

Teleperformance Supplier Code of Conduct

Teleperformance SE (including all its subsidiaries, “Teleperformance” or the “Group”) is committed to the highest standards in terms of social and environmental responsibility and ethical conduct. Teleperformance has a « zero tolerance » policy when it comes to unethical business behavior, such as bribery, corruption and forced labor. Teleperformance’s five core values are Integrity, Respect, Professionalism, Innovation and Commitment, and the Group expects all of its suppliers to adhere to similar standards and to conduct their business ethically.

Teleperformance requires its suppliers to operate in accordance with the principles of this Teleperformance Supplier Code of Conduct (the « Code ») and in full compliance with all applicable laws and regulations. This Code goes beyond mere compliance with applicable laws as it contains internationally recognized standards to advance social and environmental responsibility. Suppliers shall comply with ILO International Labour Standards and applicable local laws and regulations. When differences arise between these standards and applicable legal requirements, the stricter standard shall apply, in compliance with applicable law.

This Code applies to all suppliers and their subsidiaries, affiliates and subcontractors (each, a « Supplier ») that provide goods or services to Teleperformance or on its behalf. All Suppliers must adhere to this Code while conducting business with or on behalf of Teleperformance.

This Code defines the main principles underlying Teleperformance’s expectations for Supplier conduct regarding human rights and fair labor conditions, health and safety, environmental responsibility, business ethics and integrity, and legal and regulatory compliance. By signing it, Teleperformance’s Supplier agrees to live up to Teleperformance’s expectations in the field of ethical and responsible business conduct.

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1. PRINCIPLES

A. Human rights and fair labor conditions

At Teleperformance, we are committed to doing business with respect for workers' fundamental dignity and their human rights. Teleperformance expects the same commitment from its Suppliers and requires them to meet the following minimum standards:

- a. **Non-discrimination and no harassment:** Suppliers shall commit to a workforce and workplace free of harassment, abuse and discrimination.

While Teleperformance recognizes and respects cultural differences, we require that Suppliers not engage in discrimination in recruiting, hiring, compensation, access to training, promotion, termination and/or retirement based on age, disability, ethnicity, gender identity or expression, marital status, national origin, political affiliation, race, color, sex, religion, sexual orientation, pregnancy, union membership or veteran status, or any other status protected by applicable national or local laws or regulations. In addition, Suppliers shall not tolerate physical, verbal, sexual or psychological harassment or abuse, or the threat thereof, in the workplace or the workforce.

- b. **Freedom of association and collective bargaining:** Suppliers shall 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, without interference, discrimination, retaliation, or harassment.

- c. **No forced labor and no underage labor:** Suppliers shall ensure that all work is voluntary. Suppliers shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labor.

Suppliers must respect the rights of children as stated in the Convention on the Rights of the Child¹ including the right to education, the right to rest and play, and the right to have basic needs met. The Supplier shall not engage in, or allow, child labor within their facilities or in those of their own suppliers.

Suppliers shall follow the International Labor Organization definition of the minimum age for admission to employment or work. Suppliers shall employ 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.

- d. **Reasonable working hours:** Suppliers shall comply with ILO International Labour Standards and applicable local laws and regulations with regard to working conditions and overtime, including days of rest. All overtime must be voluntary.

- e. **Fair wages and benefits:** Suppliers shall pay at least the applicable minimum wage and provide any benefits required by law and/or contract. Where the statutory minimum wage is non-existent or not sufficient to meet basic needs, Suppliers shall strive to pay workers enough to ensure a decent standard of living sufficient to satisfy basic needs of workers and their families. Before entering into an employment relationship and, as necessary, throughout its duration, Suppliers shall provide their workers with clear and understandable written information about

¹ <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

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. Suppliers shall not take deductions from wages as a disciplinary measure, nor shall they take any deductions from wages that are not provided for by applicable national or local law without the express, written permission of the worker.

B. Health and safety

Teleperformance is a “people company”, committed to providing a safe and healthy workplace and preventing harm to its workers and visitors. Teleperformance expects its Suppliers to meet that standard and integrate sound health and safety management practices in all aspects of their business.

Suppliers are expected to meet the following minimum standards:

- 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.

C. Environmental responsibility

As a leading global company, Teleperformance believes that it is not only our responsibility but a shared responsibility with all our stakeholders, including our Suppliers, to use our resources wisely and reduce our impact on the environment.

Suppliers shall commit to protect the environment and develop, implement and maintain environmentally responsible business practices.

Suppliers shall obtain, keep current and comply with all required environmental permits, including applicable operational and reporting requirements. They shall comply with all applicable environmental laws and regulations regarding, in particular, waste, air emissions, and hazardous materials.

Suppliers shall endeavor to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in their facilities, through their maintenance and production processes, and by recycling, re-using, or substituting materials.

Suppliers shall exercise due diligence on relevant materials in their supply chains. Suppliers shall develop due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted on the material processing level in order to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, the worst forms of child labor, forced labor and human trafficking, gross human rights violations, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts. Suppliers shall comply with all applicable conflict minerals laws and regulations, including reporting requirements, and commit to identifying, reducing and ultimately eliminating the use of conflict minerals in materials or products supplied to Teleperformance.

D. Business ethics and integrity

Teleperformance is committed to doing business with integrity and fairness. We expect the highest standards of ethical conduct in all of our endeavors, and the Group requires that Suppliers be ethical in every aspect of their business, including relationships, practices, sourcing and operations.

