

VIGILANCE PLAN 2021



TELEPERFORMANCE SE 2021 VIGILANCE PLAN

Teleperformance (TP), the global leader in outsourced customer and citizen experience management and related 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 420,000 employees, based in 88 countries, support billions of connections every year in over 265 languages and over 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. 2
I'm passionate & engaged.

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RISK IDENTIFICATION AND MAPPING

RISK IDENTIFICATION AND MAPPING

In 2019, Teleperformance completed an exhaustive extra-financial risk mapping exercise, including human rights, international labor standards, health and safety, ethics and compliance, corporate governance, environment, value chain and communities. The risk map was reviewed in 2020, in particular in order to factor in the impact of the Covid-19 pandemic.

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



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To know more:

- Section 1.2 – *Risks and control*
- Section 1.2.4.1 - *Risk identification and mapping*
- Section 2.2.1 – *Non-financial risk mapping and materiality analysis*
- Section 2.6.2.1 - *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.

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 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

In 2021, Teleperformance continued its risk mapping exercise by conducting a specific analysis of climate-related risks based on the location of commercial operations. To develop scenarios, the Group used the TCFD's recommendations, the 2020 Global Climate Risk Index and the University of Notre Dame Global Adaptation Index (ND-GAIN).



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

TP is a people company. With 420,000 employees, 1,000 clients and activities in 88 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 2021 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 1.2.4.2 – *Specific assessment procedures with regard to CSR breaches in the value chain*
- Section 2.4.2.3 – *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

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 88 countries, the Group may be exposed to inappropriate behavior by some of its employees or by third parties.

Health & Safety risks

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, or specialized services such as content moderation.

The sense of isolation that some employees may feel could be reinforced by the pandemic and remote working.

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

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 88 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 2.1 – *Business model*
- Section 2.2.1 – *Non-financial risk mapping and materiality analysis*
- 2.3.6.1 – *Social dialog*

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 2019, the Group organized a consultation process with stakeholders consisting of interviews on relevant CSR issues as part of its first materiality analysis. Staff representatives, suppliers, partners, clients and interest groups (public bodies, NGOs, sector analysts) based in the main Teleperformance operating countries expressed their opinion on the importance of each issue. Staff representatives represented over 50% of the sample as the Group wanted to encourage dialogue with employees for the first year of assessment. **A new stakeholders' consultation will be conducted in 2022.**

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.
- **TP encourages discussion with employees** through meetings with management, chats with the CEO, focus groups, online communication tools... Trade unions are recognized in 19 countries, covering 40% of the Group's employees while **collective agreements** are in place in 17 countries representing around 26% of the workforce. A **European Works Council** currently comprising 22 standing members represents employees in the 18 European countries in which the Group operates.
- **TP has strengthened employee representation** in several key countries to respond to the recommendations issued by the French OECD National Point of Contact as part of the specific circumstance on the measures in place in the context of the Covid-19 epidemic. TP has transparently discussed with the stakeholders involved during the whole process.
- **Third party audits** are conducted on a regular basis in key countries on issues related to the duty of vigilance law.

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.



**DIALOGUE
WITH OUR MAIN
STAKEHOLDERS**

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

p.20-27, 2021 Integrated Report

Our top clients have been with us for 13 years on average

Shareholders

Dialogue methods

Roadshows, shareholders' meetings, financial reporting, publications

Needs and expectations

- Stable and sustainable performance
- Transparency and sound governance

TP strategic response

p.42-52, 2021 Integrated Report

Teleperformance's "investor-friendly" approach was recognized in the prestigious Institutional Investor Extel annual survey of the financial community based on investor voting

Employees

Dialogue methods

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

Needs and expectations

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

TP strategic response

p.16-19, 34-41, 2021 Integrated Report

Ranked among the 25 best employers in the world by Fortune magazine and Great Place to Work®.

