



Staff Handbook

Welcome to Clear Corporation

Your Guide to the company's Code of Conduct, Policies
& Procedures.

New
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Welcome to Clear Corporation!

Our Vision

is to provide value-added services that make a difference in businesses, communities and the people within it. We provide a full range of strategic development, training, communications services and solutions. Our extensive range of services provides a competitive advantage and a service excellence approach for our clients. We provide a full range of strategic communication services and solutions.

Our Mission

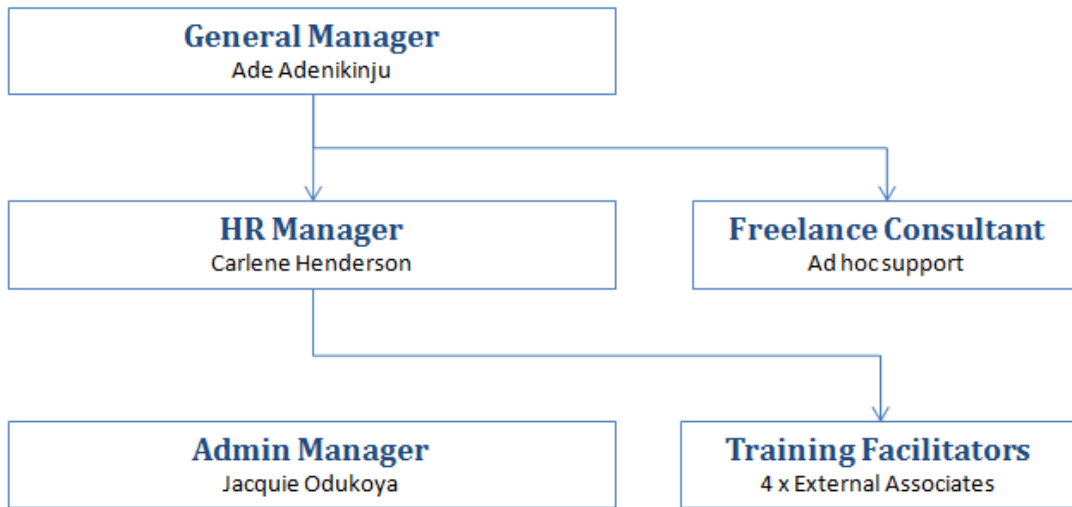
As a one-stop shop consulting firm, we provide services aimed at the business community, Government and her agencies, private sectors, charities and not-for-profit organisations. We operate at the nexus of business, public policy and politics. We form long term partnerships and develop strategies that serve our clients' needs.

Our Expertise

includes providing training, business events, seminars and workshops, leadership and management development, strategic planning, issue management, public affairs, governmental and corporate representation, political lobbying, fundraising, reputation management, social marketing, media relations and multicultural communication services.

Thank you for joining the Clear Corporation Team and for your contribution to its ongoing success!

Organisational Structure



Policies & Procedures

1. Employee Recruitment Policy & Procedure

Aim

Clear Corporation is an Equal Opportunities employer aiming to attract and select best talent and ensure that all applicants are treated fairly and clearly.

Scope

This Policy Procedure applies to all employees who are involved in hiring for our company. It refers to all potential job candidates.

Key Steps & Responsibilities

- Identify need for an opening
- The Hiring Manager (Line Manager) together with HR decide whether to hire externally or internally
- The Hiring Manager together with HR review the job description and compose a job ad
- HR select appropriate sources (external or internal) for posting the opening
- The Hiring Manager together with HR decide on the selection stages and possible timeframe
- HR review resumes and shortlists applications
- The Hiring Manager proceeds through all selection stages that, dependent on the role, may include phone screening, face to face interview, presentation, etc.
- The Hiring Manager selects the most suitable candidate
- HR runs background checks and prepares the official offer.
- HR also informs all other unsuccessful applicants.

Please note that the above stages may overlap. Hiring managers may remove/add steps as appropriate.

