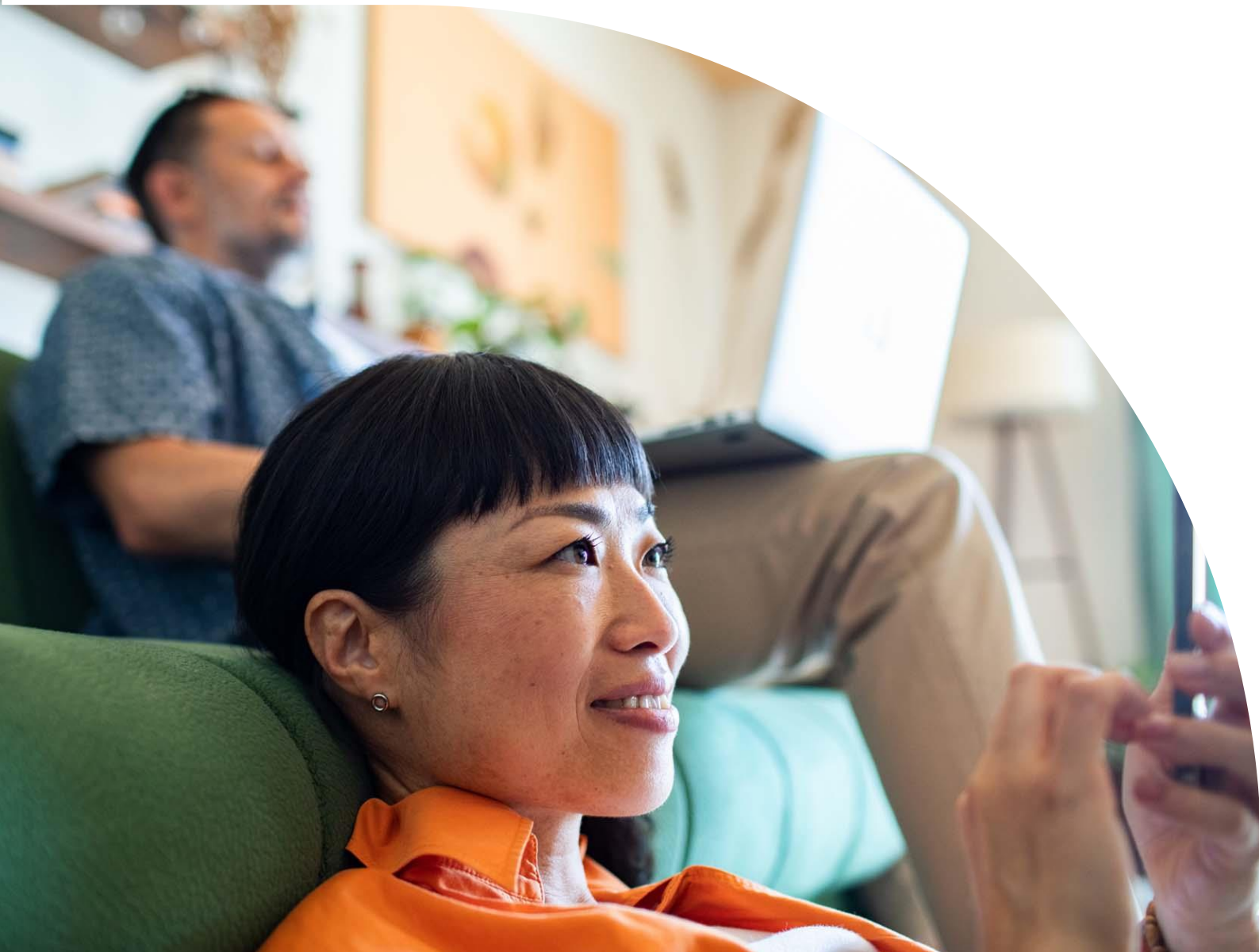




Global Ethics Hotline Policy

September | 2025





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A message from our Chief Executive Officer

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

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

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

A handwritten signature in black ink, appearing to read 'Daniel Julien'.

