employees must:

- immediately trigger the nearest fire alarm and, if time permits, call a health and safety representative and notify the location of the fire; and
- attempt to tackle the fire ONLY if they have been trained or otherwise feel competent to do so. Nominated members of staff will be trained in the use of fire extinguishers.

### On hearing the fire alarm, all staff must:

- remain calm and immediately evacuate the building, walking quickly without running, following any instructions of the fire wardens;
- leave without stopping to collect personal belongings;
- stay out of any lifts; and
- remain out of the building until notified by a fire warden that it is safe to re-enter.

The Health and Safety representative is responsible for ensuring fire risk assessments take place and for making sure there are regular checks of fire extinguishers, fire alarms, escape routes, signage and emergency lighting.

### Risk Assessments, Display Screen Equipment (DSE) and Manual Handling

Bamboo will carry out general workplace risk assessments when required or as reasonably requested by employees. Managers must ensure that any resulting recommendations are implemented. The Health and Safety representative is responsible for workplace risk assessments and any measures to control risks.

Employees who use a computer for prolonged periods of time should try, where possible, to organise short breaks every few hours away from the computer screen. You may request a workstation assessment if applicable and/or needed. If an employee is a DSE user, they are entitled to claim reimbursement for an eye test and glasses for DSE work. Please see 2.17.1 above regarding eyesight tests.

Guidance on manual handling (for example, lifting and carrying heavy objects) can be obtained from the Health and Safety representative. Necessary training will be provided by Bamboo, where needed. Employees should avoid lifting or moving heavy or awkward objects at work due to the risk of injury – our policy is that you should get help from professional movers or fitters.

### Non-compliance with health and safety rules

Any breach of health and safety rules or failure to comply with this policy will be taken very seriously and is likely to result in disciplinary action against the offender, in accordance with Bamboo's Disciplinary Policy.

## **6. Policies**

The following policies and documents are or will be available at the People & Culture Policies Sharepoint [site](#).

- Adoption Leave Policy
- Annual Attestation Form
- Bribery Act 2010 Policy
- Compassionate and Bereavement Policy
- Conflicts Policy
- Disciplinary Policy
- Diversity and Inclusion Policy
- Flexible Working Policy
- Grievance Policy
- Maternity Leave Policy
- Paternity Leave Policy
- Performance Policy
- Shared Parental Leave Policy
- Sickness Absence Policy
- Time Off for Dependents
- Whistleblowing Policy

## **7. Reasonable usage of IT systems, communication systems, internet, and mobile devices**

### **7.1 Acceptable use**

The following outlines what is acceptable and unacceptable use of Bamboo's email, internet, communication, and other systems. Breach of any of the requirements set out below will be taken seriously and may result in proceedings in accordance with Bamboo's disciplinary policy.

Although Bamboo's email and other electronic communication systems are for use by employees in relation to their work, there is no objection to employees making occasional personal use of those systems provided such usage is reasonable, does not interfere with the employee carrying out their responsibilities or their productivity and is compliant with the requirements set out below. The same applies for internet usage. Remember that all forms of communication used at Bamboo, including email, instant messaging and social media, may have to be revealed to a regulator, the Financial Ombudsman, the Information Commissioner's Office, a court or to an individual customer if they make a request. Employees are therefore required to ensure that the

content and tone of their communications is such that Bamboo would not be embarrassed if those contents had to be shared outside the Company.

### **7.1.1. Monitoring**

All communications, whether by telephone, email, instant messaging, social media or any other means, which are transmitted, undertaken or received using our information technology (IT) or communications systems or using Bamboo equipment will be treated by us as work related. Bamboo's IT systems and network are provided for your use in undertaking your duties. It is Bamboo's responsibility to record communications with its customers. We reserve the right to intercept, record and monitor all such communications made by you and your use of our IT systems and network without further notice. Accordingly, you should not regard any such communications or use as being private and matters which are private should be conducted by you outside of your working hours, away from our premises and without use of our communications and IT hardware, software, systems and networks.

