



# HUMAN RIGHTS POLICY

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## MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Protecting and promoting Human Rights, upholding freedom, respecting differences, and adhering to the rule of law are vital responsibilities that we strive to achieve every day. It is our duty to make a positive contribution and stand firmly for our values.

As a proud signatory of the United Nations Global Compact, TP Group is dedicated to respecting and supporting Human Rights across all our operations and business activities. We are committed to avoiding any complicity in Human Rights abuses.

Our Human Rights policy, which is available on the Group's intranet, serves as an indispensable resource for all TP Workforce Members, clients, suppliers, and other stakeholders. It outlines all our commitments and obligations towards our employees and stakeholders, as well as our expectations of stakeholders when entering a relationship with us.

Daniel Julien  
Chief Executive Officer

## PURPOSE

The purpose of this Human Rights Policy (the “**Policy**”) is to provide guidelines to ensure that the TP Companies implement and enforce policies and procedures that effectuate their commitment to Human Rights, including Non-discrimination and No harassment, Workplace Safety, Wellbeing and mental health, Prevention of Human Trafficking, Forced Labor, and Child Labor, Working Hours and Minimum Wage Standards, Freedom of Association/Collective Bargaining, Respect for Human Rights Defenders, Right to a healthy and sustainable environment, Privacy and Freedom of expression, and Ethical use of AI. It formalizes our long-standing commitment to uphold and respect Human Rights for all people.

Human Rights are basic rights and freedoms that belong to every person in the world from birth until death. They apply regardless of where you are from, what you believe in or how you choose to live your life. They are based on shared values like dignity, fairness, equality, respect, and independence. They are universal and inalienable, interdependent and indivisible, equal and non-discriminatory.

TP is committed to compliance with national and international standards and regulations that promote the highest standards in terms of Human Rights. See the following list for details on those:

UN Global Compact	<p>The UN Global Compact’s governance framework, adopted by UN Secretary-General Kofi Annan in 2000, is a call to companies to align strategies and operations with universal principles on Human Rights, labor, environment, and anti-corruption, and take actions that advance societal goals.</p> <p>Teleperformance SE (including all TP Companies) has been a signatory of the UN Global Compact since 2011.</p>
UN Guiding Principles on Business and Human Rights	<p>The Guiding Principles on Business and Human Rights (UNGPs) are the global standard for preventing and addressing the risk of adverse impacts on Human Rights involving business activity, and they provide the internationally accepted framework for enhancing standards and practices with regard to business and Human Rights.</p>
Universal Declaration of Human Rights	<p>The Universal Declaration of Human Rights was proclaimed by the United Nations General Assembly in 1948. It contains 30 Human Rights that are expected to be universally respected and protected.</p>
ILO conventions	<p>The International Labor Organization (ILO) is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers, and workers to jointly shape policies/programs promoting decent work for all.</p> <p>Core ILO Conventions include the Freedom of Association and Protection of the Rights to Organize Convention, 1948; the Right to Organize and Collective Bargaining Convention, 1949; the Forced Labor Convention, 1930; the Abolition of Forced Labor Convention, 1957; the Minimum Age</p>

	Convention, 1973; the Worst Forms of Child Labor Convention, 1999; the Equal Remuneration Convention, 1951; and the Discrimination (Employment and Occupation) Convention, 1958.
OECD Guidelines	The OECD Guidelines for Multinational Enterprises are recommendations on responsible business conduct addressed by governments to multinational enterprises operating in or from the 50 adhering countries. They set standards for responsible business conduct across a range of issues such as Human Rights, labor rights, and the environment.

These commitments are aligned with TP's five core values: Integrity, Respect, Innovation, Professionalism and Commitment – which are the pillars of our corporate culture.

#### SCOPE OF APPLICATION

This Policy applies to all of TP's operations, at the local, national, regional and/or international level and to all stakeholders, including Workforce Members and third parties that can be affected because of their relationship with TP Companies.

