



Code of Conduct and Ethics

August 2026

Public





TABLE OF CONTENTS

A message from our Chief Executive Officer	3
OUR WAY AT TP	5
SPEAKING UP	7
DOING BUSINESS RESPONSIBLY AND ETHICALLY	8
PROTECTING OUR ASSETS AND DATA	11
CREATING A SAFE WORK ENVIRONMENT	12
ENVIRONMENTAL COMMITMENT	13
TP UNDERLYING POLICIES	13



A message from our Chief Executive Officer

Integrity is one of TP's five core values. Together with Respect, Innovation, Professionalism, and Commitment, it forms the foundation of a corporate culture established almost 50 years ago and still relevant today. It is the basis of our long-term success. From my first days at TP, I have been struck by the depth of commitment I see across the organization—to our values, to our Clients, and to one another. I have rarely experienced such a strong and genuine alignment between a company's culture and its people.

As I join TP with a clear mandate to accelerate the execution of our strategic roadmap, I am convinced that our people are our greatest strength. Acting with integrity, *each and every* day, is not only a responsibility we share—it is a decisive enabler of our ambition and our continued success.

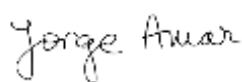
Our commitment to integrity means complying with the highest professional and ethical standards, as well as fully respecting both the spirit and the letter of the laws that govern our industry, our Group, and our operations. By conducting ourselves ethically and with integrity, we reinforce the trust and respect of those we serve and those with whom we work.

The Code of Conduct and Ethics, available on the [Group's intranet](#), is an essential resource for all TP Workforce Members. It sets out our policies on business conduct and identifies the appropriate contacts for any questions related to compliance matters. I encourage you to rely on it regularly as a practical guide to making the right decisions and addressing any issues that may arise in the course of your professional responsibilities. It is designed to support you throughout the year and in all circumstances.

Our Code of Conduct and Ethics comes to life through each of us. Continuous improvement and corrective action are core components of our Global Compliance Framework. If you have any questions, concerns, or if you observe behaviour that does not align with our standards, I strongly encourage you to use the [Global Ethics Hotline](#), our internal reporting system to alert the Compliance Department.

Acting with integrity requires understanding and consistently applying the policies that define our standards of behaviour. Upholding the highest standards is imperative. We owe this to our Clients, our partners, our shareholders, and to ourselves. This is everyone's responsibility.

I would like to thank you for your ongoing commitment to our values and for the role each of you plays in promoting our Code of Conduct and Ethics, both within TP and beyond. I firmly believe that, together, we will continue to build a company that delivers on its strategy with integrity, pride, and shared purpose.



Jorge Amar

Chief Executive Officer



Purpose

TP is built on strong values and responsible business practices. This Code of Conduct and Ethics (this “**Code**”) guides the choices we make every day. It exists to prevent wrongdoing and to promote:

- **Honest and ethical conduct** — including handling conflicts of interest properly.
- **An inclusive culture** — where we respect each other and welcome all ideas.
- **Clear, accurate disclosures** — in our public reports and other communications.
- **Compliance** — with all laws, rules, and regulations that apply to us.
- **Prompt reporting** — of suspected or confirmed violations, and a fair response to them.
- **Accountability** — for following this Code.

Our reputation is the sum of our individual actions. Misconduct by one person can undo the hard work of thousands. This Code cannot cover every situation, so use good judgment. When you are unsure, ask your manager, Human Resources, or the Code Champions at codechampions@teleperformance.com. If you believe local law prevents you from following this Code, reach out to the Code Champions right away.

Scope

This Code applies to all TP Companies (together, “**TP**” or the “**Group**”). It covers everyone — the Board of Directors, the local boards, all officers, and all Workforce Members, including interns and temporary colleagues.

The same high standards apply to everyone, whatever your role or level. It is each person’s responsibility to know the policies that apply to their job.

