

Teleperformance Group

Diversity & Inclusion Policy

Version 2.0



1. Purpose

The purpose of this Diversity & Inclusion Policy (the “**Policy**”) is to provide guidelines to ensure that the companies of Teleperformance Group (the “**Companies**” or, individually, a “**Company**”) implement and enforce policies and procedures that effectuate their commitment to equal employment opportunities, nondiscrimination, diversity and inclusion, and, where applicable, affirmative action programs for all candidates and employees, as well as equal employment advancement opportunities for employees. In this regard, the Companies do not unlawfully discriminate and, in fact, welcome, integrate and value people from all backgrounds, including ethnicity, religion, gender, LGBTQIA (lesbian, gay, bisexual, transgender, queer or questioning, intersex and asexual or allied), national origin, citizenship, ancestry, age, disability, genetic information, family care status, social background, military caregiver status, veteran or military service or obligation, reserve status, national guard status, refugee status, or any other basis protected by applicable laws. It is the policy of each such Company to fully comply with applicable laws that prohibit discrimination.

2. Coverage

This Diversity & Inclusion Policy applies to candidates/applicants for employment, all employees of the Companies, and certain third parties that can be affected because of their relationship with the Companies. This Diversity & Inclusion Policy also addresses all of the Companies’ operations and every aspect of the employment relationship, including but not limited to personnel actions such as recruitment, selection procedures (such as hiring, work assignments, and shift selection), compensation decisions, employee development, training, performance evaluations, promotions, transfers, benefits, disciplinary action and Company social and recreational programs.

3. Definition

Discrimination, which can be direct or indirect, means any distinction between individuals because of their national origin, gender, marital status, pregnancy, physical appearance, name, state of health, disability, genetic characteristics, cultural traditions and customs, sexual orientation or

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identity, age, political opinions, trade union activities, belonging to an ethnic group, nation, or religion, or other characteristics or status. Direct discrimination occurs when one person is treated less favorably than another in a comparable situation on the grounds referred to above, and indirect discrimination may occur when taking an apparently neutral provision, criterion or practice would put persons having a particular religion, disability, age, sexual orientation, etc. at a disadvantage compared with other persons.

In the employment context, unlawful discrimination means that because of an applicant's or employee's protected status—meaning his or her ethnicity, religion, gender, sexual orientation, national origin, citizenship, ancestry, age, disability, genetic information, family care status, military caregiver status, veteran or military service or obligation, reserve status, national guard status, or any other basis protected by applicable laws—the applicant or employee is treated differently with respect to compensation, terms, conditions, or privileges of employment (for example, the applicant or employee is not hired or is terminated from employment), or the applicant or employee is limited, segregated or classified in any way that deprives or tends to deprive the applicant or employee of employment opportunities or otherwise adversely affects the status as an employee.

4. Procedures

The commitment of the Companies to diversity, inclusion and equal employment opportunities concerns all aspects of the employment relationship, including the following fields:

- Recruitment & Hiring
- Training, Promotions & Career Advancement
- Anti-Harassment
- Remuneration
- Work Conditions

a. Recruitment & Hiring

Objective:

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Ensure that methods for sourcing candidates for employment, and for deciding those candidates to whom an offer of employment will be extended, do not discriminate against people based on a protected status, and that they reflect this Diversity and Inclusion Policy and, where applicable, affirmative action programs.

Measures:

Each Company shall:

- Enlarge and diversify its sources of recruitment and the pool of candidates considered for employment openings, including openings in upper level management, and encourage candidates from diverse or minority backgrounds to apply. For instance, Companies will work together with their external recruitment partners to ensure that the external partners understand the Companies' commitment to this Policy, and recruit, hire, and staff accounts with nondiscrimination and equal employment opportunity principles in mind.
- Determine the duties, functions, and competencies relevant to each position. Create objective, job-related qualification standards related to those duties, functions, and competencies. Ensure that the qualification standards are consistently applied when choosing among candidates.
- Ensure selection criteria do not disproportionately exclude certain protected groups unless the criteria are valid predictors of successful job performance and meet the employer's business needs, consistent with applicable law.

b. Training, Promotions & Career Advancement

Objective:

Incorporate measures to ensure equal employment opportunities in employee promotions and career advancement, including employee training and development.

Measures:

- The Companies should ensure that they develop the potential of employees, supervisors, and managers with equal employment opportunities and the empowerment of women, minorities and different ethnic groups in mind, by providing training and/or mentoring that offers employees of all backgrounds the opportunity, skills, experience, and information necessary to perform well and to ascend to upper-level jobs.

