



Global Anti-Corruption Policy

v.2.0. Public

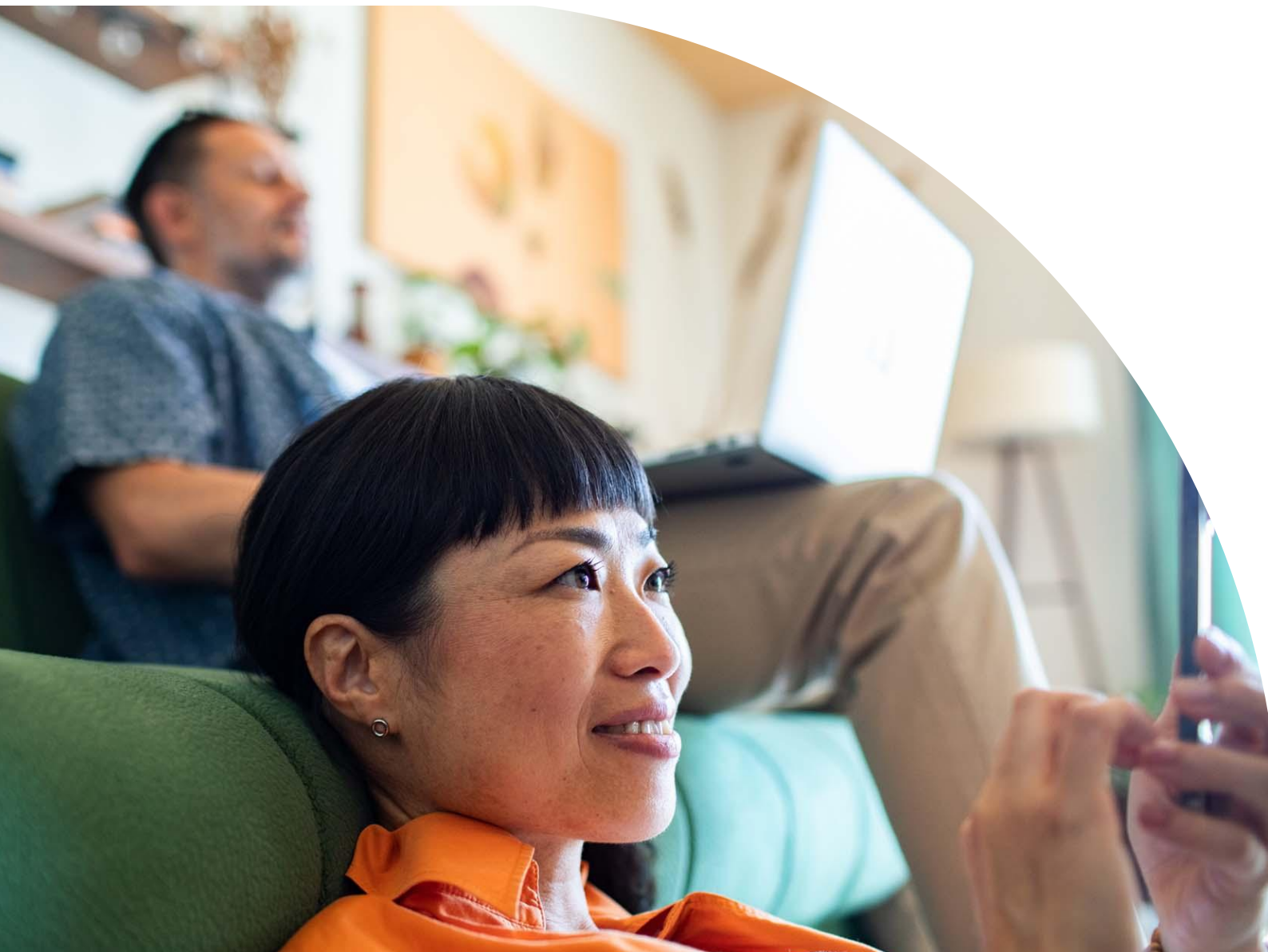




Table of Contents

1. EXECUTIVE COMMITTEE COMMITMENT2

2. GLOBAL ANTI-CORRUPTION PROGRAM2

3. PURPOSE.....2

4. SCOPE2

5. DEFINITIONS2

6. ZERO TOLERANCE FOR BRIBERY & CORRUPTION2

7. ANTI-CORRUPTION GOVERNANCE3

8. MANAGING SENSITIVE AREAS AND TRANSACTIONS4

9. CONTINUOUS IMPROVEMENT6

10.COMPLIANCE WITH THE ANTI-CORRUPTION POLICY AND PROGRAM REQUIREMENTS.....6

11.TP UNDERLYING POLICIES.....6



1. EXECUTIVE COMMITTEE COMMITMENT

TP's Executive Committee is committed to fostering a culture of integrity and zero tolerance for Bribery and Corruption. They support the effective implementation and continuous improvement of the Anti-Corruption Program, by setting clear expectations, providing adequate resources, maintaining effective oversight and accountability, and encouraging the reporting of concerns without fear of retaliation.