Definitions

Capitalized terms in this Code are defined in the [Global Glossary](#), available in the Policy on Policies.

Overview of the Global Compliance Organization

TP’s Global Compliance Organization runs from Senior Management and the Board’s Audit, Risk and Compliance Committee down through every level of the Group. It makes sure our compliance program works consistently across TP. The Chief Legal and Compliance Officer reports regularly to other members of Senior Management and to the Audit, Risk, and Compliance Committee.

How to Get Help and Report Concerns

You have several ways to ask questions and report concerns. Use this section as your guide. For most questions, start with your manager. If that doesn’t resolve it, use the channel below that best fits your situation.



Channel	Use it for	How to reach it
Your manager, local HR or local Legal/Privacy and Compliance	Everyday questions and guidance	Speak to them directly
Code Champions	Questions about this Code	codechampions@teleperformance.com
Global Ethics Hotline	Suspected misconduct, breaches of this Code or possible legal violations	Global Ethics Hotline
Global Incident Response Team (GIRT)	Security incidents	girt@teleperformance.com
Global Privacy, Risk and Compliance Office	Data privacy and records management questions	privacy@teleperformance.com

You may use the [Global Ethics Hotline](#) at any time. Local reporting channels are also available where required by law. You do not need to be certain a violation occurred or have all the facts before raising a concern.

Full versions of all underlying policies are on the Corporate Policies Page on the [Group intranet](#).

OUR WAY AT TP

TP values

Our values are the heart of our culture, and we expect everyone to live them every day: Integrity, Respect, Innovation, Professionalism, and Commitment.

Making ethical decisions

Not every situation is clear-cut. When you face a hard decision, pause and think it through.

Pause – Take a moment to summarize the facts:

- What led to this situation?
- Do I know enough to weigh the options?
- What are my choices?

Evaluate – Weigh possible decision outcomes:

- Does this feel right? Would I be comfortable if it were reported in the news or to my manager?
- How would it look to my manager, leaders, the Board, or the public?
- Could I explain it to my colleagues?
- Would a second opinion help?

Always follow the laws that apply to you. If you work or take an assignment in another country, follow that country's laws too. When you're unsure about the law, ask your manager or the Code Champions.

Ethics decision making tree

Use these questions to test a decision before you act:

- Is it legal?
- Does it meet the Client's requirements?
- Does it fit this Code and our other policies?



- Does it reflect our values and culture?
- Could it harm our Workforce Members, Clients, Third Parties, or other stakeholders?
- Could it withstand public scrutiny?
- Would it harm the Group if everyone did it?

If yes to the first four and it could withstand public scrutiny: the action is likely appropriate.

If no, or you're unsure: do not do it — the consequences could be serious. Consult your manager, local HR, or your Code Champions first.

Managers as Ethical Role Models in TP

If you manage people, you set the tone. Your team takes its cue from how you live TP's values. You must never ask your team to break the law or act against the Group's values, policies, or procedures.

As a role model, you should:

- **Be informative** — make clear that you expect ethical conduct, and hold your team accountable.
- **Be alert** — watch for conduct that could be unethical or harm the Group's reputation, and report it to the [Global Ethics Hotline](#). Avoid even the appearance of approving it.
- **Be open** — create a space where people feel safe to ask questions, share ideas, and raise concerns without fear of retaliation.

When a team member raises a concern

- **Listen carefully** — thank them for speaking up, even if you disagree.
- **Keep it confidential** — protect their privacy as much as possible.
- **Stay objective** — treat everyone fairly, whether they reported a concern or are the subject of one.
- **Escalate properly** — decide whether it needs to go to HR and/or the [Global Ethics Hotline](#). If unsure, ask the Code Champions.
- **Protect against retaliation** — no one who raises a concern in good faith or takes part in an investigation may face any adverse action.

