



**CODE OF
CONDUCT**

Introduction

Welcome to our Code of Conduct.

In this document, we have outlined how we can work together to realise our full potential to **positively shape and develop business futures and people's lives**.

We need to live and breathe our vision and values. The following pages cover the core elements of our Code of Conduct, explaining what that means and what we should expect of each other.

It's about conducting every element of our business in an ethical and honest way, with professionalism, integrity and fairness at the fore so we are an **inspirational, ethical and responsible technology business** - and to expect the same from consultants, our partners and our supply chain.

It's also about **Speaking Up** when something isn't right; and feeling confident in doing so (and knowing that any retaliation is simply not tolerated).

This keeps all of us accountable to each other and drives our ability to deliver **intelligent IOT solutions, resilient connectivity and forward thinking, cyber-secure IT services** to all our customers and our partners with complete transparency.

As with every element of our business, our Code of Conduct is underpinned by our internal mission, to **be ambitious, be proud and be passionate about progress**.

Because if we all do our best, we can all be our best.

Stuart Davis
Founder and CEO

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Speaking Up

It is important that if we think something just isn't quite right, we know we should raise it and feel confident and comfortable about doing so. It could be related to something in one of the policies in our Code of Conduct or anything else that we feel is potentially illegal or simply not in keeping with our professional values.

Speaking Up is the right thing to do and our Speaking Up policy positively encourages and wholeheartedly supports anyone who raises a genuine concern. We similarly don't tolerate any retaliation to those who do so.

How do I raise a concern?

The first stop is usually your Manager or Director, but if that doesn't feel right or comfortable due to the circumstances, then you should contact either the Head of Compliance or the Managing Director.

We will then arrange a meeting to discuss your concern. You might want to bring a colleague with you, which is fine, as long as they understand that your concern and any subsequent investigation should be kept strictly confidential.

Our culture around Speaking Up should mean all of us are happy to raise concerns openly. If for whatever reason you would prefer to raise something confidentially, we will do our utmost to keep your identity confidential and only reveal it to those who are involved in investigating it.

What about external reporting?

Our framework and process for Speaking Up, as well as investigating and remedying any wrongdoing, means that in most cases, there shouldn't be a need to report something externally, for example to a regulator.

There may be circumstances though where it might be appropriate to do so – and the law recognises this. If you feel that this is the best course and you don't want to Speak Up internally, you might still want to speak to a Manager for advice first of all.

The charity **Protect** (formerly Public Concern at Work) also operates a confidential helpline – see www.protect-advice.org.uk



Bribery and Corruption

Our policy is to conduct every part of our business in an honest and ethical manner with professionalism, integrity and fairness.

Bamboo takes a zero-tolerance approach to **bribery and corruption**, from everyone working for us or on our behalf – in other words, employees, directors, officers, interns, contractors, consultants, volunteers, third party representatives and business partners.

This approach still means that we want to know if anyone ever suggests or asks for a bribe in any form - and if so, we must report it in confidence as soon as possible to our Manager or the Head of Compliance.

The only exception to our zero-tolerance policy is where we are threatened or have reason to fear real physical harm and in these circumstances, providing anything of value is permitted. The incident must be fully reported to the Head of Compliance at the earliest opportunity.

What is bribery?

A **bribe** is anything of value that is used as an inducement or reward, financial or otherwise, for any activity or action which is illegal, unethical, a breach of trust or improper in any other way. That bribe could be money, a gift, a loan, hospitality, a discount, a favour or a contract – or something else that benefits us or gives us an advantage.

The act of **bribery** includes offering, promising, giving, accepting or seeking a bribe, directly or indirectly through any third party.

So, we should never:

- Offer or give any payment, hospitality or other benefit in exchange for any kind of business advantage – nor as a reward for any business we receive.
- Accept an offer from a third party that we think or know is being made with the expectation that we will then give them (or anyone else) a business advantage.
- Give or offer any payment to a government official (either in the UK or overseas) to help or speed up a necessary process or routine. This is sometimes called a facilitation payment.

What should I do if I am offered a gift?