The interception, recording and monitoring of communications is intended to protect our business interests, for example, but without limitation, for the purposes of quality control, security of communication and IT systems, protection of our confidential information and legitimate business interests, record keeping and evidential requirements, detection and prevention of criminal activity or misconduct and to assist us to comply with relevant legal requirements.

Intercepted communications may be used as evidence in disciplinary or legal proceedings.

#### Bamboo network

All employees are responsible for the security and appropriate use of Bamboo's systems and networks. Please note that:

- Only company-supplied devices may be connected to the Bamboo Network, although you may access company emails via your mobile phone, subject to compliance with the requirements for email-access set out below;
- Any exception to the above must be approved by the IT Support Manager or Chief Information Officer (CIO);
- A guest Wi-Fi is provided for use by staff with their personal mobile devices;
- The guest Wi-Fi is available for use by visitors; and

- Access to Bamboo systems from remote locations should be via the company-supplied VPN.

The following will be regarded as serious disciplinary offences:

- Causing a security breach to Bamboo's systems or other network resources or those of a supplier, including, but not limited to, accessing data, systems or accounts to which you are not authorised, circumventing user authentication or passwords on any device, or intercepting and logging network traffic;
- Causing a disruption of service to or by Bamboo;
- Downloading, copying, recording, sharing or exploiting any of Bamboo's or its supplier's systems, software, products, customer details or business information other than in the ordinary course of your work for Bamboo, without the prior consent of senior management;
- Intentionally introducing a Botnet, virus, automated attack software or malicious code or anything similar on Bamboo systems or network or those of its suppliers;
- Introducing Hacking Tools or software that is not authorised for use with Bamboo's systems. All software used on Bamboo's computer systems must be pre-authorised by the IT Department.

### 7.1.2. Email

As regards Bamboo's electronic communication systems, including email, please note that:

- Employees must never send or store electronic communications, e-mails or attachments that are obscene, indecent, sexist, racist, defamatory, abusive, in breach of copyright or otherwise inappropriate;
- Employees should be vigilant as regards phishing attempts and must not open attachments to e-mail messages from unknown senders without first ensuring that they are checked for viruses. All incoming and outgoing messages and attachments are currently checked for viruses, but it is the responsibility of the user to ensure that local virus checking software has not been disabled. If in doubt, contact Babble81g or the IT Support Manager;
- Be aware that email is not a secure medium. Highly confidential e-mails or ones including personal details should be sent only using an encrypted method;

- Never include payment card details in emails;
- Employees should not register a company email address on websites not being used for company business;
- Employees are not allowed to access emails of another employee unless specifically authorised to do so by their line manager.

#### Accessing email from a personal and/or non-company device

Office365 provides a webmail client that can be used for this purpose. Employees need to take extra care that:

- No one else is able to access the information on their device;
- If an attachment needs to be accessed from an email, once there is no further use for the attachment, this must be deleted and the waste bin emptied before logging out.

#### **7.1.3. Internet access**

This policy sets out the requirements for the use of Company provided internet access by employees:

- Bamboo internet access is provided primarily for Company business, but employees may use the system for reasonable personal access outside working hours;
- No specific limits have been set for personal use of internet access, but the amount of use should be restricted (limited to MByte not GByte of information) and will be subject to review by the IT Team;
- Employees must not access or download from the Internet, or post to Internet Newsgroups or social media, material that is obscene, indecent, sexist, racist, defamatory, abusive, in breach of copyright or otherwise inappropriate. Material that is not relevant for business purposes should not generally be downloaded.
- All material downloaded from the internet must be checked for viruses. This check is currently carried out automatically, but it is the responsibility of the user to ensure that local virus checking software has not been disabled;
- Employees must not discuss any aspects of Bamboo's business on the internet or in newsgroups or chatrooms unless this is done as part of the employee's job description;

- We may block or restrict access to some websites at our discretion. Employees must not visit websites that contain inappropriate or offensive material or which form part of the “darkweb”.

