

# Vigilance Plan 2023



# TELEPERFORMANCE SE 2023 VIGILANCE PLAN

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Teleperformance (TP), a global leader in digital business services, serves as a strategic partner to the world’s largest companies in many industries. It offers a One Office support services model including end-to-end digital solutions, which guarantee successful customer interaction and optimized business processes, anchored in a unique, comprehensive high touch, high tech approach. Nearly 500,000 employees, based in almost 100 countries, support billions of connections every year in 300 languages and 170 markets, in a shared commitment to excellence as part of the “Simpler, Faster, Safer” process. This mission is supported by the use of reliable, flexible, intelligent technological solutions and compliance with the industry’s highest security and quality standards, based on Corporate Social Responsibility excellence.

In accordance with Article L.225-102-4 of the French Commercial Code, the vigilance plan (“Vigilance Plan”) of Teleperformance SE (“Teleperformance” and, together with its subsidiaries, the “Group”) is designed to present the reasonable vigilance measures implemented Group-wide in order to identify the risks and prevent serious harm to human rights and fundamental freedoms, health and safety, and the environment resulting from the operations of Teleperformance and the companies it controls within the meaning of Article L.233-16 (II) of the French Commercial Code, whether directly or indirectly, and from the operations of suppliers or subcontractors with which an established business relationship is maintained, where such operations form part of this relationship.

This Vigilance Plan is based on the five main obligations set out in French law: (i) risk identification and mapping, (ii) risk assessment procedures, (iii) deployment of systems for mitigating risk and preventing serious harm, (iv) establishment of a hotline policy and internal reporting system, and (v) system for monitoring measures in place.

Teleperformance is determined to ensure that the Group’s core values are applied and upheld, not only by all managers and employees, but also by the suppliers and subcontractors with which it has an established business relationship.



Cosmos | Integrity

Absolute. Harmonious. Universal.  
I say what I do, I do what I say.



Earth | Respect

Deep. Nurturing. Abundant.  
I treat others with kindness  
and empathy.



Metal | Professionalism

Crafted. Solid. Reliable.  
I do things right the very first time.



Air | Innovation

Inspiring. Renewing. Dynamic.  
I create & improve.



Fire | Commitment

Steady. Strong. Radiant.  
I'm passionate & engaged.

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# **RISK IDENTIFICATION AND MAPPING**

# RISK IDENTIFICATION AND MAPPING

In 2023, Teleperformance updated its non-financial risk mapping and materiality matrix after consulting its main stakeholders and holding interviews on non-financial issues.

As part of the preparations for compliance with the CSRD\*, the group conducted a double materiality analysis, assessing all sustainability issues in terms of impact materiality and financial materiality (see the detailed methodology in the 2023 Universal Registration Document).

The global risk map is supplemented by more detailed risk maps covering the risks of the duty of vigilance law.

\*Corporate Sustainability Reporting Directive



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## To know more:

- Chapter 2 – *Risks and internal control*
- Section 2.4.1 - *Risk identification and mapping*
- Section 3.2.2 - *Main impacts, risks and opportunities (IRO) identified*
- Section 3.6.2.1 – *Risk mitigation strategy*

## Global methodology

The Group's main risks are identified and assessed by Group senior management using a top-down approach, and the subsidiaries based on a bottom-up approach. The criticality of each of these risks is assessed in relation to the probability of them occurring, and the expected scope of their impact. The group updated its materiality matrix in line with the CSRD\*. For each of the environmental, social and governance issues contained in the directive, the Group identified the corresponding impacts, risks and opportunities. This identification process is based on international standards, industry benchmarks, media monitoring and internal documentation. The double materiality approach considers issues as material if they have a strong impact on stakeholders and planet, and/or on the Company's economic performance.

## Human Rights

A specific human rights map, including forced & child labor, corruption & bribery, privacy, freedom of expression & association, non-discrimination and working conditions, allows to evaluate the likelihood and the impact of human rights risks on people, taking into account both inherent risks and theoretical country risks, based on the Human Rights Index score developed by Our World in Data.

## Health & Safety

One of the cornerstones of the health & safety management policy is the identification of risks facing the Group at both global and local level. Annual assessments are carried out at each facility to identify potential risks and devise appropriate risk mitigation or elimination solutions. The Group periodically audits local risk assessments to improve their accuracy.

## Environment

Teleperformance has continued its climate-related risk mapping exercise based on the location of commercial operations. In 2022, the analysis was expanded to include both the IPCC's SSP2-4.5 and SSP5-8.5 scenarios. To develop scenarios, the Group used the TCFD's recommendations, the Global Climate Risk Index 2021, the University of Notre Dame Global Adaptation Index (ND-GAIN), the COFACE report (Country & sector risks handbook 2022 major trends in the World Economy) and the reports published by the Climate Watch and the World Resources Institute (WRI).

## Main gross risks as a result of the company's activities

TP is a people company. With nearly 500,000 employees, 1,400 clients and activities in almost 100 countries close to the local communities, risks to human rights, health & safety and the environment certainly exist.

The below risks are gross or inherent risks. The Group implements many actions to mitigate them, as described in the following section and in the 2023 Universal Registration document. The criticality level is determined based on the probability of occurrence and the risk materiality level for employees, partners (clients, suppliers, associations, etc.) and communities.

It is presented on a three-level scale: high (•••), intermediate (••), and moderate (•).

Categories	Risk Factors	Criticality		
		Employees	Partners	Communities
Human Rights	Working conditions	•••		
	Forced & Child labor	••	•	•••
	Discrimination and Harassment	•••		
	Freedom of association	••		
	Privacy	•••	••	•••
	Data security and cyber attacks	•••	•••	••
	Non-compliance with labor laws or Group's standards	••	•	••
Health & Safety	Mental health	•••		
	Isolation at work	••	•	••
	Musculoskeletal disorders	•••		
	Physical security	••	•••	
Environment	Drift in energy consumption	••	••	••
	Natural disasters	••		•••
	Deficient waste management	•	•	••
	Water over-consumption	•		•
	Non-compliance with environmental laws and standards	••	••	••
Transverse	Insufficient awareness and training on Group's codes and policies	••	•	•
	Insufficient communication and deployment of the whistleblowing mechanism	••	••	••



**To know more:**

- Section 2.4.2.4 – *Specific assessment procedures with regard to CSR breaches in the value chain*
- Section 3.5.3 – *Responsible procurement*

## Main risks in the supply chain

As a business services company and following the CSR risk mapping and the materiality matrix, the risks linked to TP’s supply chain are not the most salient for the Group.

However, TP is aware that its suppliers could cause harm to people and the environment. The behavior expected from suppliers and subcontractors covers the following issues:

respect for human rights, prohibition of child labor, prohibition of forced and compulsory labor, elimination of all forms of discrimination in respect of employment and occupation, occupational health and safety, freedom of association and the right to collective bargaining, respect of data privacy, responsible use of natural resources and prevention of gradual or accidental pollution of the air and soil.