Daniel Julien
Chief Executive Officer



Purpose

TP is committed to the highest standards of ethical, honest, and legal business conduct. TP will conduct business ethically and honestly and fully comply with all applicable laws and regulations. This commitment is set forth in our Code of Conduct and Ethics (the “**Code**”) and guides every business decision.

This Global Ethics Hotline Policy (this “**Policy**”) reinforces TP’s commitment by detailing the mechanism (Global Ethics Hotline) and practices referenced in the Code. The Global Ethics Hotline offers a confidential, and if preferred, anonymous, channel to raise ethical concerns (as specified in this Policy and the Code). This Policy explains how to make a report through the Global Ethics Hotline, your protections, your responsibilities and obligations, and the investigative process. Note that local countries and subsidiaries may adopt different policies or reporting standards, not inconsistent with this Policy, to the extent appropriate based on their local country’s laws and regulations. For example, European Union countries will abide by the European Union Directive and its local legal implementations.

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

Scope

This Policy 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. This Policy is also applicable to those identified as Interested Parties.

The same high ethical standards apply and are expected from everyone, regardless of job or level within TP. This Policy 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.

This Policy is subject to specific terms and provisions described in any addendum approved for a particular country due to applicable local laws and regulations.



Definitions

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: The TP Code of Conduct and Ethics, and as applicable, the Supplier Code of Conduct.

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.

European Union Directive (EUD): Directive (EU) 2019/1937 of The European Parliament and of The Council of 23 October 2019 on the protection of persons who report breaches of Union law.

Fraud: Any activity that relies on deception in order to achieve a gain.

Global Ethics Hotline (GEH): A mechanism Reporters can utilize to raise ethical concerns, inclusive of an online portal, tp.integrityline.com, and dedicated country-specific phone lines.

Global Ethics Hotline (GEH) Team: Responsible for reviewing and managing cases reported through the Global Ethics Hotline, reporting to the Senior Vice President, Global Compliance, Audit, and Ethics.

Good Faith: When the Reporter acts in "Good Faith," and provides a sincere report.

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

Interested Parties: This includes shareholders, former Workforce Members, Workforce Members, incoming Workforce Members (not yet onboarded), volunteers, trainees, subcontractors, suppliers, and connected third parties of the Reporters (e.g., colleagues or relatives). It also extends to individuals working under the supervision of contractors, subcontractors, or suppliers (i.e., employees of those third parties), facilitators who assist Reporters, and connected legal entities (e.g., a contractor's own company).

Reasonable Belief: The Reporter has reasonable grounds to believe that the information they are reporting was true at the time of reporting and that such information fell within the scope of this Policy, aligned with the Code.



Reporter: Individual who expresses an ethical concern or Code breach (or “report”).

Retaliation: Any direct or indirect act or omission which occurs in a work-related context and which causes, or may cause, unjustified detriment to the Reporter (e.g., coercion, intimidation, withholding of training).

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.

Wrongful Business Conduct: For purposes of this Policy, this includes breach of the Code of Conduct and without limitation:

- Theft, Fraud, embezzlement, deception, forgery, conspiracy, Extortion, misappropriation of property, Corruption, Bribery, money laundering, financing counterterrorism, insider trading
- Manipulation of financial statements
- Conflicts of interest with TP’s best interests
- Violations of laws or regulations, e.g., financial services, consumer protection, antitrust, fair competition, and securities
- Unauthorized or illegal access/use/transfer to or of company data or systems, including confidential information, personal data, intellectual property, credential sharing, and/or other violations of the TP Global Information Security Policy or standards
- Billing for services not performed or other Fraudulent financial reporting, e.g., recording sales or services when the Client is likely to return the goods or terminate services
- Unauthorized use of assets, property, resources, or authority for personal gain or an improper or illegal purpose
- Retaliation, discrimination, or harassment based on gender, disability, sexual orientation, gender identity and expression, ethnicity and race, nationality, belief and ideologies, pregnancy or parenthood, marital status, age, or socio-economic status
- Serious threat or damage to the public interest, known personally by the Reporter; in particular, serious risk to public health or the environment, including violations of environmental, health and safety, product and food safety, transportation safety, or other similar laws and regulations
- Manifest and severe infringement of any applicable international commitment duly ratified or approved by France or the United Nations Global Compact (which includes commitments in the areas of human rights, freedom of association, elimination of forced and compulsory work, effective abolition of child labor, elimination of discrimination in respect of employment and occupation, environmental responsibility, and anti-corruption)



