Code of Conduct and Ethics

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A message from our Chief Executive Officer

Dear Employees,

Integrity is one of TP's five core values, which -- along with Respect, Innovation, Professionalism and Commitment -- are the pillars of our corporate culture. At TP, each individual is responsible for acting with integrity at all times.

Our commitment to act with integrity means complying with the highest professional and ethical standards, as well as the spirit and the letter of the laws that govern our industry, our Group and our operations. Conducting ourselves in an ethical manner and with integrity helps us earn the trust and respect of the people we serve and those with whom we work.

This Code of Conduct and Ethics, which can also be found on the Group's intranet, is an essential resource for all TP Workforce Members. This Code of Conduct and Ethics outlines TP's policies on business conduct and identifies the people who can answer any questions you might have about compliance-related issues. Please use it as a guide to help you make the right decisions and resolve any issues that may arise in connection with your professional duties. It has been designed as a resource to be used at all times throughout the year, and I encourage you to consult it regularly.

Our Code of Conduct and Ethics cannot exist without us, the TP team. Continuous improvement and corrective action are an integral part of our Global Compliance Framework. If you have any questions or if you witness any inappropriate behavior, I strongly urge you to make use of the Global Ethics Hotline, our internal reporting system, to bring it to the attention of our Compliance Department.

Acting with integrity depends on each of us understanding and following the policies related to our standards for behavior. It is imperative that all of us at TP abide by the highest standards. We owe this to our Clients, our partners, our shareholders and ourselves. Let me thank all of you for your unfailing commitment to upholding the principles contained within this Code of Conduct and Ethics and to promoting it both inside and outside the Group.

Daniel Julien

Chief Executive Officer

Purpose

TP is built upon a foundation of strong corporate values and business practices. Our standards of business conduct serve as an important resource for day-to-day decision making. Our standards represent the core of how we create the solid foundation of trust and success that is reflected in our relationships with our stakeholders, including without limitation our Workforce Members, Clients, suppliers, and shareholders. Our reputation comes from the sum of our individual actions. Misconduct by just one of us can overshadow hard work by thousands of us. Our Code of Conduct and Ethics (this **"Code"**) is designed to deter wrongdoing and to promote:

- **Honest and ethical conduct**, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- **An inclusive culture**, where we value our differences, treat one another with respect and welcome all ideas and opinions;
- **Full, fair, accurate, timely, and understandable disclosure** in reports and documents we file with regulatory agencies and in our other public communications;
- **Compliance with applicable laws, rules, and regulations**;
- **The prompt internal reporting of suspected or confirmed violations** of this Code and, in each case, an appropriate response; and
- **Accountability** for adherence to this Code.

This Code, to the extent permitted by applicable local laws, serves as a framework to steer our conduct in the course of our business. While it covers a wide range of principles, it may not address every possible situation that may arise. Hence, it is important to exercise sound judgment and practical wisdom while adhering to this Code. We understand that this Code does not provide an exhaustive list of solutions, and it is perfectly acceptable to seek additional advice from your Line Manager, the Human Resources Department, or the Code Champions at Codechampions@teleperformance.com. You should also consult relevant policies and procedures applicable to specific areas. If you believe that applicable local laws prevent you from applying this Code, we ask that you immediately report your concerns to the Code Champions (please refer to the Code Champions Section below).

Scope

This Code applies to Teleperformance SE and all of its subsidiaries, sites, and business areas (collectively, **"TP"** or the **"Group"**), including the Teleperformance SE Board of Directors (the **"Board"**), the local Board of Directors of each Group company and all officers and Workforce Members, which includes Individuals that perform work for or otherwise provide services to any TP subsidiary, such as, but not limited to, contractors and staffing agencies.

The same high ethical standards apply and are expected from everyone, regardless of job or level within TP. This Code also applies to interns and temporary colleagues. It is our individual responsibility to be familiar with all policies and procedures and expectations relevant to our job functions.

Definitions

Benefit: The giving or receiving of something of value, without payment being made. Benefits may include, without limitation, Gifts, entertainment and Hospitality, Client representative or public official travel, promotional expenses, sponsorship, community benefits, training, club memberships, personal favors, and confidential or privileged information.

Bribery: Offering, promising, giving, accepting or soliciting an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties. (Source: ISO37001 standard) For the avoidance of doubt, the meaning of the term "Bribery" is subject to applicable anti-Bribery law.

Client: a Third Party to whom TP provides services, in most cases as described in a contract signed between TP and such Third Party.

Corruption: Dishonest, unethical, or fraudulent conduct intended to obtain a Benefit for oneself or another or for other improper purposes.

Code: this Code of Conduct and Ethics.

Extortion: Demanding undue recompense in exchange for the grant of a business deal, contract or authorization, by exerting pressure that may include continuous demands for money, to physical threats against individuals or their family.

Gift: Any material Benefit offered or received as part of a social or professional relationship and intended to elicit friendship or interest.

Group (or TP): Teleperformance SE, together with all of its subsidiaries and affiliated entities.

Hospitality or **Invitation:** All forms of social amenity, entertainment, travel or lodging, or an invitation to a sporting or cultural event.

Workforce Members: This includes individuals that perform work for or otherwise provide services to any Group entity, including, but not limited to, Group employees and contractors, directors, employees of staffing agencies, and vendor representatives.

Overview of the Global Compliance Organization

TP's Global Compliance Organization is a dedicated structure that stretches from senior management of the Group and the Audit, Risk and Compliance Committee of the Board to every level of the Group. This dedicated structure ensures that the policies and procedures of our Global Compliance Program are effectively and efficiently implemented Group-wide.

The Chief Legal & Compliance Officer provides reports and updates to the senior management of TP and to the Audit, Risk and Compliance Committee of the Board. More information about the Global Compliance Organization can be found on the Group's intranet.

The Global Compliance Organization includes the following leaders:

- Chief Legal & Compliance Officer
- Global Audit, Ethics and Health and Safety
- Head of Compliance
- Head of Risk Management
- Senior Director, Global Standards
- Senior Vice President, Governance, Compliance and Control
- Senior Vice President, Privacy, and HIPPA Officer Senior Vice President

OUR WAY AT TP

TP values

Our values are at the very core of our corporate culture. Therefore, TP requires that everyone within the Group observes them wholeheartedly, at all times. Our values are:

Making ethical decisions

How do I know if I need to act when a situation isn't clear?