Four main purchasing categories have been identified, each involving specific ESG issues:

### IT products

- Use of conflict minerals
- Working conditions
- Production pollution
- Energy efficiency of products

### Telecom

- Excessive energy consumption
- Data protection issues

### Staffing agencies

- Poor wages
- Excessive working hours
- Insufficient paid leave

### On-site services\*

- Working conditions
- Negative impacts of the products used on health and the environment

*\*e.g., security and cleaning services*

## SUPPLIERS’ RISK ASSESSMENT

### Suppliers are assessed based on their risk level.

In 2021, a process of ranking suppliers by risk was set up in order to prioritize and adapt procedures for each supplier.

Purchasing teams complete a **criticality questionnaire** for all new suppliers to assess their criticality and gross risk level. Suppliers who receive a medium to very high-risk score are then subjected to a **detailed supplier risk assessment** to ascertain the exact level of risk. This assessment comprises at least 70 questions on anti-corruption, human rights, health and

safety, the environment and personal data. Based on the results of this assessment and any potential inadequacies, **enhanced due diligence** is then carried out to adjust controls and assess whether the supplier relationship should be terminated. Documentary or on-site inspections may be envisaged for even more thorough controls.

A **continuous improvement approach** is always preferred, and purchasing teams work closely with suppliers to implement corrective action plans.

# Risk Description



## Human Rights risks

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### WORKING CONDITIONS

Difficult working conditions represent a serious risk for employees that would also impact Group operations. The quality of the services provided by TP depends on its ability to manage its employees and offer them a high-quality working environment, including remuneration, working hours, benefits and leave, etc.

### FORCED & CHILD LABOR

Freedom from slavery and other forms of servitude is a basic human right that prevent people from being exposed to violence, threats, restriction of movement, abusive working conditions... Forced and child labor in the Company or its value chain would also lead to legal, financial, or reputational consequences and to business interruptions.

### PRIVACY

TP delivers its services through a complex technological platform that integrates a wide range of information technologies. The Group's activity requires its subsidiaries, acting as data controllers, to collect, process and transfer personal data regarding employees. When acting on behalf of its clients, TP acts as a data processor and collects and processes personal data concerning its clients' customers based on strict guidelines for each client. The Group must meet statutory requirements and contractual commitments to clients and more than 300 data security compliance criteria. The deployment of work-from-home, can generate increased risks of breaches or intrusion.

### DISCRIMINATION AND HARASSEMENT

Shortfalls in terms of anti-discrimination practices could lead to infringement of employees' fundamental rights and loss of performance for the Company, as well as employee disputes, litigation and potential damage TP's image. Harassment in the workplace, whether it is moral or sexual, directly affects employees' lives and can have serious impacts on their physical and mental health and on their daily work.

### FREEDOM OF ASSOCIATION

Employees may face barriers to form or join trade unions or other employee representative bodies. Failing to ensure freedom of association could lead to employee disputes, litigation and potential damage to the Company's image.

### DATA SECURITY AND CYBER ATTACKS

The growing use of technologies at its facilities or at employees' homes exposes the Group to risks such as IT or telecommunication system failure (due to internal or external factors), malicious acts (such as cyber attacks), human error, whether unintentional or deliberate (phishing, whaling) or employees' failure to comply with Group procedures.

### NON-COMPLIANCE WITH LABOR LAWS OR GROUP'S STANDARDS

Due to its operations in 91 countries, the Group may be exposed to inappropriate behavior by some of its employees or by third parties.

## Health & Safety risks

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### MENTAL HEALTH / PSYCHOLOGICAL RISKS

The stress inherent to any workplace can result in health and safety issues, particularly in a field as demanding as customer relationship management. The sense of isolation that some employees may feel could be reinforced by remote working.

Social media content management and moderation can be particularly stressful and affect the employees' mental wellbeing.

### MUSCULOSKELETAL DISORDERS

Given that the positions TP offer are predominantly sedentary, musculoskeletal disorders are not uncommon and may affect employees' health over the medium term.

## Environmental risks

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### DRIFT IN ENERGY CONSUMPTION

The continued consumption of finite resources can lead to difficulties in electricity generation. The Group could acquire new businesses with high energy consumption. Increase of global temperatures could increase the need for energy-demanding equipment (air-conditioning). Changes in regulations, politics and market could limit the access to renewable energy.

### DEFICIENT WASTE MANAGEMENT

At TP, the biggest waste source comes from its IT equipment. When disposed incorrectly, these materials can produce toxic chemicals that filter into soils and water and have a direct impact on human health.

### NON-COMPLIANCE WITH ENVIRONMENTAL LAWS AND STANDARDS

Due to its operations in nearly 100 countries, the Group may be exposed to inappropriate behavior by some of its employees or by third parties.

### PHYSICAL SECURITY

Growing political tensions, social instability and acts of terrorism, as well as epidemics such as Covid-19 and natural disasters may occur in some TP's operating countries, resulting in the loss or shutdown of a Group location, as in the case of certain Group facilities due to the pandemic. Such events could interrupt services provided to clients, directly or indirectly impacting all stakeholders, if the Group is unable to ensure business continuity. This could lead to operating losses, overturn the profit forecasts underlying investment decisions and curtail earnings.

### NATURAL DISASTERS

As temperatures continue to rise TP sites located in High Vulnerability areas could become heavily impacted by changes in the local climates like prolonged droughts, wildfires and floods. This could lead to operation losses and interrupted services.

### WATER OVER-CONSUMPTION

While TP does not have any direct impact on water, 13% of its total sites are located in a high to extremely-high stress zone. Maintaining a 'business as usual' trajectory could lead to exhaustion of water resources and prolonged droughts that would result in interrupted or lost operations.



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**To know more:**

- Section 3.1 – *A sustainable business model*
- Section 3.2.2 - *Main impacts, risks and opportunities (IRO) identified*
- 3.3.6.1 – *Social dialog*

## INVOLVING STAKEHOLDERS

Teleperformance (TP) is committed to being an efficient and sustainable model of value creation for all its stakeholders.

As such, the Group seeks to generate full satisfaction among all its stakeholders on a daily basis: a happy employee is the first step towards ensuring customer satisfaction and therefore, satisfying TP's clients. This "satisfaction chain" needs to function smoothly in order to create value for the whole ecosystem (shareholders, local communities, suppliers, lenders, etc.). TP conducts ongoing dialog with its main stakeholders in order to understand and meet their expectations.

## Identification of stakeholders' expectations

TP interacts with its main stakeholders on a daily basis and captures their main needs and expectations through surveys, meetings, informal discussions, events, negotiations, etc.

In 2022, TP organized a consultation process with around 40 stakeholders consisting of interviews on relevant CSR issues as part of the updating of its materiality analysis. Staff representatives, suppliers, partners, clients and interest groups (public bodies, NGOs, sector analysts) based in the main operating countries expressed their opinion on the importance of each issue. TP updated the materiality analysis in 2023.

