

# **Human Rights Policy**

# **Teleperformance Group**





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#### MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Protecting and promoting Human Rights, celebrating diversity, upholding freedom, respecting differences, and adhering to the rule of law are vital responsibilities that we strive to achieve every day. It is our duty to make a positive contribution and stand firmly for our values.

As a proud signatory of the United Nations Global Compact, Teleperformance is dedicated to respecting and supporting Human Rights across all our operations and business activities. We are passionately committed to avoiding any complicity in Human Rights abuses.

Our Human Rights policy, which is available on the Group's intranet, serves as an indispensable resource for all Teleperformance Workforce Members, clients, suppliers, and other stakeholders. It outlines all our commitments and obligations towards our employees and stakeholders, as well as our expectations of stakeholders when entering a relationship with us.

Daniel Julien Chief Executive Officer

#### PURPOSE

The purpose of this Human Rights Policy (the "**Policy**") is to provide guidelines to ensure that the companies of Teleperformance Group (the "**Companies**" or, individually, a "**Company**") implement and enforce policies and procedures that effectuate their commitment to Human Rights, including Diversity, Non-discrimination and No harassment, Workplace Safety, Prevention of Human Trafficking, Forced Labor, and Child Labor, Working Hours and Minimum Wage Standards, Freedom of Association/Collective Bargaining, and Privacy and Freedom of expression. It formalizes our long-standing commitment to uphold and respect Human Rights for all people.

Human Rights are basic rights and freedoms that belong to every person in the world from birth until death. They apply regardless of where you are from, what you believe in or how you choose to live your life. They are based on shared values like dignity, fairness, equality, respect, and independence. They are universal and inalienable, interdependent and indivisible, equal and non-discriminatory.



Teleperformance is committed to compliance with national and international standards and regulations that promote the highest standards in terms of Human Rights. See the following list for details on those:

UN Global Compact	The UN Global Compact's governance framework, adopted by UN Secretary-General Kofi Annan in 2000, is a call to companies to align strategies and operations with universal principles on Human Rights, labor, environment, and anti-corruption, and take actions that advance societal goals. Teleperformance SE (including all its subsidiaries, "Teleperformance" or the "Group") has been a
UN Guiding Principles on Business and Human Rights	signatory of the UN Global Compact since 2011. The Guiding Principles on Business and Human Rights (UNGPs) are the global standard for preventing and addressing the risk of adverse impacts on Human Rights involving business activity, and they provide the internationally accepted framework for enhancing standards and practices with regard to business and Human Rights.
Universal Declaration of Human Rights	The Universal Declaration of Human Rights was proclaimed by the United Nations General Assembly in 1948. It contains 30 Human Rights that are expected to be universally respected and protected.
ILO conventions	The International Labour Organization (ILO) is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers, and workers to jointly shape policies/programs promoting decent work for all.
	Core ILO Conventions include the Freedom of Association and Protection of the Rights to Organize Convention, 1948; the Right to Organize and Collective Bargaining Convention, 1949; the Forced Labour Convention, 1930; the Abolition of Forced Labour Convention, 1957; the Minimum Age Convention, 1973; the Worst Forms of Child Labour Convention, 1999; the Equal Remuneration Convention, 1951; and the Discrimination (Employment and Occupation) Convention, 1958.



OECD Guidelines	The OECD Guidelines for Multinational Enterprises
	are recommendations on responsible business
	conduct addressed by governments to multinational
	enterprises operating in or from the 50 adhering
	countries. They set standards for responsible
	business conduct across a range of issues such as
	Human Rights, labour rights, and the environment.

These commitments are aligned with Teleperformance's five core values: Integrity, Respect, Innovation, Professionalism and Commitment – which are the pillars of our corporate culture.

#### SCOPE OF APPLICATION

This Human Rights policy applies to all of Teleperformance's operations, at the local, national, regional and/or international level and to all stakeholders, including individuals that perform work or otherwise provide services for any Teleperformance subsidiary, such as, but not limited to, full-time and part-time employees, contractors, temporary employees, staffing agencies, and vendors ("Workforce Members") and third parties that can be affected because of their relationship with the Companies.

#### PRINCIPLES

At Teleperformance, we are committed to doing business with respect for workers' fundamental dignity and their Human Rights:

- 1. Comply with applicable laws and company policies;
- 2. Adopt a Human Rights governance structure and responsible business practices;
- 3. Implement policies and processes to identify, regularly assess, prevent, mitigate, and remediate Human Rights risks and impacts;
- 4. Report transparently on corporate support of and performance on Human Rights;
- 5. Engage openly and regularly with stakeholders on issues that impact Human Rights, including with affected or potentially affected rightsholders or their legitimate representatives;
- 6. Provide periodic training and communication to all employees on various elements of the Human Rights program;
- 7. Be a Force of Good, and contribute to global communities through Citizen of the World and Citizen of the Planet programs, focusing on providing support to essential rights (food, water, disaster relief, education, and economic empowerment);
- Conduct operations in an environmentally responsible manner, strive to conserve energy, water, and other natural resources, and work to reduce the environmental impact of the Group's activities. Teleperformance's commitment to environmental stewardship is embodied in its Environmental Policy;



- 9. Work with suppliers and partners to uphold these same values and implement similar policies and practices;
- 10. Provide grievance mechanisms accessible to all stakeholders, internal and external, to raise concerns and complaints related to potential breaches to the Group's policies found in the <u>Group's corporate policies intranet page</u>, including on Human Rights.