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

p.28-29, 2021 Integrated Report

Over a billion interactions in 2021

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

p.30-41, 2021 Integrated Report

**30,078 net jobs created
€6.3M donations made to NGOs
-15% carbon footprint per employee**

Suppliers

Dialogue methods

Calls for tenders and commercial relationships

Needs and expectations

- Balanced relationships and respect of payment deadlines

TP strategic response

Section 2.4.2.3, 2021 Universal Registration Document

Development of a responsible purchasing approach

The background features a high-angle, night-time view of a city skyline. Numerous skyscrapers are illuminated with warm yellow and white lights, contrasting against the dark blue night sky. Overlaid on the cityscape are several glowing, white, curved lines that resemble orbits or data paths, each ending in a bright, starburst-like light. A solid dark blue vertical bar is positioned on the left side of the image. A semi-transparent white rectangular box is centered over the cityscape, containing the main title.

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 1.1.4.3.4 - *Quality management procedures*
- Section 1.2.3 - *Risk management and internal control procedures*
- Section 2.7.1.1 - *Verego SRS*

Group's standards and procedures



BEST standards are designed to ensure top service quality, high performance and proactive management of existing and future programs. They also serve to reinforce HR best practices (hiring, training, promotion...) across all TP operations. Each subsidiary is required to assess its own performance twice a year 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 was designed by the Group to manage its operations in a standardized manner 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 AUDIT

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 QUESTIONNAIRES (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.

Verego certification

For the 8th 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. This results from an assessment including a review of the Group's policies and programs, site managers interviews and employee surveys to validate that policies are aligned with the international standards and effectively implemented locally.



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To know more:

- Section 1.2.2.3 – *Crisis management*
- Section 1.2.4.3 - *Mitigating risks and preventing serious harm*
- Section 2.3.3.2 - *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 Statement
- Diversity & Inclusion Policy
- Privacy Policy
- Global Essential Compliance 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



173

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

97%

**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 
Working conditions	<ul style="list-style-type: none"> Employee satisfaction surveys (GPTW) Human Rights Assessment (HRA) Living wage analysis Chats with CEO and focus groups 	<ul style="list-style-type: none"> - Section 2.3.2, <i>Employee engagement</i> - Section 2.3.5.5, <i>Human Rights</i> - Section 2.3.5.2, <i>Living wage</i> 	<ul style="list-style-type: none"> Capped working hours Teleworking Competitive remuneration Living wage Employee benefits Health coverage 	<ul style="list-style-type: none"> - Section 2.3.5, <i>Working conditions</i>
Discrimination and Harassment	<ul style="list-style-type: none"> HRA 	<ul style="list-style-type: none"> Section 2.3.5.5, <i>Human Rights</i> 	<ul style="list-style-type: none"> Dedicated governance with employee resource groups Training and awareness <i>TP Women</i> Integration of persons with disabilities Multicultural group 	<ul style="list-style-type: none"> - Section 2.3.7, <i>Diversity, Equity & Inclusion</i>
Forced & Child labor	<ul style="list-style-type: none"> HRA 	<ul style="list-style-type: none"> Section 2.3.5.5, <i>Human Rights</i> 	<ul style="list-style-type: none"> Compliance with the highest standards: ILO, OECD, UNGC, etc. 	<ul style="list-style-type: none"> - Section 2.3.5, <i>Working conditions</i>
Freedom of association	<ul style="list-style-type: none"> HRA 	<ul style="list-style-type: none"> - Section 2.3.5.5, <i>Human Rights</i> 	<ul style="list-style-type: none"> Multiple channels of dialog Collective bargaining agreements European Works Council Strengthened dialog in response to the pandemic 	<ul style="list-style-type: none"> - Section 2.3.5, <i>Labor relations</i>
Privacy	<ul style="list-style-type: none"> HRA Security & Compliance audits 	<ul style="list-style-type: none"> - Section 2.3.5.5, <i>Human Rights</i> - Section 2.4.3.1, <i>Personal data protection</i> 	<ul style="list-style-type: none"> Global ISO 27701 certification Set of compliance and security rules (GECSP) Binding Corporate Rules (BCRs) 	<ul style="list-style-type: none"> - Section 2.4.3.1, <i>Personal data protection</i>
Data security and cyberattacks	<ul style="list-style-type: none"> Tools and procedures for the identification, assessment and management of cyber-risk 	<ul style="list-style-type: none"> Section 2.4.3.2, <i>Cybersecurity</i> 	<ul style="list-style-type: none"> Cybersecurity investment program (Project Eagle) 	<ul style="list-style-type: none"> - Sections 1.1.4.3.3 and 2.4.3.2, <i>Cybersecurity</i>