2. GLOBAL ANTI-CORRUPTION PROGRAM

The Global Anti-Corruption Program (the '**Program**'), certified to ISO 37001 Standard, provides a framework to manage Bribery and Corruption Risks across TP. As a global Company, TP must comply with all applicable laws relating to Bribery and Corruption, including but not limited to, Sapin II, the UK Bribery Act 2010, the UK ECCTA failure-to-prevent-fraud offence, and the FCPA.

3. PURPOSE

This Anti-Corruption Policy (the '**Policy**') provides the requirements of the Global Anti-Corruption Program and how Workforce Members should conduct themselves in relation to Bribery and Corruption. This Policy is reviewed and revised, as necessary, at least annually by the Global Privacy and Compliance Office.

4. SCOPE

This Policy applies to all Workforce Members of all TP Companies, as well as to Third Parties and other Business Associates acting for or on behalf of any TP Company, to the extent applicable to their activities and contractual obligations.

Where local law prevents full compliance with this Policy, or requires additional measures, Workforce Members must contact the Global Privacy and Compliance Office at Global-Compliance@teleperformance.com. Local programs must be mapped to this Policy prior to implementation to identify conflicts, evaluate alternatives, and record any approved exceptions or supplementary controls.

5. DEFINITIONS

Capitalized terms are defined in the *Global Glossary*.

6. ZERO TOLERANCE FOR BRIBERY & CORRUPTION

TP has a zero tolerance to Bribery and all forms of Corruption.

The principal offences addressed by this Policy are:

- **Bribery** – offering, promising, giving, accepting or soliciting an undue advantage to improperly influence someone's judgement or conduct. Bribes need not be in cash, have no minimum value, and may be given directly or through a Third Party.
- **Corruption** – dishonest or fraudulent conduct to obtain a Benefit or improper purpose, in which a person solicits, approves or accepts an undue advantage (financial or non-financial) to perform, delay or refrain from an act within their duties. It may be active (offering a Benefit) or passive (accepting one) and may involve Public Officials or private parties.



- **Extortion** – demanding undue compensation through pressure, threats or persistent demands in return for business, contracts or authorizations.
- **Facilitation Payments** – small payments to Public Officials to expedite a routine governmental action; prohibited for Workforce Members and Third Parties acting on TP's behalf, regardless of amount.
- **Influence Peddling** – offering, promising or accepting Benefits in exchange for using one's position or political influence to secure a favorable decision, employment, tender or other advantage from a Government Official or public authority.
- **Fraud** – addressed under TP's standalone [Fraud Program](#).

Workforce Members shall:

- Not offer or accept bribes or any other kind of improper payment, including Facilitation Payments.
- Not provide or accept any other object of value, and never use Company funds, to influence a decision under any circumstances. This applies to dealings with, among others, Suppliers, Clients, competitors, public authority representatives, political parties, and individuals with political exposure.
- Not make political contributions, charitable Donations, or sponsorships to improperly influence decisions or obtain an improper advantage, and always adhere to the Group's Donations and Sponsorships Policy.
- Not offer, give, promise, or solicit, either directly or indirectly, such as 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 use a Third Party, intermediary or proxy to do anything that this Policy prohibits Workforce Members from doing directly, and engage any Third Party that interacts with Government Officials on TP's behalf only after appropriate risk-based Due Diligence.

TP can be criminally liable for failure to prevent Bribery and Corruption if a person associated with TP bribes another person in pursuit of business objectives.

No Workforce Member may engage in corrupt practices regardless of local customs, competitive pressures, or perceived business necessity.

7. ANTI-CORRUPTION GOVERNANCE

7.1. Anti-Corruption Objectives

The Program has the following objectives:

- Promote an ethical and compliant business culture, free from Bribery & Corruption.
- Ensure compliance with applicable Anti-Bribery and Anti-Corruption Laws & Obligations.
- Prevent, detect, and address Bribery and Corruption Risks.
- Implement appropriate risk-based Due Diligence and controls across TP, including Sales, Finance, Procurement, HR and Third-Party management.
- Ensure that effective reporting, awareness, training, and disciplinary mechanisms are provided.



7.2. Anti-Corruption Measures

- **Applicable Laws & Obligations** – TP maintains an Applicable Laws and Obligations Register for each country where it operates.
- **Program Acknowledgement** – Top management across TP, including CEOs, Regional Presidents and CFOs, annually acknowledge and support the Program and its objectives.
- **Corruption Risk Assessment** – TP applies a risk-based approach, assessing Corruption risks across its operations, geographic footprint and business relationships through periodic global and local risk assessments.
- **Conflict of Interest (COI)** – Workforce Members must promptly disclose any actual, potential or perceived COI to their Line Manager or local Human Resources so business decisions are made objectively, fairly and independently.
- **Training & Awareness** – TP provides annual anti-Corruption training and awareness for all Workforce Members, with enhanced training for those at higher risk.
- **Internal Audit** – The Global Internal Audit Team designs and conducts regular audits based on this Policy framework.