We are responsible for recognizing ethical issues and doing the right thing in all TP business activities. But not all circumstances we encounter are straightforward. We must consider the following when faced with a difficult decision or situation:

Pause – Take a moment to summarize the facts:

- What led to this situation?
- Do I know enough about the topic to evaluate the possible outcomes?
- What are the possible options for making my decision?

Evaluate – Weigh possible decision outcomes:

- What feels right or wrong about the planned action? Would I be comfortable if my actions were reported in the news or to my supervisor?
- How will the planned action appear to my manager, Group executives or board members, the Board, or the general public?
- Could I justify my actions to my co-workers?

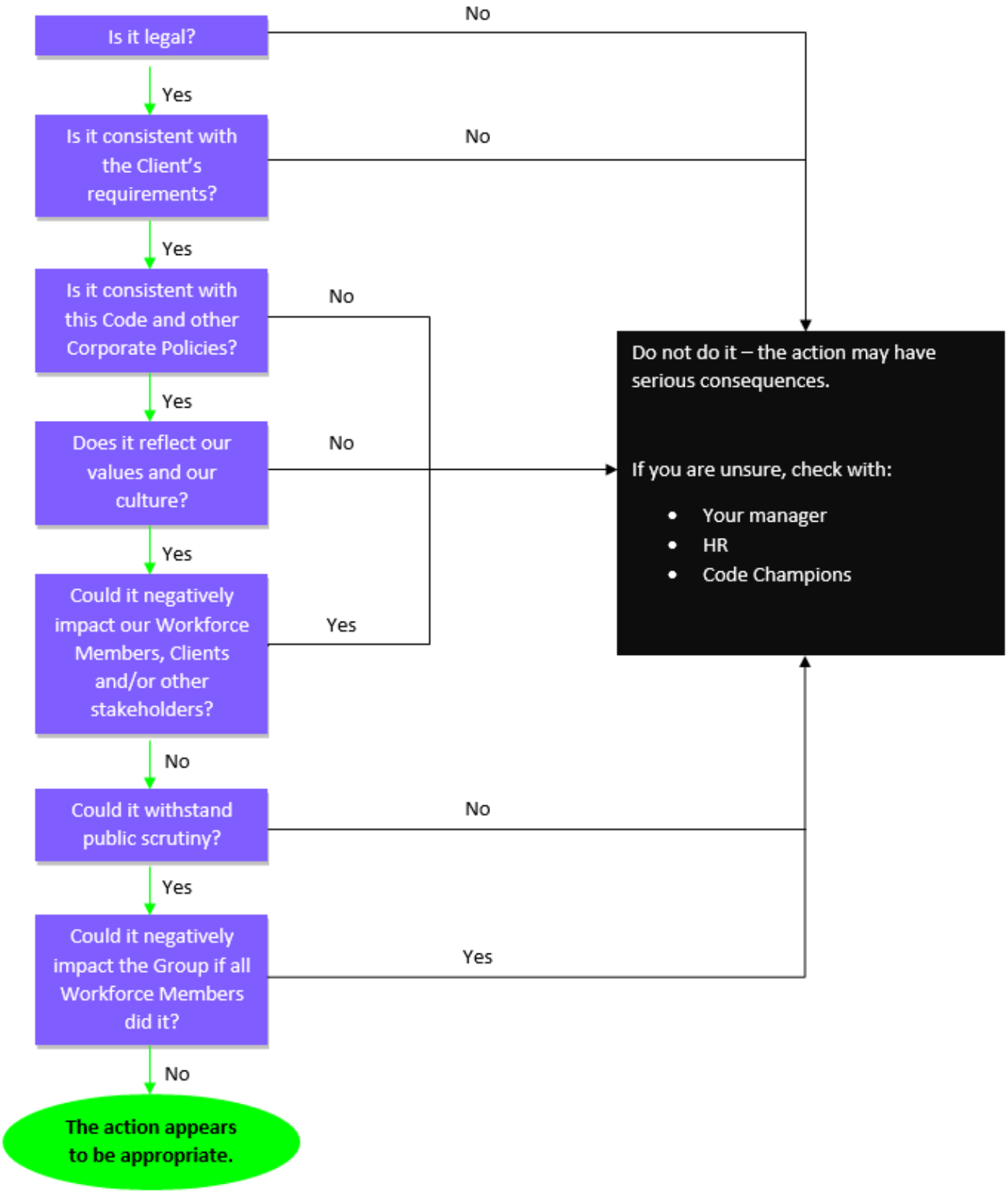
- Would another person's input help to evaluate the planned action?

TP Workforce Members must act in strict compliance with all laws applicable to them. In the event of employment or an assignment outside your country of residence, Workforce Members also must act in strict compliance with applicable local laws in the location of their employment or assignment. In the event of confusion, lack of understanding or doubt about the applicable law and/or its content, Workforce Members must immediately seek guidance from their manager or if any clarification and/or advice is needed on this Code, you may contact the Code Champions (please refer to the Code Champions Section below).

Ethics decision making tree

Although this Code does not cover every situation, it can provide guidance in making decisions that uphold our principles.

If you are unsure of what the “right thing to do” is, use this Ethics Decision Tree to assist you in making a decision:


Is it legal?
No
Yes
Is it consistent with the Client's requirements?
No
Yes
Is it consistent with this Code and other Corporate Policies?
No
Yes
Does it reflect our values and our culture?
No
Yes
Could it negatively impact our Workforce Members, Clients and/or other stakeholders?
Yes
No
Could it withstand public scrutiny?
No
Yes
Could it negatively impact the Group if all Workforce Members did it?
Yes
No
The action appears to be appropriate.
Do not do it – the action may have serious consequences.
If you are unsure, check with:
Your manager
HR
Code Champions

Managers as Ethical Role Models in TP

For TP Workforce Members exercising managerial roles, you have special responsibility for building a culture of trust and ethics within your teams. The way you display your commitment to TP's values and principles sets the standards for ethical behavior and trust for your team to follow. Your success depends upon promoting a team environment where compliance is expected, and ethical behavior is the norm. Under no circumstances can you ask your team to break the law, or go against the Group's values, policies and procedures.

