



Gifts and Hospitality Procedure - SPAIN

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1. Gifts & Hospitality Procedure

This Gifts & Hospitality Procedure (the 'Procedure') covers all requirements of the **Gifts & Hospitality Policy** measures to be in place across TP Spain.

1.1 *Rationale*

The purpose of this Procedure is to provide Teleperformance with procedures to manage locally the requirements of the **Gifts & Hospitality Policy**, available on the [Group's corporate policies intranet page](#).

1.2 *Scope*

This Procedure and all its requirements are in scope for TP Spain and its Workforce Members.

1.3 *Definitions*

Benefits: Could include, without limitations, gifts, entertainment and hospitality, client representative or public official travel, promotional expenses, sponsorship, community benefits, training, club memberships, personal favours, confidential and privileged information.

Client: a Third Party to whom Teleperformance provides services described in a contract signed between Teleperformance and such Third Party.

Client Travel: Any travel of a prospect, a potential client or a client that is financed directly or indirectly by the Group (e.g., visits to facilities or inspection missions)

Code Champions: The ambassadors for the Group's Code of Conduct and Ethics.

Corruption: Dishonest, unethical, or fraudulent conduct to obtain a benefit or for other improper purposes.

Gift: Any material benefit offered or received as part of a social or professional relationship and intended to elicit friendship or interest irrespective of monetary consideration or value.

Government Official: Could refer to various positions in administrative, legislative, executive, or judicial government, whether paid or unpaid, temporary or permanent, elected or appointed, senior or junior. Some examples of government officials are public servants, public officials, administrators, police officers, judges, public prosecutors, custom officials, employees in state companies, local politicians, political parties, political officials or candidates for political office, members of a royal family, mayors, and city council members, as well as family members of the above.

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



Hospitality or Invitation: All forms of social amenity, entertainment, travel or lodging, or an invitation to a sporting or cultural event.

Influence Peddling: A form of corruption in which a person uses his or her influence with persons in authority in exchange for money or favors.

Most Exposed Persons (MEP): Workforce Members with roles at a risk above Low to Bribery & Corruption within Teleperformance.

Policy: The Gift & Hospitality Policy.

Procedure: This Gift & Hospitality Procedure, or a local Procedure where required.

Teleperformance: Teleperformance Group, its subsidiaries and affiliates of the Group.

Third-Party: A person or a legal entity, including an affiliate, that has a business relationship with Teleperformance or its clients.

TP Global Anti-Corruption Program: The internal program implemented to prevent and fight corruption in all its forms. Based on Top Management Commitment, it contains a set of measures to prevent acts of corruption, detect them as quickly as possible and react to acts of corruption.

Workforce Members: This includes Individuals that perform work or otherwise provide services for any Teleperformance subsidiary, such as, but not limited to, employees, contractors, staffing agencies, and vendors.

1.4 Exception Process

1.4.1. Exception Requests to the Procedure or Policy

Request for exception or deviation to the requirements of the Gifts and Hospitality Policy or this Procedure shall be submitted to the Code Champions via the codechampions@teleperformance.com by the Compliance Officer. The Code Champions shall review the request.

1.4.2. Exception Requests for Prohibited Gifts, Hospitality and/or other Benefits

No exceptions will be given to TP Spain Workforce Members.

In summary, TP Spain employees will not be permitted to give or accept a single gift, invitation, business meal or other Benefit at **€350 or above**.

1.5 Gifts & Hospitality Tracking



1.5.1. Register

All Gifts, Hospitality and/or other Benefits offered or received must be adequately and explicitly recorded in the financial records of the relevant Teleperformance Group company via the Gifts & Hospitality Register, attached in *Annex A*.

A new copy of the Gifts & Hospitality Register is to be started from the 1st January and closed on the 31st December of each calendar year.

The Compliance Officer shall maintain records of the Gifts & Hospitality Register in-line with the Global Data Retention Schedule, available on the [Group's corporate policies intranet page](#).

1.5.2. Marketing

When Gifts, Hospitality or other Benefits are part of a Teleperformance Group company's marketing program, these must also be adequately recorded in the Gifts & Hospitality Register via Compliance Officer.

