



Teleperformance Vigilance Plan

September 2019



2019 Vigilance Plan

In accordance with Article L.225-102-4 of the French Commercial Code, the vigilance plan (the “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 an enhancement of the Group’s Vigilance Plan published in 2018 and is based on the five main obligations set out in the 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 employs approximately 300,000 people in approximately 80 countries and therefore carries on its business in a wide range of complex economic and socio-cultural environments liable to generate risks that fall within the scope of the Vigilance Plan.

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.

Our Genetic

Cosmos
Integrity
I say what I do,
I do what I say.



Earth
Respect
I treat others
with kindness
and empathy.



Metal
Professionalism
I do things right the
very first time.



Air
Innovation
I create and
improve.



Fire
Commitment
I’m passionate and
engaged.



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

The 2019 Vigilance Plan was presented to the Global Corporate Social Responsibility (CSR) Committee and to the Group's Executive Committee in September 2019.

In addition to its commitment to comply with applicable laws and regulations in each of the Group's operating countries to safeguard the objectives of the Group and the Vigilance Plan, in 2011 Teleperformance joined the United Nations Global Compact, thereby committing to abide by the principles of the Universal Declaration of Human Rights.

The Vigilance Plan covers three main areas:

- Human Rights
- Health and Safety
- The Environment

Stakeholder dialogues were conducted in all our main subsidiaries to capture stakeholders' key expectations and to identify and prioritize risks. This consultation process, conducted in a structured approach and coordinated by the global CSR Department, was used to build the Materiality Analysis and the global CSR roadmap for the coming years. It included, among other topics, areas covered by the duty of vigilance (Human Rights, Health and Safety, Environment).

As part of the Vigilance Plan, several tools and procedures had already been introduced Group-wide, and certain information about them are described in the Teleperformance Registration Document. Other tools and procedures have been added and/or enhanced in 2018/19 in order to meet new regulatory requirements and to provide for the Group's new consolidation scope. Those will be detailed in the Vigilance Plan. More additions and enhancements will be made in the future as part of our continual improvement process.

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1. Risk Identification and Mapping

Identifying, analyzing, measuring and processing risk is the responsibility of the Group's three main departments: Finance, Legal & Compliance, and Operations, at the Group level and at the individual company level. This organization provides the framework for the risk management scheme.

This management scheme stems from the interaction of the three main departments with senior management, the Audit and Compliance Committee of the Teleperformance Board of Directors, and the functional and operational departments, which perform day-to-day management of the risks within their respective areas of responsibility.

This interaction under the risk management scheme is embodied, among other things, in joint exercises involving the main departments.

In 2018, this work related to compliance and protection topics such as:

- cross-functional review of the legal, operational and security-related aspects of the Group sites;
- mapping risks of corruption; and
- instituting a crisis-management plan.

In 2019, the Group continued its improvement process of risk identification and mapping:

- generalizing and formalizing risk mapping based on its internal control self-assessment scheme, deployed to all its subsidiaries;
- CSR risk mapping, including Human Rights, International Labor Standards, Health and Safety, Ethics and Compliance, Corporate Governance, Environment, Value Chain and Communities; and
- Conducting a Materiality Analysis and identifying CSR priorities via consultation with key internal and external stakeholders in the Group's main countries and regions of operations.

CSR Risk Mapping:

Teleperformance has completed an exhaustive CSR Risk Mapping, including Human Rights, International Labor Standards, Health and Safety, Ethics and Compliance, Corporate Governance, Environment, Value Chain and Communities.

To prepare the list of CSR issues to be submitted to stakeholders, Teleperformance considered:

- international standards (ISO 26000, UN Global Compact, GRI 4);
- sectorial benchmarks and media monitoring; and
- analysis of existing internal documentation.

The risk mapping was performed through consultation with 23 executives, representing all Group business functions (Legal & Compliance, Human Resources, Operations, Information Security, Business Development, Client Management, Finance, and Risk Management) and all key regions and countries (with a specific focus on our largest operations in EMEA, India, the Philippines, the United States, Mexico, Colombia and Brazil).