Manager Responsibilities - Serving as Ethical Role Models

As a leader, you are the ethical role model for your team members. Embodying the following will help you exemplify TP's corporate values and exhibit the highest standards of integrity:

- **Be informative** by helping your team understand the seriousness of TP's expectations for ethical conduct and compliance with Group values and purpose. Be clear that you expect their actions to be consistent with these expectations and hold your team members accountable for deviations.
- **Be alert** by always looking out for situations or actions that may be unethical or potentially damaging to the Group's reputation. Report to the Global Ethics Hotline immediately if you suspect such situations and be careful to avoid even the appearance of implicit approval.
- **Be open** by fostering an inclusive environment, where your team members feel comfortable asking questions and expressing their ideas and opinions, including protecting them from any possible retaliation for reporting their concerns in good faith regardless of the outcome.

Manager Responsibilities - Handling Employee Reports

When your team member raises a concern, you must carry out the following actions to assure them that they have made the right decision in approaching you:

- **Listen Carefully**: Thank the person for making the difficult decision to speak up, even if you disagree with them about the concern. Listen closely to what they have to say and show that you are focused on resolving the issue.
- **Maintain Confidentiality**: To the extent possible, protect the employee's privacy and confidentiality of the information disclosed. Avoid discussing the conversation with others on your team.
- **Be Objective**: Continue to treat all team members with the same degree of fairness even if they have reported a concern or are the subject of a report.
- **Escalate to the Right Channels**: While you may be tempted to take ownership of the concern, you must assess whether it needs to be escalated to HR and/or the Global Ethics Hotline. If you have questions or aren't sure if you can resolve a concern on your own, consult the Code Champions.
- **Protection from retaliation**: Ensure that the Workforce Member who has raised a concern honestly and in good faith, or participated in an investigation, cannot be subject to any adverse employment action, including but not limited to separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

Code Champions

The Code Champions act as Ambassadors for this Code, engage with Workforce Members to increase their knowledge of the Code, and provide advice and guidance on how to apply the Code in their daily duties whilst working for TP.

The first point of contact for questions about this Code, ethical practices, or a potential conflict of interest, should be your Line Manager. If your questions cannot be resolved through this method, the Code Champions should be contacted.

The Code Champions are the following:

- Chief Legal and Compliance Officer
- Senior Vice President, Governance, Compliance and Control
- Senior Vice President, Privacy, and HIPPA Officer
- Head of Compliance
- Senior Director, Global Standards

The Code Champions can be contacted through the email: Codechampions@teleperformance.com

SPEAKING UP

Raising your concerns

TP encourages a culture of openness

Each person is encouraged to raise concerns and views about this Code and should be confident that they will be heard by the management. We are all responsible for ensuring the application of and compliance with this Code. We understand that you may have concerns about certain practices and need advice and guidance in order to make sure that you comply with this Code.

Concerns relating to workplace conduct can often be resolved by addressing them constructively with the person involved or by seeking support from a local contact person. Other issues, such as illegal or unethical practices, might be better addressed confidentially with the relevant contact inside or outside the local environment.

If you need guidance on any topic related to this Code, please contact the Code Champions. If you notice or suspect a breach of this Code, there are several ways of reporting the concern:

1. **Contact one of the following people:**

    - Your Line Manager
    - Your local Chief Human Resources Officer
    - Your local Chief Legal Officer
    - Your local Privacy, Risk and Compliance Officer
    - A Code Champion
    - The Chief Executive Officer for your country
    - The Regional Chief Executive Officer for your region

2. **Use the Global Ethics Hotline**

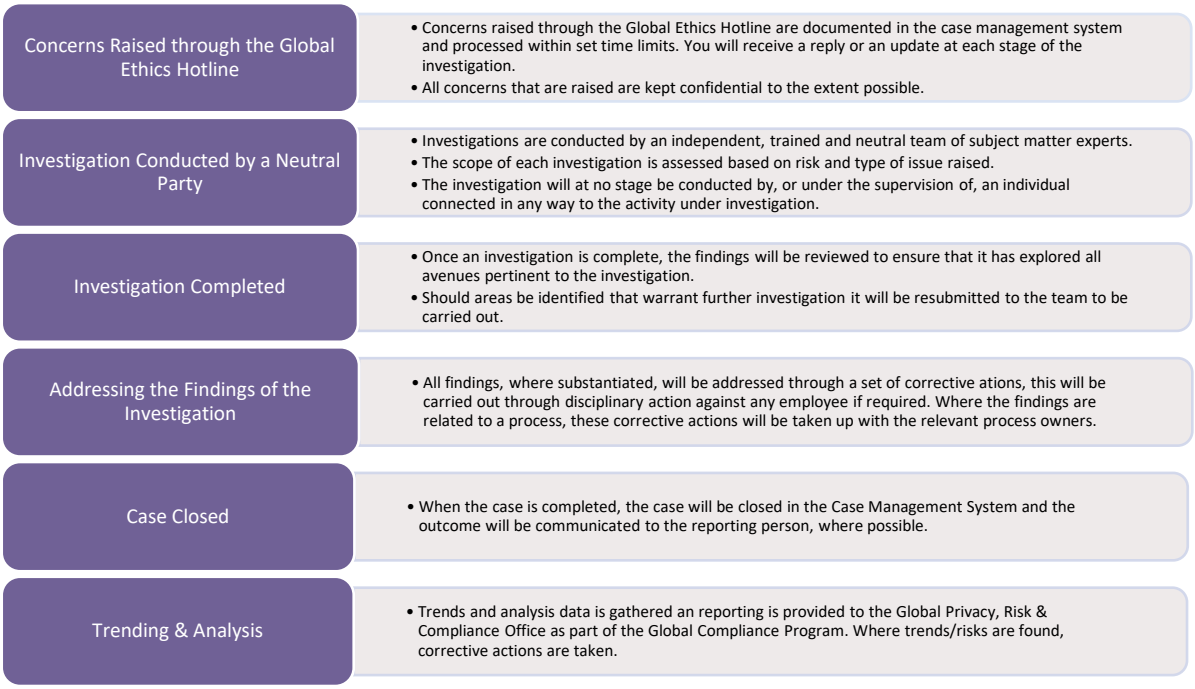
At TP, we take ethical reporting seriously. As always, everything we do reflects on TP. Our commitment to you is that:

- TP will not threaten, intimidate, or retaliate against any reporting person who, in good faith and selflessly, reports or cooperates in investigating suspected wrongful business conduct.
- TP will promptly investigate reports of any retaliation, and appropriate corrective measures will be taken if warranted.
- TP will handle reports with sensitivity, discretion, and confidentiality to the extent permitted by the circumstances and applicable laws and regulations.
- TP will only share information concerning reports on a "need-to-know" basis, so that we can perform the appropriate investigations. Please note that certain investigations require TP to work with the external judicial authorities, law enforcement, government officials, and/or TP's external legal counsel or other specialists, where appropriate.