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 66 questions, the HRA spans 10 Human Rights categories: Diversity & Inclusion, Gender Equality, 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** via the annual reassessment.

2021 HIGHLIGHTS



30 countries covering ~85% of global workforce



91% average score + 4pts vs. 2020





3 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 
Mental health	<ul style="list-style-type: none"> Employee satisfaction surveys Remote H&S audits On-site H&S inspections Compliance of H&S licenses Client audits Local authority inspections 	- Section 2.3.2, <i>Employee engagement</i> - Section 2.3.4.5, <i>Risk prevention: audits and inspections</i>	<ul style="list-style-type: none"> Passion 4U program Partnership with a mental health expert Employee training 	- Section 2.3.4.3, <i>Supporting local roll-out of the TP health and safety policy</i>
Isolation at work			<ul style="list-style-type: none"> Remote engagement plan 	
Musculoskeletal disorders			<ul style="list-style-type: none"> Workplace ergonomics 	- Section 2.3.4.3, <i>Supporting local roll-out of the TP health and safety policy</i> - Section 2.3.4.2, <i>Resilience in response to the global health crisis</i>
Physical security			<ul style="list-style-type: none"> Safety directives toolkit and trainings Global Premises Standard Teleworking, health & safety measures, ventilation and vaccination against Covid-19 	

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.

2021 HIGHLIGHTS



100% moderators trained in wellbeing and mental health





5,000 hours of wellbeing and mental health workshops and activities



8,000+ individual counseling sessions

ENVIRONMENTAL RISKS ASSESSMENT AND MITIGATION

Environmental risks	Assessment procedures	URD 	Risk mitigation measures	URD 
Drift in energy consumption	<ul style="list-style-type: none"> Environmental monitoring and reporting following the GHG Protocol 	- Section 2.6., <i>Promoting Teleperformance's environmental Responsibility</i>	<ul style="list-style-type: none"> Ambitious carbon reduction targets (SBTi, Climate Pledge) Adoption of Renewable Energy Environmental best practices implemented at all sites; energy efficiency measures Awareness and trainings 	- Section 2.6.2, <i>Climate Change Strategy</i> - Section 2.6.4, <i>Climate change performance – Metrics and targets</i>
Natural disasters	<ul style="list-style-type: none"> Climate Watch ND-Gain 		<ul style="list-style-type: none"> Safety directives toolkit Awareness and training Business Continuity plans 	- Section 6.2.1, <i>Risk Mitigation Strategy</i>
Deficient waste management	<ul style="list-style-type: none"> Monitoring and reporting of e-waste and paper consumption 		<ul style="list-style-type: none"> Waste management programs Guidelines and training sessions 	- Section 6.6.4.5, <i>Waste Management and Circular Economy</i>
Water over-consumption	<ul style="list-style-type: none"> WRI Water Atlas 		<ul style="list-style-type: none"> Awareness programs and development of best water practices for High-Extremely High-water Stress 	- Section 6.6.4.4, <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 200+ 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;
- Designated specific targets to top company emitters to reduce overall CO₂ emissions by 2030;
- Identification of high vulnerability zones based on TP business operations.

2021 HIGHLIGHTS



Reduction of **-15%** of carbon footprint per full-time employee yoy.



21.4% reduction of electricity consumption yoy.



