

# Teleperformance Global Ethics Hotline Policy



This Global Ethics Hotline Policy applies to the Teleperformance group of companies, subject to specific terms and provisions described in any addenda approved for a particular country due to applicable local laws and regulations.

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# 1. Purpose



Teleperformance and its subsidiaries (collectively, “Teleperformance” or the “Company”) are committed to the highest standards of ethical, honest and legal business conduct. This Ethics Hotline Policy reflects the practices and principles of behavior that support that commitment. It is intended to provide a mechanism for the reporting of suspected wrongful business conduct (as described below), while protecting the reporting individuals from retaliation or other adverse employment action. This Ethics Hotline Policy will be communicated to all employees, officers, directors, temporary staff and consultants by, among other means, posting on the Company’s intranet and on posters in Company locations. Each individual is expected to read the Ethics Hotline Policy and understand its application to the performance of his/her responsibilities.

## 2. Policy

This Ethics Hotline Policy encourages Teleperformance employees, officers, directors, temporary staff and consultants (each, a “Reporting Person”) to report, pursuant to 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 occur (a “Report”). Wrongful business conduct, for purposes of this Ethics Hotline Policy, includes, without limitation:

- Theft, illegal act or crime
- Fraud, including fraudulent use of personal information (such as name, social security or identification number, address or other information by which a person can be identified)
- A violation of applicable laws or regulations, in particular those relating to anti-corruption, anti-bribery, insider trading or other securities laws, human trafficking, or harassment
- Acts or behavior that violate, or are not compliant with, Teleperformance’s Code of Conduct, the Company’s internal accounting controls or any other Company policy, including any of the Global Essential Compliance and Security Policies (“GECSPs”)
- Billing for services not performed or other fraudulent financial reporting
- The use of Teleperformance property, resources or authority for personal gain or for an improper or illegal purpose
- Discrimination on the basis of race, creed, color, religion, national origin, ancestry, age, gender, sex, sexual orientation, marital status, veteran status, disability, medical condition or other legally protected characteristics
- Serious threat or damage to the public interest, known personally by the Reporting Person
- Serious violation of the health and safety of persons or the environment
- Manifest and serious infringement of any international commitment duly ratified or approved by France or of the United Nations Global Compact (which includes principles 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)
- Other fraudulent, dishonest or unethical conduct

A Report is made “in good faith” when it is based on reasonable facts and/or circumstances allowing for the reasonable assumption that it is sufficiently grounded, and when it is not made maliciously, recklessly or with knowledge that it is false.

### 3. Protections



Teleperformance will not discharge, threaten, diminish the compensation or other employment terms or conditions, or otherwise retaliate against any Reporting Person who in good faith and selflessly reports, or cooperates in the investigation of, suspected wrongful business conduct. Any complaint of retaliation will be promptly investigated and appropriate corrective measures will be taken, if the allegations of retaliation are substantiated. Subject to applicable local laws and regulations, the protection from retaliation does not prevent the Company from taking actions, including disciplinary action, in connection with unrelated matters that may occur in the usual scope of the Reporting Person's duties if such actions are based on valid performance related factors.

Teleperformance encourages Reporting Persons to identify themselves when making a Report because more detailed information and follow-up questions may be required in order to efficiently and effectively investigate the Report. However, a Reporting Person can submit a Report anonymously if he/she wishes to do so, keeping in mind that in the course of the investigation it may become necessary to identify the source of the Report. If a Reporting Person chooses to report anonymously, he/she must provide sufficient specific and concrete facts that will enable the Company to adequately investigate and address the Report. Subject to applicable local laws and regulations, if disciplinary or legal action is taken against a person as a result of a Report, such person may have the right to know the contents of the Report.

The identity and identifying information of the Reporting Person must be kept confidential and cannot be disclosed to any third party without his/her prior consent, except, subject to applicable local laws and regulations, in case of disclosure to judicial authorities, law enforcement, and government officials.

Information identifying the person who is the subject of the Report cannot be disclosed to any third party before it is established that the concern is well founded (except in case of disclosure to judicial authorities, law enforcement, and government officials).

