



Anti-Bribery Statement

At BambooHR, we pride ourselves on acting with integrity wherever we do business. As a company, we are committed to our values and letting them guide our business practices. To that end, we have implemented policies and procedures within our organization to demonstrate our collective effort to engage in ethical business practices, including the prevention of bribery.

1. *Policies and Procedures:*

BambooHR's policies and procedures prohibit all forms of corruption and bribery. All employees at BambooHR are required to read, acknowledge, and abide by our Code of Business Conduct and Ethics (Code of Conduct). Under the Code of Conduct, all BambooHR employees are required to understand any applicable legal requirements related to their duties and must comply with all applicable laws, rules, regulations, and regulatory orders. Additionally, if employees were to engage in business outside of the United States, they would be required to comply with all applicable jurisdictional laws and regulations, including any bribery acts. Employees that violate this policy may be subject to criminal or civil liability as well as disciplinary action by the company as deemed appropriate by HR and the Executive Team.

Employees are also prohibited from providing or accepting business amenities from clients that violate applicable laws or create an appearance of impropriety, bribery, or payoff as outlined in the Code of Conduct.

Employees are expected to engage in the highest standard of ethical conduct. If any employee becomes aware of any person or entity that is engaging in unethical or illegal behavior, the employee is required to report the conduct to HR immediately.

2. *Top-Level Commitment:*

Our Board of Managers is committed to fostering a culture where bribery is never acceptable and where people feel comfortable reporting any concerns regarding bribery. BambooHR's policies and procedures support an open-door policy that ensures that team members have the freedom to approach their people leaders or higher levels of management with their concerns or ideas. BambooHR's policies also prohibit retaliation against any individual who reports illegal or unethical behavior. Additionally, our Board of Managers has reviewed and endorsed this statement as well as the policies and procedures therein.

3. *Risk Assessment:*

As recognized by the [Corruption Perceptions Index](#), BambooHR does not primarily operate in countries that are estimated to have a high-risk of bribery and corruption. Additionally, BambooHR's vendors operate in countries that are relatively low-risk. Despite engaging in business in a low-risk environment, BambooHR remains committed to preventing bribery within our organization through our relevant policies and procedures.



4. *Due Diligence:*

If a potential customer or vendor is found to be conducting business in an environment that is at high risk for bribery or corruption, BambooHR's Legal department will conduct an internal investigation to evaluate the risk. If a material risk is found through Legal's due diligence, the relationship will either be terminated or not pursued.

Customers are required to comply with BambooHR's Terms of Service, which include using our services in compliance with applicable local, state, national, and international laws, rules, and regulations. If BambooHR finds that our Terms of Service have been violated in this manner, BambooHR will terminate the relationship immediately.


5. *Communication:*

All employees are required to read and understand our policies and procedures. These provide instruction on how to engage in ethical behavior and the channels through which an employee should report unethical behavior.

6. *Monitoring:*

Our Board of Managers approves BambooHR's enterprise-wide bribery prevention framework. The Board will review and evaluate the adequacy and effectiveness of such framework annually, considering major risks facing BambooHR, and review and endorse an annual Anti-Bribery Statement that sets forth the steps the company has in place to mitigate the risk of bribery within the organization.

This statement has been reviewed and endorsed by the Board of Managers and is signed on behalf of the Board by Brad Rencher, Chief Executive Officer.

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