The results of the Annual Employee Satisfaction Survey (E-Sat) were also incorporated into the risk analysis. The 2018 E-Sat was completed by 118,509 employees from 68 subsidiaries and 47 countries).

Mapping below shows the risks associated with the main areas of the duty of vigilance:



Note that in Health & Safety and Security, Security relates to physical security.

1.1 Risks of serious harm to human rights and fundamental freedoms

Throughout the Group, Teleperformance strives to uphold the principles related to fundamental labor rights, in particular:

- For its employees:
 - non-discrimination in respect of employment and occupation (hiring, training, promotion, etc.);
 - prohibition and elimination of all forms of forced or compulsory labor; and
 - upholding freedom of association and the right to collective bargaining.

- For its employees, clients and their customers:
 - personal data security
 - Teleperformance received approval of its Binding Corporate Rules (BCRs), both as a data controller and a data processor, from the CNIL (French data protection authority), making it the first company in the industry to attain this critical data protection compliance status in the European Union; and
 - The Group is fully compliant with international standards such as ISO 27001 and the PCI (Payment Card Industry) and HIPAA (Health Insurance Portability & Accountability Act) standards.

1.2 Risks of serious harm to health and safety

Risks to health and safety can materialize at any stage of the value chain. Among the potential victims of health and safety risks, the Group includes its employees at their place of work, Group clients and their customers. Teleperformance has identified the following main health and safety risks:

- For its employees:
 - occupational safety; and
 - eliminating the risks of industrial accidents and occupational illness.

1.3 Risks of serious harm to the environment

Teleperformance's business activity is non-polluting. The risks of serious harm to the environment are mainly linked to excessive consumption of resources (water, electricity, paper, etc.).

Teleperformance's global Environmental Policy and the practical implementation of that Policy are designed to continually decrease the Group's carbon footprint per employee by improving facilities to create sustainable sites, striving for paperless environments, recycling, and incentivizing energy improvements.

Teleperformance has been engaged in the fight against climate change for over a decade. In 2008, the Group's CEO launched a global environmental initiative "Citizen of the Planet", aimed at ensuring that Teleperformance operates in an environmentally friendly and responsible manner.

Teleperformance is committed to minimizing negative environmental impacts. In 2018, the Group's carbon footprint was 0.712 tons per employee, a decrease of -7.7% vs 2017.

Teleperformance also seeks to foster awareness among all its employees and encourages them to adopt a set of environmentally-friendly behaviors at the workplace (reducing energy and paper consumption, etc.) and while performing their work duties outside the company (minimizing air travel, using public transport, etc.).

The Vigilance Plan will focus on more salient areas of risks, and as such will not detail Teleperformance's mitigation and monitoring processes for preventing climate change and reducing GHG emissions. For more information on Teleperformance's Environmental Policy and commitments, please refer to the 2018 Registration Document, p.68-72

http://www.teleperformanceinvestorrelations.com/media/4515888/tele_ddr_2018_uk-final.pdf

1.4 Risks of CSR breaches in the value chain

The behavior expected of 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.

Materiality Analysis:

The CSR Risk Mapping was then enhanced by a Materiality Analysis, where the Group engaged in a structured consultation of key stakeholders in its main regions and countries of operations during Q2/2019.

Teleperformance consulted more than fifty stakeholders, including:

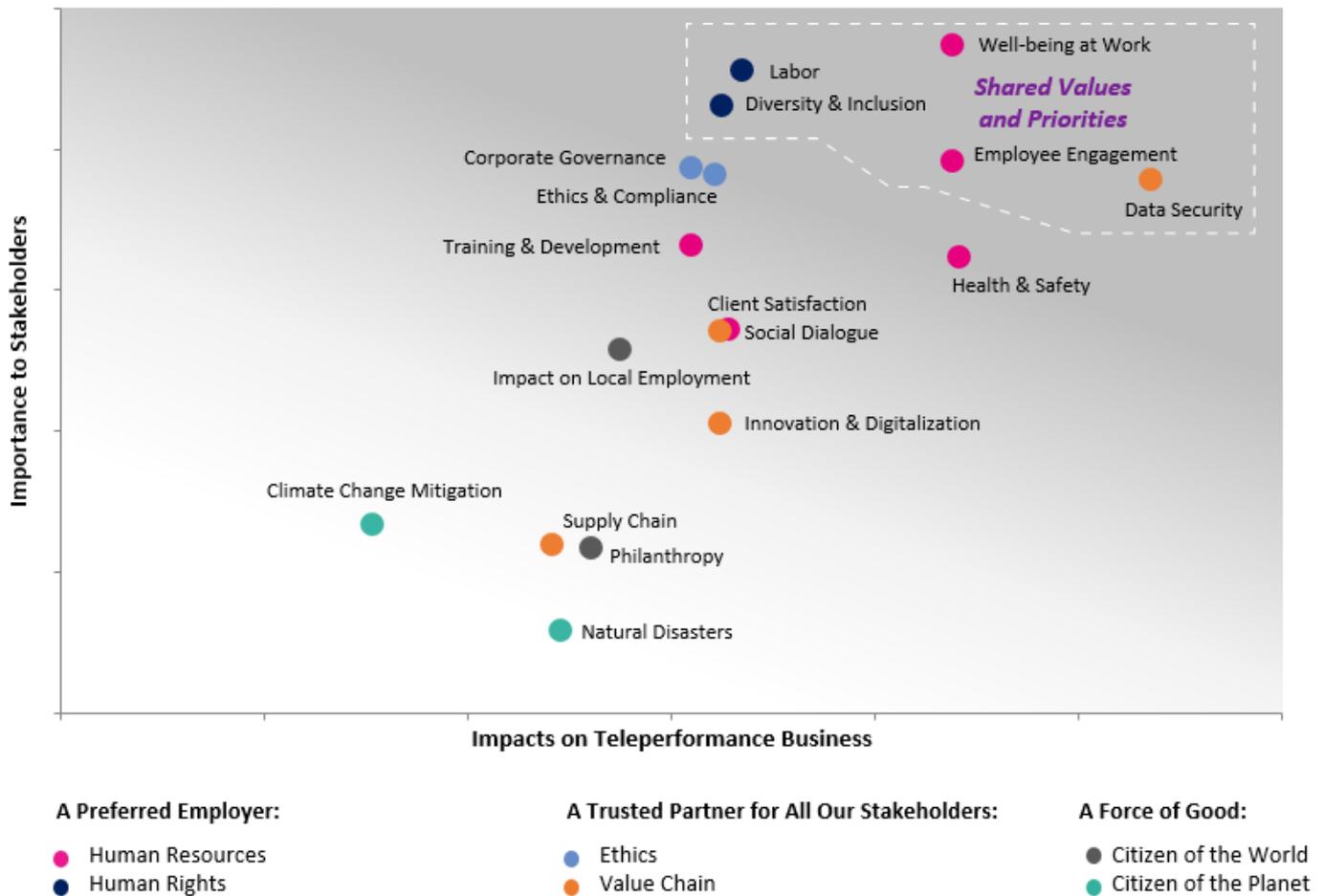
- employee representatives;
- a sample of our largest clients;
- suppliers;
- public administrations;
- advocacy groups; and
- certification/audit entities.

In 2019, Teleperformance chose to involve mainly employee representatives – more than 50% of the panel – and to prioritize dialogue with our employees for the first year of the assessment.

Teleperformance reached out to stakeholders representative of the Group's larger operations: EMEA, India, the Philippines, the United States, Mexico, Colombia, Brazil.

The consultation was carried out through interviews by the Group's Corporate Social Responsibility Department, with the support of local teams.

KPMG, mandated as the Group's independent third party for the verification of non-financial information, confirmed that the Materiality Analysis performed by Teleperformance was conducted in accordance with the methodological note established under the responsibility of Teleperformance's CSR direction, and delivered an agreed-upon procedures report regarding this subject in accordance with ISRS 4400.



The priority areas highlighted in the Materiality Analysis are subject to specific action plans and initiatives to improve, mitigate and monitor the associated risks. These action plans and initiatives have been integrated into the Group's strategic objectives. As further demonstration of the importance of these priorities, our Executive Officers' incentive remuneration is tied to the Group's performance in these areas.