1.5.3. Compliance Officer

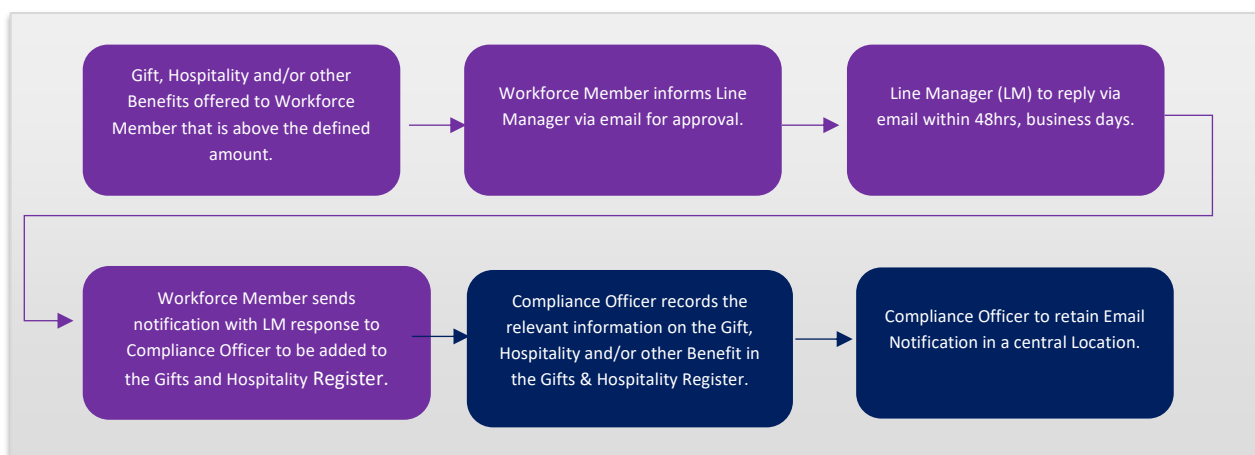
The Compliance Officer shall provide with the latest version of the Gifts & Hospitality Register, as provided in *Appendix B*. This can be obtained from the Global Privacy, Risk & Compliance Office.

1.6 Gifts & Hospitality Approval Process

Approvals for Gifts, Hospitality and/or other Benefits to be accepted shall be required if they are above the set amounts, please see *Section 1.6.3*, or where there are local requirements, these amounts will take precedence once approved by the Code Champions. Where the Gifts, Hospitality and/or is being provided by Teleperformance, prior approval shall be sought from the appropriate Line Manager. Below is the process to be followed for gaining approval for Gifts, Hospitality or other Benefits and informing Compliance Officer in order for it to be recorded.