Protections apply 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 the investigation and potential corrective actions. The protection extends to individuals who report in good-faith and are covered by applicable laws and regulations.

Investigations Process

Where a Workforce Member has a concern about any unethical, fraudulent, or inappropriate behavior or nonconformity with applicable law or our policies, procedures and/or standards, the concern can be raised through the Global Ethics Hotline for investigation. Reporting through this method offers the reporting person the choice to remain completely anonymous. The process undertaken to investigate reported concerns is detailed below:



TP may, in appropriate cases and subject to applicable local laws, notify government authorities and cooperate with any resulting prosecution or other government action. In addition, when legally required or otherwise appropriate, TP will timely self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by TP's Chief Legal & Compliance Officer or his or her delegees, in their sole discretion.

For more information on investigations conducted based on reports submitted through the Global Ethics Hotline, please see Global Ethics Hotline Policy.

Making False Accusations

TP will protect any Workforce Member who raises a concern honestly and in accordance with applicable laws and regulations. However, it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with a Code investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to reasonably believe that the information you are providing is accurate.

Non-Retaliation Statement

Any Workforce Member that has raised a concern honestly, or participated in an investigation, cannot be subject to any adverse employment action as a result thereof, including but not limited to separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

If you have reasonable grounds to believe that you are being subjected to retaliation due to your disclosure of a potential legal or ethical compliance incident, conflict of interest or other violation of this Code, you should immediately inform HR and/or the Global Ethics Hotline.

Definition of "Good Faith"

When you act in "good faith," you provide a sincere and complete report.

Self-Reporting

Nothing in this Code shall be construed as excusing any person from their own misconduct or protecting them from disciplinary action as a result of their self-reporting of that misconduct. However, the fact that a person self-reported their own wrongdoing will be taken into consideration in determining the appropriate response.

DOING BUSINESS RESPONSIBLY AND ETHICALLY

Anti-Corruption and Anti-Bribery

At TP, all acts of Corruption, Bribery or Extortion in any form are strictly forbidden.

As a global company, TP must comply with all applicable laws relating to Corruption, Bribery and illegal payments, including the US Foreign Corrupt Practices Act, the UK Bribery Act, the French anti-corruption law, known as Sapin II, and other applicable anti-corruption laws in the jurisdictions where we do business. These laws generally prohibit the Bribery of government officials and private individuals in the conduct of their duties. They also require that TP keeps accurate books and records, and they establish criminal and civil penalties for violations. We must always conduct TP's business in accordance with these laws.

TP Workforce Members shall:

- Not offer or accept bribes or any other kind of improper payment, including Facilitation Payments.
- Refrain from providing or accepting other objects of value such as Gifts, loans, discounts or the payment of excessive Hospitality expenses, obtaining or giving undue advantage, or using the Group's funds to influence a decision under any circumstances. This concerns, among others, suppliers, Clients, competitors, public authority representatives, political parties, political candidates, individuals with political exposure, etc.
- Not offer, give, promise or solicit, either directly or through a third party, any payment or supply of services, Gifts, entertainment or other Benefits to obtain or retain business or a competitive advantage.
- Not offer or accept cash as a business courtesy, irrespective of value.
- Where possible, refrain from acting through third party intermediaries or proxies when transacting with government officials.

If you suspect any violations, please contact the Global Ethics Hotline. If you require further guidance, please contact your Code Champions.

The full version of the Anti-Corruption Policy can be found in the Corporate Policies Page in the Group's Intranet page.

HOW TO BEHAVE

Before entering into a relationship with a business partner, supplier or other third party, you must ensure that the appropriate financial and other due diligence has been conducted on that person or entity. Before engaging a business partner, supplier or other third party, please contact your local Legal Department or the Code Champions for guidance if you are unsure which due diligence and other procedures you must follow.

If you have any doubts about accepting a Gift or an entertainment invitation from a current or prospective business partner, always evaluate it with your compliance contact first.

Gifts and Hospitality

When someone receives something of value without having paid the fair market value for it, he or she has received a Gift. For purposes of this Code, Gifts and Hospitality mean giving or receiving something of value, such as meals, drinks, admission tickets, transportation, travel costs, accommodation or allowances, without paying fair market value for it.

TP requires its Workforce Members who engage with Clients, prospective Clients, business partners, vendors, suppliers and other third parties, including public officials or political representatives, to follow certain guidelines in offering or accepting Gifts, travel and/or entertainment.

If you suspect anyone of violating our policies with respect to giving and/or receiving Gifts and Hospitality, please contact the Global Ethics Hotline. If you are unsure of a situation or require guidance, please contact your Code Champions.

The full version of the Gifts and Hospitality Policy can be found in the Corporate Policies Page in the Group's Intranet.

HOW TO BEHAVE

As a general rule, TP Workforce Members should not give or accept any lavish or excessive Gifts or Benefits, whether monetary or non-monetary, directly or indirectly, to or from any government official, Client, supplier, subcontractor or any other third party. Gifts or invitations should never influence a TP Workforce Member's business decision or be seen as influencing the person receiving them.

Example

As part of my job, I organize numerous meetings and trips. Now a hotel where I often book rooms for TP Workforce Members has offered me a free weekend for my parents' wedding anniversary. Can I accept it? No. Even if you are not personally going to benefit from the Gift, accepting the offer gives the appearance of accepting a Benefit to influence your business decisions and makes it difficult to remain impartial when you arrange the future hotel accommodation for TP.