2. Risk assessment procedures

• Subsidiaries

The Group has established procedures for assessing risks at its subsidiaries' level. These procedures are conducted by Group teams or in consultation with external organizations in order to identify and prevent risks of serious harm to human rights, fundamental freedoms, and health and safety.

All our sites are extensively controlled, visited and audited. They do not operate in silos, but on the contrary are closely managed following the Group's global values, global operating standards and global policies.

Global operating standards span the full operations cycle from:

- the way we hire employees (BEST* Recruitment – BEST R&S);
- the way we train and promote (BEST* Training & Development – BEST T&D);
- the way we operate:
 - Global Premises Standard: Since 2009, Teleperformance has deployed a Global Premises Standard which provides blueprints and detailed guidance on lighting, acoustics, IT and Security, safety, proximity and hands-on-management, sustainable development, and employee well-being in all areas of its sites. A dedicated team supports the creation and enhancement of the Group's facilities around the world. Moreover, they are responsible for continual auditing and analysis of our sites and putting appropriate action plans in place to guarantee global consistency and ensure employees' well-being in all Teleperformance facilities.
 - TOPS (Teleperformance Operational Processes and Standards): TOPS are processes used to manage daily performance. The TOPS processes 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. TOPS allows for improved quality control, and has been rolled out in all Group subsidiaries. The process is backed by the Group's integrated software suite for service management (CCMS). TOPS provides a reference framework for Teleperformance that is tailored to its operations.

- BEST* Workforce Management – BEST WFM

**BEST stands for Baseline Enterprise Standard for Teleperformance. BEST are qualitative standard manuals guaranteeing high-end service quality, high performance rates and proactive management of existing and future programs. BEST also serves to reinforce best practices in human resources management and projects for all Teleperformance operations worldwide.*

Teleperformance has numerous mechanisms of controls, which are continually enhanced:

- Internal Audits
 - In 2019, the Internal Audit Department, together with the Compliance Department, conducted a review of compliance of the Group's sites with the local regulations concerning health and safety measures.
- Security & Compliance Audits:
 - Site audits (including health and safety conditions and matters under the GDPR and Sapin II) are performed on a rotating 24-month schedule, or annually for high risk sites or those that received a low audit score. In 2018, the Security and Compliance team performed 180 site audits and 215 client contract reviews.
- Operational / Process Audits: each subsidiary is required to perform a self-assessment twice yearly for TOPS, BEST R&S, BEST T&D, BEST QA, BEST AM & BEST WFM. Corporate audits are then performed to certify the subsidiaries in the individual processes.

- Internal Control Questionnaire (ICQ)
 - Each Group subsidiary is required to respond and certify three times a year to the ICQ, which contains over 200 questions and controls. The results are reported to the Audit and Compliance Committee of the Teleperformance Board of Directors.
 - The ICQ results are formalized into a risk mapping, which is deployed to all Group subsidiaries.

- A large set of indicators from the audits and controls are reviewed on a monthly or quarterly basis by the Group’s Executive Committee and the senior management of the Group subsidiaries.

- Health & Safety site inspections, which are conducted by each subsidiary on a monthly basis and, as appropriate, by the Group Compliance Department.

- Health & Safety Risk Assessments: each subsidiary is required to conduct an annual Health & Safety Risk Assessment for each of its sites, following the Group’s Health & Safety Policy and guidelines. Each subsidiary must systematically check for physical and mental risks, as well as possible chemical and biological hazards. Furthermore, whenever a major change in business occurs, a new assessment must be done. A risk assessment score above a certain level (scales vary from country to country) requires implementation of an action plan to mitigate the risk within a clearly defined time frame. Local H&S assessments are evaluated by the Group’s Health & Safety team.

- WARM visits (on-site visits and in-depth operational reviews with local management) are conducted annually by the Group’s Executive Management team.

- “Chats with CEO” and focus groups are organized and conducted at each site by local management (i.e., in the Philippines, Colombia, etc.)