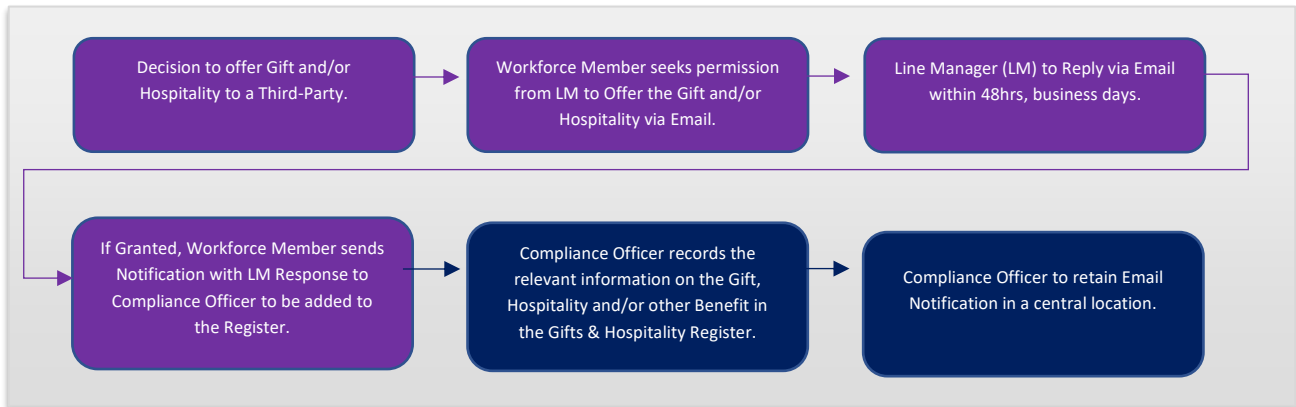
1.6.1. Approval Process

a. Gift, Hospitality and/or other Benefits offered to Workforce Member

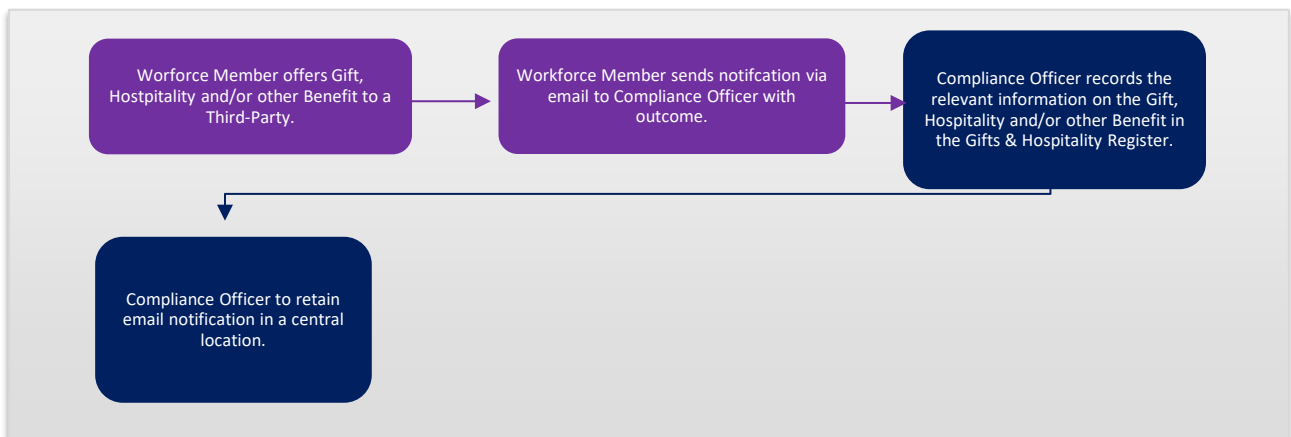


b. Gift, Hospitality and/or other Benefits to be offered to Third-Party by Workforce Member

Prior Approval



Post-Approval



c. Email Notifications

Email notifications shall contain the below information:

- Whether the offer or acceptance pertains to a Gift, Hospitality or other benefits (including business meals)
- Name of the Third-Party concerned
- Name and position of the person who is offering or accepting
- Relationship to the Third-Party
- Whether negotiations are ongoing (new contract, renewal or other business decision)
- Description of the Gift, Hospitality or other benefits (including business meals) and any beneficiary partner or family member
- Reason for the Gift, Hospitality or other benefits (including business meals)
- Total value (approximate)
- Number of Gift, Hospitality or other benefits (including business meals) already approved since the beginning of the year



- Whether it was accepted or declined.