Note that surfing the internet leaves an electronic trail from which Bamboo can sometimes be identified. If an employee visits inappropriate sites, then there is the potential for legal action against both the employee and Bamboo. Bamboo's reputation may be seriously damaged as a result.

## 7.2 Instant messaging use

Bamboo provides Teams and Slack instant messaging facilities which can be used to communicate with your colleagues.

Teams and Slack can also be used to run joint channels with suppliers or partners. An automated access request will be processed by the IT department. These channels should be clearly named so it is clear where there are non-Bamboo participants.

When using instant messaging at work, please follow the guidance provided for Email use.

## 7.3 Social media

This policy relates to use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, Instagram, and all other social networking sites, including internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.

Occasional personal use of social media during working hours from your personal devices is permitted as long as it does not involve unprofessional or inappropriate content, does not interfere with your responsibilities or productivity and complies with this policy. Remember that posts on social media can reach a very wide audience (and not just in the UK) – we therefore have to be particularly careful when using this form of media.

Prohibited use:

- You are prohibited from making posts from our official accounts unless you are authorised to do so;
- You must avoid making any social media communications that could damage our business interests or reputation, even indirectly;

- You must not use social media to defame or disparage us, our staff or any third party, to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statement; or to impersonate colleagues or third parties;
- You must not express opinions on our behalf via social media, unless expressly authorised to do so by our General Counsel or Chief Executive Officer. You may be required to undergo training in order to obtain such authorisation;
- You must not post comments about sensitive business-related topics, such as our performance, internal processes and procedure or do anything to jeopardise our trade secrets, confidential information or intellectual property;
- You must not include logos or other trademarks in any social media postings or in your profile on any social media, unless you have our permission to do so;

#### **7.4 Mobile phone usage**

Due to the risk of data breach, employees in the Operations Department are required to keep their phones and mobile devices in their bags or lockers (ie. away from their desk) whilst working. They will only be allowed to have their phones with them when working in special situations, such as family emergency, and in circumstances which have been pre-approved by the team leader.

Other employees may have personal mobile phones at work provided they use them occasionally, quietly and not in a way which will distract colleagues or have an impact on their own productivity. Employees must be prepared to silence their mobile phones if asked to do so.

We are aware that many employees use their personal mobile phones for work purposes and are happy to install apps which relate to work or which assist with security procedures. There is no obligation to do this and any employee not wishing to use their own phone for these purposes should contact People & Culture so that we can arrange alternative systems for them (for example, instant messaging etc). If an employee uses their own phone for work purposes, they are not permitted to download or save business data on that phone unless permitted by the CIO. Employees must permit Bamboo's email system and any other business data or system on their phone to be disconnected or wiped remotely at any time.

#### **7.5 Confidentiality and security**

##### **7.5.1 Computer security**

Overall computer security is the responsibility of the CIO.

Employees are only permitted access to those parts of Bamboo's systems and networks which they need to enter in order to carry out their normal duties. Access to other areas is restricted to authorised employees only, and any changes to permission will be decided by the CIO.

Due to the risk of importing viruses and breaching licenses, all software on Bamboo devices must be authorised by the CIO. Authorisation will only be considered if the software has been purchased from a recognised supplier, backed by a confirmation that it is free from viruses etc and/or with an indemnity supporting that.

Automated update notifications for software installed on approved systems can be accepted by the user. This applies to Bamboo installed software as well as operating system updates. Users should follow instructions from our external IT advisers regarding any update, in particular rebooting their devices when required.