## Continuous stakeholders' dialogue as part of the duty of vigilance

- As a member of the French **UN Global Compact Human Rights taskforce**, TP regularly interacts with its peers on the duty of vigilance.
- **Clients and investors are getting more and more interested** in matters related to human rights, health and safety and the environment. TP regularly meets with them to answer their questions, fulfill their requirements and engage in new projects.
- **In December 2022, Teleperformance and UNI signed a global agreement to strengthen their shared commitments to employee's rights to form trade unions and participate in collective bargaining.** It also reflects a determination to improve the working environment, particularly health and safety and covers all employees. One year later, the global agreement has already been implemented in Colombia, El Salvador, Jamaica, Poland and Romania. An international health and safety working group has also been established, bringing together management, workers, experts and UNI-affiliated trade unions to review health and safety risks. TP also maintains an open dialog with trade unions in most of the countries where it operates. A **European Works Council** currently comprising 20 standing members represents employees in the 18 European countries in which the Group operates. **TP also encourages unformal discussion with employees** through meetings with management, chats with the CEO, focus groups, online communication tools...
- **Third party audits** are conducted on a regular basis in key countries on issues related to the duty of vigilance law.

# Dialogue with our main stakeholders

## Employees

### Dialogue methods

Employee satisfaction surveys, chats with the CEO, focus groups, Intranet, coaching and performance reviews

### Needs and expectations

- Wellbeing at work, diversity & inclusion
- Competitive remuneration
- Career development

### TP strategic response

- Health and wellness programs
- Attractive remuneration package
- Training and development to achieve full potential
- Strong focus on diversity, equity and inclusion programs

Recognized as the 5th World's Best Workplace™ 2023 by Fortune magazine and Great Place to Work®

## Clients

### Dialogue methods

Client satisfaction surveys, RFPs, strategic account management, events, website, partnerships

### Needs and expectations

- Customer satisfaction and loyalty
- Growth and digital transformation
- Secure and cost-effective solutions

### TP strategic response

- Enhanced customer experience, advanced data analytics, digitalization and automation
- Industry-specific expertise
- Smartshoring
- Operational standards

Our top clients have been with us for 14 years on average

## Communities

### Dialogue methods

Volunteer work, partnerships with government departments and NGOs, industry associations

### Needs and expectations

- Develop jobs and local economy
- Use natural resources responsibly

### TP strategic response

- Major employer and Impact Sourcing
- COTW charity initiative
- COTP environmental initiative

96,500 young people hired for their first job  
€7.6M donations made to NGOs

## Customers

### Dialogue methods

Systematic customer satisfaction surveys, omnichannel interactions

### Needs and expectations

- Identify a simple and fast solution to their problems, wherever they may be

### TP strategic response

- Emotional intelligence
- Omnichannel solutions
- Multilingual capabilities
- Data security (RGPD, ISO 27701, BCR approval)

Over a billion interactions in 2023

## Shareholders

### Dialogue methods

Roadshows, shareholders' meetings, financial reporting, publications

### Needs and expectations

- Stable and sustainable performance
- Transparency and sound governance

### TP strategic response

- Solid, sustainable financial performance
- Integration of best practices in corporate governance and CSR

The TP AI Open Doors event organized in September 2023 demonstrated to more than 65 attending investors and analysts how TP integrates AI into its operations

## Suppliers

### Dialogue methods

RFPs and commercial relations

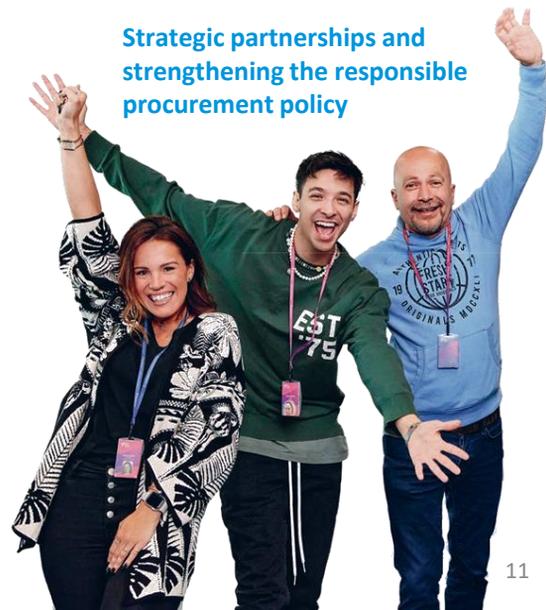
### Needs and expectations

- Balanced relationships and respect of payment deadlines

### TP strategic response

- Standardized supplier management procedure
- Compliance with contract terms

Strategic partnerships and strengthening the responsible procurement policy





# **RISK ASSESSMENT AND MITIGATION**

# CROSS-FUNCTIONAL ASSESSMENT PROCEDURES

All sites are extensively controlled, visited and audited. They are closely managed following the Group's global values, global operating standards and global policies. The internal control system depends on subsidiaries implementing Group's standards and procedures and is also based on international management processes such as the Six Sigma approach. The standardization and application of these procedures and standards make our global network more internally consistent, while providing greater control over the operations.



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## To know more:

- Section 2.3 – *Internal control and risk management procedures*
- Section 3.7.1.1 - *Verego SRS*

## Group's standards and procedures



**BEST standards** are designed to ensure top service quality, high performance and proactive management of programs. They also serve to reinforce HR best practices across all operations. Each subsidiary is required to assess its own performance under these procedures.



**TOPS processes and standards** allow performance and quality to be optimized, while managers are able to dedicate the majority of their working time to the agents they manage. TOPS helps to standardize practices in each subsidiary and allows improved quality control.

### GLOBAL PREMISES STANDARD

**Global Premises standard** provides detailed plans and guidelines for lighting, acoustics, IT & security, sustainability and employee wellbeing in all sites. A dedicated team is responsible for the design and improvement of the facilities worldwide and the implementation of appropriate actions to ensure group-wide consistency and employee well-being everywhere.

## Internal control mechanisms

- **Internal audits:** The internal audit team defines action plans with each subsidiary's management to ensure that internal control procedures are continually improved.
- **WARM visits:** These in-depth operational reviews with local management are conducted annually by the Group's Executive Management team.
- **Internal Control Questionnaire (ICQ):** Each subsidiary respond three times a year to the ICQ which is composed of over 200 questions and controls to ensure the correct implementation of all Group procedures.

## Third party audits

### VEREGO CERTIFICATION

For the 10<sup>th</sup> year running, Verego, an independent CSR certification body, awarded TP the SRS certification given to companies that stand out in five areas (governance, ethics, people, community and environment) covering all facilities.

### ISO 26000 AUDITS

Bureau Veritas has certified the application and inclusion of international standard ISO 26000 in social responsibility for the Group's operations in all the countries where the Group runs major content moderation operations.



**To know more:**

- Section 2.2.3 – *Crisis management*
- Section 2.4.3 - *Mitigating risks and preventing serious harm*
- Section 3.3.3.2 - *Employee training*

## Codes and policies

TP has developed global policies to ensure the Group complies with the Ten Principles of the UN Global Compact and with international labor standards in all its subsidiaries:

- Code of Ethics
- Code of Conduct (including anti-corruption)
- Human Rights Policy
- Diversity & Inclusion Policy
- Privacy Policy
- Global Information and Security Policies
- Health & Safety policy
- Environmental policy
- Supplier Code of Conduct

## Training sessions

- Training in CSR, compliance, privacy and health & safety for all new employees
- Comprehensive training module on the Code of Conduct, including anti-corruption, provided to senior managers and employees.
- All local CSR ambassadors, responsible for liaising with the Global CSR Department, must complete a mandatory learning path on CSR

## Crisis management

Since 2018, Teleperformance has implemented a Group-wide crisis management scheme to anticipate and manage sudden, unforeseen and major events with a likely negative impact on staff, continuity of business, financial results or reputation



# GLOBAL RISK MITIGATION MEASURES

TP has introduced measures to mitigate risks and prevent serious harm that are tailored to different circumstances. These measures are deployed at Group and subsidiary level, as well as with suppliers and other stakeholders.