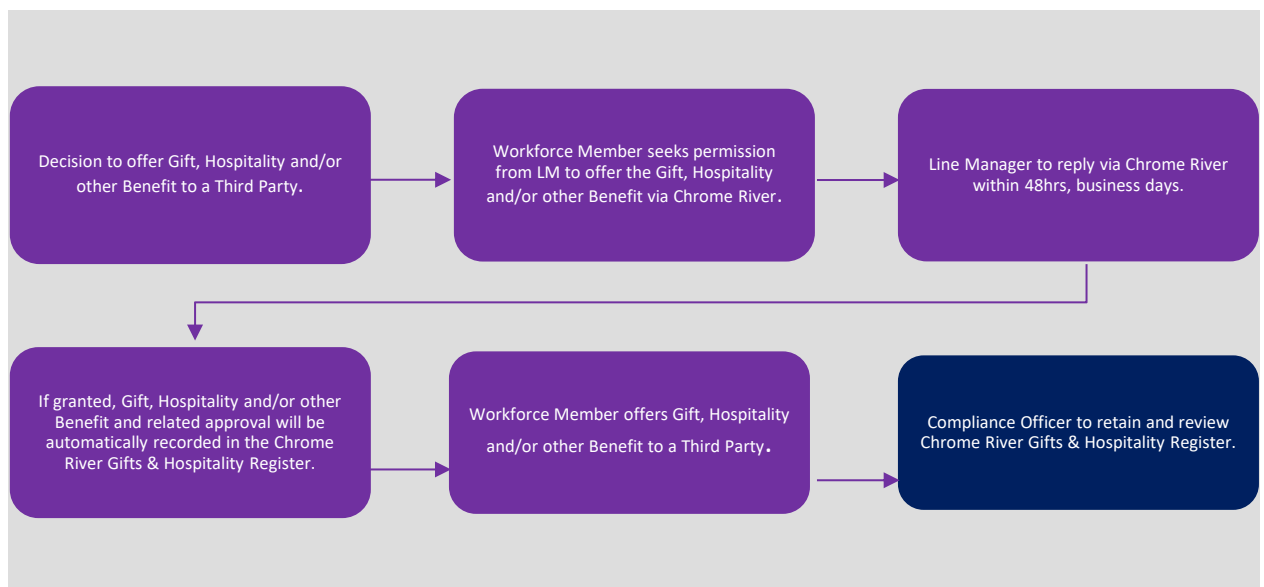
The Email Template in *Annex A* should be added and completed with relevant information to the email.

d. Line Manager providing Approval

The Line Manager shall assess the request for either providing or accepting Gifts, Hospitality and/or other Benefits based on the information

All Gifts, Hospitality and/or other Benefits below the set requirements, do not need approval, but must be registered with Compliance Officer.

1.6.2. Approval Process via Chrome River



Please note: Chrome River, or other related platforms, can only record Gifts, Hospitality or other Benefits that have been given by Teleperformance. Therefore, Gifts, Hospitality and/or other Benefits received by Workforce Members of Teleperformance remains the same as the approval process described in *Section 1.6.1* – Gifts, Hospitality or other Benefits offered to Workforce Member.



1.6.3. Group Thresholds

a. Gifts, Invitations and other Benefits

GIFTS, INVITATIONS and OTHER BENEFITS	
APPROVAL REQUIRED	PROHIBITED
Offer or acceptance ☒ Single (1) Invitation of any value . ☒ Single (1) Gift, business meal or other Benefit valued between €200 and €349 . ☒ More than two (2) Gifts or other Benefits to the same Third Party within a six-month period and cumulatively valued at more than €400, based on a good faith estimate. ☒ More than six (6) business meals with the same Third Party in a 12 month-period and cumulatively valued at more than €1,200, based on a good faith estimate.	Offer or acceptance ☒ Single Gift, invitation, business meal or other Benefit valued at €350 or above .

* No exception will be able to be requested for approval by TP Spain Workforce Members regarding accepting or giving a single gift, invitation, business meal or other Benefit valued at €350 or above. In summary, TP Spain employees will not be permitted to give or accept a single gift, invitation, business meal or other Benefit at **€350 or above**

b. Client Travel

As a general rule, all costs related to a Client's visit should be, as much as possible, paid by the Client.

Where there is a need to pay for Client travel, Workforce Member must first receive pre-approval from their Line Manager and then request an exception from the Code Champions.

Please contact the Code Champions via codechampions@teleperformance.com to request an exception to the Gifts and Hospitality Policy, available on the [Group intranet](#).

1.7. Applicable Laws

The Compliance Officer in connection with the Legal Department or outsourced legal support, shall identify the applicable laws that apply to Teleperformance within the specific country in relation to Bribery and Anti-Corruption and ensure that sufficient controls are implemented.



Where the applicable law state values different to those stated within this Procedure or the Policy, the Compliance Officer shall inform the Global Privacy, Risk & Compliance Office via global-compliance@teleperformance.com.