Adoption of Solar Rooftops in India, Dominican Republic and Mexico.



RISK MITIGATION IN KEY COUNTRIES

India, Philippines, Colombia, United States

Country risk mitigation

India

With 72,647 employees in 2021, TP India is the Group's first country in terms of headcount and the main employer in the Business Process Management sector in India. 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 ¹	TP initiatives
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.
Freedom of expression and association	In 2021, four staff representatives joined the local Health and Safety Committee, thereby enabling the company to pay greater heed to employee expectations in terms of health and safety.
Increased threats to the health and well-being, particularly due to the pandemic	All employees, including temporary workers, and their family members benefit from health coverage. During the pandemic, global H&S policy was enforced to ensure social distancing, reinforced cleaning and disinfection and deployment of work-from-home. TP India enabled the vaccination against Covid-19 of over 11,000 employees.
Children's Rights during Covid-19 Pandemic	TP partners with various organizations to promote education, nutrition and digital literacy and has contributed to the education of thousands of children for several years. In 2021, the COTW initiative in India was recognized at the ACEF Asian Leaders Awards for its work to support the education of underprivileged children to give them a better future.
Living wage	The 10% lowest-paid employees earn on average 36% more than the local minimum wage in India, excluding bonuses and employee benefits. Language-skilled employees earn on average 86% more than the local individual living wage. ²
Water Management	Identification of water stress hotspot areas & awareness campaigns.
Global warming	Ten of TP India's sites are certified ISO 14001. Green Energy sourcing through Solar Rooftops & Wind power, replacement of old AC & UPS units for more efficient ones, investment on E-Vehicles.

¹ <https://www.hrw.org/world-report/2022/country-chapters/india>

² TP has partnered with Wage Indicator for the third year in a row to conduct an analysis to benchmark local TP salaries against the local living wage. Different from the minimum wage, the living wage is a higher standard corresponding to the minimum income necessary for a worker to comfortably meet their basic needs.



37% women
in the total headcount
vs. 14% in 2014



8,900+ children
benefited from COTW
initiatives in 2021



-13% energy consumption
in 2021 vs. 2020

Country risk mitigation

Philippines

With 54,643 employees in 2021, TP Philippines is the third-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 ¹	TP initiatives
Discrimination and violence	TP regularly reviews its set of policies, including on Equal Employment Opportunity, Anti-sexual Harassment, Whistleblowing, Ethics and Human Rights. The Speak Up Committee reviews any reports made by employees or third parties on potential ethical breaches including on discrimination and freedom of expression. TP Pride aims to raise awareness on LGBTQIA+ issues among TP employees.
Children’s rights.	Through the philanthropic COTW program, TP launched the Back-to-School annual project which aims to support the education of children through school supplies donations, activities for children who suffer from chronic illnesses with Kythe Foundation, partnerships with the Department of Education, etc.
Increased threats to the health and well-being, particularly due to the pandemic	All permanent employees benefit from health coverage which is extended to the employees’ partners, irrespective of their marital status or sexual orientation. Nurses and physicians are available on-site 24/7. During the pandemic, global H&S policy was enforced to ensure social distancing, reinforced cleaning and disinfection and deployment of work-from-home. TP Philippines changed the structure of its Health and Safety Committee to include a staff representative. The local TPVac campaign provides free vaccines against Covid-19 to all employees.
Living wage	The 10% lowest-paid employees earn on average 41% more than the local minimum wage in the Philippines, excluding bonuses and employee benefits. Language-skilled employees earn on average 43% more than the local individual living wage. ²
Global warming	Energy efficiency devices are being installed across operations, conversion to LED lighting, replacement of old electric units for more efficient ones, adoption of renewable energies. The monthly implementation of Earth Hour helped save 20,000 kWh in 9 months. Decrease of electricity consumption by -9% between 2020 and 2021.