Reports submitted to Teleperformance will be handled with sensitivity, discretion and confidentiality, to the extent allowed by the circumstances and applicable laws and regulations. Generally, this means that Reports will only be shared with those who have a "need-to-know", so that Teleperformance and, if applicable, its client (and, if appropriate, judicial authorities, law enforcement, government officials, and/or Teleperformance's external legal counsel or other specialists) can conduct an effective investigation and determine what action to take, based on the results of the investigation.

This Ethics Hotline Policy, and the protections it provides, apply only to Reports made in good faith with a reasonable belief in the accuracy of the Report. A Reporting Person whose own conduct is implicated will not be given automatic protection from investigation, disciplinary action or, in appropriate cases, civil action or referral for criminal prosecution.



## 4. Reporting Procedures

The procedures in this Ethics Hotline Policy are intended for serious and sensitive issues. If a Reporting Person has reason to believe that wrongful business conduct has occurred, is occurring or is about to occur, the Reporting Person should, without delay, report those facts by contacting the Teleperformance Ethics Hotline via the dedicated website: [www.teleperformance.com/ethicshotline](http://www.teleperformance.com/ethicshotline)

If the Reporting Person provides a manner by which he/she can be contacted, he/she will be informed of the receipt of his/her Report without delay. The Reporting Person also may be given an estimate of the amount of time needed to investigate the Report, which will depend on the content and nature of the Report, and may receive an update as to the status of the investigation (although not necessarily all the results of the investigation or any action taken), to the extent appropriate, practicable and permitted by applicable local laws and regulations. To preserve the integrity of the reporting and investigation process, the Company requests that the Reporting Person 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. In addition, if the Reporting Person is contacted by Teleperformance management, external legal counsel or other specialists for information in connection with the Report, the Company asks that he/she kindly cooperate.

## 5. Investigations



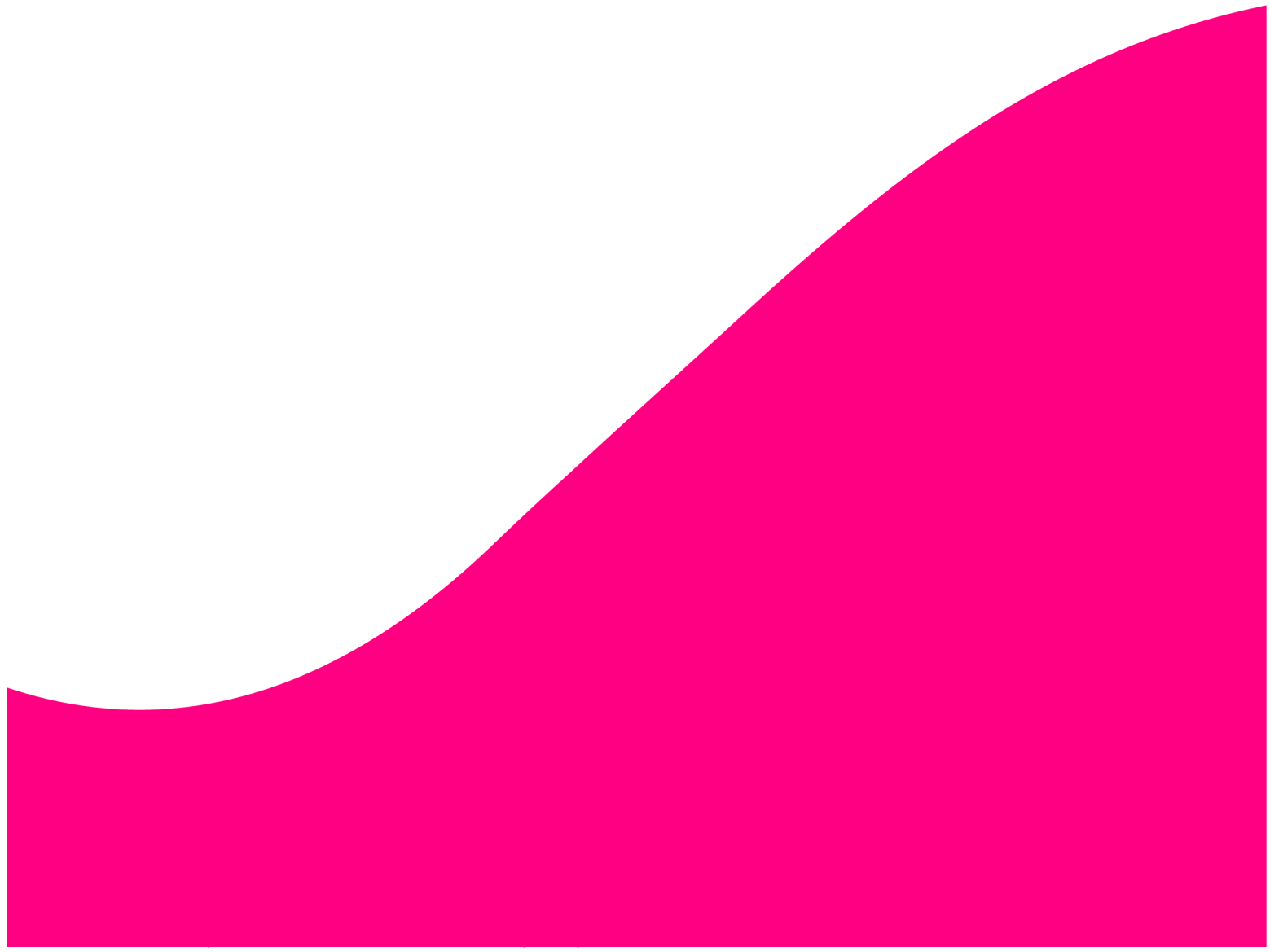
All Reports made under this Ethics Hotline Policy will be promptly and, to the extent practicable, thoroughly investigated under the direction and oversight of the Chief Compliance Officer and the Deputy Chief Compliance Officer. The Chief Compliance Officer and/or the Deputy Chief Compliance Officer have the authority to engage legal counsel and such other specialists as he/she deems appropriate to assist with the investigation of any Report made under this Ethics Hotline Policy. The Chief Compliance Officer and/or the Deputy Chief Compliance Officer will 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 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/discussion with the Audit and Compliance Committee.