8. MANAGING SENSITIVE AREAS AND TRANSACTIONS

8.1. Gifts, Hospitality and other Benefits

TP maintains strict requirements governing Gifts, Hospitality, Donations, Sponsorships and other Benefits. Applicable approval requirements, monetary thresholds, and restrictions may vary by jurisdiction and by whether the beneficiary is a public or private sector counterparty. Workforce Members must be aware that these Benefits could appear to influence business decisions or suggest Corruption and should therefore avoid such situations, as they can negatively impact TP's reputation, or violate the law.

For more information, please refer to the Global [Gifts & Hospitality](#) and [Sponsorships](#) Policies.

8.2. Politically Exposed Persons (PEPs)

PEPs are high-risk individuals who hold, or have been entrusted with, prominent public functions, whether through employment, appointment, or election, as well as their close associates and family members, in any country or territory.

This also encompasses representatives of state-owned or state-controlled entities, as well as representatives of public international organizations such as the European Union, United Nations, and the World Bank for the purposes of this Policy.

Workforce Members must be extremely vigilant to identify any Corruption red flags and steer away from any improper conduct while interacting with PEPs.

8.2.1. Most Exposed Persons (MEP)

Workforce Members identified as MEP are most vulnerable to the Risks of Bribery and Corruption above others. Additional training and controls are implemented to mitigate those Risks.

For more information, please refer to the Procedure on Identifying Most Exposed Persons.



8.3. Public Officials and State Owned or State Controlled Enterprises (SOEs)

Interactions with Public Officials and SOEs present heightened Corruption Risks and must be conducted with particular care. TP prohibits providing anything of value to Public Officials or SOEs for the purpose of improperly influencing official actions or obtaining an improper advantage.

For the purposes of this Policy, an SOE is any entity over which a Government exercises ownership or control, including where it holds any one of the following:

- 50% or more of the ownership interest
- Voting control
- Board control, or other indicia of control.

8.3.1. Anti-Corruption Measures in high risk departments

Certain functions and activities may present elevated Corruption risks due to their nature, level of discretion, access to funds or interactions with external stakeholders.

8.3.2. Finance

Finance and accounting functions play a critical role in preventing and detecting Corruption. All transactions must be accurately recorded and supported by appropriate documentation and approvals. Financial Controls and transaction monitoring are implemented to identify any unusual or suspicious activity.

8.3.3. Human Resources

Human Resources is exposed to several areas that may be vulnerable to Bribery and Corruption risks. These include recruitment, hiring, promotions, compensation decisions, disciplinary actions, and the engagement of temporary staff, consultants, or recruitment agencies.

Appropriate controls must be in place to ensure that employment-related decisions are objective, transparent, merit-based, and free from improper influence, Conflicts of Interest, or favoritism.

8.3.4. Sustainability and Environment

Corporate social responsibility (CSR) initiatives may present Corruption Risks where they are used to improperly influence decisions, or to benefit individuals connected to Public Officials or business partners.

Controls shall be implemented to mitigate any Corruption risk related to carbon offsetting measures in place, and to ensure the reliability of the data communicated regarding the achievement of carbon targets.

TP prohibits the use of CSR activities as a means of concealing improper payments or influencing decision-making. For more information, please consult the Citizen of the World Guidelines (COTW).



8.3.5. Third Party Risk Management (TPRM)

Corruption Risks may arise through Third Parties acting for TP. A Global Third-Party Risk Management Program applies Due Diligence and Sanctions checks. For more information, please consult the [TPRM Policy](#).

9. CONTINUOUS IMPROVEMENT

TP is committed to ensuring continuous improvements to the Global Anti-Corruption Program. For more information, please consult the Global Continuous Improvement Procedure.

10. COMPLIANCE WITH THE ANTI-CORRUPTION POLICY AND PROGRAM REQUIREMENTS

Noncompliance may result in criminal prosecution, monetary fines, and disciplinary action up to and including termination.

All violations and Policy exceptions will be reported to the Governance & Risk Committee (GRC) by the Corporate Compliance Office, at least annually or where significant exposure risk is identified.

If you suspect, or know of a violation of this Policy, you must report it to your Line Manager, the Global Ethics Hotline at Teleperformance | Home (integrityline.com) (GEH), or the Global Incident Response Team (GIRT) at girt@teleperformance.com. Retaliation is not permitted against any Workforce Member who makes a report in good faith.

Where a deviation from this Policy is justified, an exception shall be requested by contacting the Corporate Compliance Office via Global-Compliance@teleperformance.com.

11. TP UNDERLYING POLICIES

The Policy should be read in conjunction with TP's underlying policies and Standards found on the [Group's corporate policies intranet page](#) and/or on the [Teleperformance website](#):

- Code of Conduct and Ethics
- Compliance Policy
- Anti-Money Laundering and Counter-terrorist Financing Policy
- Global Ethics Hotline Policy
- Gifts & Hospitality Policy
- Global Sanctions and Trade Compliance Policy
- Global Sponsorships Policy
- GPCS – 05 Compliance
- GPCS – 06 Third Party Risk Management Sanctions
- GPCS – 07 Compliance – Anti-Corruption
- Citizen of the World Guidelines
- Procedure for Identifying Most Exposed Persons
- Procedure for Conflict of Interest
- Applicable Laws and Obligations
- Global Continuous Improvement Procedure