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- Employment decisions related to promotions and career advancement in which equal employment opportunity principles should be considered include, but are not limited to, evaluating employees' performance; making recommendations on internal transfers; employee skills or professional development opportunities; and promotions.
- The Companies should strive to put in place an evaluation system under which no advancement is blocked or favored under the influence of favoritism (see Code of Conduct) and under which unbiased individuals evaluate an employee for promotion and/or advancement on the basis of objective and job-related criteria.
- The Companies should ensure that promotion criteria are made widely known, and that job openings are communicated to all eligible employees.
- Each Company shall abide by any affirmative action or other obligation to advance in employment qualified individuals in protected categories, as required by applicable law.

c. Anti-Harassment

Objective:

Provide working conditions that are free of, and that prevent, any kind of unlawful harassment, including harassment because of ethnicity, religion, gender, sexual orientation/ LGBTQIA community, national origin, citizenship, ancestry, age, disability, genetic information, family care status, military caregiver status, veteran or military service or obligation, reserve status, national guard status, or any other basis protected by applicable laws, consistent with applicable law.

Measures:

- The Companies shall take all necessary measures to prevent sexual and other unlawful harassment, including by implementing, disseminating to all employees, and enforcing a policy prohibiting unlawful harassment and retaliation on any basis protected by applicable laws. Such policies must include at least the following:
 - the definition of unlawful harassment, a clear explanation of prohibited conduct, and specific examples of prohibited conduct;
 - Assurance that individuals who make complaints or provide information related to complaints will be protected against unlawful retaliation;
 - A clearly-described complaint process that provides for more than one accessible avenue for raising complaints;

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- Assurance that the Company will protect the confidentiality of harassment complaints to the extent possible and consistent with applicable law;
- A complaint process that provides a prompt, thorough, and impartial investigation.
- Each Company should ensure that it takes immediate and appropriate corrective action when it determines that harassing behavior in violation of the Company's policy has occurred. The Companies shall raise the awareness of the diverse actors in the Companies by conducting periodic training of personnel on the topic of unlawful harassment and Company policies addressing this topic, and posting such policies and notices and summaries of employee rights related to sexual and other unlawful harassment in the workplace.
- The Companies shall organize work discussions within the works council and the committees in charge of hygiene, safety and working conditions matters, if applicable.

d. Remuneration

Objective:

Promote equal pay and ensure that no worker is unlawfully discriminated against in terms of salary, benefits, incentives, or other forms of compensation or remuneration.

Measures:

- The Companies shall monitor remuneration/compensation practices on an annual basis in order to identify areas of potential concern in terms of equal employment opportunities, and put in place the necessary means in order to rectify such areas as deemed appropriate and consistent with applicable law.
- The Companies shall also ensure that leaves of absence related to pregnancy and parental leave, among other types of leaves, or other events linked to parenting do not result in a violation of the Company's equal employment opportunities commitment.

e. Work Conditions

Objective:

Ensure that every employee is treated with respect and courtesy. Promote policies and work arrangements that benefit the Company as well as employees in terms of their family, personal and

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work time. Encourage efficiency in the use of work time, making effective measures and tools available in the Companies for this purpose.

Measures

- Each Company shall ensure that no individual is rejected or ignored in the context of work or work-related activities of the Company. This covers job assignments as well as hours of work and rest / holidays.
- Each Company shall encourage clear and transparent Company-wide communication about the importance of managing family, personal and work time.
- The Companies shall comply with all applicable laws requiring modification and reasonable accommodations in the workplace for disabled applicants and employees.
- The Companies shall monitor practices for equal employment opportunity compliance, and conduct self-analyses to determine whether current employment practices disadvantage people of protected categories.

5. Policy Training & Awareness

Objective:

Incorporate measures to ensure that all Company staff and management are aware of the Company's commitment to equal employment opportunities, nondiscrimination, diversity and inclusion, and where applicable, affirmative action programs.

Measures:

- The Companies shall identify and implement appropriate and periodic training, for both staff and managers, on equal employment opportunity principles and laws, and best practices within the workplace for ensuring such principles are followed in Company employment decisions. This training shall include training modules intended for employees responsible for the recruitment and the hiring process and Human Resources Department management.
- To increase and broaden awareness, each Company shall ensure that its equal employment opportunity policies are prominently and conspicuously displayed for all employees, including on Company bulletin boards in common areas, within employee handbooks and manuals, as well as in training sessions, among other locations.

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- Managers are responsible for understanding and following diversity & inclusion and equal employment opportunity policies in their location, and educating employees who report to them about such policies. Managers should maintain open lines of communication, and allow employees to express their concerns about possible violations of such policies without fear of unlawful retaliation. Managers must respond to any form of unlawful discrimination or harassment reported to them or that they observe, in accordance with the Company policies, including by taking swift action designed to stop the conduct and reporting it to Human Resources Department management.

6. Responsibilities

Managers: Not only must managers and supervisors conduct themselves in a manner consistent with this Policy, they are also responsible for establishing and maintaining a work environment free of unlawful discrimination and harassment. Managers must respond to any form of unlawful discrimination or harassment reported to them, or that they observe, in accordance with the Company policies, including by taking swift action designed to stop the conduct and reporting it to Human Resources Department management.