- Employee Satisfaction Survey (E-Sat): since 2008, Teleperformance has measured employee satisfaction via the E-Sat. The aim of the survey is to gain a better understanding of how employees view the Group's business activity and their contributions to it. The survey is conducted by a team focused on continually improving the methods and processes used, as well as on the results obtained. By giving employees a chance to express their expectations and potential criticisms, E-Sat helps to improve working conditions and foster job satisfaction. Accordingly, based upon E-Sat results, action and improvement plans are drawn up, implemented and monitored in each subsidiary under the responsibility of the local HR director. In order to ensure continual improvement of these plans, progress on each project is monitored on a monthly basis by a dedicated global team.
- HR Assessments: when the Group identifies a decrease in employee satisfaction or in overall performance, an independent global team, responsible for Employee Engagement, performs a thorough on-site assessment reviewing all Human Resources processes and Human Rights aspects, via data collection, employee interviews and focus groups. The results are presented to the local site and subsidiary leadership team and lead to action plans to improve identified impact areas. The progress toward objectives is monitored regularly by this independent global team.

In addition to these internal control mechanisms, Teleperformance's sites are also visited, audited, evaluated and/or certified by numerous external stakeholders.

- Certification processes:
 - Verego awarded Teleperformance the Enterprise-Wide Social Responsibility Standard (SRS) Certification Award for the 5th consecutive year. This certification provides a comprehensive framework for ensuring the effective management of corporate responsibility initiatives. The Verego SRS Certification Award is given to companies that excel in terms of policies and practices in five key

areas, including leadership, ethics, people, community, and the environment. Teleperformance achieved certification in all five defined areas of the Verego SRS Standard at a Group-wide scope to include all its global sites.

- Teleperformance applies for and obtains certifications as a Best Employer in many of its subsidiaries, representing 70% of its workforce.

These extensive certification processes are the outcome of an employee survey (*an additional way to capture the voice of TP employees*) and a data collection process conducted by the external stakeholder.

- In 2018, Teleperformance received 10 “Great Place to Work” awards in China, India, Philippines, Brazil, Mexico (2 subsidiaries), El Salvador, Colombia, Dominican Republic, Portugal
 - 7 subsidiaries were recognized as « Global Best Employers™ Program » by A.On Hewitt (Albania, Guyana, India, Lithuania, Morocco, Tunisia, Lebanon TLS)
 - 4 subsidiaries recognized as « Best Place to Work® » (Albania, Morocco, Tunisia, Lebanon)
- Audits and evaluations from local public administrations, independent third parties and employee representatives. For example:
 - In the Philippines, the Department of Labor and Employment (DOLE) does annual (or more frequent) on-site inspections in all TP Philippines’ 21 sites. TP Philippines also receives ad-hoc inspections from the Bureau of Fire Protection, Bureau of Immigration and the Philippine Economic Zone Authority. TP Philippines is an active member of professional, non-profit organizations like People Management Association of the Philippines (PMAP), Contact Center Association of the Philippines (CCAP) and Information Technology and Business Process Association of the Philippines (IBPAP). These

organizations share best practices and thought leadership among their entire membership.

- In India, Teleperformance is audited by the Government Labor Department for compliance with labor laws on an annual basis. Local fire safety authorities perform fire safety inspection on an annual basis. Teleperformance India is audited once a year by an independent third-party consultant for compliance with applicable labor laws. This consultant also audits the manpower agencies supplying services to Teleperformance India. Ten of Teleperformance India's sites are certified ISO 14001 (Environment management system) and OHSAS 18001 (Health & Safety management system).
- In Mexico, the "*Secretaria de Trabajo y Previsión Social*" (Mexican Labor Board) audits TP sites on labor conditions on a bi-annual basis, according to the Mexican Federal Law. The Mexican "*Protección Civil*" (Fire Department) audits health & safety matters annually.
- In Colombia, the Ministry of Labor audits the overtime legal compliance twice a year, and audits compliance with minimum wage and labor and general conditions once a year. The independent third-party Bureau Veritas audits TP Colombia's health management system on an annual basis. Deloitte audits employee benefits on a monthly basis and payroll twice a year. The COPASST ("*Comité Paritario de Seguridad y Salud en el Trabajo*"), a committee composed of 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.
A "Convenience Grievances Committee", composed of employee and employer representatives, meets on a regular basis to address any grievance.
- In El Salvador, the Ministry of Labor audits employee contracts and health & safety management on an annual basis, and audits

minimum wage compliance twice a year. The Ministry of Health audits overall health conditions on a quarterly basis.

