

Teleperformance: Global Ethics Hotline Policy



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Document Version Log

VERSION	AUTHOR	REMARKS / CHANGES	REVIEWED BY	APPROVED BY	APPROVED DATE
1.0	N/A	Policy creation	N/A	N/A	N/A
2.0	Quincy Howard Bob Bair	<ul style="list-style-type: none"> Policy Alignment Regulatory updates 	Alan Winters: Chief People and Diversity Officer	Teri O'Brien: Chief Legal and Compliance Officer	10/27/2023

OWNER	GLOBAL ETHICS HOTLINE
Document Type	Policy
Version	2.0
Status	Approved
Effective Date	11/6/2023
Classification	Publicly Available and External Use

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Message from the Chairman and Chief Executive Officer



CEO Message

Integrity is one of Teleperformance's five core values, pillars of our corporate culture, with Respect, Innovation, Professionalism, and Commitment. At Teleperformance, everyone is responsible for always acting with integrity.

Our commitment to act with integrity means acting and complying with the highest professional and ethical standards and the laws that govern Teleperformance, our operations, and our industry. Teleperformance and its subsidiaries are committed to the highest standards of ethical, honest, and legal business conduct. This Global Ethics Hotline Policy reflects the practices and behavioral principles supporting that commitment. It is intended to provide a mechanism for reporting suspected wrongful business conduct (as described below) while protecting the reporting individual from retaliation or other adverse employment action.

We are all custodians of Teleperformance's reputation and culture and are responsible for keeping our business strong by demonstrating the highest standards of integrity in our behavior. We owe this to our clients, partners, shareholders, and ourselves. Many thanks for your unfailing commitment to upholding the values of Teleperformance and promoting them both inside and outside the Group.

Daniel Julien,
Chairman and Chief Executive Officer

Our Purpose

Teleperformance and its subsidiaries (collectively, “Teleperformance,” the “Company,” or the “Group”) are committed to the highest standards of ethical, honest, and legal business conduct. We will conduct business ethically and honestly and fully comply with all applicable laws and regulations. This commitment guides every business decision we make globally in every Company area.

This Global Ethics Hotline Policy reflects the practices and behavioral principles supporting that commitment. It is intended to provide a mechanism for reporting suspected wrongful business conduct (as described below) while protecting the notifying individual from retaliation or other adverse employment action. Note that local countries and subsidiaries may adopt different policies or reporting standards, not inconsistent with this policy, to the extent appropriate based on their local country’s laws and regulations.

This Global Ethics Hotline Policy will be communicated to all relevant individuals by posting it on the Company’s intranet and in the Company’s physical locations, among other means. Everyone is expected to read, understand, and consistently adhere to the Policy while performing their day-to-day activities.

This Global Ethics Hotline Policy applies to all members of the Teleperformance group of companies, including their respective shareholders, current and former employees, officers and directors, incoming employees (not onboarded), volunteers, trainees, contractors, and subcontractors. This Policy is subject to specific terms and provisions described in any addendum approved for a particular country due to applicable local laws and regulations.

Reporting an Ethical Concern

This Global Ethics Hotline Policy is intended to identify severe and sensitive issues where a reporter reasonably believes wrongful business conduct has occurred, is occurring, or is about to happen. In that case, the reporter should promptly report the relevant facts by contacting the Teleperformance Global Ethics Hotline via the website tp.integrityline.com or the country-dedicated phone line.