All Company employees, officers, directors, temporary staff and consultants have a duty to promptly cooperate and provide accurate information in connection with any investigation of a Report, or of discrimination, retaliation or harassment resulting from a Report or the investigation of a Report.

Appropriate corrective action will be taken as and when warranted. Persons responsible for the wrongful business conduct or those who provide false information during 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.

This Ethics Hotline Policy is intended to encourage and enable Reporting Persons to raise, in good faith, reasonably and selflessly, concerns about suspected wrongful business conduct through the designated Teleperformance channels prior to providing any notification outside the Company. Unless otherwise provided under applicable laws or regulations, if the Reporting Person has not received a reply to his/her Report within 60 days of its receipt (assuming the Reporting Person has provided a manner by which he/she can be contacted), the Reporting Person can report the relevant information to the appropriate governmental, administrative or judicial authority. Unless otherwise provided under applicable laws or regulations, if the Reporting Person has not received a reply to his/her Report after 90 days (assuming the Reporting Person provides a manner by which he/she can be contacted), the Reporting Person can publicly disclose the relevant information as long as that information is not required to be kept confidential under the Company’s policies or agreements or applicable laws or regulations.

## 6. Administrative Matters



The Company will retain all Reports as part of its records for a period of at least two months, unless otherwise required under applicable local privacy, document retention and/or destruction laws or regulations.

In jurisdictions where local laws or regulations set stricter rules or greater protections or rights for Reporting Persons than those set forth in this Ethics Hotline Policy, the stricter rules or greater protections or rights will prevail in that jurisdiction. Any deviations of this Ethics Hotline Policy because of applicable laws or regulations will be incorporated in the procedures followed in the applicable jurisdiction.

Teleperformance may modify this Ethics Hotline Policy unilaterally at any time without notice. Modifications may be necessary, among other reasons, to maintain compliance with applicable legal requirements and/or to accommodate Company organizational changes.

## **7. Right of access and of rectification**

Any person identified in a Report made in connection with this Ethics Hotline Policy benefits from a right to access the data concerning him/her and can request, if such data are inaccurate, incomplete, equivocal or out of date, their correction or deletion.





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