When creating a Job Description & Job Ads

Hiring managers can create job ads based on full job descriptions of each role. Job ads should be clear and accurately represent the open position. They should include:

- A brief description of our company and mission
- A short summary of the role's purpose
- A list of responsibilities
- A list of requirements
- How to apply

2. Training & Continuous Professional Development (CPD) Policy

Aim

At Clear Corporation, we want our employees to feel confident about improving efficiency and productivity, as well as finding new ways towards personal development and success. To that end, this policy outlines our commitment in supporting our employees replenish their knowledge and acquire new skills that benefit both them and the company.

Scope

This Policy applies to all permanent, full-time or part-time, employees of the company. Employees with temporary/short-term contracts might attend trainings at their manager's discretion.

This policy doesn't cover supplementary employees like contractors or consultants.

Key Elements & Responsibilities

Employees, managers and Human Resources (HR) should all collaborate to build a continuous professional development (CPD) culture. It's an employee's responsibility to seek new learning opportunities. It's a manager's responsibility to coach their teams and identify employee development needs.

When you identify a learning opportunity, please discuss it with your manager who will be in a position to review it and also advise on the available company support which may include paying for the training, time off, etc.

Also, it is HR's responsibility to facilitate any staff development activities and processes and advise accordingly.

In general, we approve and encourage the following *employee trainings*:

- On the job training
- Job shadowing
- Participating in conferences
- Participating in the in-house training courses
- Informal employee coaching & mentoring
- Formal training

As part of our learning and development provisions, we can also arrange for subscriptions or educational material, so employees will have access to news, articles and other material that can help them become better at their job. There are two conditions for this:

Subscription/Material should be job-related

All relevant fees should not exceed a set limit per person

This list doesn't include software licences or other tools that are absolutely necessary for employees' jobs.

3. Performance Appraisal Policy & Procedure

Aim

Our employee performance appraisal policy and procedure describes how we coach, evaluate and reward employees. We base our performance management systems on constructive feedback and open communication between managers and team members.

Scope

This policy applies to all employees. We have built our performance management practices to:

- Ensure you understand your job responsibilities and have specific goals to meet.
- Provide you with actionable and timely work feedback.
- Invest in development opportunities that help you grow professionally.
- Recognize and reward your work in financial or non-financial ways (e.g. awards.)

To achieve a good performance evaluation, you should:

- Meet your targets consistently.
- Complete your job duties as expected.
- Show a willingness to learn and develop.
- Follow our Code of Conduct and other company policies.
- Have a good attitude and collaborate well with your colleagues.

Each employee may excel in one aspect and need improvement in another. But, to remain employed with our company, you should meet a minimum standard for all of these aspects and show a willingness to improve where appropriate.

Periodical Reviews

At Clear Corporation, we value communication. In addition to regular informal discussions between you and your manager, we also conduct an annual performance review meeting. The aim of these review meetings and discussions is to:

- Recognize employees who are good at their jobs.
- Talk about employee motivations and any potential concerns or suggestions you may have.
- Identify areas of improvement and/ or further training.

Periodical reviews apply to employees who have completed their onboarding period.

Rewards



We encourage our managers to reward their staff as appropriate. Clear Corporation has a Bonus Scheme in place to reward employees when we meet our business targets. However a bonus (or a pay increase) is not guaranteed.

Training

Training and development opportunities are available for all employees year long. But, if managers identify a team member's training needs in a specific area, they can discuss this with their team member during performance reviews. That way, they can set up an improvement plan.

On-the-job training, job shadowing and other training methods are also appropriate when managers intend to promote an employee in the near future. We encourage managers to discuss future career moves with their team members, so they can determine what type of training is appropriate.

Manager's Responsibilities

To conduct effective regular meetings and performance evaluations, we expect you to:

- Set clear objectives.

Your team members should know what you expect of them. When you first hire someone to your team, ensure they understand their job duties. Set specific goals for each team member. Renew those goals during the performance review meetings.

- Provide useful feedback.