¹ <https://www.hrw.org/world-report/2022/country-chapters/philippines>

² TP has partnered with Wage Indicator for the third year in a row to conduct an analysis to benchmark local TP salaries against the local living wage. Different from the minimum wage, the living wage is a higher standard corresponding to the minimum income necessary for a worker to comfortably meet their basic needs.



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



TPVac campaign provides free vaccines against Covid-19 to all employees



4 sites with 100% or partial renewable energy coverage throughout operations

Country risk mitigation

Colombia

With over 42,000 employees, Teleperformance is the largest employer in Colombia. The company focuses on creating quality jobs and providing inclusive opportunities for the local communities. 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 ¹	TP initiatives
Freedom of expression	A "Convenience Grievances Committee", composed of employee and employer representatives, meets on a regular basis to address daily issues in the workplace and any grievance. The COPASST, a committee composed of elected employee and employer representatives whose function is to promote and monitor the Occupational Health standards and programs within the company, meets at least each quarter to discuss health and safety matters.
Abuses against 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, an NGO that mobilizes the private sector on behalf of refugees, TP has implemented several initiatives to hire and retain refugees displaced by the crisis in Venezuela. As of December 31st, 2021, over 2,250 Venezuelan refugees had joined the Company. In addition to these measures, the Group provides administrative support, such as assistance in obtaining a work permit, thanks to the creation of a dedicated internal department.
Gender, Sexuality, and Gender-Based Violence	Several committees (CSR, TP Women, TP Pride, Sexual Harassment, Workplace Wellbeing) have been developed with the goal of improving and growing the group's inclusion policies as well social inversion programs for single mothers
Indigenous rights	A committee has been developed with the goal to invest in indigenous communities and promote equal job opportunities. In 2021, TP Colombia provided training on sustainable leadership to vulnerable communities impacting more than 3000 people including people who belong to indigenous communities. This project aims to achieve the successful implementation of local businesses ran by indigenous communities.
Living wage	Agents' salaries including bonuses are on average 110% higher than the local minimum wage. Language-skilled employees earn on average 87% more than the local individual living wage. ²
Climate Policy and impacts (forest destruction)	TP Colombia has planted more than 3,000 trees in 2021 and intends to plant 80,000 trees by 2023.
Global warming	Energy efficiency devices being installed across operations, adoption of renewable energies throughout operations. Emergency plan placed to mitigate possible wildfires.

¹ <https://www.hrw.org/world-report/2022/country-chapters/colombia>

² TP has partnered with Wage Indicator for the third year in a row to conduct an analysis to benchmark local TP salaries against the local living wage. Different from the minimum wage, the living wage is a higher standard corresponding to the minimum income necessary for a worker to comfortably meet their basic needs.



2,250 refugees
working at TP



**Best Workplaces
for Women**
certification



3,000 trees planted in
Colombia; goal for 2023 to
plant 80K

Country risk mitigation

United States

Teleperformance USA counts with more than 37,000 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 ¹	TP initiatives
Discrimination based on race	One of the five priority areas of TP’s DE&I approach is ethnicity. The aim is to increase ethnic and cultural diversity within teams and management positions and maintain an environment in which everyone is empowered to speak openly. 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.
Poverty and Inequality	In the United States, the average base salary of Teleperformance agents is 63% higher than the minimum wage and all employees are paid above the living wage. ² Employees earn on average 69% more than the local individual living wage. TP also aims to hire people living in poverty and refugees. Its partnership with the Salvation Army has enabled Teleperformance to hire homeless people, while its work with the Idaho Office for Refugees has led to the hiring of refugees from countries at war. In cooperation with Feed the Children, TP regularly participates in campaigns to support disadvantaged communities or victims of natural disasters. In 2021, TP USA raised €3.4M as part of the philanthropic COTW program.
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.
Climate Policy	Implementation of Energy Management System. Energy efficiency measures as well as green power sourcing alternatives are being developed.