### 7.5.2 Computers and laptops

You are responsible for the security of the equipment allocated to or used by you, and you must not allow it to be used by anyone other than in accordance with this policy. You should use passwords or biometrics where available on all IT equipment, particularly items that you take out of the office. You should keep your passwords confidential and follow the Password Policy, which can be found under the following [link](#). Bamboo is transitioning to using Multi-factor authentication to improve security of its systems. Employees within the Operations Team will be provided with a Yubi-key which allows them to access Bamboo's systems. Other employees have the option of using an app on their mobile phone such as Authy or a Yubi-key. You must not log into someone else's account or allow someone else to log in to your account as you. Shared accounts are discouraged due to lack of traceability but in some cases are necessary. These must be approved by the CIO.

If you are away from your desk, you should log out of or lock your computer. You are recommended to log out and shut down your computer at the end of each working day.

The CIO or his/her designated representatives are responsible for the setup of Bamboo devices and employees must not, under any circumstances, change that set up or configuration.

Any breaches of computer security must be referred to the CIO by whoever discovers the breach. Please also refer to the Incident Policy. Where a criminal offence may

have been committed, the CIO will work with the Legal team to decide whether to involve the police.

Any member of staff who suspects that a fellow employee of whatever seniority is abusing the computer system may speak in confidence to the Head of People & Culture or General Counsel.

## 7.6 Copyright

We protect our own copyright and intellectual property. Please be aware of the risk of infringing another company's copyright when downloading text or images from other sources. We have a strict policy relating to software piracy or other use of unauthorised material with which you should ensure that you are familiar. There are specific obligations in relation to copyright, design rights and inventions in your employment contract.

## 8 Jury service

Bamboo recognises that employees may be called for jury service at some stage during their employment with us. This policy outlines the procedures Bamboo requires employees to follow should they receive a summons for jury service.

As soon as you receive notification that you are required to attend for jury service, you should notify your manager/team leader and People & Culture of that fact in writing and provide a copy of the jury summons, upon request. Depending on the demands of the business, Bamboo may request that you apply to be excused from or defer your jury service.

We are not required by law to pay you while you are absent on jury service. You will be advised at court of the expenses and loss of earnings that you can claim.

Frequently, those called for jury service are excused by the court on any morning of required service and should this happen, you must return to the office.

## 9 Visitor access policy

Unauthorised visitors can steal intellectual property, customer data or cause harm to our employees. Our data protection obligations also mean that we are expected to maintain physical security in the workplace and not allow unauthorised visitors.

Visitors to Southampton office should sign the Visitors book upon entering and then sign out when leaving.

Visitors requiring internet access should be given a guest username and password for the wireless network. It is not acceptable to allow visitors to share or allow access to Bamboo Wi-Fi.

Depending on the purpose of their visit, visitors could be asked to sign a non-disclosure agreement. Please check with your line manager, if you are not sure.

Photographs and recordings of our office must not be taken without the prior consent of a member of the Executive Committee or the Head of Legal in case they include sensitive data (white board, etc.) so, unless pre-approved, please ensure visitors do not take photos/videos whilst they are visiting.

It is also important that all visitors are responsible for following any health and safety instructions and procedures. If you are hosting a visit, it is your responsibility to ensure your visitor complies with health and safety procedures and with the other requirements set out above.

## 10 Closed Circuit Television (CCTV)

Bamboo uses CCTV image recording at our premises as part of our measures to provide a safe and secure environment for us and for our visitors, such as clients, customers, contractors and suppliers, and to protect Bamboo's property.

Our CCTV records images only. There is no audio recording and therefore conversations are not recorded on CCTV. Only authorised employees are permitted access to the recordings made by CCTV.

A copy of the CCTV policy is available on Sharepoint under the following [link](#).

## 11 Relationships at work

We recognise that employees who work together may have/form close personal relationships. While we do not wish to interfere with these personal relationships, we feel it is necessary to ensure we behave in an appropriate and professional manner at work. It is important we have safeguards in place to avoid any possible conflict of interest or accusation of bias, favouritism or prejudice. It is also important to avoid breaches of confidentiality.