Teleperformance makes strong commitments to respect, support, and promote Human Rights. We also expect our partners and suppliers to make commitments aligned to these standards, as displayed in the Group's Supplier Code of Conduct found in the <u>Group's corporate policies intranet</u> page.

#### Diversity, Non-discrimination, and no harassment

Teleperformance commits to a workforce and workplace free of harassment, abuse and discrimination. The Companies do not unlawfully discriminate and, in fact, welcome, integrate and value people from all backgrounds, including ethnicity, religion, gender, LGBTQIA (lesbian, gay, bisexual, transgender, queer or questioning, intersex and asexual or allied), national origin, citizenship, ancestry, age, disability, genetic information, family care status, social background, military caregiver status, veteran or military service or obligation, reserve status, national guard status, refugee status, or any other basis protected by applicable laws.

The commitment of the Companies to diversity, inclusion and equal employment opportunities concerns all aspects of the employment relationship, including recruitment & hiring, training, promotions & career advancement, anti-harassment, remuneration and work conditions. They shall not tolerate physical, verbal, sexual or psychological harassment or abuse, or the threat thereof, in the workplace or the workforce.

Teleperformance's full commitment is available in its Diversity and Inclusion Policy found in the <u>Group's corporate policies intranet page</u>.

#### Workplace Safety

Teleperformance commits to providing a safe and healthy workplace and preventing harm to its workers, contractors, visitors, and communities. Teleperformance integrates sound health and safety management practices in all aspects of their business, in order to:

- Provide and maintain a safe and healthy work environment and fully comply with all applicable health and safety laws and regulations, as well as Teleperformance policies;
- Obtain, keep current, and comply with all required health and safety permits;
- Provide and maintain emergency plans and response procedures for health emergencies and accidents that will minimize harm to life, environment and property;
- Provide workers with appropriate workplace health and safety information and training in a language understood by the workers, and clearly post adequate health and safety information in their facilities; and



• Identify, evaluate, manage and minimize occupational health and safety hazards and have a health and safety management system in place covering all aspects of their business.

Teleperformance's full commitment is available in its Health & Safety Policy found in the <u>Group's</u> <u>corporate policies intranet page</u>.

#### Prevention of Human Trafficking, Forced Labor, and Child Labor

Teleperformance condemns any form of child and forced labor. Teleperformance will ensure that all work is voluntary and will not use or tolerate any form of slave, forced, bonded, indentured or prison labor or any kind of human trafficking. Teleperformance respects the rights of children as stated in the Convention on the Rights of the Child including the right to education, the right to rest and play, and the right to have basic needs met. Teleperformance will not engage in, or allow child labor within their facilities or in those of their own suppliers.

Teleperformance follows the ILO definition of the minimum age for admission to employment or work and employs only workers who are at least 15 years old, the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is the highest.

#### Working Hours and Minimum Wage Standards

Teleperformance complies with ILO International Labour Standards and applicable local laws and regulations regarding working conditions and overtime, including days of rest. All overtime must be voluntary and applies on a case-by-case basis and always in compliance with local laws.

Working hours are not to exceed the maximum set by local law or no more than 48 hours per week excluding overtime (or 60 hours per week including overtime), whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off.

Teleperformance ensures that employee compensation complies with applicable wage laws, including those related to minimum wages, overtime hours, and legally mandated benefits. Teleperformance expects Companies to pay workers enough to ensure a fair pay and a living wage. The goal of a living wage is to allow a worker to afford a decent standard of living, sufficient to satisfy all their basic needs. Before entering an employment relationship and, as necessary, throughout its duration, the Companies shall provide their workers with clear and understandable written information about their employment conditions in a language understood by the workers with respect to, in particular, their wages, benefits, location of work and, if applicable, any costs charged to workers. Teleperformance promotes equal pay and ensures that no worker is unlawfully discriminated against in terms of salary, benefits, incentives, or other forms of compensation or remuneration. Teleperformance requires its suppliers to comply with these expectations.



#### Freedom of Association and Collective Bargaining

Teleperformance commits to respect workers' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively in accordance with applicable legal requirements. All Workforce Members may freely join or associate with organizations without interference, retaliation, adverse actions, discrimination, or harassment. Teleperformance does not tolerate any discrimination or adverse actions against employee representatives for participating in lawful trade union activities, and also prohibits any discrimination or adverse actions against employees for participating in or refraining to participate in such activities.

Teleperformance commits not only to respect and protect workers' representative but also guarantee the effective exercise of the trade union rights in the workplace.

Where Workforce Members are represented by a legally recognized union, Teleperformance is committed to establishing a constructive dialogue with their freely chosen representatives. In situations or locations where independent trade unions are discouraged or restricted, Teleperformance allows employees to gather independently to discuss workplace-related problems and encourages them to meet with management to discuss these issues and any concerns or complaints employees may wish to raise.