Code Champions

The Code Champions promote this Code and help you apply it day to day. Start with your manager for questions about the Code, ethics, or a possible Conflict of Interest. If your manager can't resolve it, contact the Code Champions:

- Chief Legal and Compliance Officer
- Chief Privacy and Data Ethics Officer
- Chief Privacy, Compliance and Risk Officer
- Vice President of Global Compliance

You can reach out to the Code Champions at codechampions@teleperformance.com.



SPEAKING UP

Integrity is a shared responsibility. Each of us protects TP's reputation and culture, so speak up when something seems wrong or out of step with our values, this Code, our policies, or the law.

Open, respectful communication keeps our workplace healthy. Many questions are best resolved through your manager or a support team, where you can get quick, practical help. Speaking up protects our people, our Clients and partners, and our communities.

Choosing the Right Channel

See "How to Get Help and Report Concerns" above to pick the best channel. You can always use the [Global Ethics Hotline](#), especially if another channel doesn't feel right.

Our Commitment to Protection and Fair Treatment

We handle every report seriously, fairly, and confidentially. We share information only with people who need to know, and we follow data-protection laws. Where the law requires or allows it, TP may notify authorities, cooperate with investigations, or self-report; the Chief Legal and Compliance Officer oversees those decisions. Nothing in this Code reduces the protections you have under whistleblower laws.

Non-Retaliation Statement

TP prohibits retaliation against anyone who, in good faith, raises a concern, asks for guidance, refuses to do something wrong, or takes part in an investigation. We will not take adverse action against you for reporting honestly, even if your concern turns out to be unfounded. Retaliation is itself a violation of this Code and may lead to discipline, up to and including termination. If you experience or witness retaliation, report it to HR or the [Global Ethics Hotline](#).

"Good Faith" Reporting

Reporting in good faith means raising a concern honestly, with a genuine belief — based on reasonable grounds — that it may be true. Knowingly making a false accusation is a violation of this Code and may lead to discipline, up to and including termination. But you will never be penalized simply because an honest report turns out to be mistaken or unproven.

Self-Reporting

Self-reporting misconduct does not exempt an individual from responsibility for their actions or from disciplinary measures that may be appropriate under this Code, TP policies, and applicable law. However, TP encourages self-reporting and will take into account whether an individual voluntarily and promptly disclosed their own misconduct when determining the appropriate response, consistent with principles of fairness, proportionality, and applicable legal requirements.

The Role of Our Leaders

Managers play a key role in building trust. They encourage dialogue, listen with respect, address concerns quickly, escalate when needed, and protect anyone who speaks up.

Remember: when we speak up and use the right channel, we keep our culture strong.



DOING BUSINESS RESPONSIBLY AND ETHICALLY

How to report on any topic below: use the [Global Ethics Hotline](#) to report a concern. Full policies are on the [Corporate Policies Page](#).

Anti-Corruption and Anti-Bribery

TP has a zero-tolerance approach for Corruption, Bribery or Extortion in any form.

As a global company, we follow all anti-corruption laws applicable in the jurisdictions in which we operate, including the US Foreign Corrupt Practices Act, the UK Bribery Act, and France's Sapin II law. These laws ban bribing Government Officials and private individuals, require accurate books and records, and carry serious penalties.

You must never

- Offer or accept bribes or other improper payments, including facilitation payments.
- Offer or accept improper Benefits — Gifts, loans, discounts, or excessive Hospitality — to gain an unfair advantage or influence a decision. This applies to Vendors, Clients, competitors, Public Officials, political parties, candidates, and Politically Exposed People.
- Offer, give, promise, or request anything of value, directly or through a Third Party, to win or keep business.
- Offer or accept cash or cash equivalents (vouchers, gift cards, or loans) as a business courtesy, whatever the amount.

You must

- Avoid using Third-party Intermediaries when dealing with Government Officials, where possible.
- Keep full, accurate records of financial transactions, especially those involving Public Officials or higher-risk Third Parties.

See the [Anti-Corruption Policy](#) for details.