TP's success and reputation are closely related to the Group's conduct of its business activities in a responsible manner in accordance with its core values and applicable law.

**9**

**Group policies**

**156**

**Hours of training  
per employee**  
(full-time equivalent)

**95%**

**Employees trained on  
the Group's Code of  
Conduct**

# HUMAN RIGHTS RISKS ASSESSMENT AND MITIGATION

Human Rights risks	Assessment procedures	URD 	Risk mitigation measures	URD 
<b>Working conditions</b>	<ul style="list-style-type: none"> <li>Employee satisfaction surveys (GPTW, Moment of Truth, Sentiment Surveys)</li> <li>Human Rights Assessment (HRA)</li> <li>Human rights self-assessment (CHRB methodology)</li> <li>Living wage analysis</li> <li>Focus groups</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.1, <i>Employee engagement</i></li> <li>- Section 3.3.4.5, <i>Human Rights</i></li> <li>- Section 3.3.4.2, <i>Employee compensation and loyalty schemes</i></li> </ul>	<ul style="list-style-type: none"> <li>Capped working hours</li> <li>Teleworking</li> <li>Competitive remuneration, reviewed at least annually vs. minimum wage, market practices and living wage</li> <li>Employee benefits</li> <li>Health coverage</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.4, <i>Working conditions</i></li> </ul>
<b>Discrimination and Harassment</b>	<ul style="list-style-type: none"> <li>HRA</li> <li>Employee satisfaction surveys (GPTW, Moment of Truth, Sentiment Surveys)</li> <li>Human rights self-assessment (CHRB methodology)</li> </ul>	<ul style="list-style-type: none"> <li>Section 3.3.4.5, <i>Human Rights</i></li> </ul>	<ul style="list-style-type: none"> <li>Dedicated governance with employee resource groups</li> <li>Training and awareness</li> <li><i>TP Women</i></li> <li>Integration of persons with disabilities</li> <li>Multicultural group</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.7, <i>Diversity, Equity &amp; Inclusion</i></li> </ul>
<b>Forced &amp; Child labor</b>	<ul style="list-style-type: none"> <li>HRA</li> <li>Human rights self-assessment (CHRB methodology)</li> </ul>	<ul style="list-style-type: none"> <li>Section 3.3.4.5, <i>Human Rights</i></li> </ul>	<ul style="list-style-type: none"> <li>Compliance with the highest standards: ILO, OECD, UNGC, etc.</li> <li>Vendor due diligence</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.4, <i>Working conditions</i></li> </ul>
<b>Freedom of association</b>	<ul style="list-style-type: none"> <li>HRA</li> <li>Employee satisfaction surveys (GPTW, Moment of Truth, Sentiment Surveys)</li> <li>Human rights self-assessment (CHRB methodology)</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.4.5, <i>Human Rights</i></li> </ul>	<ul style="list-style-type: none"> <li>Multiple channels of dialog</li> <li>Collective bargaining agreements and global agreement with UNI Global</li> <li>European Works Council</li> <li>Strengthened dialog in response to the pandemic</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.6, <i>Labor relations</i></li> </ul>
<b>Privacy</b>	<ul style="list-style-type: none"> <li>HRA</li> <li>Security &amp; Compliance audits</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.4.5, <i>Human Rights</i></li> <li>- Section 3.5.2.1, <i>Data privacy</i></li> </ul>	<ul style="list-style-type: none"> <li>Global ISO 27701 certification</li> <li>Set of compliance and security rules (GESPs)</li> <li>Binding Corporate Rules (BCRs)</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.5.2.1, <i>Data privacy</i></li> </ul>
<b>Data security and cyberattacks</b>	<ul style="list-style-type: none"> <li>Tools and procedures for the identification, assessment and management of cyber-risk</li> </ul>	<ul style="list-style-type: none"> <li>Section 3.5.2.2, <i>Cybersecurity</i></li> </ul>	<ul style="list-style-type: none"> <li>Cybersecurity investment program (Project Eagle Talon)</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.5.2.2, <i>Cybersecurity</i></li> </ul>

## HUMAN RIGHTS ASSESSMENT (HRA)

Each year, TP assesses its subsidiaries in terms of human rights and fundamental freedoms to evaluate their **compliance with Group codes and policies, OECD guidelines, ILO conventions and the UN Global Compact.**

Through a set of questions, **the HRA spans 9 Human Rights categories:** DE&I, working hours, remuneration, paid leaves & benefits, social dialogue, grievance, Precarious contracts, Child & Forced Labor and Privacy Rights.

This documentary audit also serves to **identify risks, and track progress and the implementation of corrective plans.**

## 2023 HIGHLIGHTS



**43 countries** covering 91% of global workforce



**96% average score** + 4pts vs. 2022



**2 action plans** developed to close identified gaps

# HEALTH & SAFETY RISKS

## ASSESSMENT AND MITIGATION

The Group’s health and safety management system aims to control risks efficiently and prevent staff injuries during the performance of their duties. All workplace accidents and incidents are reported and recorded. Each accident is analyzed in detail in order to determine the root cause and continually improve employee safety by mitigating the risk identified.

Staff representatives are periodically consulted to ensure the Group Health & Safety Policy is rigorously applied at local level. Each Group entity has its own Health & Safety Committee supervised by the local management team, local experts and the central Health & Safety Department. The local experts ensure the subsidiary’s compliance with the Group Health & Safety Policy.

Health & Safety risks	Assessment procedures	URD 	Risk mitigation measures	URD 
<b>Mental health</b>	<ul style="list-style-type: none"> <li>Employee satisfaction surveys</li> <li>Remote H&amp;S audits</li> <li>On-site H&amp;S inspections</li> <li>Compliance of H&amp;S licenses</li> <li>Client audits</li> <li>Local authority inspections</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.1, <i>Employee engagement</i></li> <li>- Section 3.3.5.2, <i>Health and safety risk management</i></li> </ul>	<ul style="list-style-type: none"> <li>Wellbeing program</li> <li>Partnership with mental health experts</li> <li>Employee training</li> <li>Remote engagement plan</li> <li>Workplace ergonomics</li> <li>Safety directives toolkit and trainings</li> <li>Global Premises Standard</li> </ul>	<ul style="list-style-type: none"> <li>- Section 3.3.5.1, <i>Health and safety policy organization and approach</i></li> <li>- Section 3.3.5.4, <i>Wellbeing at work and mental health</i></li> <li>- Section 3.3.5.1, <i>Health and safety policy organization and approach</i></li> </ul>
<b>Isolation at work</b>				
<b>Musculoskeletal disorders</b>				
<b>Physical security</b>				

### MENTAL HEALTH OF CONTENT MODERATORS

TP places great importance on the wellbeing and mental health of its moderators. Specific procedures have been developed for them, including:

- an appropriate hiring procedure involving psychometric tests designed to identify candidates;
- resilience training provided to all managers, trainers, team leaders and advisors to help them identify signs of emotional stress and know how to deal with them;
- personalized organization and infrastructures to provide the right working environment: relaxation times, employee surveys, the chance to disconnect, regular rotation, etc.
- continuous access to counseling, including by certified therapists;
- a 24/7 support program during and after the work cycle.