During scheduled meetings with your team members, give them guidance and praise, as appropriate. Be fair and specific to help them understand and implement your feedback.

- Keep your team members involved.

There should be two-way communication between you and your team. Make your expectations clear, but always take your team members' motivations and aspirations into account. Discuss training and development opportunities that may interest your team members.

- Keep logs with important incidents about each one of your team members. Also keep notes of what was discussed during the regular performance discussions as well as the annual review meetings.

These logs help you evaluate your team, but they may also prove useful if you want to terminate, reward or promote your team members.

4. Disciplinary Policy & Procedure

Aim

Our aim is to encourage improvement in individual conduct or performance. This procedure sets out the action which will be taken when disciplinary rules are breached.

Scope

This policy applies to all employees.

Principles

- a) The procedure is designed to establish the facts quickly and to deal consistently with disciplinary issues. No disciplinary action will be taken until the matter has been fully investigated.
- b) At every stage you will be informed in writing of what is alleged and have the opportunity to state your case at a disciplinary meeting and be represented or accompanied, if you wish, by a work colleague.
- c) You have the right to appeal against any disciplinary penalty.

The Procedure

Dealing with disciplinary problems informally

Wherever possible and as appropriate, we aim to resolve issues informally. Your manager will invite you to a meeting to discuss their concerns and how best to support you. If conduct or performance is deemed unsatisfactory, you will receive in writing an improvement note which will stay in your file for *3 months*.

If informal action does not bring about an improvement, or the misconduct or unsatisfactory performance is considered too serious to be classed as minor, formal action will be taken.

Stage 1 – first warning

If conduct or performance is unsatisfactory, you will be given a written warning or performance note. Such warnings will be recorded, but disregarded after *6 months* of satisfactory service. You will also be informed that a final written warning may be considered if there is no sustained satisfactory improvement or change. (Where the first offence is sufficiently serious, for example because it is having, or is likely to have, a serious harmful effect on the organisation, it may be justifiable to move directly to a final written warning.)

Stage 2 – final written warning

If the offence is serious, or there is no improvement in standards, or if a further offence of a similar kind occurs, a final written warning will be given which will include the reason for the

warning and a note that if no improvement results within *12 months*, action at Stage 3 will be taken.

Stage 3 – dismissal or action short of dismissal

If the conduct or performance has failed to improve, you may suffer demotion, or dismissal. Gross misconduct If, after investigation, it is confirmed that you have committed an offence of the following nature (the list is not exhaustive), the normal consequence will be dismissal without notice or payment in lieu of notice:

- theft, damage to property, fraud, incapacity for work due to being under the influence of alcohol or illegal drugs, physical violence, bullying and gross insubordination.

While the alleged gross misconduct is being investigated, you may be suspended, during which time you will be paid your normal pay rate. Any decision to dismiss will be taken by the employer only after full investigation.

Appeals

If you wish to appeal against any disciplinary decision, you must do so to HR within five working days. The General Manager will hear the appeal and decide the case impartially.

5. Grievance Policy & Procedure

Aim

The aim of this policy procedure is to provide a framework to deal with our employees issues, concerns or complaints in a fair, consistent and efficient manner.

Scope

This policy applies to all employees.

Dealing with grievances informally

If you have a grievance or complaint to do with your work or the people you work with you should, wherever possible, start by talking it over with your manager. You may be able to agree a solution informally between you.

Formal grievance

If the matter is serious and/or you wish to raise the matter formally you should set out the grievance in writing to your manager. You should stick to the facts and avoid language that is insulting or abusive. Where your grievance is against your manager and you feel unable to approach him or her you should talk to HR.

Grievance hearing

Your manager will call you to a meeting, normally within five days, to discuss your grievance. You have the right to be accompanied by a colleague at this meeting if you make a reasonable request. After the meeting the manager will give you a decision in writing, normally within 24 hours. If it is necessary to gather further information before making a decision your manager will inform you of this and the likely timescale involved.