Gifts and Hospitality

A Gift is anything of value you receive without paying its fair market price. If your work involves Clients, partners, Vendors, or other Third Parties — including Public Officials — follow our rules before you give or accept any Gift, travel, entertainment, or other Benefit. See the [Gifts and Hospitality Policy](#) for details.

Fraud Prevention

Never take part — however small your role — in theft, fraud, embezzlement, deception, forgery, conspiracy, extortion, or misuse of property. Fraud includes helping to hide, change, falsify, or leave out information in TP records, whether for yourself or at someone else's direction. Refuse anything questionable, and report suspicious behaviour to the [Global Ethics Hotline](#).

Sanctions and Trade Compliance

TP follows all trade laws, embargoes, sanctions lists, and import/export rules. Before you start a business relationship or transaction — and again as risks change — check whether the other party (or its associates)



or the country involved may be subject to sanctions or trade restrictions. TP uses screening software against official government lists. If you see a possible sanctions or trade risk, contact the Code Champions. See the [Sanctions and Trade Compliance Policy](#) for details.

Antitrust and Fair competition

TP competes fairly and lawfully. Competition laws ban agreements and conduct that limit free competition. This includes entering into formal or informal agreements with any Third Parties to engage in any anti-competitive behavior, including setting prices or dividing up customers, Vendors, or markets. To promote fair and honest competition, you should minimize contact with competitors and always avoid sensitive subjects, including those relating to competition between TP and others.

Follow these rules:

- Do not enter into formal or informal arrangements, understandings or agreements with competitors which fix prices, rotate or allocate bids, compare bids, boycott a supplier or client, or allocate sales territories, customers or Vendors.
- Do not exchange information with competitors which might change the way the competitor behaves in the marketplace.
- Do not participate in any conversations with Third Parties that could be perceived as limiting competition. If a conversation on such a topic begins, immediately leave the meeting and report the incident to your manager or contact the [Global Ethics Hotline](#).

Anti-Money Laundering

Money laundering hides the illegal origin of money so it looks legitimate. Reverse money laundering uses legal money to fund illegal activity, such as terrorism, bribery, or tax evasion. Both are banned at TP.

Make sure TP never receives or helps with the proceeds of crime. Follow these rules:

- Pay intermediaries only under a valid written contract and a proper invoice or supporting document.
- Never make a payment without proper documentation, including proof the work was done.
- Keep receipts for reimbursable expenses.
- Never pay in cash unless it has been approved.

See the [Anti-Money Laundering and Counter Terrorist Financing Policy](#) for details.

Conflicts of Interest

A Conflict of Interest arises when a personal, financial, or business interest interferes — or appears to interfere — with TP's interests or reputation.

Examples include:

- Anything that affects your ability to act in TP's best interests.
- You, a family member, or a friend gaining an improper benefit (money, a job, a contract, or services) because of your role.
- Using a business opportunity you learned about at TP for personal benefit.



- Sharing Client-related information, benefits, or incentives (such as loyalty points or rewards) externally without authorization.

Make business decisions in TP's best interests, and avoid situations where your personal interests — or those of close friends or relatives — conflict, or seem to conflict, with TP's.

Disclose any potential, actual, or perceived Conflict of Interest to your manager or local HR.

Insider Trading

Teleperformance SE, our ultimate parent company, is a publicly-traded company listed on the Paris Stock Exchange. As a listed company, we maintain the trust of investors by strictly complying with applicable securities and financial laws. Those laws prohibit trading on material non-public information — news about TP that isn't public yet and could affect its share price.

Information is “material” if there is a substantial likelihood that a reasonable investor would find it useful in deciding whether to buy, sell, or hold securities. This can include information about acquisitions, financial results, management changes, and information about a company's financial performance.

Through your work, you may learn material, non-public information about TP or companies we deal with. You must not trade TP stock, or any other company's stock (Client, Vendor, competitor, or potential partner), based on material non-public information, and you must not “tip” others who might trade on it. This is illegal, breaks trust, and violates Group policy. It also applies to your family members and anyone in your household. If you're unsure whether information is “material” or “non-public,” ask the Code Champions before acting.