- In Costa Rica, employee benefits are randomly audited by the “*Ministerio de Trabajo y Seguridad Social*” (Department of Labor and Social Welfare). Health & safety matters are randomly audited by the “*Comisión Nacional de Emergencia*” (National emergency committee).
 - In the Dominican Republic, the Ministry of Labor audits compliance with health & safety regulations on an annual basis. Additionally, the Ministry of Labor performs ad-hoc audits following any employee complaints. Teleperformance Dominican Republic meets monthly with its employee representatives (Sitratel and UniGlobal) to discuss any employee concerns. Teleperformance Dominican Republic also organizes monthly meetings with its local Health & Safety Committee to discuss any findings in the premises and establish action items to correct. Union members are part of the Teleperformance Dominican Republic Health & Safety Committee.
- Prospects and clients site visits and/or audits: clients and prospective clients routinely visit Group sites and frequently conduct client audits.

● Subcontractors and suppliers

Based on the CSR Risk Mapping and Materiality Matrix, the risks related to Teleperformance’s supply chain are not the most important risks of the Group.

Procurement spend accounts for ~5% of the Group’s total revenue. The top Group suppliers are mainly temporary employment agencies, IT hardware and software suppliers, and telecommunications providers.

Teleperformance has been working on standardizing the Procurement processes and the Supplier assessment and selection process globally:

- In 2019, risks related to the supply chain were incorporated into the Internal Control Questionnaire.
- The Group will launch a new global Supplier Code of Conduct in Fall 2019, replacing the existing Supplier Policy.
This Code includes the Group's updated requirements in terms of human rights and fair labor conditions, health and safety, environmental responsibility, business ethics and integrity (including anti-corruption), and GDPR compliance.
All suppliers will be asked to adhere to this Code, and it will form part of all new Group contracts beginning in 2020.
- The Group will also launch a revised global Internal Procurement Policy in Fall 2019, applying to all TP employees ordering goods and services.
This Policy details the procurement governance and processes to source, perform due diligence (including CSR), buy, deliver, and control goods and services procured by the Group.

The Group is committed to exercising vigilance in identifying potential adverse impacts in its supply chain, whether direct or indirect, of its business in order to prevent and, if identified, minimize such impacts. The Group asks each of its subsidiaries to work with suppliers and subcontractors that agree to comply with the Group's requirements in this area and who abide by the Supplier Code of Conduct.

Suppliers and subcontractors are periodically assessed, at the subsidiary level, in accordance with the precepts of the Group Supplier Code of Conduct and Internal Procurement Policy.

Teleperformance has created Purchasing Committees at the Group, regional and local levels to make sure the Group's global policies and procedures are applied consistently.

3. Mitigating risks and preventing serious harm

Teleperformance has introduced measures to mitigate risks and prevent serious harm that are tailored to different circumstances. These measures are deployed at the Group and subsidiary levels, as well as with suppliers and other stakeholders. They are adapted in accordance with changing circumstances or risks identified in accordance with audit findings and messages reported via the various hotlines already set up or undergoing deployment.

As a Group that operates in approximately 80 countries and is acutely aware of the diversity of socio-cultural environments within which it operates, Teleperformance promotes respect for all internationally- recognized human rights and fundamental freedoms.

Teleperformance'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.

Teleperformance has developed global standards and processes to ensure the Group complies with the ten principles of the UN Global Compact and with international labor standards in all its subsidiaries.

These consist primarily of the following **codes and policies**:

- Code of Ethics
- Code of Conduct, including anti-corruption and anti-influence peddling, which was launched in May 2018, replacing the previous Anti-Corruption Policy
- Human Rights Statement
- Diversity & Inclusion Policy launched in March 2019, replacing the previous Equal Opportunity Policy
- Privacy Policy
- Global Essential Compliance and Security Policies, updated in May 2018
- Health and Safety Policy, updated in August 2019
- Environmental Policy
- Supplier Code of Conduct and Internal Procurement Policy to be launched in Fall 2019, replacing and enhancing the previous Supplier Policy.