Appeal

If you are unhappy with your manager's decision and you wish to appeal you should let HR know. You will be invited to an appeal meeting, normally within five days, and your appeal will be heard by a more senior manager (or the company owner). You have the right to be accompanied by a colleague at this meeting if you make a reasonable request. After the meeting the General Manager will give you a decision, normally within 24 hours. The General Manager's decision is final.

6. Handling Personal Data Policy and Guidelines

Aim

The aim of this Policy and Guidelines is to ensure the protection of all personal data that you may handle in the course of your work in accordance with the General Data Protection Regulations 2018 Act. (For more information, please visit <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>)

Scope

This Policy applies to all personal information relating to employees, training facilitators and participants held by Clear Corporation (the Data Controller). Personal data is any information, whether held in hard copy or electronic form, relating to an individual who can be identified, directly or indirectly, from that data. Processing is anything that is done with that information – it includes the collecting, editing, storing/ holding/ retaining, disclosing /sharing, viewing, recording, listening, erasing/ deleting etc. of personal information.

Responsibilities

Clear Corporation is responsible for retaining any records in accordance with data protection principles, which require that personal information is limited to what is relevant and necessary, is accurate, and is kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which it was obtained. Ensuring that personal information is erased or anonymised when no longer required will reduce the risk of it becoming irrelevant, excessive, inaccurate or out of date, and the risk of it being processed in error.

Your responsibility, as an employee of Clear Corporation, is to fully comply with the company's systems, policies, procedures and guidelines. Failure to do so may result to formal action.

Guidelines for Handling Personal Data

Security!

- Don't share your passwords
- Lock away your papers when you are away from your desk
- Lock your laptop/tablet whenever you leave it

Share with Care!

- Be aware when sharing personal data – ask what, why and how
- Don't work with personal data on personal devices that are not encrypted
- Use the Warwick systems to access your emails and documents

Incident Reporting!

- Incidents happen! Tell us when things are lost, stolen or shared by mistake
- Using the reporting procedure means we can help you take the right action

Data Retention & Disposal

- Do not keep personal data longer than you need it - follow the company's retention schedule
- Dispose of personal data with care - record how and when

Retention of Records

The retention periods for the different types of records are set out in the Schedule (Appendix 1) to this policy, and decisions relating to the retention (and disposal/erasure) of personal information should be taken with reference to the Schedule.

Disposal/ Erasure of Records

Documents containing personal information should be disposed of confidentially and securely either by shredding or by using confidential waste bins or sacks. Such documents may include, but are not limited to, those containing names and contact details, health-related information, information relating to pastoral matters and financial information.

Electronic communications including email, Facebook pages, twitter accounts etc. and all information stored digitally should also be reviewed regularly and if no longer required should be closed and/or permanently deleted. It is understood that the word "deletion" can mean different things in relation to electronic data, and that it is not always possible to erase all traces of it. The key issue is to put the data beyond use. Therefore, it will normally be sufficient simply to delete the information, with no intention of it ever being used or accessed again by anyone. In addition to deleting personal information from a live system, it should also be deleted from any back-up of the information on that system.

7. Equal Opportunities Policy

Aim

The aim of this policy is to communicate our commitment to equality of opportunity in employment and ways of working, with the aims of ensuring that all employees, job applicants, contractors, associates, training facilitators and other external stakeholders are treated fairly and equally, and supporting the Company's objective of providing a working environment that is free from all forms of discrimination.

Scope

This Policy applies to all employees, associates, contractors, and training participants. (This Policy should also be read in conjunction with the Bullying & Harassment Policy and Procedure, also found in this Handbook.)

Key Principles & Responsibilities

The Company is fully committed to safeguarding a culture of equality in the workplace and training environment and everyone is treated fairly irrespective of age, disability, gender, gender reassignment, marital or civil partnership status, pregnancy or maternity, race including colour, ethnic or national origins and nationality, religion or belief or sexual orientation ("the protected characteristics"). We aim to create a working and training environment that is free from discrimination and harassment in any form, in which all staff, clients, training facilitators and training participants are treated with dignity and respect.