### 2023 HIGHLIGHTS



**100%** of moderators benefit from a wellbeing break of at least 30 minutes every day



**Nearly 112,000** individual counseling sessions

# ENVIRONMENTAL RISKS ASSESSMENT AND MITIGATION

Environmental risks	Assessment procedures	URD 	Risk mitigation measures	URD 
<b>Drift in energy consumption</b>	<ul style="list-style-type: none"> <li>Environmental monitoring and reporting following the GHG Protocol</li> </ul>	- Section 3.6, <i>Promoting Group environmental Responsibility</i>	<ul style="list-style-type: none"> <li>Ambitious carbon reduction targets (SBTi, Climate Pledge)</li> <li>Adoption of Renewable Energy</li> <li>Environmental best practices implemented at all sites; energy efficiency measures</li> <li>Awareness and trainings</li> </ul>	- Section 3.6.2, <i>Climate Change Strategy</i> - Section 3.6.4, <i>Climate change performance – Metrics and targets</i>
<b>Natural disasters</b>	<ul style="list-style-type: none"> <li>Climate Watch</li> <li>ND-Gain</li> </ul>		<ul style="list-style-type: none"> <li>Safety directives toolkit</li> <li>Awareness and training</li> <li>Business Continuity plans</li> </ul>	- Section 3.6.2.1, <i>Risk Mitigation Strategy</i>
<b>Deficient waste management</b>	<ul style="list-style-type: none"> <li>Monitoring and reporting of e-waste and paper consumption</li> </ul>		<ul style="list-style-type: none"> <li>Waste management programs</li> <li>Guidelines and training sessions</li> </ul>	- Section 3.6.4.5, <i>Waste Management and Circular Economy</i>
<b>Water over-consumption</b>	<ul style="list-style-type: none"> <li>WRI Water Atlas</li> </ul>		<ul style="list-style-type: none"> <li>Awareness programs and development of best water practices for High-Extremely High-water Stress</li> </ul>	- Section 3.6.4.4, <i>Responsible Water Consumption Management</i>

## Climate Change and the Environment

TP has been committed to the environment since the launch of its Citizen of the Planet (COTP) program in 2008. As temperatures continue to rise, the company became more ambitious on its environmental goals through the implementation of initiatives like:

- Commitment to The Climate Pledge in April 2021, a coalition of 400+ companies aiming at being carbon neutral by 2040;
- Adoption and validation of Science-Based Targets initiative (SBTi) Goals to keep temperatures well below 2°C and to continue efforts to limit global warming to 1.5°C;
- Designated specific targets to top company emitters to reduce overall CO<sub>2</sub> emissions by 2030;
- Identification of high vulnerability zones based on TP business operations.

## 2023 HIGHLIGHTS



Reduction of **-51%** reduction in per full-time employee carbon emissions (scope 1&2) from 2019 to 2023



**34.7%** renewable energy in 2023 up from 11% in 2019



# **RISK MITIGATION IN KEY COUNTRIES**

**India, Philippines, Colombia, United States**

# Country risk mitigation

## India

With 86,255 employees in 2023, TP India stands as the Group's largest in terms of headcount and the leading employer in the Business Process Management sector within India. Beyond adhering to local laws and the group's policies, TP India has introduced specific initiatives and programs tailored to address the prominent local challenges.

Salient Issues <sup>1</sup>	TP initiatives
Discrimination and Stigmatization of Minorities	Through the TTNA program, the Teleperformance India recruitment team works closely with several NGOs, which run training centers for people from rural and low-income areas. TP India has also set up programs to hire persons with disabilities
Freedom of Expression Restrictions	Through diverse employee representative bodies and communication platforms, including satisfaction surveys and an Ethics Hotline, TP India ensures robust social dialogue and addresses concerns, embodying the group's dedication to employee rights and corporate responsibility.
Sexual harassment against women	In 2014, when the gender ratio was particularly unbalanced, TP India created the GenderSmart initiative to guarantee equality and equal opportunities for men and women at the company. TP has established strict and efficient procedures for preventing sexual harassment at work and has set up a special committee for this purpose, as required by the Indian POSH Act.
Children's education	Teleperformance collaborates with UNICEF in India on a program targeting critical areas: young children's education, improving education quality and learning outcomes, enhancing access to digital educational tools, and support for children not attending school.
Living wage	Entry-level wages at TP are higher than the national minimum wage everywhere. To go further, TP has partnered with Wage Indicator since 2019 to conduct an analysis to benchmark local TP salaries against the local living wage. As a market leader, the Group is committed to providing competitive remuneration to all its employees and to promoting higher standards for its sector. Against a backdrop of high inflation in many countries, TP ensures that its employees continue to receive a living wage.
Global warming	India is located within a medium to high vulnerability zone exposed to risks of extreme heat. In this respect, new buildings include adaptation measures such as greening, fans and a renewable energy supply. Adaptation and continuity plans are also in place to anticipate future climate change.

<sup>1</sup> <https://www.hrw.org/world-report/2024/country-chapters/india>



**39%** women  
in the total headcount  
vs. 14% in 2014



**150** people with a  
disability joined TP as  
part of the SAMARTH  
program



**5** sites  
with renewable  
energies

# Country risk mitigation

## Philippines

With 52,482 employees in 2023, TP Philippines is one of the largest Business Process Outsourcing (BPO) employer in the country. As such, Teleperformance’s impact on the local economy and employment market is considerable, especially in Manila. In addition to compliance with local legislation, and the group’s policies, it has implemented specific initiatives and programs to respond to the main local issues.

Salient Issues <sup>1</sup>	TP initiatives
Discrimination and Stigmatization of Minorities	TP Philippines launched the Echo project, an inclusive recruitment program for the hearing impaired, for one of its clients. Awareness sessions were provided for the entire Cebu facility to show each employee and service provider how to interact with the new hearing-impaired agents, while several recruiters, trainers and supervisors learned sign language. The company has partnered with a university for the deaf and hearing impaired (De La Salle-College of Saint Benilde School of Deaf Education and Applied Studies) to offer employment opportunities for future graduates. TP Philippines has also developed the STEP program aimed at training candidates from vulnerable groups and supporting them throughout the hiring and induction process.
Children’s rights	TP supports UNICEF’s education programs aimed at promoting access to education, particularly for the most vulnerable children, training teachers and implementing a system for identifying young children at risk of retarded development and disability, to ensure appropriate and rapid care. Teleperformance’s support impacted around 15,000 children in 2023.
Health & safety	TP provides inclusive health insurance extended to the employees’ partners, irrespective of their marital status or sexual orientation.
Living wage	Entry-level wages at TP are higher than the national minimum wage everywhere. To go further, TP has partnered with Wage Indicator since 2019 to conduct an analysis to benchmark local TP salaries against the local living wage. As a market leader, the Group is committed to providing competitive remuneration to all its employees and to promoting higher standards for its sector. Against a backdrop of high inflation in many countries, TP ensures that its employees continue to receive a living wage.
Global warming	In response to global warming, TP Philippines implemented eco-friendly measures by replacing traditional lighting with LEDs, programming air conditioning and lighting based on occupancy, and deploying renewable energy solutions at four facilities.