TP makes strong commitments to respect, support, and promote Human Rights. We also expect our partners and suppliers to make commitments aligned to these standards, as displayed in the Group's Supplier Code of Conduct found on the [Group's corporate website](#).



## DEFINITIONS

**AI System:** means a machine-based system that is designed to operate with varying levels of autonomy, that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

**Client:** A third party to whom TP provides services, in most cases as described in a contract signed between TP and such Client.

**Corporate Policy/ies:** Standards or rules which guide the conduct of all units and Workforce Members of TP Companies, unless specifically exempted by the Policy Working Group.

**CSR:** Corporate Social Responsibility refers to the voluntary integration of social and environmental concerns into a company's business operations and its interactions with stakeholders, beyond legal requirements.

**Generative AI:** Deep-learning models that can generate high-quality text, images, and other content based on the data they were trained on.

**Global Compliance Framework:** A structured set of policies, standards, procedures, processes, tools and controls built by the Global Privacy & Compliance Office to ensure that it adheres to applicable laws, regulations, industry requirements, and internal ethical guidelines.

**Group or TP Group:** Teleperformance SE and any subsidiary that is wholly or partially owned, whether directly or indirectly, by Teleperformance SE.

**Human Rights:** Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

**ILO:** International Labor Organization

**Personal Data:** Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Policy:** This Human Rights Policy

**Policy Owner:** means the person or department accountable for the applicable policy.

**Policy Working Group:** The TP executives who are tasked with managing activities related to the creation and updates of Corporate Policies. This group acts under the supervision of the Global Compliance and Security Council.



**OECD:** Organization for Economic Co-operation and Development

**TP or TP Company/ies:** Any/all subsidiary/ies of the Group.

**UN:** The United Nations

**Workforce Members:** Individuals that perform work for or otherwise provide services for any TP Company, including, but not limited to, employees, contractors, directors, and employees of staffing agencies.

## PRINCIPLES

At TP, we are committed to doing business with respect for workers' fundamental dignity and their Human Rights and uphold the following principles:

1. Comply with applicable laws and company policies;
2. Adopt a Human Rights governance structure and responsible business practices;
3. Implement policies and processes to identify, regularly assess, prevent, mitigate, and remediate Human Rights risks and impacts;
4. Report transparently on corporate support of and performance on Human Rights;
5. Engage openly and regularly with stakeholders on issues that impact Human Rights, including with affected or potentially affected rightsholders or their legitimate representatives;
6. Provide periodic training and communication to all employees on various elements of the Human Rights program;
7. Be a Force of Good, and contribute to global communities through Citizen of the World and Citizen of the Planet programs, focusing on providing support to essential rights (food, water, disaster relief, education, and economic empowerment);
8. Conduct operations in an environmentally responsible manner, strive to conserve energy, water, and other natural resources, and work to reduce the environmental impact of the Group's activities. TP's commitment to environmental stewardship is embodied in its Environmental Policy;
9. Work with suppliers and partners to uphold these same values and implement similar policies and practices;
10. Provide grievance mechanisms accessible to all stakeholders, internal and external, to raise concerns and complaints related to potential breaches to the Group's policies found in the [Group's corporate policies intranet page](#), including on Human Rights.

## Non-discrimination and no harassment

TP is committed to maintaining a workplace and workforce free from harassment, abuse, and discrimination. We do not unlawfully discriminate and instead actively welcome, integrate and value people from all backgrounds. This includes, but is not limited to, race, ethnicity, religion or belief, gender, sexual orientation, gender identity or expression, LGBTQIA+ identity, national origin, citizenship, ancestry, age, disability (physical, mental, or neurodivergence), genetic information, family or marital status, caregiving status, social background, veteran or military





status (including caregiver, reserve, or national guard obligations), refugee status, or any other characteristic protected by applicable law.