- Unauthorized or illegal manipulation of IT networks or operating systems
- Unethical conduct of suppliers that violates the TP Supplier Code of Conduct or any other TP policy

Reporting an Ethical Concern

TP encourages Workforce Members and Interested Parties to report ethical concerns when they personally, in Good Faith and with Reasonable Belief suspect that Wrongful Business Conduct has occurred, is occurring or is about to occur (a “report”).

As specified in the Code, TP offers multiple avenues to report ethical concerns or Wrongful Business Conduct (e.g., contacting local leadership). This Policy specifically addresses use of the Global Ethics Hotline for reporting Wrongful Business Conduct. Reports can be made through the Global Ethics Hotline, with the option to report anonymously, using either of the following channels:

- TP website: tp.integrityline.com
 - Complete a typed form or record a voice message
- Dedicated country phone lines
 - Intake personnel will verbally collect, report, and transcribe
 - Reporters must review, revise (if necessary), and approve

TP strongly encourages individuals to bring concerns forward through internal channels, as outlined in the Code and this Policy, assuring every Reporter that their concerns will be heard, thoroughly investigated, and addressed appropriately. While we ask that concerns are first reported internally to allow TP the chance to respond, we also recognize that Reporters may choose to use external reporting options. For further details, please refer to the following:

- EU Countries: [External reporting channels](#)
- Non-EU Countries: Check local ethics reporting policies/procedures and/or national laws

In instances where a report submitted through the Global Ethics Hotline falls outside the scope of this Policy—such as matters unrelated to Wrongful Business Conduct as listed above—the case will be securely redirected to the appropriate internal department (e.g., Human Resources, IT, or Payroll) for review and resolution. The Reporter will be informed of this referral. All information will continue to be handled with discretion and in accordance with applicable confidentiality and privacy standards.



Your Protections

The protections below apply to Reporters whose submissions are made in Good Faith, with a Reasonable Belief in the accuracy of the report and are covered by applicable laws and regulations (e.g., EUD), regardless of reporting channel. A Reporter whose own conduct is implicated will not be given automatic protection from the investigation and potential corrective actions.

The following commitments guide TP's Global Ethics Hotline practices:

- **Anti-Retaliation:** TP will not retaliate against or condone Retaliation against any Reporter who, in Good Faith and with Reasonable Belief, reports or cooperates in an investigation concerning suspected Wrongful Business Conduct. Any allegations of Retaliation should be reported through the Global Ethics Hotline for prompt investigation; appropriate corrective measures will be taken if such allegations are substantiated. Subject to applicable local laws and regulations, a Reporter's protection from Retaliation does not prevent the Group from taking appropriate disciplinary action based on valid performance-related factors.
- **Anonymous Reporting:** TP encourages Reporters to identify themselves when submitting a report because more detailed information and follow-up questions may be required to investigate the report efficiently and effectively. However, Reporters can submit a report anonymously if they wish, keeping in mind that it may become necessary to identify the source of the information during the investigation. If Reporters report anonymously, they must provide sufficient specific and concrete facts to enable TP to investigate and address the report adequately. Subject to applicable local laws and regulations, if disciplinary or legal action is taken against a person as a result of a report, TP may have a duty to disclose the report's contents to such person.
- **Confidentiality and Privacy:** All reports submitted to TP will be handled with the highest degree of sensitivity, impartiality, discretion, and confidentiality. This includes:
 - Protection of the Reporter and reported facts: The identity and identifying information of the Reporter will be kept confidential to the extent possible.
 - Protection of all individuals named: The confidentiality of individuals to whom the report refers, as well as any third parties mentioned, is equally protected.
 - Access restrictions: Access is governed by the Global Ethics Hotline Team and supported by systematic controls. Only personnel whose roles require access for investigation or resolution purposes are granted permission to access the report details, strictly within the limits of their respective responsibilities and the fulfilment of these duties and functions. All access is logged and monitored. Additional governance measures include periodic audits and training sessions for authorized personnel to reinforce ethical handling of reports and maintain the highest standards of privacy.