Fraud Prevention

It is never acceptable to take part, no matter how small your role, in any activity that involves theft, fraud, embezzlement, deception, forgery, conspiracy, Extortion or misappropriation of property.

Participation in fraud means: any time you help conceal, alter, falsify or omit information in TP records either for your benefit or at the direction of others. You must refuse to engage in any questionable activities and must report any suspicious behavior to the Global Ethics Hotline.

Sanctions and Trade Compliance

TP is responsible for complying with applicable national and global laws and regulations in relation to trade, embargos, sanction lists and import and export restrictions. Before entering into any business relationship or carrying out any transaction, and subsequently based on perceived risk, you must consider whether the other party (or one of its associates) or the country involved might be the subject of sanctions or trade restrictions.

TP uses software, which screens a person or legal entity against the relevant and authorized lists published by governments.

If you believe there is a risk of sanctions or trade restrictions applying to the other party to a transaction (whether directly/indirectly) or to a potential business partner, contact the Code Champions.

Antitrust and Fair competition

TP believes in free and open competition. Regulations prohibit collusive or unfair business behavior that restricts free competition. Attempts to discriminate in prices or terms of sale among our Clients, or to otherwise restrict the freedom of our Clients, our competitors or our suppliers to compete, may sometimes be illegal. Legal issues may also arise if we refuse to deal with certain Clients or competitors.

You should contact the Code Champions with any questions surrounding Antitrust and Fair Competition or report any suspected violations through the Global Ethics Hotline for any suspected violations.

HOW TO BEHAVE

We respect our competitors. We intend to competitively differentiate ourselves through the quality of our services and the outstanding relationship we build with our Clients and prospects. TP is committed to competing fairly and complying with anti-trust and competition laws in every country where we do business. We are transparent in our marketing and advertising. We are truthful about our services and the quality of our performance. We have a process to ensure fairness and sound decisions when selecting our suppliers. We formalize agreements with suppliers by ensuring the presence of a Purchase Order or a Contract (or both).

Example

As a TP sales representative, I am competing against other companies to get new Clients. Can I embellish some facts to get more Clients?
No. You should not make misleading advertisements or make false statements to close a deal. All statements made by TP Workforce Members in promoting our services must be accurate.

Anti-Money Laundering

At TP, money laundering (which is the process of illegally concealing the origin of money, obtained from illicit activities to make them appear as legitimate) and reverse money laundering (which is the act of using legally obtained funds to finance illegal activities, such as terrorism, Bribery, or tax evasion) are strictly forbidden. TP Workforce Members must ensure that TP does not receive or assist in any way with the proceeds of any criminal activity. This could constitute a criminal offense of money laundering or reverse money laundering. Payments must not be made to intermediaries unless the payments are legal, comply with the terms of a written contract and are made following delivery of a proper invoice or other appropriate supporting document. No payment may be made without appropriate documentation, including evidence of the work performed. Receipts must be provided for reimbursable expenses. Unless otherwise approved, payments must never be made in cash.

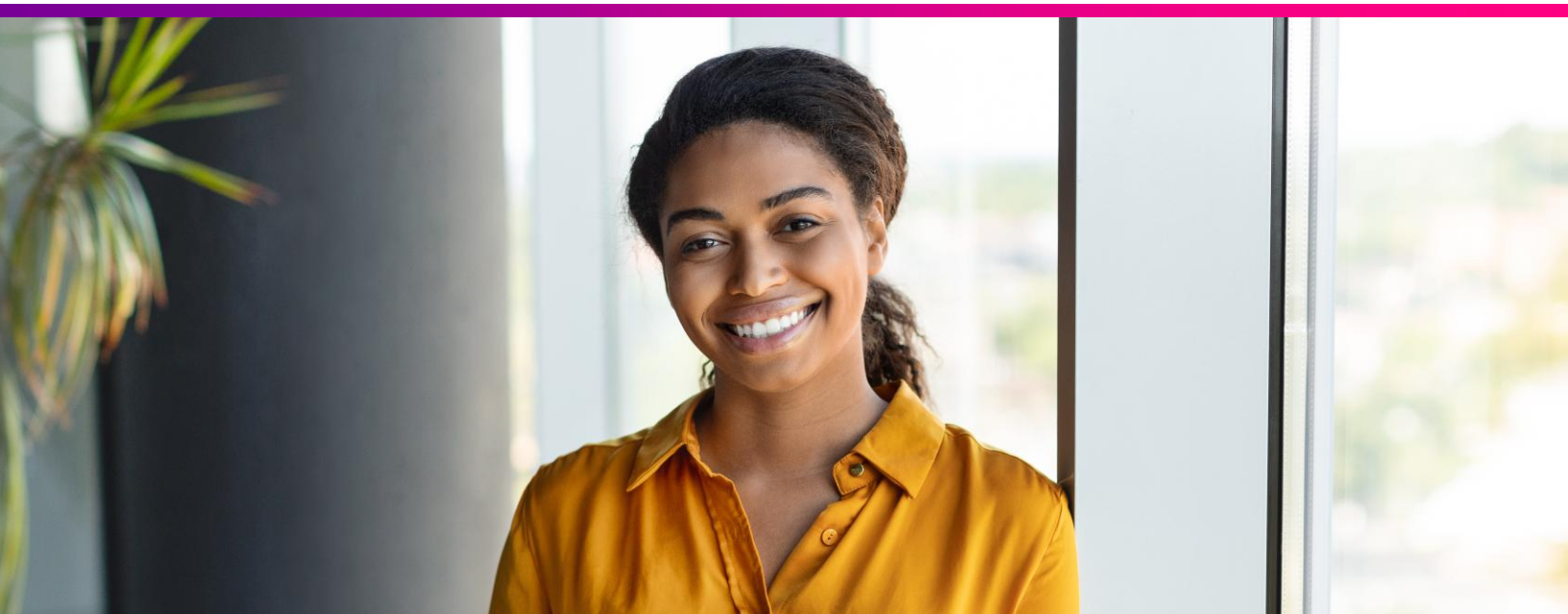
If you suspect any activity involving money laundering, please contact the Global Ethics Hotline.