<sup>1</sup> <https://www.hrw.org/world-report/2024/country-chapters/philippines>



Signatory of the **United Nations LGBTQIA+ Standards for Businesses**



**8,700+** pupils and students benefited from donations



**5** sites with 100% or partial renewable energy coverage throughout operations

# Country risk mitigation

## Colombia

With 41,140 employees, Teleperformance stands as Colombia's largest employer, emphasizing the creation of quality employment and offering inclusive opportunities for local communities. Beyond adhering to local laws and group policies, Teleperformance Colombia has launched targeted initiatives and programs to tackle key local challenges.

Salient Issues <sup>1</sup>	TP initiatives
Freedom of expression	The COPASST, a committee composed of elected employee and employer representatives, meets at least each quarter to discuss health and safety matters. In April 2023, TP finalized an agreement with Ultraclaro and UNI Global Union re-affirming their shared commitments to workers' rights in Colombia.
Refugees, asylum seekers and migrants	In partnership with several governmental and non-governmental organizations, including the United Nations High Commissioner for Refugees (UNHCR) and TENT Partnership for Refugees, TP has implemented several initiatives to hire and retain refugees displaced by the crisis in Venezuela. Nearly 2,000 employees at TP Colombia are Venezuelan refugees. In addition to these measures, the Group provides administrative support, such as assistance in obtaining a work permit, thanks to a dedicated internal department.
Gender-Based Violence	A gender equality program facilitates the identification and promotion of women in management positions.
Sexual Orientation and Gender Identity	On the occasion of the 2023 pride parade, TP launched a new program entitled "Beyond Labels" designed to celebrate diversity, equity and inclusion and boost the voices of the LGBTQIA+ community worldwide. Beyond Labels offers awareness programs, in-person activities and events, enhanced visibility on social media, donations to charities, etc.
Living wage	Entry-level wages at TP are higher than the national minimum wage everywhere. To go further, TP has partnered with Wage Indicator since 2019 to conduct an analysis to benchmark local TP salaries against the local living wage. As a market leader, the Group is committed to providing competitive remuneration to all its employees and to promoting higher standards for its sector. Against a backdrop of high inflation in many countries, TP ensures that its employees continue to receive a living wage.
Climate Policy and impacts (forest destruction)	TP Colombia has demonstrated its commitment to environmental sustainability by planting over 2,000 trees in partnership with Al Verde Vivo and processing over 30 tons of plastic waste with local associations, recycling part of it and transforming the remainder into school desks for children.

<sup>1</sup> <https://www.hrw.org/world-report/2024/country-chapters/colombia>



Nearly **2,000** refugees working at TP Colombia



**Diversity and Inclusion Management Certification** from AENOR



**2,000+** trees planted

# Country risk mitigation

## United States

Teleperformance USA counts with more than 16,971 employees. In addition to compliance with local legislation, and the group’s policies, it has implemented specific initiatives and programs to respond to the main local issues.

Salient Issues <sup>1</sup>	TP initiatives
Discrimination based on race	One of the five priority areas of TP’s DE&I approach is ethnicity. TP has created different forums and employee resource groups (ERGs) within the company to offer communities a chance to share ideas to combat discrimination and intolerance while giving them voice to express themselves.
Technology and Human Rights	In 2021, TP obtained global ISO 27701 certification, which was successfully renewed in 2022 and 2023. This new standard strengthens data protection controls and requirements. TP ensures the security of sensitive information by systematically removing and destroying hard drives from all computers before they are decommissioned, adhering to strict data protection measures.
Economic Justice Immigrants’ Rights	TP has set up Project@Home, an initiative that seeks to hire war veterans, their partners and other members of their family. Teleperformance also aims to hire people living under the poverty line and refugees. The collaboration with the Idaho Office for Refugees has led to the hiring of refugees from Iraq, Congo, Myanmar, Afghanistan and Somalia.
Child Labor	TP has formed a number of partnerships with NGOs in the United States to provide support to the most disadvantaged children. The main associations the Group works with are Feed the Children, Ronald McDonald House Charities, Alan Truitt Force of Good and Make-A-Wish America. Every year, TP gives a child the chance to realize their dream in partnership with Make-A-Wish.
Lack of access to health insurance and care	All employees, including temporary workers, benefit from health coverage which is extended to the employees’ family members.
Living wage	Entry-level wages at TP are higher than the national minimum wage everywhere. To go further, TP has partnered with Wage Indicator since 2019 to conduct an analysis to benchmark local TP salaries against the local living wage. As a market leader, the Group is committed to providing competitive remuneration to all its employees and to promoting higher standards for its sector. Against a backdrop of high inflation in many countries, TP ensures that its employees continue to receive a living wage.
Climate Policy	Implementation of an Energy Management System (EMS) and a set of IT tools to optimize resource consumption. Replacement of existing lighting with LEDs at the main facilities. Increasing in the number of sites with renewable energy.

<sup>1</sup> <https://www.hrw.org/world-report/2024/country-chapters/united-states>