¹ <https://www.hrw.org/world-report/2022/country-chapters/united-states>

² TP has partnered with Wage Indicator for the third year in a row to conduct an analysis to benchmark local TP salaries against the local living wage. Different from the minimum wage, the living wage is a higher standard corresponding to the minimum income necessary for a worker to comfortably meet their basic needs.



2,400+ employees formerly living in poverty were working at TP at the end of 2021



3.4 M€ donations as part of the COTW program



Implementation of an **Energy Management System** to optimize resource consumption



VIGILANCE PLAN GOVERNANCE AND MONITORING

Grievance mechanism, monitoring system,
governance, implementation report



UNIVERSAL
REGISTRATION
DOCUMENT
2021

To know more:

- Section 1.2.4.4 - *Whistleblowing and grievance mechanisms*
- Section 2.3.6.1 – *Social dialog*
- Section 2.4.2.1 - *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).

In 2021, the hotline recorded 1,460 alerts, of which 44 (3%) were well within the purview of the GEH. In most cases, the remaining alerts were HR matters that were forwarded to the relevant departments. Of the legitimate reports made via the GEH, 73% involved potential workplace misconduct, 16% business ethics, 9% suspected fraud and 2% misuse or misappropriation. On average, alerts reported through the GEH were resolved within 37 days.

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".