HOW TO BEHAVE

TP Workforce Members must be alert to any unusual or suspicious activity or signs of money laundering and report this immediately to the Global Ethics Hotline. Where possible, the suspicious activity should be suspended. When dealing with suppliers, do not wire funds to an account outside the supplier's country of activity or to a third-party bank account. Do not make payments in a manner that is outside the normal course of business and do not split payments between different bank accounts. When receiving money from Clients, be alert to payments from multiple bank accounts, from a bank account located in a tax haven, from foreign bank accounts outside the Client's country of activity, an early payment outside the normal course of business, and payments made in cash.

Example

I was asked by a long-standing supplier to pay a portion of the supplier's invoice by wiring funds to a bank account in the name of someone other than the supplier. What should I do? You must immediately bring this unusual request to the attention of your supervisor and/or the Global Ethics Hotline.



Conflicts of Interest

A conflict of interest may occur when a TP Workforce Member has a financial, business or personal interest or activity that interferes or conflicts, or appears to interfere or conflict, with TP's best interests or reputation. There are many situations that are or could be perceived as a conflict of interest, such as:

- A situation that interferes with your duties or responsibilities to TP, or that affects your ability to act in the best interests of TP;
- A situation in which you, a family member or friend benefits from an undue advantage or receives an improper Benefit, including money, services or other gain, as a result of your position with TP; and
- A situation in which you learn about a business opportunity through your position at TP and you, a family member or friend uses it for personal benefit or otherwise against TP's best interests.

You are required to make informed business choices in the best interests of TP. You should avoid any situation in which your personal interests, or the interests of your close friends or relatives, are -- or appear to be -- in conflict with TP's best interests.

If you suspect a conflict of interest violation please contact the Global Ethics Hotline, or in case you require guidance please contact your Code Champions.

The full version of the Anti-Corruption Policy can be found in the Corporate Policies Page in the Group's Intranet.

HOW TO BEHAVE

When you conduct professional activities, you must act only in the best interests of TP, and refrain from benefiting or taking advantage of any situation, either directly or indirectly through a third party, for your own gain or that of others. You must identify actual and potential conflicts of interest in advance and comply strictly with the procedures outlined by TP in specific areas of operation, such as procurement, subcontracting and business development. You must also comply with the regulations that apply in your country, or the country concerned. **You must disclose in writing** to your manager, local Legal Department and/or the Code Champions all your outside interests or those of your family members that create, or could appear to create, a conflict of interest. Avoid using TP resources for personal gain or Benefit of any kind. This includes TP office equipment, materials, time, resources and/or intellectual property.

Example

My spouse works for one of TP's competitors. We don't talk about work at home, and I cannot see what my spouse does in his or her professional life. Yet some of my colleagues have suggested I am in a compromising situation. What should I do?

This could create the appearance of a conflict of interest. To protect both yourself and the Group, you should disclose the facts to your manager, local Legal Department or the Code Champions. In addition, you and your spouse should take steps to ensure that confidential or proprietary information of both companies is protected and not disclosed to the other party. For example, you should not share your TP log-in or password with your spouse or anyone else.

Insider Trading

As a listed company, we maintain trust with our investors and the public by respecting financial laws, which means we do not trade based on material non-public information (i.e., news or information about TP that has not yet been made public and which could also have an impact on its share price). In your work, you may become aware of material, non-public information about TP or companies we do business with that you must not disclose.

Trading or enabling others to trade TP stock or the stock of any other company – Client, supplier, competitor, potential acquisition or alliance – based on this information, not only breaks trust with our investors and the public, but is also illegal, violates Group policy, and is unfair to other investors. To use material non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision based on this information, is also unethical and illegal. The prohibition against insider trading also applies to your family members or anyone else living in your household.

If you suspect that an individual is engaged in insider trading, please contact the Global Ethics Hotline, or if you are unsure whether an activity is considered Insider Trading or whether something is "material" or "non-public" information, please contact the Code Champions for guidance.

Example

I am working on a project with a new Client. This Client is developing a product that has the potential to make a lot of profit. Can I buy this company's stock before the launch of this product?

No. This would be insider trading because you are acting on material non-public information.

Financial Integrity

TP recognizes that the integrity of financial information and financial performance are critical aspects of its business. Honesty, transparency and accuracy of financial information is valued and protected. We respect applicable regulations and standards including the International Financial Reporting Standards (IFRS) and work with auditors to ensure compliance.

We ensure that the financial representations of TP are not misleading. We forbid the manipulation of financial statements and ensure all arrangements included in our financial reports are valid.

All records and publications of financial data should be accurate, complete and transparent. Workforce Members must respect the Charts of Authority defined at local and global level. By doing this we ensure good control of TP's assets and protect the Group's interests.

As Workforce Members you are responsible for:

- Ensuring the accuracy of data in reporting provided to your Line Manager or to the finance teams.
- Ensuring that the services billed to our Clients are accurate and complete.
- Following the applicable travel and expenses policy and keeping any receipts necessary to justify and claim travel expenses.
- Respecting and not exceeding the budget allocated to your department or project.
- Escalating any financial transaction not tracked properly in the finance and accounting systems.

If you are aware of any reporting issue, which might expose TP to financial losses or risks, or suspect a violation of applicable legal or tax requirements, please report it to your Line Manager immediately or contact the Global Ethics Hotline.

Example

Do we have to record low value cash transactions? Is this not a waste of time?

Payment in cash is prohibited, unless an exception has been approved. This being said, the discipline around financial records applies to all cash transactions irrespective of the value. The correct recording of petty cash is important from a control perspective as many small amounts can total a significant amount over time. A fault in recording petty cash may also put into question the integrity of financial records in general, during statutory audits.

Ethical conduct of Suppliers

Suppliers, including agents and consultants, are an integral part of our day-to-day business and contribute to our success. At TP, those involved in procurement and purchasing have a duty to source suppliers responsibly, with integrity and without lowering our own internal standards.

We expect our suppliers and contractors to match or exceed the principles set out in this Code of Conduct when doing business on behalf of and with TP. In addition to these principles, suppliers should comply with all applicable laws and regulations.

We cascade our requirements for ethical conduct to our suppliers and contractors principally through:

- Conducting due diligence checks on our suppliers and contractors as part of our Third Party Risk Management (TPRM) Program.
- Sharing our Supplier Code of Conduct each time we engage a new supplier or contractor.
- Ensuring that our Global Ethics Hotline is available to suppliers and contractors.
- Including a special clause in contracts referring to TP's Supplier Code of Conduct.