Modest gifts and hospitality are a normal part of business life. Not all offers of gifts or hospitality are bribes and it's important we consider the timing, value and context. When working with international clients or outside of the UK, we may also need to think about local culture or customs.

Sometimes we might offer or accept appropriate hospitality in line with legitimate business activities such as building relationships, marketing Bamboo's services or promoting our business, for example, a meal after a business meeting.

And low value promotional items, such as stationery or branded products are also ok to give or receive.

However, there are situations where it is not appropriate to give any gifts or hospitality, such as during a tender process to those involved in the procurement process. Extravagant, expensive or lavish gifts or hospitality wouldn't be appropriate if they could be seen as a reward or incentive for preferential treatment, for example during contract negotiations.

Gifts and hospitality to government officials need to be treated carefully and should be pre-approved by your Manager or the Head of Compliance, as these may be subject to rules or laws that restrict or even prohibit such courtesies.

Remember:

Gifts must be of an appropriate type or modest in value and must not include cash or a cash equivalent such as vouchers - and they should never be given in secret.

Any gifts or hospitality should be declared to the Head of Compliance and you should keep a written record of anything you have accepted or attended. Central records are also kept.

If you are ever unsure whether accepting or offering a gift or hospitality could be considered as bribery, then speak to your Manager or our Head of Compliance.

If you are ever offered a bribe or are asked to make one, or you are concerned that any sort of bribery or corruption has occurred, then [Speak Up](#) as soon as possible.

Disclosure of Interests

There may be times when we find ourselves in a position where our outside interests or involvements overlap with our roles and commitment to Bamboo.

This could be a personal relationship or family connection for example, or a financial investment. We all need to ensure that these overlaps or conflicts don't cloud our judgement in any way when we are making decisions in our jobs at Bamboo – or that anyone else might feel that the association could compromise our choices.

Even if we are confident that won't be the case, we should always [Speak Up](#) and disclose the situation to the Head of Compliance or the Managing Director. By doing so, we can avoid or manage potential conflicts without detriment to ourselves or our business.

Dignity at Work - Bullying and Harassment

We want Bamboo to be a safe, healthy and enjoyable place to work for everyone. One that's free from any kind of discrimination, harassment or bullying. And one where we treat each other fairly, with respect and celebrate diversity.

Put simply, we are committed to tackling any bullying and harassment in the workplace and will not tolerate this kind of behaviour, from employees, customers, suppliers or visitors. Any allegations will be treated seriously, sensitively and confidentially. We will investigate them promptly and seek a speedy resolution.

Appropriate action, which may include disciplinary action, will be taken where an allegation is upheld.

What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour that involves the misuse of power or authority. It can make us feel upset, vulnerable, humiliated, undermined or threatened.

Bullying might be verbal, non-verbal or physical in its delivery, for example:

- physical or psychological threats
- overbearing and intimidating levels of supervision
- inappropriate derogatory remarks about someone's performance

What is harassment?

Harassment is any unwanted physical, verbal or non-verbal behaviour that either violates our dignity or creates an intimidating, hostile, humiliating or offensive working environment for us.

It might be related to age, disability, sexuality, nationality, religion or race to name a few examples or it could involve physical or sexual conduct.

One single incident can amount to harassment and we can be a victim even if we were not intended to be, if the behaviour causes an uncomfortable or unpleasant environment.

Examples of harassment include:

- unwanted physical conduct or horseplay, such as touching, pushing or grabbing
- unwelcome sexual advances or suggestive behaviour (even if the harasser perceives it as harmless)
- sending offensive e-mails or messages or posting offensive content on social media
- mocking, mimicking or belittling a person's disability

What should I do if I am being bullied or harassed?

It is important that we **Speak Up** about bullying and harassment.

Very often, the best course of action initially is to raise the problem with the person responsible. If someone says or does something that makes us uncomfortable then we should tell them so – and why. It is very possible that they might not realise this was the case at all.

Alternatively, you might prefer to speak to your Manager or Director, who can help advise you on how to resolve things, whether formally or informally.

If these steps are successful or not appropriate, then you should raise the matter as a grievance.

We will deal with any complaints in a timely and confidential manner, only disclosing the details of a need to know basis by those who are involved in handling the investigation.