Where applicable, local requirements may be implemented by the Compliance Officer. This must be approved by the Global Privacy, Risk & Compliance Office.

The applicable laws identified shall be recorded in the Applicable Laws & Obligations Register for the specific country.

1.8. Conflicts of Interest/Ethics Concerns

Where a Workforce Member identifies an actual, potential or perceived Conflict of Interest where Gifts, Hospitality and/or other Benefits are concerned, the Workforce Member shall notify their Line Manager at the earliest opportunity.

Where there is a concern around offering/accepting Gifts, Hospitality or other Benefits, the first point of contact shall be the Workforce Member's Line Manager. If the concern still exists, the Code Champions can be contacted for further advice via the codechampions@teleperformance.com

Where a Workforce Member identifies a conflict of interest that is being exploited, or any breach of the Documented Process, they should report it to the **Global Ethics Helpline (GEH)** at [Teleperformance | Home \(integrityline.com\)](https://integrityline.com) (GEH), or the Global Incident Response Team (GIRT) at girt@teleperformance.com. Retaliation is not permitted against any Workforce Member who makes a report in good faith.

1.9. Training and Awareness

The Policy must be communicated annually to all Workforce Members.

Training related to the Policy is provided as part of the TP Global Anti-Corruption Program:

- The TP Global Anti-Corruption e-training is available on the learning platform, which must be completed and passed by all Workforce Members annually.
- Further training is required for those Workforce Members that have been categorized by the TP Global Anti-Corruption Managers as "Most Exposed Persons" (MEP). A refresher training is provided to "Most Exposed Persons" every two (2) years.

1.10. Procedure Requirements

This Procedure shall be implemented by all Subsidiaries of Teleperformance including Core businesses and Specialized Services. Where a Subsidiary requires any of the information below to be changed, a local Procedure is to be put in place. Prior to implementation, it shall be submitted to the Code Champions for approval via codechampions@teleperformance.com.

- Approval Process is different.
- Recording of Gifts/Hospitality/ Benefits is different.
- Amounts specified in this Procedure/Policy are different.
- Additional Controls are required to be in place.
- Applicable Law requirements.

1.11. *Related Policies and Procedures*

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

- Code of Conduct and Ethics
- Compliance Policy
- Anti-corruption Policy
- Anti-Money Laundering and Counter-terrorist Financing Policy
- Global Ethics Hotline Policy
- Privacy Policy
- Record Retention Policy
- ISS.013.001 – Incident Management Standard

1.12. *Procedure Review*

To ensure that this Procedure is fit for purpose, the Global Privacy, Risk & Compliance Office shall review this Procedure annually in conjunction with the Gifts and Hospitality Policy.

For any local Procedure, the Compliance Officer shall review the local Procedure in conjunction with the Gifts and Hospitality Policy and submit the local Procedure to the Code Champions via codechampions@teleperformance.com.



Annex A – Email Insert

Date Received/Date of Event	Date of Submission to Compliance Officer	TP Entity	Country	Email of Workforce Member Gifting/Receiving	Email of Workforce Member Line Manager Approval	Entity/Persons giving or accepting Gifts/Hospitality	Relationship to Entity	Description of Gift/Hospitality	Reason for Gift/Hospitality	Type of Gift/Hospitality	Value in Euro (Estimate)	Accepted/Declined

Instructions:

Insert a copy of the above template into an email and complete the required information as indicated in section 1.6.1. 'Approval Process' above. Some columns have specific wording requirements needed as covered below:

- Relationship to TP – use; Third-Party, Client, Business Lead, or Other
- Type of Gift/Hospitality – use; Gifts & Hospitality, Gifts, or Hospitality.
- Accepted/Declined – use; Accepted, or Declined



Annex B – Gifts & Hospitality Register Template

Date	Location	Type (e.g., Gift/ invitation/ meal)	Description	Value (Euro)	Reason/ Occasion	Offered/Accepted/ Declined	Third Party/Provider's Name	Third Party/Provider's position	Gifts/ invitations/other Benefits previously approved this year	Relationship (beneficiary, partner or family member)	Negotiations ongoing? (Please specify if so)



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