Examples

We are in the middle of a negotiation with a potential supplier. How can we get the correct wording to add to the contract?

The Legal Department for your country will give you the standard clause related to the TP Supplier Code of Conduct. This clause can be integrated into the contract about to be signed.

Is there a document we can give to new or existing suppliers which explains the ethical conduct expected?

Yes, this is the TP Supplier Code of Conduct; please contact the Global Privacy, Risk & Compliance Office (Global_Compliance@teleperformance.com) to obtain a digital or printed copy.

The suppliers we are using at the moment signed their contract a long time ago. How do I go about integrating the TP Supplier Code of Conduct into my relationship with these suppliers?

You should contact the Legal Department for your country to get advice. Depending on the country and the contract type, there are many ways you can incorporate the reference to the Supplier Code of Conduct into an existing contract.

Government Clients/Contracting

When doing business with any government or public entity, we must ensure all statements and representations to government procurement officials are accurate and truthful, including costs and other financial data.

If your assignment directly involves a government or if you are responsible for someone working with a government on behalf of TP, you must be alert to the special rules and regulations applicable to our government Clients. You must take additional steps to understand and comply with these requirements, and avoid any conduct that could appear improper when dealing with government officials and their employees.

For guidance in dealing with government Clients or contracts, please contact the Code Champions, or if you suspect a violation or wrongdoing please contact the Global Ethics Hotline.

Political Activity/Lobbying

TP observes strict political, religious and philosophical neutrality. Accordingly, TP's policy is not to make financial contributions to political candidates, elected representatives or officials, political parties, or religious organizations. TP respects its Workforce Members' right to participate as individuals in the political process as long as they make sure that they do not represent TP and their activities are not viewed by others as participation by or on behalf of TP.

For guidance around political activity/lobbying, please contact the Code Champions or if you suspect someone is representing TP in any partisan political activities, please contact the Global Ethics Hotline.

HOW TO BEHAVE

If you choose to do so, participate in political activities in your own name and outside of work hours and work locations. Never use TP premises, materials, supplies, equipment or other resources for political activities. Do not use TP's corporate image, logos, stationery or other TP-branded materials to support your political views.

Example

I do some volunteer work for a local political candidate whose policies are very much in line with TP's values. May I use the copy machine to run off a few flyers?

No. TP prohibits the use of Group resources of any nature as well as any participation during working hours to support personal political activities.

PROTECTING OUR ASSETS AND DATA

Group Assets

TP relies on each of its Workforce Members to act as an owner of Group resources and use them honestly and efficiently so TP can better serve its Clients and maintain value for its stakeholders. Workforce Members must use TP's assets — whether they are physical (such as computers, corporate credit cards, etc.) or non-physical (such as email, information, etc.) — solely for the benefit of the Group. These assets are not for personal gain or for the benefit of others outside of TP. You must spend TP funds wisely and keep TP's assets safe from loss, theft, damage, inappropriate use or other forms of fraud.

In case you suspect any instance of fraud in the workplace, or become aware of the misuse of Group assets, you must report it immediately to the Global Ethics Hotline.

Example

TP provided me with a work laptop/tablet to use on-site. I have a presentation to finish, and I want to take my IT equipment back home to finish my presentation, can I do so?

You should not remove or borrow the resources provided to you on-site unless you have prior authorization to do so. Any equipment provided to you for work purposes is TP's property.

Can I forward my work to my personal email?

You should not do it. By sending confidential information to your personal email, you might expose sensitive information or be exposed to hackers. Be careful when you handle confidential information, you should take every precaution to keep work-related information secure.

Maintaining accurate records

Records management is crucial to enable TP's business to run in an efficient and organized manner by ensuring that TP has ready access to accurate information to support its decision-making process. All corporate records are the property of TP and should be retained in accordance with our Global Data Retention Policy. TP occasionally may issue notices regarding retention of records in the case of actual or threatened litigation or government investigation in accordance with the Legal Hold Procedure. Workforce Members must abide by the directions contained in these notices, as failure to do so could subject the Group and Workforce Members to serious legal risks.

Workforce Members are responsible for:

- Properly labeling and carefully handling confidential, personal, sensitive, and proprietary information and securing it when not in use.
- Not destroying official Group documents or records before the retention time expires, but timely destroying documents in accordance with applicable data retention requirements.
- Retaining or discarding TP's records in accordance with TP's record retention policies. For more information, please consult our Legal Hold Standard.

If you have questions about the record-keeping requirements that apply to your role, please contact the Global Privacy, Risk & Compliance Office at privacy@teleperformance.com.

For more specific retention and destruction guidelines, refer to TP's Data Retention Policy and TP's Records Retention Schedule available on Corporate Policies Page in the Group's Intranet.

Example

I do not maintain any Client information on my desktop. Do I still need to be compliant with the Global Data Retention Policy?

Yes, all TP Workforce Members are personally responsible for ensuring that all business records are accurate, complete and reliable. This same standard applies to all reports and records prepared for internal and external purposes.

Please familiarize yourself with our Global Data Retention Policy.

Data Privacy

TP respects the privacy of all its Workforce Members, business partners and Clients. We must handle personal data responsibly and in compliance with all applicable privacy laws, regulations and Group policies (including our records retention requirements). Personal data is information that can directly or indirectly identify an individual, such as name, contact information, and health-related information. As Workforce Members who handle the personal data of others, you must:

- Act in accordance with applicable laws and regulations;
- Act in accordance with any relevant contractual obligations;
- Collect, use and process such information only for legitimate business purposes;
- Limit access to the information to those who have a legitimate business purpose for seeing the information (i.e., following the need-to-know principle); and
- Securely store, transmit and destroy personal information in accordance with applicable policies and laws.

Take care and precaution to prevent unauthorized disclosure and protect the integrity of personal information by implementing adequate organizational and technical measures where relevant. For additional guidance on the handling of personal data and a description of protected information, you should refer to TP's Privacy Policy available on the Corporate Policies Page in the Group's Intranet.

To see the measures TP has in place when it comes to data privacy or to exercise your data privacy rights, see Privacy | Teleperformance.

For questions related to Data Privacy, please contact the Global Privacy, Risk & Compliance Office at privacy@teleperformance.com.