Equal Opportunities

We have a great team of people at Bamboo and there is a wealth of knowledge combined with an emotional investment and passion for the business, from those of us with many years' experience to those with just a few months.

We are also committed to Bamboo being a great place to work. One that treats everyone equally and fairly. We hire, develop and promote the right people for the job, with the right skills. Those who have the drive, talent, knowledge, experience and ability to deliver the best possible service for our customers and partners. That is all that matters.

Our equal opportunities policy details our approach to fairness and the avoidance of any discrimination in the workplace and covers all stages of employment from recruitment onwards.

What is discrimination?

In its simplest form, discrimination is the unequal or differing treatment of an individual, meaning they are treated either more or less favourably than another, due to factors such as race, sex, disability, age or religion. Discrimination can be either direct or indirect.

There are nine **protected characteristics** that are important to note in relation to discrimination:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation



Direct discrimination leads to less favourable treatment because of a protected characteristic. So, rejecting someone for a job or promotion because of religious views for example.

Indirect discrimination occurs when an arrangement, provision or criterion is applied to everyone, but unjustifiably and adversely affects a team member (or members) with a particular protected characteristic.

Harassment due to a protected characteristic is also a form of discrimination (see [Bullying and Harassment](#)).

Discrimination is completely unacceptable and unlawful. We all need to **Speak Up** if we become aware of or suffer from discrimination. Complaints will be treated in confidence and investigated swiftly.

Modern Slavery and Human Trafficking

Modern Slavery is a serious and often hidden crime, resulting in the abhorrent abuse of human rights. It is a top priority for the UK Government and UK businesses play a vital role.

As a technology and communications business that is regulated by a number of bodies, we consider the risk of any Modern Slavery or Human Trafficking within our organisation (or supply chain) to be low. That doesn't stop us all from being aware of the risk and Bamboo is committed to upholding the highest standards of ethical behaviour and monitoring, ensuring it doesn't occur.

Due diligence for all suppliers and potential acquisitions is imperative; we will never knowingly support or work with a business that is involved in these practices – and will report any organisation where we suspect any involvement in Modern Slavery or Human Trafficking.

If we have any questions or concerns, then we should **Speak Up** to either the Head of Compliance or Managing Director.

Confidentiality and Privacy

During our day to day jobs, we all have access to information that is private or confidential, either about Bamboo, our colleagues, our partners and our customers.

It is up to all of us to preserve that confidentiality, as well as the integrity of any information we retain, and to protect the interests of our business.

This could be information (written or verbal) about new product launches, pricing, partnerships, financial details or customer contracts – really anything that could be considered confidential (commercially or personally) and that is not already in the public domain.

When dealing with new suppliers, partners, consultants or other similar parties where we need to share potentially sensitive information, we should always get a signed non-disclosure agreement (or NDA) before any conversations take place.

Don't forget, our obligations around confidentiality extend past our employment with Bamboo. You will find more information in your contract of employment.

What about GDPR?

Our GDPR policy refers directly to personal information and data we collect, hold and process and how we do so responsibly, legitimately and lawfully.

Every one of us needs to be aware of the principles of GDPR and ensure we act in accordance with them. As such, any personal data – whether stored as a paper document or in an electronic format:

- must be processed fairly and lawfully
- must be obtained for lawful purposes
- must be adequate, relevant and not excessive
- must be accurate and, where necessary, kept up to date
- must not be kept longer than necessary
- must be processed in accordance with the rights of employees
- must be safeguarded against unauthorised or unlawful processing and against accidental loss, damage or destruction
- must not be transferred to a country outside the European Economic Area

We should also be completely transparent about how we collect, store and process any personal information and data.

There are plenty of practical steps we should all be taking too and which should be second nature. Simple, everyday things like keeping a clear desk, making sure all confidential documentation is locked away securely, not taking work related documents out of the building and ensuring that any personal data is not left visible or unattended on our computer screens, printers or photocopiers.

And, of course, once we no longer need to retain data for business reasons, it should be deleted or destroyed in line with our policies and legal obligations.

If you have any questions regarding confidentiality, privacy and data or suspect any non-compliance, please speak to the Head of Compliance.