TP upholds fairness and belonging in every interaction and applies these principles to all aspects of its relationship with its stakeholders. We are dedicated to creating a workplace where all Workforce Members are welcomed, supported, and respected, and where diversity of perspectives and experiences is valued. This commitment extends to recruitment and hiring, training and development, promotions and career advancement, remuneration, work conditions, and protections against harassment and discrimination.

TP maintains a zero-tolerance policy toward harassment, bullying, abuse, or retaliation of any kind. This includes physical, verbal, sexual, or psychological misconduct, as well as the threat of such behavior, whether in the workplace or connected to the workforce.

TP's full commitment is available in its Inclusion and Belonging Policy found on the [Group's corporate website](#).

### **Workplace Safety**

TP commits to providing a safe and healthy workplace and preventing harm to its workers, contractors, visitors, and communities. TP integrates sound health and safety management practices in all aspects of their business, in order to:

- Provide and maintain a safe and healthy work environment and fully comply with all applicable health and safety laws and regulations, as well as TP policies;
- Obtain, keep current, and comply with all required health and safety permits;
- Provide and maintain emergency plans and response procedures for health emergencies and accidents that will minimize harm to life, environment and property;
- Provide workers with appropriate workplace health and safety information and training in a language understood by the workers, and clearly post adequate health and safety information in their facilities; and
- Identify, evaluate, manage and minimize occupational health and safety hazards and have a health and safety management system in place covering all aspects of their business.

TP's full commitment is available in its Health & Safety Policy found on the [Group's corporate website](#).

### **Wellbeing at work and mental health**

TP is committed to promoting the psychological well-being of its employees, particularly those exposed to high-stress environments such as customer support and content moderation. TP strives to provide a supportive work environment that fosters mental well-being and combating mental health stigmatization.



### **Prevention of Human Trafficking, Forced Labor, and Child Labor**

TP condemns any form of child and forced labor. TP will ensure that all work is voluntary and will not use or tolerate any form of forced labor. This includes, but is not limited to, human trafficking, modern slavery, debt bondage, restrictions on freedom of movement within the workplace, prison labor, involuntary overtime, withholding of wages, and the confiscation of identity documents. TP respects the rights of children as stated in the Convention on the Rights of the Child including the right to education, the right to rest and play, and the right to have basic needs met. TP will not engage in, or allow child labor within their facilities or in those of their own suppliers.

TP follows the ILO definition of the minimum age for admission to employment or work and employs only workers who are at least 15 years old, the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is the highest.

### **Right to Decent Working Conditions and an Adequate Standard of Living**

TP complies with ILO International Labor Standards and applicable local laws and regulations regarding working conditions and overtime, including days of rest. All overtime must be voluntary, compensated at a higher rate, and applies on a case-by-case basis, always in compliance with local laws.

Working hours are strictly monitored to ensure they are not to exceed the maximum set by local law or no more than 48 hours per week excluding overtime (or 60 hours per week including overtime), whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off.

TP ensures that employee compensation complies with applicable wage laws, including those related to minimum wages, overtime hours, and legally mandated benefits. TP Group expects all TP Companies to pay workers enough to ensure a fair pay and a living wage. The goal of a living wage is to allow a worker to afford a decent standard of living, sufficient to satisfy all their basic needs. Before entering an employment relationship and, as necessary, throughout its duration, the Companies shall provide their workers with clear and understandable written information about their employment conditions in a language understood by the workers with respect to, in particular, their wages, benefits, location of work and, if applicable, any costs charged to workers. TP is committed to ensuring fair and equitable wages for all employees and actively monitors the gender pay gap to achieve equal remuneration between men and women. It ensures that no worker is unlawfully discriminated against in terms of salary, benefits, incentives, or other forms of compensation or remuneration. TP requires its suppliers to comply with these expectations.