Close relationships include:

- employees who are married, dating or in a partnership or co-habiting arrangement;

- immediate family members or an applicant or employee e.g. parents and son/daughter, brother/sister, grandparents/grandchild;
- other relations of an applicant or employee e.g. extended family such as aunts/uncles/cousins/nieces/nephews;
- close friendships.

### **11.1 Recruitment and appointment of employees**

It is important that we keep our recruitment process fair. Individuals applying for a role with us will be asked if they have a close relationship with any employee at Bamboo.

You should disclose to us if you have a close relationship with any candidate applying for a job role with us. This information should be shared with People & Culture. People & Culture may then ask you not to be involved in any recruitment process or ensure that the recruitment decision is made by a panel and not you alone, to ensure impartiality.

### **11.2 Relationships at work involving a senior role**

Managers/team leaders should declare if they have a close relationship with an employee or consultant. Managers should not be involved in:

- any appraisals, promotion, or formal disciplinary or grievance procedure involving a member of staff with whom they have a close relationship;
- authorisation of any financial payments/decisions relating to financial matters (e.g. timesheets, expense claims, salary changes) involving an employee with whom they have a close relationship.

Managers will also have a general duty to ensure there are no conflicts of interest or breaches of confidentiality in relation to a member of staff with whom they have a close personal relationship. Professional conduct at work will be expected at all times.

### **11.3 Relationships at work not involving a senior role**

Where close personal relationships occur, it is the responsibility of both individuals to avoid any potential conflicts of interest or breaches of confidentiality. Employees should act professionally at work at all times.

#### **11.4 Conflict of interest or prejudice**

It is important that employees feel they can approach their line manager and/or People & Culture if they feel affected by a close personal relationship at work with other colleagues. Please speak to your line manager/team leader or People & Culture if this is the case.

Should we find that a close personal relationship at work has led to a conflict of interest, breach of confidentiality, bias, favouritism or prejudice, we may take action under Bamboo's disciplinary policy.

### **12 Leaving Bamboo**

#### **12.1 Notice**

Please refer to your contract regarding your notice period. You are contractually obliged to work your notice unless advised otherwise. Should you have any questions, please speak to People & Culture.

#### **12.2 Exit interview**

Bamboo may decide to conduct an exit interview with a departing employee at any time before he/she leaves. The interview will be performed by an impartial party, usually this will be a People & Culture representative to ensure openness. The interview will remain confidential, unless some serious misconduct is mentioned during the interview, in which case we may need to investigate this further and discuss the anonymity with the departing employee.

#### **12.3 Return of company property**

Upon the termination of employment, the employee must ensure they hand in all Bamboo property on the last day they are in the office. Bamboo reserves the right to deduct money from the employee's salary for any company property that has not been handed over as requested. The deduction will be equivalent to the cost of the new item, with the same or comparable specifications as the unreturned item.

#### **12.4 References**

Bamboo is happy to confirm employment details for all our employees. If your consent to disclose relevant remuneration data has not been provided by the party

seeking the reference, we will seek such consent directly from you. Bamboo will only provide employment start date and basic salary details; no other remuneration or performance/ conduct details will be disclosed in the reference unless the FCA requires that as part of a regulatory reference.

#### Regulatory references

Bamboo is regulated by the FCA and therefore we are obliged to follow certain rules regarding regulatory referencing. Should another FCA regulated organisation request regulatory references regarding one of our former employees we are obliged to not only provide employment dates and job title, but a confirmation of holding any controlled functions or performing a certified role as well. Bamboo will also be obliged to disclose any relevant details regarding disciplinary proceedings or investigations relating to any breach of Conduct Rules by that employee.

Regulatory references are only applicable to Senior Manager and certified roles as defined by the FCA. Please note that former employees who did not perform such functions at Bamboo may still be subject to a regulatory reference if their role at the new employer involves them being a Senior Manager or carrying out a certified role.

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