

## Ethics and compliance —

Teleperformance's Global Compliance organization is a dedicated structure composed of teams in charge of developing, implementing, and continuously improving Teleperformance's compliance program.

### How is the compliance department structured within Teleperformance?

The members of the compliance team interact with other functions such as legal, finance, operations, privacy, CSR, and HR across all regions. This dedicated structure ensures that our policies and procedures are effectively and efficiently implemented Group-wide. We provide a report on a regular basis to the Audit, Risk and Compliance Committee of the Board of Directors. Our main missions are to structure, develop and adapt the Group's compliance framework in line with new and existing regulations and best practices, and to ensure its application in all subsidiaries. To do this, we rely on the security and compliance audit function, among other things.

In 2020, we completed a global structural alignment across operational teams and Group-level functions to enable us to react in a more agile and consistent way.

### What are the bases and priorities of the Teleperformance compliance program?

We are committed to respecting national and international standards and regulations that promote the highest ethical standards: the UN Global Compact, the Universal Declaration of Human Rights, the ILO conventions, and the OECD Guidelines.

Teleperformance's global compliance framework is based on its Code of Ethics and Code of Conduct.



**LEIGH RYAN**  
CHIEF LEGAL, COMPLIANCE  
AND PRIVACY OFFICER

Among other areas of compliance, we focus in particular on our anti-corruption program, reinforced in 2020 following an internal compliance audit conducted on existing procedures. We are also implementing a Group-wide standardized procedure for third-party due diligence, and are continuously improving our data privacy program, which is one of the Group's most important priorities.

## VEREGO SRS CERTIFICATION

For the seventh year running, Teleperformance was awarded SRS certification by Verego, given to companies that stand out in five key areas: leadership, ethics, social, community and environment. In its assessment of the Group in 2020, Verego found that Teleperformance's global policies were of the highest standard.



Since its first certification in 2013, Teleperformance has continued to develop its responsible business practices and show leadership in ethical, social and environmental matters. Feedback from facility managers and employees shows that Teleperformance's values and policies are implemented in the field. ●●

**CAROLE KERREY,**  
LEAD CERTIFICATION DIRECTOR, VEREGO



# Our GLOBAL ANTI-CORRUPTION PROGRAM

Teleperformance is committed to preventing corruption in all its forms and adopts a zero-tolerance approach. Its anti-corruption program is based on:

- strong commitment from management;
- a dedicated structure including a multi-disciplinary team responsible for coordinating the program, and clear definition of responsibilities;
- a specific communication plan to inform all stakeholders of the existence and content of the program;
- a range of measures to prevent any form of corruption or influence peddling, detect such conduct as quickly as possible and respond where applicable.



## MATERIAL TOPICS

Ethics & Compliance

### SDGs



## KEY PERFORMANCE INDICATORS 2020

# 86%

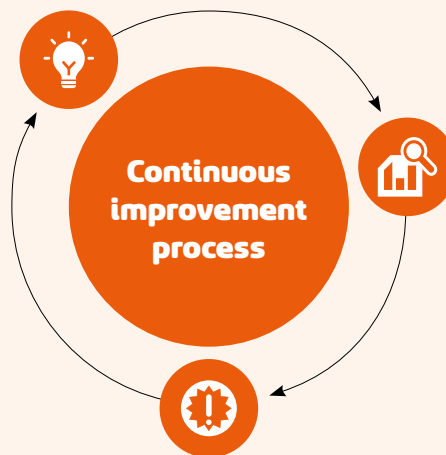
employees trained on the Code of Conduct

# 100%

footprint where Global Ethics hotline has been rolled out

### Prevention

- Code of Conduct setting out the basic rules to be followed and prohibited behaviors.
- Corruption risk mapping to identify and assess corruption risks.
- Training program to raise awareness about corruption risks.
- Due diligence procedure prior to signing contracts with third parties.



### Response

- Sanctions and disciplinary measures for breaches of the Code of Conduct.
  - Feedback and corrective measures.

### Detection

- Audits and controls to prevent and detect all forms of corruption.
- Compliance and performance tracking indicators to guarantee effective implementation of measures.
- Confidential Global Ethics Hotline open to all stakeholders.