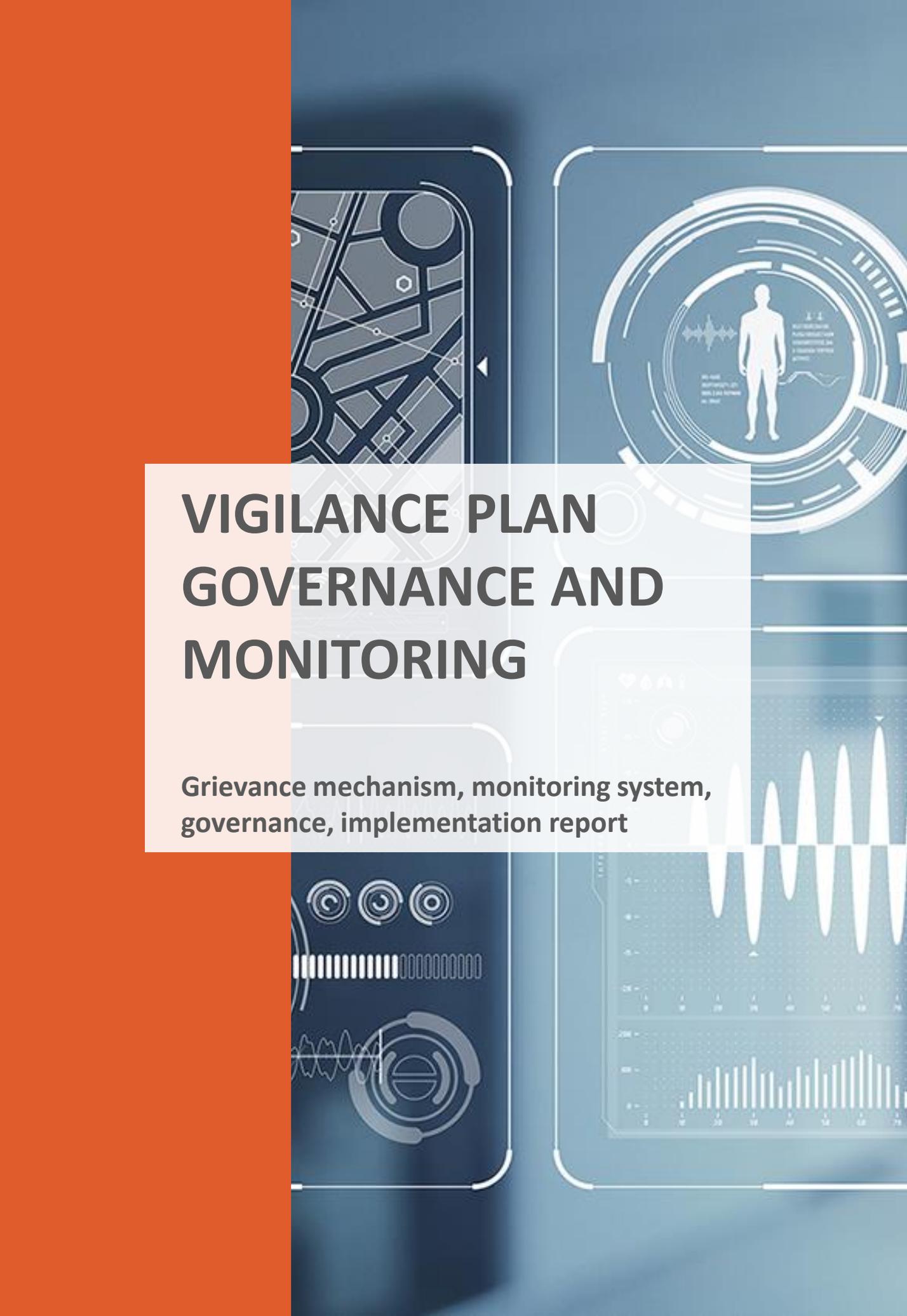
Minimum of **6** days of paid leave per year



**1.6M€** donations as part of the COTW program



**7** new sites with renewable energy in 2023



# VIGILANCE PLAN GOVERNANCE AND MONITORING

Grievance mechanism, monitoring system,  
governance, implementation report



UNIVERSAL  
REGISTRATION  
DOCUMENT  
2023

#### To know more:

- Section 2.4.4 - *Whistleblowing and grievance mechanisms*
- Section 3.3.6.1 – *Social dialog*
- Section 3.5.1.1 - *Commitments to ethical business practices*

## WHISTLEBLOWING AND GRIEVANCE MECHANISMS

TP fosters a culture of openness and dialog that allows all employees to express their point of view and voice their concerns. Employees are free to approach their line manager, HR manager, corporate counsel or compliance officer.

In 2018, the Group launched the Global Ethics Hotline (whistleblowing mechanism), accessible to both internal and external stakeholders, to report on any infringement of human rights or fundamental freedoms, health and safety of persons or the environment, ethics, corruption, or fraud.



## The Global Ethics Hotline (GEH)

Available to **100% of Teleperformance's workforce**, the GEH is designed as a means of reporting behavior or events that may constitute acts of corruption, anti-competitive behaviors, infringement of human rights, harm to the environment or any other crime or fraud that could seriously harm the Group's business or reputation or cause it to incur liability. Alerts submitted via this system are treated confidentially.

Prior to launch, the GEH was submitted to local employee representatives and trade unions where required by law. The GEH can be used by anyone and can be found on the Group's website ([www.teleperformance.com/ethicshotline](http://www.teleperformance.com/ethicshotline)).

In 2023, the hotline recorded 1,650 alerts. Upon investigation, 483 of these incidents, i.e. 29% of alerts, proved to be admissible alerts within the purview of the hotline. Of these 483 cases, 83 were referred to the Group's Ethics Committee. The remaining alerts did not fall within the hotline's remit; in the vast majority of cases, they were HR matters that were forwarded to the relevant departments (e.g. payroll, scheduling and operational issues). Of the legitimate reports made via the Ethics Hotline, 74% involved potential workplace misconduct, 5% involved ethics, and 21% involved suspected fraud.

## Governance

The GEH is managed by an independent internal multilingual team reporting to the Compliance Department. Regular reports are submitted to the Audit, Risk and Compliance Committee attached to the Board of Directors. The GEH Policy setting out the objectives, protection measures and survey and reporting procedures is available on the Group's website.

## External expert assessment

TP grievance mechanisms have been assessed by an external expert, CSR Europe, against the 8 effectiveness criteria outlined by the UN Guiding Principles on Business and Human Rights (UNGPs) and against company peers.

The UNGPs spell out 8 criteria to ensure effective grievance mechanism processes: legitimate, accessible, predictable, equitable, transparent, right-compatible, a source of continuous learning, based on engagement and dialog. TP's score was above average in all criteria, and best in class in several criteria, such as "predictable" and "a source of continuous learning".