As a consequence, Teleperformance expects its Suppliers to meet the following minimum standards:

- **Anticorruption, Bribery:** Suppliers shall not engage in corruption, extortion, embezzlement, kickbacks, or bribery of any kind in order to obtain an unfair or improper advantage, whether in dealing with public officials or individuals in the private sector. Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate and international anti-corruption conventions.

Suppliers shall not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses, loans and charitable donations) to any official or employee of any government, government agency, political party, public international organization or any candidate for political office to improperly influence any act or decision of the official, employee or candidate for the purpose of promoting Teleperformance's business interests, or otherwise improperly promote Teleperformance's business interests.

Gifts: Suppliers shall avoid gifts to Teleperformance employees because even a well-intentioned gift might constitute a bribe under certain circumstances or create a conflict of interest. Suppliers shall not offer anything of value to obtain or retain a benefit or advantage for the giver, and shall not offer anything that might appear to influence, compromise judgment, or obligate a Teleperformance employee, director or senior executive. If offering a gift, meal or entertainment to Teleperformance employees, Suppliers must use good judgment, discretion, and moderation. Any gift from a Supplier must be permissible under the Teleperformance Code of Conduct.

Any gifts, meals or entertainment offered or made by a Supplier must comply with applicable law, must not violate the giver's or recipient's policies on the matter, and must be consistent with local custom and practice. Teleperformance Procurement team or its representatives are not allowed to receive any gift, meal or entertainment from a Supplier other than an inexpensive corporate gift such as a pen, notebook, etc., as referenced in section "gifts, travel and entertainment" from Teleperformance Code of Conduct.

- **Conflict of interest:** Suppliers shall avoid the appearance of or any actual impropriety or conflict of interest. Suppliers shall avoid any situation in which a conflict could arise between the best interests of Teleperformance and a direct or indirect personal interest. As a consequence, Suppliers shall not deal directly with any Teleperformance employee whose spouse, domestic partner, or other family member or relative holds any relationship or interest in the Supplier. Suppliers shall not deal directly either with any Teleperformance employee whose reporting line holds any relationship or interest in the Supplier. Suppliers are expected to immediately disclose to Teleperformance any situation in which they perceive a potential conflict of interest so that appropriate action can be taken.
- **Financial records, Money laundering, Confidential information, and Insider trading:** Teleperformance expects its Suppliers to perform all business and commercial dealings transparently and to record them accurately in their books and records as provided for by applicable laws and regulations. Suppliers shall abide by all applicable anti-money

laundrying laws and regulations, and shall not, directly or indirectly, engage in or facilitate any form of money laundering.

In addition, Suppliers shall treat all business, commercial, operating and financial information of, about or regarding Teleperformance and its commercial partners as confidential. No Supplier shall use any confidential information it possesses regarding Teleperformance to either engage in or support, directly or indirectly, insider trading.

- **Risk assessment and management:** Suppliers shall develop and maintain a process to identify labor and human rights, health and safety, environmental, business ethics and legal compliance risks associated with their operations; determine the relative significance of each risk; implement appropriate procedures and controls to minimize the identified risks; and have all required insurance.

E. Legal and regulatory compliance

Suppliers must conduct their business activities in full compliance with applicable laws and regulations while conducting business with or on behalf of Teleperformance. In addition to the other legal and regulatory compliance expectations set forth in this Code, Suppliers are expected to meet the following minimum standards:

- Comply with all applicable trade controls and export, re-export, and import laws and regulations;
- Conduct business in full compliance with antitrust and fair competition laws in the jurisdictions in which they conduct business;
- Comply with local tax regulations;
- Respect and protect the intellectual property rights of all parties, including Teleperformance, and safeguard proprietary and/or confidential information of Teleperformance and other parties; and
- Keep Teleperformance's 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). When the provision of services to Teleperformance terminates, all Teleperformance Personal Data Processed by the Supplier and any Third Party Data Processor shall, at the choice of Teleperformance and in accordance with the relevant terms of its contract with the Supplier, be either safely returned (including all copies) to Teleperformance, or destroyed (including all copies), in which case the Supplier shall certify to Teleperformance that it has done so. Such return or destruction should be done within a 30-day timeframe after the termination of the contract between the Supplier and Teleperformance, which can be extended to 90 days (or more with the CPO's agreement), depending on the timeframe agreed in that contract.

2. COMPLIANCE WITH THIS CODE

While Suppliers are expected to self-monitor and demonstrate their compliance with this Code, Suppliers shall permit Teleperformance, or a third party designated by Teleperformance, to evaluate, audit and/or inspect any Supplier's facilities and operations to confirm compliance.

In the event of non-compliance or violations of this Code, Teleperformance will work together with the Supplier to take corrective action within an appropriate timeframe. If a Supplier is not able or fails to correct the non-compliance or violation, Teleperformance may end the relationship.

3. MISCELLANEOUS

A. Teleperformance underlying policies and statements

[Teleperformance Code of Ethics](#)

[Teleperformance Code of Conduct](#)

[Teleperformance Global Ethics Hotline](#)

[Teleperformance Environmental Policy](#)

[Teleperformance Vigilance Plan](#)

[Teleperformance Diversity and Inclusion Policy](#)

[Teleperformance Privacy Policy](#)

[Teleperformance Health and Safety Policy](#)

[Teleperformance Human Rights Statement](#)

B. Modifications to the Code

Teleperformance may modify this Code unilaterally at any time without notice. Modifications may be necessary, among other reasons, to maintain compliance with applicable legal or regulatory requirements, Teleperformance policies, standards or practices and/or to accommodate Teleperformance organizational changes.

C. Contacts and further information

For further information and support related to the Teleperformance Supplier Code of Conduct, please contact your Teleperformance contact person.