Financial Integrity

Accurate financial information is critical to our business. We value honest, transparent, and accurate reporting, follow applicable standards, including International Financial Reporting Standards (IFRS), and cooperate fully with our internal and external auditors. We never mislead in our financial statements or manipulate results. You must give auditors, internal audit, and regulators complete, accurate, and timely information, and you must never conceal information from them, misrepresent facts to them, or attempt to influence, coerce, or mislead anyone performing an audit or review. All financial records and reports must be fair, accurate, complete, transparent, and understandable, and you must respect the Charts of Authority set locally and globally.

You are responsible for:

- Making sure the data you report to your manager or finance teams is accurate.
- Making sure what we bill Clients is accurate and complete.
- Following the travel and expenses policy and keeping receipts.
- Staying within your department's or project's budget.
- Escalating any transaction that isn't recorded properly.

If you spot a reporting issue that could expose TP to loss or risk, or you suspect a legal or tax violation, tell your manager right away or contact the [Global Ethics Hotline](#).



Ethical conduct of Vendors

Vendors, agents, and consultants are part of our success. If you work in procurement, source Vendors responsibly and never lower our standards. We expect Vendors and contractors to meet or exceed this Code when working with or for TP, and to follow all applicable laws. We pass these expectations on by:

- Running due-diligence checks through our Third Party Risk Management (TPRM) Program.
- Sharing our Supplier Code of Conduct when we engage a new Vendor.
- Making the [Global Ethics Hotline](#) available to Vendors and contractors.
- Including a clause in contracts that points to our Supplier Code of Conduct.

Government Clients/Contracting

When working with any government or public entity, make sure every statement to procurement officials is accurate and truthful — including costs and financial data. If your work involves a government Client, or you oversee someone whose work does, learn the special rules that apply, take extra care to comply, and avoid anything that could look improper. For guidance, contact the Code Champions.

Political Activity/Lobbying

TP stays strictly neutral in political, religious, and philosophical matters. We do not contribute money to political candidates, officials, parties, or religious organizations. You are free to take part in the political process as an individual — as long as you make clear you don't represent TP and your activities can't be seen as TP's. For guidance, contact the Code Champions.

PROTECTING OUR ASSETS AND DATA

Group Assets

Treat TP's resources like an owner — use them honestly and efficiently. Use TP's assets, whether physical (e.g., computers and corporate cards) or non-physical (e.g., email and information), only for the Group's benefit, never for personal gain or for others outside TP. Spend TP funds wisely and protect assets from loss, theft, damage, or misuse. If you suspect fraud or misuse of Group assets, report it to the [Global Ethics Hotline](#).

Maintaining accurate records

Good records keep our business running and support sound decisions. All corporate records belong to TP and must be kept under our Global Data Retention Policy. When TP issues a legal hold (for actual or threatened litigation or an investigation), you must follow it — failing to do so creates serious legal risk.

You are responsible for:

- Labelling and handling internal, confidential, and restricted information carefully, and securing it when not in use.
- Not destroying official records before their retention period ends — and destroying them on time once it does.
- Keeping or discarding records in line with our retention policies.

For questions about record-keeping, contact the Global Privacy and Compliance Office at privacy@teleperformance.com. See the [Data Retention Policy and Records Retention Schedule](#) for details.



Data Privacy

We respect the privacy of our people, partners, and Clients, and we handle personal data responsibly and lawfully. If you handle others' personal data, you must:

- Follow applicable laws and regulations.
- Follow any relevant contractual obligations.
- Collect, use, and process the data only for legitimate business purposes.
- Limit access to those who need it (the need-to-know principle).
- Store, transmit, and destroy the data securely.

Take care to prevent unauthorized disclosure and to protect data integrity with the right organizational and technical measures. See TP's Privacy Policy for guidance, and contact the Global Privacy, Risk and Compliance Office at privacy@teleperformance.com with questions.