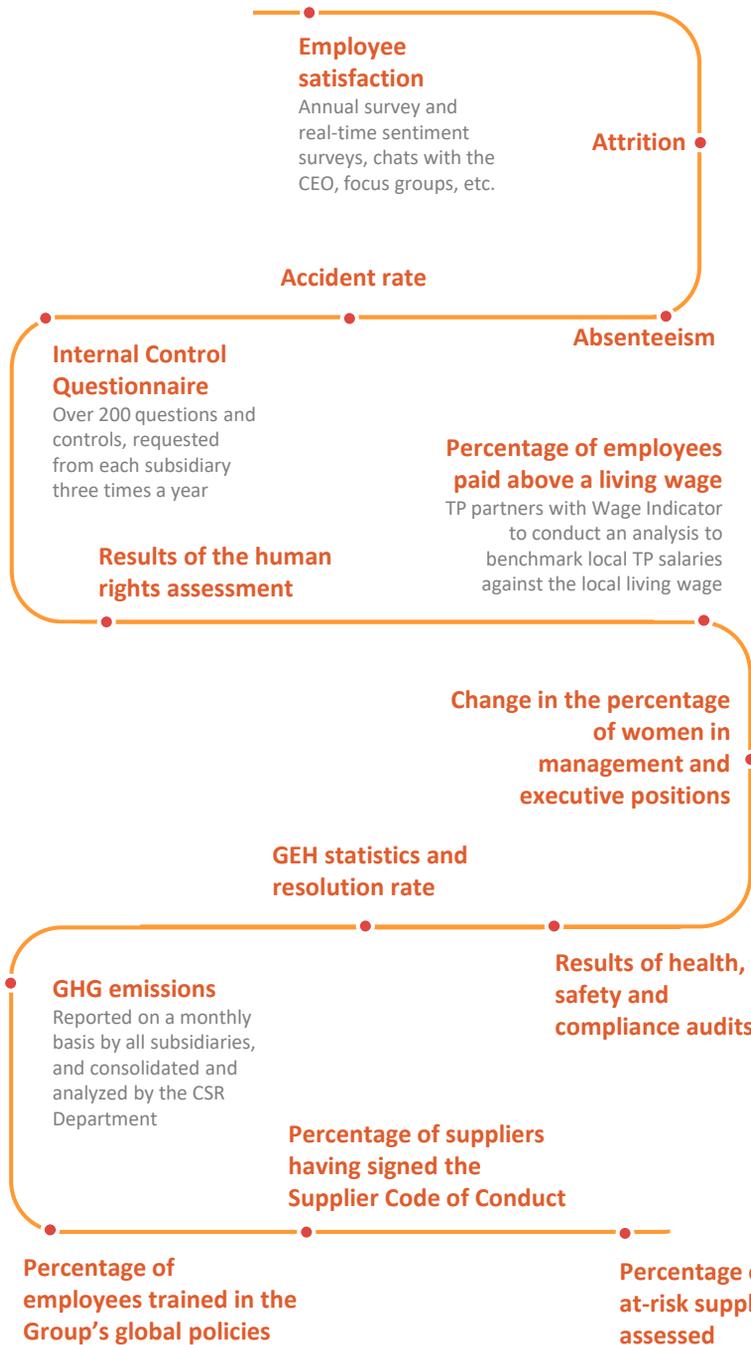


**To know more:**

- Section 2.3 – *Internal control and Risk management procedures*
- Section 2.4.5 – *System for monitoring measures in place*
- Section 3.2.2 – *Main impacts, risks and opportunities (IRO) identified (commitments and targets)*

## Key performance indicators

Teleperformance closely monitors a large number of indicators to evaluate the effectiveness of its policies. Here are some examples:



## SYSTEM FOR MONITORING MEASURES IN PLACE

Risk management and internal control systems complement each other in controlling the Company's activities.

The internal control system relies on the risk management system to identify the main risks that need to be controlled. The risk management system includes controls that are part of the internal control system.

# VIGILANCE PLAN DASHBOARD

The Group has set ambitious targets driven by sustained and sustainable growth to fulfill its CSR commitments: being a preferred employer, a trusted partner and a Force of Good. **TP integrated performance dashboard is disclosed in the Group's 2023 Integrated Report and in the Universal Registration Document at section 3.2.2.**

The below dashboard sums up the main indicators related to the duty of vigilance law.

Human Rights	2020	2021	2022	2023	Target	SDGS
Employees working at a subsidiary certified as best employer	87%	98%	97%	99%	Maintain more than 90%	
Internal promotion rate (from supervisor)	68%	71%	63%	61%	Internal mobility at all levels >60%	
Human rights assessment average score	87%	91%	92%	96%	Maintain above 86%	
Percentage of women in the Group's Management Committee	30%	30%	30%	38%	35% by 2023	
Employees trained on Code of Conduct	86%	97%	95%	95%	> 90%	
Footprint where Global Ethics Hotline has been rolled out	100%	100%	100%	100%	100%	
Employees trained on Privacy and Data security	87%	97%	96%	96%	> 90%	
Donations raised by Citizen of the World (€M)	5.1	6.3	11	7.6	More than €5m annually	
Health & Safety	2020	2021	2022	2023	Target	SDGS
Employees trained on Health & Safety policy	76%	95%	94%	94%	> 90%	
Accident frequency rate (including commuting)	N/A	0.19	0.23	0.28		
Average absenteeism	5.2%	3.9%	4.2%	4.2%	<5%	
Number of locations audited on H&S	> 300	> 300	288	184		
Environment	2020	2021	2022	2023	Target	SDGS
Scopes 1 & 2 GHG emissions per FTE* (tons CO2e)	0.476	0.425	0.387	0.367	-49% per FTE from 2019 to 2026	
Share of Renewable energy out of total electricity consumption	17%	21%	28%	35%	25% by 2023, 30% by 2026	
Scope 3 GHG emissions - purchased goods & services and commuting per FTE* (tons CO2e)	0.774	0.633	0.693	0.767	-38.3% per FTE from 2019 to 2026	

\*Full-time employee

# VIGILANCE PLAN GOVERNANCE

To ensure the deployment of the Vigilance Plan and the success of its programs and targets, a dedicated governance structure was set up, articulated around the CSR Department, the Human Resources Department, and the Compliance, Privacy and Security teams.

## Human Resources

HR department whose remit covers the entire human resources cycle, employee engagement, wellbeing at work, training and career development, health & safety and diversity & inclusion

## Corporate Social Responsibility

Board CSR Committee  
Executive sponsors  
CSR department  
Global network of CSR ambassadors

## Compliance, privacy and security

Board Audit, Risk and Compliance Committee  
Group Chief Legal and Compliance Officer  
Compliance and Security Council  
Technology, Privacy and Security Committee

Various working groups comprising representatives of the Compliance, Corporate Social Responsibility, Finance, Information Security, Procurement, Internal Audit and Legal Departments, together with Group senior management, are involved in preparing and implementing the Vigilance Plan.

The 2023 Vigilance Plan was presented to the Group's Executive Committee and the Board of Directors' CSR Committee on March 5th, 2024.



# VIGILANCE PLAN IMPLEMENTATION REPORT 2022/2023

The report below summarizes the measures taken in 2022/2023 under the duty of vigilance law:

- **continued improvement of CSR risk mapping**, especially regarding Human Rights and the environment;
- **update of the non-financial risk mapping and materiality analysis**, through consultation with key stakeholders, both globally and in key countries;
- **enhanced employee listening and dialog channels**, and strengthened social dialog in key subsidiaries and at global level;
- **governance strengthened** via the creation of a CSR Department in 2019, a Group procurement department in early 2020, and a Board CSR Committee in January 2021;
- **presentation of CSR action plan** to the Board of Directors and shareholders' meeting;
- renewed **adherence to the UN Global Compact**;
- **regular revision of global policies**, aligned with the ten principles of the UN Global Compact (e.g. the human rights policy was reviewed in 2023);
- **launch and Group-wide roll-out of the Global Ethics Hotline** (whistleblowing mechanism), accessible to both internal and external stakeholders, to report on any breach relating to human rights and fundamental freedoms, health and safety of persons or the environment, ethics, corruption, or fraud.
- **Systematic consideration of issues** or controversies facing the Group;
- Organization of a **consultation with stakeholders**, including UNI Global, **on the duty of vigilance**.

Teleperformance is **committed to a continual improvement approach** and has already listed some of its upcoming priorities for 2024:

## Training of a network of human rights experts

In key subsidiaries to implement best-in-class practices across our operations.

## Ongoing incorporation of non-financial risks at global level

including the addition of new non-financial and CSR controls to the internal audit plans.

## Ongoing integration of the framework agreement with UNI Global

into the duty of vigilance procedure

## Enhancement of the global supplier CSR assessment process

by deploying the solution designed by supply chain CSR assessment specialist IntegrityNext.