The Companies commit to provide reasonable notice of impending changes in operations that affect employment such as mergers and significant layoffs.

#### **Privacy and Data Protection**

Teleperformance is committed to the right of privacy and data protection and seeks to protect against unauthorized access, use, destruction, modification, or disclosure of personal information and data as outlined in Teleperformance's Privacy Policy found in the <u>Group's corporate policies</u> <u>intranet page</u>. Teleperformance commits to keep its Workforce Members, clients and customers data safe and keep them only as long as it is needed for business purposes, in compliance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the European Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and all other applicable local privacy, data protection and information laws where Teleperformance operates.



#### ETHICS HOTLINE AND PROTECTION OF WHISTLEBLOWERS

We encourage Teleperformance Workforce Members and stakeholders to use the established channels to report, including the Global Ethics Hotline, their manager, the Compliance department, or the Human Resources department, when they personally -- acting in good faith, reasonably and selflessly -- believe that wrongful business conduct or Human Rights breaches have taken place, are taking place or are about to take place. Reports will be investigated in accordance with the procedures set forth in the Global Ethics Hotline Policy and actions put in place to remediate and mitigate any adverse Human Rights impacts.

Workers, communities, or any individuals who may be adversely impacted by the company are encouraged to raise complaints or concerns, including in relation to Human Rights issues, through the Global Ethics Hotline. This mechanism does not preclude access to judicial or other non-judicial grievance mechanisms.

No retaliation will be made against anyone who in good faith, reasonably and selflessly reports wrongful business conduct or Human Rights breaches. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures will be taken, if the allegations of retaliations are substantiated.

Reports will be treated with confidentiality within the limits as provided for by applicable laws and regulations.

The Global Ethics Hotline Policy and information about the Global Ethics Hotline are available on the <u>Group intranet</u> and corporate website.

In case Teleperformance has caused or contributed to adverse Human Rights impacts, we commit to provide for or cooperate in remediation to victims and engaging in a continuous improvement process to prevent similar adverse impacts in the future.

#### RESPONSIBILITIES

To ensure the deployment of this policy, a dedicated governance structure is articulated around the Human Resources Department, the Corporate Social Responsibility (CSR) Department, and the Compliance, Privacy and Security teams, with Board oversight, mainly through the CSR Committee.

**Human Resources**: The Human Resources Department has the same responsibilities as all other Workforce Members relative to compliance with this Policy. At the same time, Human Resources Department personnel in the Companies have special responsibilities in preparing and implementing this Policy and any Company-specific policies, identifying and conducting/arranging for training on such policies, conducting thorough investigations of the complaints that are brought forward by management or any employee under such policies; and providing appropriate coaching and support for all parties involved in possible breaches to Human Rights.

**CSR**: Human Rights risks and practices are regularly reviewed and assessed by the CSR department, to evaluate the adherence between local practices vs. international standards and Teleperformance



global codes and policies, address the requirements from the Duty of Vigilance, identify best practices or implement corrective actions.

**Compliance, Privacy and Security**: Privacy, compliance, and security are critical for protecting Human Rights. The collection, use, and storage of personal information must be managed responsibly to ensure individuals' privacy rights are protected. Adherence to legal and regulatory requirements also supports the protection of Human Rights, as these laws and regulations are designed to ensure fairness and prevent discrimination. Security measures help prevent unauthorized access and misuse of sensitive information, reducing the risk of harm to individuals. Teleperformance reviews and assesses the privacy, compliance, and security practices by conducting regular audits and risk assessments, testing systems for vulnerabilities, and continuously updating policies and procedures to meet changing legal and regulatory requirements through the various privacy, compliance, and security policies.

**Managers**: Not only must managers and supervisors conduct themselves in a manner consistent with this Policy, they are also responsible for establishing and maintaining a work environment respecting and upholding Human Rights. Managers must respond to any form of potential breach to Human Rights reported to them, or that they observe, in accordance with the Company policies, including by taking swift action designed to stop the conduct and reporting it to Human Resources Department management.

**Workforce Members**: Workforce Members are responsible for reviewing, understanding, and asking any questions needed to clarify this Policy; promoting a workplace respectful of Human Rights by conducting themselves in a manner consistent with such policies; attending all required training on the subject matter of such policies; and immediately reporting any possible violation of such policies in accordance with the procedures set forth in their Company policies to their Human Resources Department or the Global Ethics hotline.

#### **TELEPERFORMANCE UNDERLYING POLICIES AND STATEMENTS**

The Human Rights policy should be read in conjunction with Teleperformance's underlying policies and statements found in the <u>Group's corporate policies intranet page</u> and/or <u>Teleperformance's</u> <u>website</u>:

- Code of Conduct
- Code of Ethics
- Compliance Policy
- Anti-Money Laundering and Counter-terrorist Financing Policy
- Gifts and Hospitality Policy
- Third-Party Risk Management Policy
- Global Ethics Hotline
- Environmental Policy
- Vigilance Plan
- Diversity and Inclusion Policy
- Privacy Policy
- Health and Safety Policy

For more information: teleperformance.com

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