Teleperformance has continued to invest significantly to verify the due application and continual improvement of the Group's global policies and Vigilance Plan.

Training sessions:

- As part of the Group onboarding process, all new employees receive training in CSR, Security & Compliance (including GDPR compliance), and Health & Safety.
- All Group employees attended at least one Teleperformance safety standards training course in 2018. As part of a drive to improve the Group's safety culture, access to online safety training was extended and more than 17,000 managers completed additional training.
- The Group has developed a comprehensive training module on the Code of Conduct, including anti-corruption, provided to senior managers and employees.
- The Group has appointed local CSR correspondents in each subsidiary, responsible to liaise with the Global CSR Department. All local CSR correspondents must complete a mandatory learning path, which includes knowledge of the ten principles of the UN Global Compact and training on their mission and responsibilities.

Internal reporting system and indicators for monitoring the implementation of measures in place, including the following:

- Employee and customer satisfaction surveys
- % of employees trained on the global policies
- Reporting and monitoring of employee grievances
- Internal Control Questionnaire three times per year
- Regular health and safety, compliance and security audits

Creation of a crisis management unit

In 2018, Teleperformance instituted a Group-wide crisis management scheme to anticipate and manage major sudden and unforeseen events with a likely negative impact on staff, the continuity of the Group's operations, financial results or reputation.

This scheme is based on:

- a manual containing all the procedures and rules associated with crisis management: alert reporting, the composition of the crisis management unit, the unit's operating rules, the dedicated communication tools for crisis management;

- a training program for staff and managers;
- regular crisis exercises contributing to fostering awareness among staff and managers of the features specific to crisis management and continual improvement of the scheme.

Periodic audits

Discussion with stakeholders and implementation of corrective or adaptive measures based on their feedback

A dedicated **governance structure** was set up to ensure the success of these programs and objectives.

HUMAN RESOURCES

In 2018, the Group appointed a Chief Administrative Officer, whose responsibilities primarily include Human Resources, Group Shared Services, Group Learning and Development, and Global Compliance, Privacy and Security. The Chief Administrative Officer reports to the Group Chairman and Chief Executive Officer and the Group Chief Legal and Compliance Officer. He assesses the results obtained in connection with the Vigilance Plan and reports to the Audit & Compliance Committee of the Teleperformance Board of Directors on progress with respect to all measures under his purview.

- The global Human Resources Department has been strengthened around a global HR Committee, as well as regional heads in charge of implementing and monitoring the local application of global policies and standards.
- A global department, reporting to the Chief Administrative Officer, is dedicated to developing global programs focusing on Employee Engagement and Well-being and monitoring their implementation. They work with a network of Employee Engagement Directors and coordinators in each subsidiary.

CORPORATE SOCIAL RESPONSIBILITY

- **Global CSR Department:** In January 2019, the Group appointed a Corporate Social Responsibility (CSR) Director, under the direct supervision of the Group's Deputy CEO. The CSR Director's mission, together with her team, is to coordinate the Group's CSR strategy, harmonize the various CSR initiatives and closely monitor the entire CSR program.
- The global CSR Department works with a network of local CSR correspondents, appointed in each subsidiary. Local CSR correspondents

have the day-to-day responsibility to act as a link between the global CSR Department and the local companies, to ensure that the Group CSR policies are implemented at a local level and to track and report relevant CSR matters and indicators. The CSR correspondents carry out the instructions from the CSR Director, who is responsible for making sure Teleperformance's business practices are aligned with the 10 principles of the UN Global Compact and the Vigilance Plan.

- Additionally, a global CSR Committee gathers at least 4 times a year to validate the CSR strategy, review progress on the CSR global roadmap and coordinate cross-department projects. This committee is comprised of key support functions and specialists in their respective fields (CSR, HR, Legal & Compliance, Finance, Communication).

COMPLIANCE, PRIVACY & SECURITY

- The Compliance, Privacy & Security teams report to the Chief Administrative Officer & Deputy Chief Compliance Officer, who has a dotted line reporting relationship to the Audit and Compliance Committee of the Teleperformance Board of Directors and a direct reporting relationship to the Group CEO.