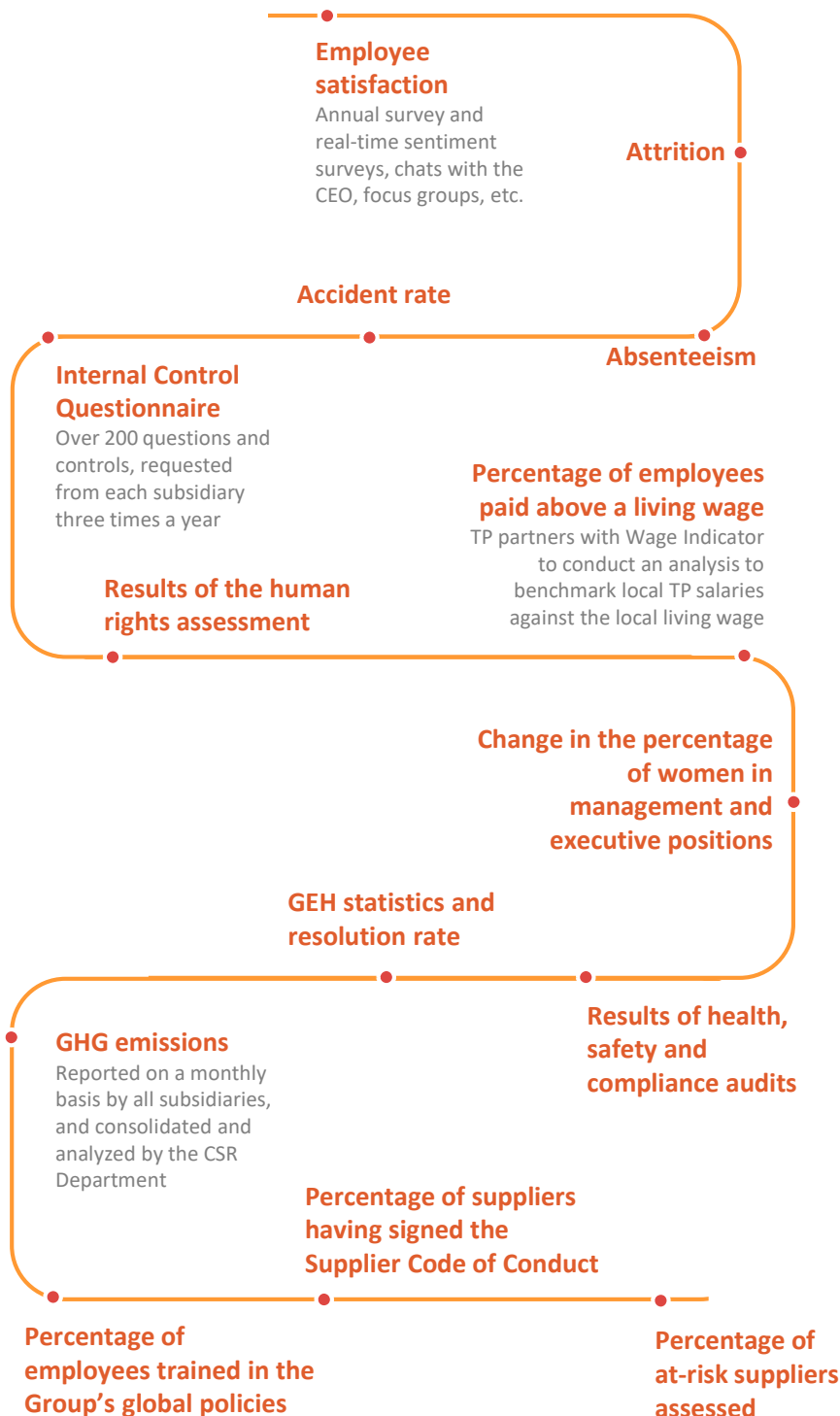


To know more:

- Section 1.2.3 – Risk management and internal control procedures
- Section 1.2.4.5 – System for monitoring measures in place
- Section 2.2.2 – Commitments and targets
- Section 2.2.3 – Non-financial performance indicators

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 2021 Integrated Report and in the Universal Registration Document at section 2.2.3.**

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

Human Rights	2019	2020	2021	Target	SDGS
Employees working at a subsidiary certified as best employer	70%	87%	98%	Maintain more than 90%	
Internal promotion rate (from supervisor)	69%	68%	71%	Internal mobility at all levels	
Human rights assessment average score	N/A	87%	91%	Maintain above 86%	
Percentage of women in the Group's Executive Committee	13%	25%	25%	30% by 2023	
Employees trained on Code of Conduct	84%	86%	97%	> 90%	
Footprint where Global Ethics Hotline has been rolled out	98%	100%	100%	100%	
Employees trained on Privacy and Data security	75%	87%	97%	> 90%	
Donations raised by Citizen of the World (€M)	4.9	5.1	6.3	More than €5m annually	
Health & Safety	2019	2020	2021	Target	SDGS
Employees trained on Health & Safety policy	75%	76%	95%	> 90%	
Accident frequency rate (including commuting)	N/A	2.9	1.4		
Average absenteeism	4.6%	5.2%	3.9%		
Number of location audited on H&S	> 300	> 300	> 300	> 300	
Environment	2019	2020	2021	Target	SDGS
Scopes 1 & 2 GHG emissions per FTE* (tons CO2e)	0.756	0.476	0.425	-49% per FTE from 2019 to 2026	
Share of Renewable energy out of total electricity consumption	11% (estimated)	17%	21%	25% by 2023, 30% by 2026	
Scope 3 GHG emissions - purchased goods & services and commuting per FTE* (tons CO2e)	1.311	0.774	0.633	-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 2021 Vigilance Plan was presented to the Group's Executive Committee and the Board of Directors' CSR Committee on February 15th, 2022.



VIGILANCE PLAN IMPLEMENTATION REPORT 2020/2021

The report below summarizes the measures taken in 2020/2021 under the duty of vigilance law:

- **continued improvement of CSR risk mapping**, especially regarding Human Rights and the environment;
- **enhanced employee listening and dialog channels**, and strengthened social dialog in key subsidiaries in response to the health crisis;
- **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;
- **overhaul of the CSR and ethics & compliance training module** delivered to all new hires;
- **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.

Teleperformance is **committed to a continual improvement approach** and has already listed some of its upcoming priorities for 2022:

CSR risk mapping and materiality matrix update

through stakeholder consultation at global level and in all key countries

Ongoing incorporation of non-financial risks at global level

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

Repetition of the human rights assessment

prioritizing high risk countries

Global expansion of new tools

such as the new supplier due diligence process and CSR assessment