Examples

Data Privacy – Workforce Members

I am contacted by someone claiming to be from the IT team, their email address is not the standard TP issued email address. This person is asking me to share my personal information including my TP credentials. TP is a very big company, and I am not sure I have spoken to this person before, but this person has signed the email with the TP signature, should I respond?

You should not share any personal information with anyone, working for TP or not, unless you can verify their identity, the purpose and the authorization to access your information. If you become aware or suspect that personal information is lost or being misused, report it immediately! It is important to let the Global Incident Response Team (GIRT) know through email at girt@teleperformance.com as soon as you become aware of any data incident.

Data Privacy – Client/Third Parties

While sending a confirmation email to the Client, the autofill included an email address belonging to another Client. This email included sensitive information about the Client. What do I do?

Report this data incident immediately to the Global Incident Response Team at girt@teleperformance.com.

Our Social Media and Communication Commitment

Social media enables us to learn from and share information with our stakeholders, as well as communicate with the public about the Group. While doing so, we must be mindful that our social media posts may have unintended consequences that could impact both ourselves and TP.

We also need to ensure that all of our communications, across all channels and all media, is professional, respectful, and aligned with TP's communication strategy.

Marketing is responsible for representing the Group to external parties. Any external communication on behalf of TP must therefore be subject to prior authorization.

If you suspect any improper use of social media resources or any other professional communication violation, please contact the Global Ethics Hotline and/or Global Marketing.

HOW TO BEHAVE

You should always be respectful in your communications. You should not post content that could be viewed as discriminatory, malicious, obscene, threatening, or intimidating or could be interpreted as harassment, a threat of violence or bullying.

You must uphold confidentiality and protect the reputation of the Group. Never disclose TP confidential information or information that could harm the reputation of TP and/or any of its Workforce Members, Clients, contractors, suppliers, vendors or business partners.

In a professional setting, you should not be in contact with media without prior approval.

You must communicate accurately. If you discuss TP-related public matters on social media, you must make it clear that you are speaking for yourself and not on behalf TP. If you publish content to any web site outside of TP and it has something to do with work you do or subjects associated with TP, you must use a disclaimer.

Examples

There is a trend that people are posting a picture of their 'healthy habits' and their workspace. Can I share a picture of myself in my workspace? No. There is a strict policy concerning health and safety in the workplace. You are not authorized to take pictures inside TP facilities as you may accidently disclose confidential information. For more information, please consult TP's Clean Desk Policy available on the Corporate Policies Page in the Group's Intranet.

I work in Talent Acquisition and I would like to promote TP's participation in a job fair in my country. Which social media platform could I use?

You should contact your local HR or marketing team and they will point you in the right direction.

CREATING A SAFE WORK ENVIRONMENT

We promote diversity, equity and inclusion

Understanding, respecting and encouraging diversity among our Workforce Members means that we allow each individual to be themselves and honor their own cultural, religious, political and other personal beliefs. Respect of diversity is one of our core values and is present in all dealings with the Group.

For more information on how we promote diversity, equity and inclusion, please see TP Diversity and Inclusion Policy.

To report any violations of our policy, including discrimination based on gender, disability, sexual orientation, gender identity and expression, ethnicity and race, nationality, belief and ideologies, pregnancy or parenthood, marital status, age, socio-economic status, employee harassment or other experiences please contact the Global Ethics Hotline.

We respect human rights

As a signatory of the United Nations Global Compact, TP respects and supports human rights throughout its operations and business activities and is committed to avoid complicity in human rights abuse (such as, but not limited to, child and forced labor, slavery, torture, degrading treatment, arbitrary detention, etc.).

For more details on our commitment to human rights, please see TP Human Rights Policy.

To report any violations of our policy prohibiting discrimination or human rights concerns please contact the Global Ethics Hotline.

We provide a safe and healthy workplace

We are committed to providing a safe environment for everyone, every day. At the heart of TP's values, we promote an inclusive culture where Workforce Members feel valued and safe to express themselves and treat each other with respect and dignity.

Each Workforce Member has a duty and responsibility to take reasonable care of their own health and safety, as well as the health and safety of others who may be affected by their acts or omissions. These duties include:

- Cooperating with line managers and other department managers to ensure that safe and healthy work practices are maintained;
- Reporting any health and safety concerns promptly to your local contact (or to the Client's management when working in Client facilities) and/or the Global Ethics Hotline; and

- Acting responsibly in the workplace, attending trainings, and refraining from unsafe behavior at work.

If you have any concern or issue to raise related to health and safety, please contact the Global Health & Safety team via OHS@teleperformance.com.

ENVIRONMENTAL COMMITMENT

TP is committed to conducting business in an environmentally responsible manner and strives to improve our performance to benefit our Workforce Members, Clients, communities, shareholders and the environment. To do so:

- We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact.
- We comply with the environmental laws that apply to TP.
- We educate our Workforce Members whose work affects environmental compliance about the permits, laws, and regulations that apply to their work.
- We educate and engage our Workforce Members and inform external stakeholders in our environmental efforts.
- We contribute to and partner with organizations that work towards environmental goals.
- We engage our supply chain in supporting our sustainability efforts.
- We work with suppliers with demonstrable environmental commitments, to the extent we can.

We expect our Workforce Members, Clients and suppliers to support and join our efforts in protecting our environment. Please see our Global Environmental Policy Statement for more detail on how we meet our environmental and sustainability goals.

If you have any questions related to our environmental commitment and sustainability efforts, please contact the CSR Committee at csr@teleperformance.com.

TP UNDERLYING POLICIES

This Code of Conduct and Ethics should be read in conjunction with TP's underlying policies and standards found on the Group's corporate policies intranet page and/or on TP's website, including the following:

- Global Compliance Policy
- Global Anti-corruption Policy
- Anti-Money Laundering and Counter-terrorist Financing Policy
- Global Ethics Hotline Policy
- Diversity and Inclusion Policy
- Human Rights Statement
- Global Environmental Policy Statement
- Privacy Policy BCR
- Global Data Retention Policy

POLICY REVIEW

To ensure that this Code of Conduct and Ethics remains fit for purpose, the Global Privacy, Risk and Compliance Office will review this Code at least annually.

tp.com