### **Freedom of Association and Collective Bargaining**

TP commits to respect workers' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively in accordance with applicable legal requirements. All Workforce Members may freely join or associate with organizations



without interference, retaliation, adverse actions, discrimination, or harassment. TP does not tolerate any discrimination or adverse actions against employee representatives for participating in lawful trade union activities and also prohibits any discrimination or adverse actions against employees for participating in or refraining to participate in such activities.

TP commits to respect and protect workers' representative and engage with them on working conditions. The Group also guarantees the effective exercise of the trade union rights in the workplace.

Where Workforce Members are represented by a legally recognized union, TP is committed to establishing a constructive dialogue with their freely chosen representatives. In situations or locations where independent trade unions are discouraged or restricted, TP allows employees to gather independently to discuss workplace-related problems and encourages them to meet with management to discuss these issues and any concerns or complaints employees may wish to raise.

TP Companies commit to provide reasonable notice of impending changes in operations that affect employment such as mergers and significant layoffs.

#### **Respect for Human Rights Defenders**

TP respects the lawful activities of Human Rights defenders. The Group does not restrict their freedom of expression, freedom of association, or right to peaceful assembly, including those advocating on issues related to its business operations.

#### **Right to privacy and Data Protection**

TP is committed to the right of privacy and data protection and seeks to protect against unauthorized access, use, destruction, modification, or disclosure of personal information and data as outlined in TP's Privacy Policy found on the [Group's corporate website](#). TP commits to keep its Workforce Members, clients and customers data safe and keep them only as long as it is needed for business purposes, in compliance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the European Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and all other applicable local privacy, data protection and information laws where TP operates.

TP is committed to respecting the right to privacy of its employees while protecting the sensitive data they handle on behalf of Clients and preventing fraud. The Group may use monitoring tools, including cameras, both on-site and for employees working from home, strictly for security and compliance purposes. Such measures are implemented transparently, with employees informed in advance, and conducted in full accordance with applicable laws and internal privacy policies to ensure the protection of employee rights.



### **Right to a healthy and sustainable environment**

TP recognizes the fundamental right of all individuals to live and work in a healthy and sustainable environment. The Group is committed to implementing and enforcing leading environmental practices and procedures, including reducing its environmental impact, supporting the circular economy, and promoting responsible procurement.

TP's full commitment is available in its Environmental Policy found on the [Group's corporate website](#).

### **Human Rights and AI**

TP recognizes the rapid evolution of AI technologies, including the recent emergence of Generative AI, which presents both opportunities and challenges. While AI can drive innovation and enhance services, it also raises important risks such as bias, misuse, lack of transparency, and non-alignment with human values. TP is committed to using AI ethically and responsibly, ensuring that its deployment respects Human Rights. The Group has developed an AI governance framework establishing a systematic and balanced approach to address these risks while fostering innovation in a manner that safeguards the rights and dignity of all stakeholders.

### **ETHICS HOTLINE AND PROTECTION OF WHISTLEBLOWERS**

We encourage TP Workforce Members and stakeholders to use the established channels to report, including the Global Ethics Hotline, their manager, the Compliance department, or the Human Resources department, when they personally -- acting in good faith, reasonably and selflessly -- believe that wrongful business conduct or Human Rights breaches have taken place, are taking place or are about to take place. Reports will be investigated in accordance with the procedures set forth in the Global Ethics Hotline Policy and actions put in place to remediate and mitigate any adverse Human Rights impacts.

Workers, communities, or any individuals who may be adversely impacted by TP Companies are encouraged to raise complaints or concerns, including in relation to Human Rights issues, through the Global Ethics Hotline. This mechanism does not preclude access to judicial or other non-judicial grievance mechanisms.

No retaliation will be made against anyone who in good faith, reasonably and selflessly reports wrongful business conduct or Human Rights breaches. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures will be taken, if the allegations of retaliation are substantiated. TP will neither tolerate nor contribute to threats or intimidation against Human Rights defenders and expects its business relationships to respect and protect their rights.

Reports will be treated with confidentiality within the limits as provided for by applicable laws and regulations.