This Global Ethics Hotline Policy encourages Teleperformance respective shareholders, current and former employees, officers and directors, incoming employees (not onboarded), volunteers, trainees, contractors, and subcontractors (each a potential “reporter”) to report via the Global Ethics Hotline, by the procedures described below, when they personally, in good faith, reasonably and selflessly believe that wrongful business conduct has occurred, is occurring or is about to appear (a “report”). Wrongful business conduct, for purposes of this Global Ethics Hotline Policy, includes, without limitation:

- Theft or fraud, including fraudulent use of personal or confidential information
- Violations of financial services, consumer protection, anti-corruption, antibribery, insider trading, anti-money laundering, securities or other similar laws and regulations
- Inappropriate access to or misuse of company data or systems, including confidential information, intellectual property, credential sharing, and/or other violations of the Teleperformance Global Information Security Policy or standards
- Billing for services not performed or other fraudulent financial reporting
- Misappropriation of assets, property, resources, or authority for personal gain or an improper or illegal purpose
- Retaliation, discrimination, or harassment based on race, creed, color, religion, national origin, ancestry, age, gender, sex, sexual orientation, marital status, veteran status, disability, medical condition, or other legally protected characteristic
- Serious threat or damage to the public interest, known personally by the reporter
- Serious risk to public health or the environment, including violations of environmental, health and safety, product and food safety, transportation safety, or other similar laws and regulations.
- Manifest and severe infringement of any applicable international commitment duly ratified or approved by France or the United Nations Global Compact (which includes commitments in the areas of human rights, freedom of association, elimination of forced and compulsory work, effective abolition of child labor, elimination of discrimination in respect of employment and occupation, environmental responsibility, and anti-corruption)
- Violation of applicable privacy protections, including those related to personal data and security of networks and information systems

- Other fraudulent, dishonest, or unethical conduct that violates the Teleperformance Code of Conduct, Global Ethics Hotline Policy, Code of Ethics, or any other Teleperformance policy.

Your Protections

Teleperformance conducts business ethically, honestly, and in full compliance with applicable laws and regulations. This applies to every business decision we make in every area of the Company. The following commitments guide Teleperformance's Global Ethics Hotline practices:

- **Anti-Retaliation:** Teleperformance will not retaliate against or condone retaliation against any reporter who, in good faith and selflessly, reports or cooperates in an investigation concerning suspected wrongful business conduct. Any allegations of retaliation will be promptly investigated, and appropriate corrective measures will be taken if such allegations are substantiated. Subject to applicable local laws and regulations, a reporter's protection from retaliation does not prevent the Company from taking appropriate disciplinary action based on valid performance-related factors.
- **Anonymous reporting:** Teleperformance encourages reporters to identify themselves when submitting a report because more detailed information and follow-up questions may be required to investigate the report efficiently and effectively. However, a reporter can submit a report anonymously if they wish, keeping in mind that it may become necessary to identify the source of the information during the investigation. If reporters report anonymously, they must provide sufficient specific and concrete facts to enable Teleperformance to investigate and address the report adequately. Subject to applicable local laws and regulations, if disciplinary or legal action is taken against a person result of a report, Teleperformance may have a duty to disclose the report's contents to such person.
- **Confidentiality and privacy:** The identity and identifying information of the reporter will be kept confidential to the extent possible. It will not be disclosed to any third party except where applicable local laws and regulations require disclosure to judicial authorities, law enforcement, or other government officials. Reports submitted to Teleperformance will be handled with sensitivity, discretion, and confidentiality to the extent permitted by the circumstances and applicable laws and regulations. Generally, this means that reports will only be shared on a "need-to-know" basis, to the extent necessary to ensure that Teleperformance can conduct an effective investigation and formulate an appropriate plan of action based on its findings.
- **Good-faith reporting:** This Global Ethics Hotline Policy and the protections afforded by it only apply to reports made in good faith by reporters who reasonably believe that the information reported is accurate. A reporter's wrongdoing will not be given automatic protection from investigation, disciplinary action, or, in appropriate cases, civil action or referral for criminal prosecution.