4. Whistleblowing and grievance mechanisms

Teleperformance 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 breach relating to Human Rights and fundamental freedoms, Health and Safety of persons or the environment, Ethics, Corruption, or Fraud.

The Global Ethics Hotline is now live in 38 countries and will be rolled-out in remaining countries by the end of 2019 (in some countries, the process is subject to consultation with employee representatives).

Prior to launch, the Global Ethics Hotline was submitted to local employee representatives and unions in any country where the law required it.

The Global Ethics Hotline Policy is publicly available on the Teleperformance website.

As part of our continual improvement process, the Global Ethics Hotline will be assessed in Q3/2019 by an external CSR expert.

Additionally, the Teleperformance Human Resources grievance mechanism, which enables any employee to report on issues related to Human Resources (hiring, training, payroll, staff/manager relations, etc.), has been assessed by an external expert, CSR Europe. As part of this assessment, Teleperformance's grievance mechanism was benchmarked against the 8 effectiveness criteria outlined by the UN Guiding Principles on Business and Human Rights (UNGPs) and against company peers from a number of sectors. The UNGP 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 dialogue. Teleperformance's score was above average overall, and best in class in several criteria, such as predictable and a source of continuous learning. CSR Europe is the leading European business network for Corporate Sustainability and Responsibility. With their corporate members and National CSR organizations, CSR Europe supports over 10,000 enterprises at local, European and global levels. Teleperformance's grievance mechanism is coordinated and monitored on a global basis by a dedicated global team, reporting to the Deputy Chief Compliance Officer.

5. System for monitoring measures in place

Teleperformance closely monitors a large number of indicators to evaluate the effectiveness of its policies. Some examples include:

- Employee satisfaction:
 - o Measured once a year through the annual Employee Satisfaction Survey.
 - o Survey results are analyzed by a dedicated team, communicated internally at the local, regional and Group level, and lead to specific action plans to improve weak spots. Actions plans are approved by the local leadership team, and progress is closely monitored.
 - o Teleperformance's Executive Officers' incentive remuneration is tied to the Employee Satisfaction score.
- Attrition
- Absenteeism

- Accident rate
- Internal Control Questionnaire (over 200 questions and controls, requested to each subsidiary three times a year)
- Global Ethics Hotline statistics and resolution rate
- GHG emissions, reported on a quarterly basis by all subsidiaries, and consolidated and analyzed by the Group's Finance Department
- % of employees trained on the Group's global policies

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.

In 2020, the Group plans to implement additional risk management measures, including a CSR self-assessment questionnaire to be completed by all subsidiaries. This questionnaire will integrate Teleperformance's main CSR risks, based on the CSR risk mapping, consultation with stakeholders, and Materiality Matrix, into the Group's internal control scheme.

2018/19 Vigilance plan implementation report

The report below summarizes the measures taken in 2018/19 under the duty of vigilance law:

- Completion of a CSR Risk Mapping
- Completion of a Corruption Risk Mapping
- Completion of a Materiality Analysis, involving external stakeholders in our main regions and countries (including consultation with employee representatives, clients, suppliers, public administrations, advocacy groups, NGOs)
- Establishment of an enhanced governance plan for CSR and Human Resources
- Re-launch of the Global CSR Committee, including key support functions and specialists in their respective fields (CSR, HR, Legal & Compliance, Finance, Communication)
- Presentation of CSR action plan to the Teleperformance Board of Directors and to the General Assembly of Shareholders
- Renewed adherence to the UN Global Compact
- Revision of global policies, aligned with the ten principles of the UN Global Compact: Code of Conduct, Diversity & Inclusion, Supplier Code of Conduct, Internal Procurement Policy, Health & Safety Policy
- Development of CSR and Ethics & Compliance training modules
- Launch and roll-out of the Global Ethics Hotline (whistleblowing mechanism). The Global Ethics Hotline is now live in 38 countries, 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 next priorities:

- Further integrating CSR risks into global risk mapping
- Developing a CSR self-assessment questionnaire to further monitor CSR compliance in all subsidiaries and integrate it into the Group's internal control scheme
- Standardizing the supplier due diligence process / CSR assessment on a global basis
- Having the Global Ethics Hotline (whistleblowing mechanism) assessed by an external CSR expert