The Global Ethics Hotline Policy and information about the Global Ethics Hotline are available on the [Group intranet](#) and corporate website.

In case TP has caused or contributed to adverse Human Rights impacts, we commit to provide for or cooperate in remediation to victims and engaging in a continuous improvement process to prevent similar adverse impacts in the future. TP also strives to work with its business partners to address adverse impacts directly linked to the company's operations and services. We expect our business relationships to uphold the right to remedy.

TP regularly monitors, evaluates, and strives to improve its grievance mechanisms and remediation processes to ensure their effectiveness in addressing Human Rights concerns.

## RESPONSIBILITIES

To ensure the deployment of this Policy, a dedicated governance structure is articulated around the Human Resources Department, the CSR Department, and the Compliance, Privacy and Security teams, with TP Group Board oversight, mainly through the CSR Committee.

**Human Resources:** The Human Resources Department has the same responsibilities as all other Workforce Members relative to compliance with this Policy. At the same time, Human Resources Department personnel in TP Companies have special responsibilities in preparing and implementing this Policy and any TP 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 breaches to Human Rights.

**CSR:** Human Rights risks and practices are regularly reviewed and assessed by the CSR department, to evaluate the adherence between local practices vs. international standards and TP global codes and policies, address the requirements from the Duty of Vigilance, identify best practices or implement corrective actions.

**Compliance, Privacy and Security:** Privacy, compliance, and security are critical for protecting Human Rights. The collection, use, and storage of personal information must be managed responsibly to ensure individuals' privacy rights are protected. Adherence to legal and regulatory requirements also supports the protection of Human Rights, as these laws and regulations are designed to ensure fairness and prevent discrimination. Security measures help prevent unauthorized access and misuse of sensitive information, reducing the risk of harm to individuals. TP reviews and assesses the privacy, compliance, and security practices by conducting regular audits and risk assessments, testing systems for vulnerabilities, and continuously updating policies and procedures to meet changing legal and regulatory requirements through the various privacy, compliance, and security policies.

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

**Workforce Members:** Workforce Members are responsible for reviewing, understanding, and asking any questions needed to clarify this Policy; promoting a workplace respectful of Human Rights 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 Global Ethics hotline.

## REPORTING

TP annually discloses information in its Universal Registration Document, in accordance with its obligations under the Duty of Vigilance and the Corporate Sustainability Reporting Directive (CSRD). This disclosure includes the Group's Vigilance Plan, a detailed overview of the measures implemented to respect and promote Human Rights across the Group's operations and value chain, as well as data on the number and nature of reports received through the Global Ethics Hotline.

## TP UNDERLYING POLICIES AND STATEMENTS

The Human Rights policy should be read in conjunction with TP's underlying policies and statements found in the [Group's corporate policies intranet page](#) and/or [TP's website](#):

- Code of Conduct and Code of Ethics
- Compliance Policy
- Anti-Money Laundering and Counter-terrorist Financing Policy
- Gifts and Hospitality Policy
- Third-Party Risk Management Policy
- Global Ethics Hotline Policy
- Environmental Policy
- Vigilance Plan
- Global Inclusion and Belonging Policy
- Privacy Policy BCR
- Health and Safety Policy

## POLICY VIOLATIONS AND EXCEPTION

Failure to comply with this Policy may result in severe consequences for noncompliant Workforce Members and/or the Group, including criminal prosecution, monetary fines, and penalties. Non-



compliance may also result in disciplinary action, up to and including termination, for those Workforce Members who do not comply.

Where there is a valid reason to deviate from the set requirements of this Policy, an exception shall be applied for through the set exceptions process by contacting the Group CSR Department via [CorporateSocialResponsibility@teleperformance.onmicrosoft.com](mailto:CorporateSocialResponsibility@teleperformance.onmicrosoft.com).

#### **POLICY REVIEW**

To ensure that this Policy remains fit for purpose, the Group CSR Department will review this Policy every year.



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