

Modern Slavery Statement

This constitutes Bamboo HR LLC's (BambooHR) modern slavery and human trafficking statement for the financial year ending December 31, 2024.

For over 15 years, we've been on a mission to set people free to do great work. As a part of that mission, we find that it is important that we have a defined set of policies and standards that push us towards that goal while maintaining our company values. At BambooHR, we take a zero-tolerance approach to modern slavery. This statement outlines the policies and standards that we have in place to ensure that modern slavery is not taking place within our business.

1. Our Structure:

BambooHR is a Software as a Service (SaaS) company, and all software is created inhouse by product teams and engineers employed by BambooHR. Our software empowers HR pros, employees, and organizations everywhere to simplify complicated processes and streamline time-consuming tasks, so they can focus on supporting their people, thriving in their roles, and growing their business. We provide customers with a variety of services that transform their work experience, including HR data and reporting, hiring and onboarding, payroll, time, and benefits.

2. Our Risk Assessment and Evaluation:

As recognized by the <u>Global Slavery Index</u>, BambooHR does not operate in an industry or in countries that are estimated to have a high prevalence of modern slavery. Additionally, BambooHR's vendors operate in industries that are relatively low-risk. For a list of our Vendors see our <u>Third-Party Subcontractors Authorized to Assist BambooHR with Processing Data on Behalf of Customers Report</u>. If we deem the vendor to be at a high risk for modern slavery, BambooHR will not engage in business relations with that vendor. Despite operating in a low-risk environment, BambooHR remains diligent in assessing the risk modern slavery poses to our organization's supply chain through internal policies and procedures.

3. Our Policies:

BambooHR has established policies and procedures that mitigate the risk of modern slavery within our supply chain and business practices. 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 responsible for complying with all laws, rules, regulations, and regulatory orders applicable to the conduct of our business and to act in an honest and ethical manner. Employees are responsible for understanding any applicable legal requirements relating to their duties. Additionally, if employees ever were to engage in business outside of the United States, they would be required to comply with applicable laws and regulations of that jurisdiction, including any modern slavery acts. Employees that violate these laws and regulations may be subject to criminal or civil liability, in addition to the appropriate



disciplinary action by the company. If this code is found to be violated, HR and the Executive Team will be responsible for investigating and determining disciplinary action.

At BambooHR, we are committed to maintaining the highest standards of ethical conduct and legal compliance. If employees become aware of any illegal or unethical behavior by any team member, contractor, or customer of BambooHR, the employee is required to report it immediately through the channels specified in the Code of Conduct. Additionally, BambooHR supports 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.

4. Our Due Diligence Process:

If potential customers or vendors are operating in a high-risk environment, BambooHR's Legal department will engage in a thorough due diligence process to evaluate the risk. If any material risks are recognized, BambooHR will either terminate or not pursue the relationship.

BambooHR customers are required to comply with our <u>Terms of Service</u>, which include using our services in compliance with applicable local, state, national, and international laws, rules, and regulations. Additionally, BambooHR performs background checks on employees in positions of trust or managerial oversight.

5. Training:

Given the level of risk found through our risk assessment, BambooHR does not require formal employee training. However, through our policies and procedures, employees are trained to report any unethical or illegal behavior immediately. Our policies and procedures are made available to all employees upon hire and remain available to them through their employment. Our open-door and anti-retaliation policies ensure that employees are comfortable reporting any knowledge they have regarding potential instances of modern slavery.

6. Measuring Effectiveness:

BambooHR does not have Key Performance Indicators (KPI) in place that would increase the risk of modern slavery in our business. Additionally, we will review our policies and procedures annually to ensure that they remain effective.

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.

Docusigned by:

Brad Kendur

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Updated: August 20, 2024