- Generally, this means the Global Ethics Hotline Team will only share information concerning reports on a “need-to-know” basis, so that the appropriate investigations can be performed.

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.

- **Good Faith Reporting:** 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. This protection applies to individuals who are subject to relevant laws and regulations, such as those outlined in the EUD.

Your Responsibilities and Obligations

At TP, our reputation relies on everyone’s actions. As a Workforce Member, you should:

- **Own your actions:** Be authentic and accountable for your conduct and responsibilities.
- **Follow policies:** Comply fully with the Policy, the Code, all TP policies, and applicable laws.
- **Report Wrongful Business Conduct:** Promptly report any suspected Wrongful Business Conduct to leadership as outlined in the Code or this Policy.
- **Use good judgment:** Apply TP’s values, consult relevant policies, and seek guidance from supervisors or HR if unsure.
- **Cooperate:** Participate in investigations and keep all shared information confidential to protect the process.

After Reporting Your Concern

After you submit a report through the Global Ethics Hotline, and as allowed by law, you can expect the following:

- To be notified in writing, within seven days, confirming the Global Ethics Hotline Team received your report.
- To receive an update in writing, in a reasonable timeframe not exceeding 90 days from the acknowledgment of TP’s receipt, as to the status of the investigation while keeping confidentiality and privacy in mind.



- To be informed, in writing, by TP once the report has been thoroughly investigated, usually within 90 days of TP's receipt. Note, some investigations may take more time due to the nature of the reported information.

TP seeks to preserve the integrity of the reporting and investigatory process; accordingly, the Group requests that you keep the information in the report strictly confidential and not disclose it to others, except to the extent required or permitted by applicable laws or regulations.

Investigating an Ethics Report

All reports made via the Global Ethics Hotline will be promptly and, to the extent practicable, thoroughly investigated by the Global Ethics Hotline Team or designated, impartial individual or department under the direction and oversight of the Chief Compliance Officer, the Deputy Chief Compliance Officer, or their designee. The Chief Compliance Officer, Deputy Chief Compliance Officer, or designee has the authority to engage legal counsel and other specialists as they deem appropriate to investigate any report made under the Policy and Code.

- The Chief Compliance Officer and/or the Deputy Chief Compliance Officer may periodically provide a summary report to the Audit and Compliance Committee of the Board (the “**Audit and Compliance Committee**”) on how the Policy and related procedures are functioning.
- The Chief Compliance Officer and/or the Deputy Chief Compliance Officer will inform the Group's Chief Executive Officer if a report rises to a materiality level that may justify reporting to/discussing with the Audit and Compliance Committee.

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

Recordkeeping

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

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



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

Rights of Access

As permitted by applicable laws or regulations, any person identified in a report made to the Global Ethics Hotline benefits from a right to access the data concerning them, without prejudice to the rights and freedoms of others, including trade secret protection. Persons can request correction or deletion if such data are inaccurate, incomplete, equivocal, or outdated

TP Underlying Policies

This Policy should be read in conjunction with TP's underlying policies and standards found on the [Group's corporate policies intranet page](#) and/or [TP's website](#), including the following:

- Code of Conduct and Ethics
- Diversity and Inclusion Policy
- Global Data Retention Policy
- Global Record Retention Schedule
- Human Rights Policy
- Information Security and Privacy Program
- Supplier Code of Conduct
- TP Group Data Privacy Policy/BCRs

Policy Review

To ensure that this Policy remains fit for purpose, the Global Ethics Hotline Team will review this Policy at least annually.