If you suspect phishing or an unauthorized disclosure of personal data, do not respond or forward the message. Report it right away through the channels identified in this Code (including to GIRT) and follow Security/Privacy instructions.

Our Social Media and Communication Commitment

Social media helps us learn from and connect with our stakeholders, but our posts can have unintended effects on us and on TP. Keep all communications — across every channel — professional, respectful, and aligned with TP's communication strategy. The Global Marketing Team represents the Group externally, so any external communication on TP's behalf needs prior approval.

To report misuse of social media or other communication concerns, contact Global Marketing at globalmarketing@teleperformance.com and/or the [Global Ethics Hotline](#).

Artificial Intelligence

TP is committed to using AI responsibly, lawfully, and in line with Group policies, our values, and the AI principles of Safety, Transparency, Ethics and Accountability. See the Global Artificial Intelligence Governance Policy for details.

When you use AI systems, follow TP's Acceptable Use Policy. Be cautious with AI-generated content, and always review and verify it for accuracy before you use it.

CREATING A SAFE WORK ENVIRONMENT

An inclusive workplace

At TP, we treat everyone with fairness and respect. We value the perspectives and identities of our Clients and Workforce Members, and we build a culture where every voice is heard and respected.

To report discrimination, harassment, or other similar violations — based on gender, disability, sexual orientation, gender identity or expression, ethnicity or race, nationality, beliefs, pregnancy or parenthood, marital status, age, socio-economic status, or anything similar — contact the [Global Ethics Hotline](#). See the [Inclusion and Belonging Policy](#) for more.



We respect human rights

As a signatory of the UN Global Compact, TP respects and supports human rights across our operations and avoids complicity in abuses such as child or forced labor, slavery, torture, degrading treatment, and arbitrary detention. To report a human rights concern, contact the [Global Ethics Hotline](#). See the [Human Rights Policy](#) for more.

We provide a safe and healthy workplace

We are committed to a safe environment for everyone, every day, where people feel valued and safe to be themselves. Each of us must take reasonable care of our own health and safety and that of others affected by our actions. This includes:

- Working with managers to keep practices safe and healthy.
- Reporting health and safety concerns promptly to your local contact (or to the Client's management when working at Client sites) and/or the [Global Ethics Hotline](#).
- Acting responsibly, attending training, and avoiding unsafe behavior.

For health and safety questions, contact the Global Health and Safety team at OHS@teleperformance.com.

ENVIRONMENTAL COMMITMENT

TP is committed to doing business in an environmentally responsible way and to improving our performance for our people, Clients, communities, shareholders, and the environment. To do this, we:

- Use energy wisely and use technology to reduce environmental impact.
- Follow the environmental laws that apply to us.
- Educate Workforce Members whose work affects environmental compliance.
- Engage our people and inform external stakeholders about our efforts.
- Partner with organizations working toward environmental goals.
- Engage our supply chain in our sustainability efforts.
- Work with Vendors that have clear environmental commitments, where we can.

We ask our Workforce Members, Clients, and Vendors to support these efforts. For questions, contact the Sustainability Committee at csr@teleperformance.com.

TP UNDERLYING POLICIES

This Code should be read in conjunction with TP's underlying policies and standards found on the [Corporate Policies Page of the Group's Intranet page](#), and/or on [TP's website](#), including the following:

- | | |
|--|--|
| • Global Compliance Policy | • Global Inclusion and Belonging Policy |
| • Global Anti-Corruption Policy | • Human Rights Policy |
| • Global Gift and Hospitality Policy | • Global Environmental Policy |
| • Anti-Money Laundering and Counter-Terrorist Financing Policy | • Privacy Policy BCR |
| • Global Ethics Hotline Policy | • Global Data Retention Policy |
| • Sanctions and Trade Compliance Policy | • Global Information Security Policies (GISPs) |