Human Resources: The Human Resources Department has the same responsibilities as all other employees relative to compliance with this Policy. At the same time, Human Resources Department personnel in the Companies have special responsibilities in preparing and implementing this Policy and any Company-specific policies, identifying and conducting/arranging for training on such policies, conducting thorough investigations of the complaints that are brought forward by management or any employee under such policies; and providing appropriate coaching and support for all parties involved in possible discrimination or harassment situations. In cases where an employee is not responsive to coaching relative to Company procedure and policy, the Human Resources Department is obligated to elevate the situation to appropriate leaders of the Company for immediate action.

Employees: Employees are responsible for reviewing, understanding, and asking any questions needed to clarify this Policy and any Company-specific equal employment opportunity policies or, where applicable, affirmative action programs; promoting a workplace free of unlawful

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discrimination and harassment by conducting themselves in a manner consistent with such policies; attending all required training on the subject matter of such policies; and immediately reporting any possible violation of such policies in accordance with the procedures set forth in their Company policies to their Human Resources Department or the CSR Committee at csr@teleperformance.com.

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Document Control

Document Owner			
Name	Signature	Role	Date
Allison Junoy		Group Chief Legal Officer Member of CSR Committee	January, 2015

Document Approval			
Name	Signature	Role	Date
Adam Smyth		Director of Human Resources, Corporate Compliance and Employee Relations	January, 2015

Review				
Review Date	Name	Signature	Role	Next Review Date
March 20, 2019	Leigh Ryan		Chief Legal Officer and Chief Compliance Officer	
March 20, 2019	Alan Winters		Group Chief Administrative Officer and Group Chief Privacy and Data Protection Officer	

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Date	Revision	Author
March, 2019	Name of policy: "Equal Opportunity Policy" renamed "Diversity & Inclusion Policy". Policy name updated in all occurrences in the text	Leigh Ryan
March, 2019	Purpose: - added that we "welcome, integrate and value people from all backgrounds" "Ethnicity" replacing "race" (and in all further occurrences) "Gender" replacing "sex" (and in all further occurrences) "LGBTQIA (lesbian, gay, bisexual, transgender, queer or questioning, intersex and asexual or allied)" replacing "sexual orientation" (and in further occurrences)	Leigh Ryan
March, 2019	Coverage: "concerns an applies to" summarized into "applies to"	Leigh Ryan
March, 2019	Definition: - specification added, "Discrimination, which can be direct or indirect" "cultural traditions and customs" replacing "cultural mores" - sentence added defining direct and indirect discrimination "the applicant or employee" replacing "they" in the paragraph	Leigh Ryan
March, 2019	Procedures: "diversity, inclusion" added to "equal employment opportunities" in Company's commitment "Anti-Harassment" replacing "Harassment" (and in all further occurrences)	Leigh Ryan
March, 2019	Recruitment & Hiring: "people" replacing "groups of people" - added "and encourage candidates from diverse or minority backgrounds to apply" "external recruitment partners" and "external partners" are specified "nondiscrimination" added to "with equal employment opportunity principles in mind"	Leigh Ryan

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	“the qualification standards” specified as subject of “are consistently applied” - bullet point erased: “Abide by any diversity or inclusion standards or goals, and/or affirmative action programs, consistent with applicable laws and regulations.”	
March, 2019	Sub-chapter title “Training, Promotions & Career Advancement” replacing “Promotions & Career Advancement”	Leigh Ryan
March, 2019	Training, Promotions & Career Advancement: “empowerment of women, minorities and different ethnic groups” added “offers employees of all backgrounds” replacing “provides workers of all backgrounds” “Code of Conduct” replacing “Anti-Corruption Policy”	Leigh Ryan
March, 2019	Anti-Harassment: “Violation of Company’s policy” replacing “violation of the policy” “The Companies shall organize work discussions” replacing “the Companies will organize work discussions”	Leigh Ryan
March, 2019	Remuneration: “Promote equal pay” added	Leigh Ryan
March, 2019	Work Conditions: “Each Company” replacing “The Companies” in all bullet points “work-related activities of the Company” replacing “activities of the Group” - second bullet point rephrased “Each Company shall encourage clear and transparent Company-wide communication about the importance of managing family, personal and work time.”	Leigh Ryan
March, 2019	“Policy Training & Awareness” replacing “Training & Awareness”	Leigh Ryan
March, 2019	Policy Training & Awareness: “ensuring such principles are followed in Company employment decisions” replacing “ensuring such principles are brought to Company employment decisions”	Leigh Ryan

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	“diversity & inclusion” added to “following equal employment opportunity policies”	
March, 2019	Responsibilities: “implementing this Policy and any Company-specific policies” replacing “implementing Company policies” “possible discrimination or harassment situations” replacing “possible harassment and discrimination situations” - added “or, where applicable, affirmative action programs” to the list of subjects	Leigh Ryan

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