Your Responsibilities and Obligations

Everything we do reflects on Teleperformance. As a Teleperformance reporter, we expect you to:

- **Own your conduct:** At Teleperformance, we value all reporters for being 100% themselves. As such, we expect employees to own their conduct, job duties, and responsibilities.
- **Follow the policy:** Comply with the letter and spirit of the Global Ethics Hotline Policy and all applicable laws and regulations.
- **Speak up:** If you see something, say something. Suppose you see or hear of any violation of the Teleperformance Global Ethics Hotline Policy, another Teleperformance policy, or an applicable legal or regulatory requirement. In that case, you should promptly notify your manager, Human Resources, or Legal via established reporting channels (e.g., the Global Ethics Hotline).
- **Use good judgment and ask questions:** Consistently apply Teleperformance's principles and values and review relevant policies as needed. When in doubt about how to proceed, you should reach out to your supervisor, a member of the management team, Human Resources, or Legal via an established reporting channel.
- **Cooperate:** You must fully cooperate in any Teleperformance investigation and keep any information shared with you confidential to safeguard the investigation's integrity.

After Reporting Your Concern

This Global Ethics Hotline Policy is intended to encourage and enable reporters to raise good-faith concerns about suspected wrongful business conduct through the designated channels. Subject to applicable laws and regulations, you can expect the following after successfully submitting a report:

- To be contacted within seven days following the Company's receipt of your report.
 - If you submitted accurate contact information and did not receive acknowledgment of your report within seven days, you can report the relevant information to the appropriate governmental, administrative, or judicial authority.
- To receive an update as to the status of the investigation while keeping confidentiality and privacy in mind.
- Teleperformance seeks to preserve the integrity of the reporting and investigatory process; accordingly, the Company requests that you keep the information in the report strictly confidential and not disclose it to others, except to the extent required or permitted by applicable laws or regulations.
- To be contacted by Teleperformance management once the report has been thoroughly investigated, usually within 90 days of the Company's receipt. Note that some investigations may take more time due to the nature of the reported information.
 - If you submitted accurate contact information and did not receive a reply to your report within 90 days, you can report the relevant information to the appropriate governmental, administrative, or judicial authority.

Investigating an Ethics Report

All reports made via the Global Ethics Hotline will be promptly and, to the extent practicable, thoroughly investigated under the direction and oversight of the Chief Compliance Officer, the Deputy Chief Compliance Officer, or their designee.

- The Chief Compliance Officer, Deputy Chief Compliance Officer, or designee has the authority to engage legal counsel and other specialists as they deem appropriate to investigate any report made under the Global Ethics Hotline Policy and Code of Conduct.
- The Chief Compliance Officer and/or the Deputy Chief Compliance Officer may periodically provide a summary report to the Audit and Compliance Committee of the Teleperformance Board of Directors (the “Audit and Compliance Committee”) on how the Global Ethics Hotline Policy and related procedures are functioning.
- The Chief Compliance Officer and/or the Deputy Chief Compliance Officer will inform the Company’s Chief Executive Officer if a report rises to a materiality level that may justify reporting to/discussing with the Audit and Compliance Committee.

All parties, including respective shareholders, current and former employees, officers and directors, incoming employees (not onboarded), volunteers, trainees, contractors, and , must promptly cooperate and provide accurate information with any investigation.

Appropriate corrective action will be taken as and when warranted. Persons responsible for wrongful business conduct or those who provide false information or refuse to participate in an investigation may be subject to disciplinary action up to and including termination of employment and, in appropriate cases, civil action or referral for criminal prosecution, subject to applicable laws and regulations.

Recordkeeping

The Company will retain all reports in compliance with its internal record-keeping standards and as required under applicable privacy, document retention, and/or destruction laws and regulations.

In jurisdictions where local laws or regulations set stricter rules or greater protections or rights for reporters than those outlined in this Global Ethics Hotline Policy, the more stringent rules or greater protections or rights will prevail in that jurisdiction. Any deviations from this Global Ethics Hotline Policy required by applicable laws or regulations will be incorporated into the procedures followed in the relevant jurisdiction.

Teleperformance may modify this Global Ethics Hotline Policy unilaterally at any time. Modifications may be necessary, among other reasons, to maintain compliance with applicable legal requirements and/or to accommodate Company organizational changes.

Rights of Access

Any person identified in a report made to this Global Ethics Hotline Policy benefits from a right to access the data concerning them. Persons can request correction or deletion if such data are inaccurate, incomplete, equivocal, or outdated.