We aim, as far as reasonably practicable, to ensure that all our working practices are applied fairly and consistently and, where necessary, we will take reasonable steps to avoid or overcome any particular disadvantage these may cause and to promote equality.

We all have a responsibility not to discriminate or harass other staff, clients, training facilitators and participants and to report any such behaviour of which you become aware to your manager, or training facilitator and/ or HR.

Managers are responsible for implementing the Equal Opportunities Policy and must apply the policy as part of their day-to-day management of the Company.

Training facilitators are responsible to create a training environment and culture that is free from discrimination.

Forms of discrimination

The following are forms of discrimination that this policy aims to avoid:

Direct Discrimination occurs when a person is treated less favourably because of a protected characteristic that they either have or are thought to have. Direct discrimination can also occur by way of association, which is when a person is treated less favourably

because, for example, their spouse or partner or other relative has the protected characteristic.

Indirect Discrimination occurs when a provision, criterion or practice is applied equally to everyone, but has a disproportionately adverse effect on people who share a particular protected characteristic. A person with the protected characteristic who is disadvantaged in that way has the right to complain.

To be justified the provision, criterion, or practice must be necessary for legitimate business reasons in circumstances where less discriminatory alternatives are not reasonably available.

Victimisation occurs where someone is treated unfavourably because he/she has raised a complaint under this policy or taken legal action, in relation to any alleged act of unlawful discrimination, against the Company or because he/she has supported someone else in doing this.

Harassment is unwanted conduct that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Harassment can take many different forms and may involve inappropriate actions, behaviour, comments, emails or physical contact that causes offence or are objectionable.

Harassment may involve a single incident or persistent behaviour that extends over a period of time and can occur even if someone did not mean to cause offence. It also means that a person can be subjected to harassment by behaviour that is not aimed at them directly but which they nonetheless find unpleasant.

Harassment is always unacceptable and where it relates to a protected characteristic it will amount to an unlawful act of discrimination.

Discrimination arising from Disability- In addition to the above, it is unlawful to treat a person unfavourably because of something that is the result, effect or outcome of their disability, unless the treatment is necessary and can be objectively justified. Furthermore, employers have a duty to make reasonable adjustments to ensure that disabled applicants, employees or other workers are not substantially disadvantaged.

Creating Equal Opportunities in the Workplace and Training Environment

There are a number of ways in which the Company aims to ensure equal opportunities in the workplace and the training environment, including:

- **Recruitment and selection procedures** are conducted objectively and based upon specific and reasonable job-related criteria. Decisions regarding an individual's suitability for a particular role are based on aptitude and ability. We also consider reasonable adjustments for applicants with disabilities.

- **Training & Continuous Professional Development** opportunities are free from bias and discrimination. All staff are given an appropriate induction to enable them to fulfill the responsibilities of their role. Any improvement needs and learning opportunities are reviewed and discussed in the regular informal meetings with the line manager and the annual review meeting.
- **Terms and conditions** are applied fairly. Clear Corporation operates a Pay and Bonus Scheme that is transparent, based on objective criteria and free from bias to ensure that all employees are rewarded fairly for their contribution.
- **Employment policies and practices** including any rules or requirements, do not directly or indirectly discriminate and are applied in a non-discriminatory manner.

Equal Opportunities Monitoring

Clear Corporation monitors the effectiveness of this policy to ensure it is achieving its objectives by monitoring the composition of job applicants and decisions in recruitment, the composition of our workforce (and our contractors and clients), access to training and other opportunities and benefits. We also monitor the impact of our employment policies and any formal action to safeguard an environment free from bias and discrimination.

Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.

Raising a complaint of discrimination

If you believe you have been discriminated against, you should raise the matter in accordance with the Company's Grievance Procedure (also included in this Employee Handbook).

Any employee who is found to have committed an act of discrimination, or breached this policy in any other way, will be subject to action under the Disciplinary Procedure, up to and including dismissal.

Non-employees (ie contractors and clients) will be subject to appropriate formal action that may, depending on the circumstances, involve terminating any contract or agreement.

The Company will also take seriously any malicious or, in its opinion, unwarranted allegations of discrimination and will take appropriate action, disciplinary or otherwise, where necessary.

8. Bullying & Harassment Policy & Procedure

Aim

Clear Corporation is committed to creating a safe and stimulating environment of mutual respect and personal responsibility where our employees enjoy working and our clients (training participants) encounter creative learning experiences. The aim of this Policy is to encourage everyone to be aware of their behaviour and how it affects other people.

Scope

This Policy applies to all employees, associates, contractors, and training participants. (This Policy should also be read in conjunction with the Bullying & Harassment Policy and Procedure, also found in this Handbook.)

Key Principles

This Policy seeks to ensure that all employees are treated and treat others with dignity and respect, free from harassment and bullying. Employees should always consider whether their words or conduct could be offensive. Even unintentional harassment or bullying is unacceptable.

The Company takes allegations of harassment or bullying seriously and addresses them promptly and confidentially where possible. All employees, contractors and clients (training participants) must comply with this policy and take appropriate measures to ensure that such conduct does not occur.

Harassment or bullying by an employee will be treated as misconduct under our Disciplinary Procedure. In some cases it may amount to gross misconduct leading to summary dismissal.

Please note that this policy covers harassment or bullying which occurs both in and out of the workplace, such as on client visits, events or work-related social functions and on social networking sites. It covers bullying and harassment by employees, contractors and clients (training participants) and also by third parties such as other consultants, suppliers, clients.

What is Harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past. *Unlawful harassment* may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race (including, colour,

nationality, ethnic or national origin), religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Examples of Harassment

- unwanted physical conduct or "horseplay", including touching, pinching, pushing, grabbing, brushing past someone, invading their personal space, and more serious forms of physical or sexual assault;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless), and suggestions that sexual favours may further a career or that a refusal may hinder it;
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
- offensive or intimidating comments or gestures, or insensitive jokes or pranks;
- mocking, mimicking or belittling a person's disability;
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- outing or threatening to out someone as gay or lesbian; or
- ignoring or shunning someone, for example, by deliberately excluding them from a conversation or a workplace social activity.

Important Note: A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for him or her.

What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct.

Examples of Bullying:

- shouting at, being sarcastic towards, ridiculing or demeaning others;
- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate and/or derogatory remarks about someone's performance;
- abuse of authority or power by those in positions of seniority; or
- deliberately excluding someone from meetings or communications without good reason.

Important Note: Legitimate, reasonable and constructive criticism of a worker's or a learner's performance or behaviour, or reasonable instructions, will not amount to bullying on their own.

Dealing with Harassment and/ or Bullying

If you are being bullied or harassed, you must attempt to manage the situation informally if this is at all possible. The objective of an informal approach is to resolve the difficulty with the minimum of conflict. Every individual has personal rights and this includes being made aware that their attention or behaviour is perceived by another as bullying or harassing. It is possible that the "perpetrator" simply does not realise the effect of their behaviour on the recipient. You should explain clearly to them that their behaviour is not welcome or makes you feel uncomfortable.

If you would find it too difficult or embarrassing to speak directly with the other person, then you should attempt to communicate through a third party, for example, your line manager, training facilitator, HR person.

If informal steps have not been successful or are not possible or appropriate due to the seriousness of the allegations, employees should follow the formal Grievance procedure set out in this Employee Handbook.

Employees who make complaints or who participate in good faith in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result. If you believe you have suffered any such treatment you should inform your line manager or HR. If the matter is not remedied you should raise it formally using this procedure. Anyone found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure will be subject to disciplinary action under our Disciplinary Procedure.

All complaints are handled under the strictest confidentiality.

Code of Conduct

As an employee of Clear Corporation, you are responsible to represent our company values and behave appropriately at work. We outline our expectations here. We can't cover every single case of conduct, but we trust you to always use your best judgement. Reach out to your manager or HR if you face any issues or have any questions.

Dress Code

The dress code is business casual and/ or formal when you meet with clients and prospects.

Corporate email

Email is essential to our work. You should use your *company email* primarily for work, but we allow some uses of your company email for personal reasons.

Work-related use. You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.

Personal use. You can use your email for personal reasons as long as you keep it safe, and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download ebooks, guides and other safe content for your personal use.

Our general expectations

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.
- In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts.

Social media

We want to provide practical advice to prevent careless use of *social media in our workplace*. We address two types of social media uses: using personal social media during work and representing our company through social media.

Using personal social media during work



You are permitted to access your personal accounts at work. But, we expect you to act responsibly, according to our policies and ensure that you stay productive. Specifically, we ask you to:

Discipline yourself. Avoid getting sidetracked by your social platforms.

Ensure others know that your personal account or statements don't represent our company. For example, use a disclaimer such as "opinions are my own."

Avoid sharing intellectual property (e.g trademarks) or confidential information. Ask your manager or PR first before you share company news that's not officially announced.

Avoid any defamatory, offensive or derogatory content. You may violate our company's anti-harassment policy if you direct such content towards colleagues, clients or partners.

Representing our company through social media

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- Be respectful, polite and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.
- Check with your manager first when you're about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.

Conflict of interest

When you are experiencing a *conflict of interest*, your personal goals are no longer aligned with your responsibilities towards us. For example, owning stocks of one of our competitors is a conflict of interest.

In other cases, you may be faced with an ethical issue. For example, accepting a bribe may benefit you financially, but it is illegal and against our business code of ethics. If we become aware of such behaviour, you will lose your job and may face legal trouble.

For this reason, conflicts of interest are a serious issue for all of us. We expect you to be vigilant to spot circumstances that create conflicts of interest, either to yourself or for any other employee of Clear Corporation. Follow our policies and always act in our company's best interests. Whenever possible, do not let personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to your manager or HR and we will try to help you resolve it.

For more information

The Code of Conduct, Policies and Procedures outlined in this Employee Handbook do not form part of your contract of employment and therefore it is at the company's discretion to review them on ad hoc basis and ensure that they comply with the UK Employment Law.

For more information on the legal framework supporting these policies, please visit www.acas.org.uk

Appendix 1: Schedule of Data Retention

| | Record Type | Retention Period |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| PERSONNEL RECORDS | Commissions/Bonuses/Incentives/Awards | 7 years |
| | Employee Earnings Records | Separation + 7 years |
| | Employee Handbooks | 1 copy kept permanently |
| | Employee Medical Records | Separation + 6 years |
| | Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records) | 6 years after separation |
| | Employment Contracts – Individual | 7 years after separation |
| | Employment Records - Correspondence with Employment Agencies and Advertisements for Job Openings | 3 years from date of hiring decision |
| | Employment Records - All Non-Hired Applicants (including all applications and resumes - whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence) | 2-4 years (4 years if file contains any correspondence which might be construed as an offer) |
| | Job Descriptions | 3 years after superseded |

| | | |
|-------------------------------------------------------------------|----------------------------------------------------------------------|-----------------------------------------------------------------|
| | Personnel Count Records | 3 years |
| | Forms I-9 | 3 years after hiring, or 1 year after separation if later |
| TRAINING PARTICIPANTS RECORDS | Participants' recruitment records | ENTER DURATION |
| | Participants' training records | ENTER DURATION |
| | Participants's personal information & equal opportunities records | ENTER DURATION |
| | Participants' attendance records | ENTER DURATION |
| | Procedures relating to participants' recruitment and selection | ENTER DURATION |
| | Correspondence / Enquiries received from prospective applicants | ENTER DURATION |
| | Correspondence / records of unsuccessful applicants | ENTER DURATION |
| TRAINING FACILITATORS' (and Other Associates) RECORDS | Service Level Agreements | |
| | Invoices | |
| | CVs, Interview Notes, Personal Information | |
| | | |