

Code of Conduct

February 2024

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ABOUT TELEPERFORMANCE GROUP

Teleperformance (TEP – ISIN: FR0000051807 – Reuters: TEPRF.PA - Bloomberg: TEP FP), is a global leader in digital business services which consistently seeks to blend the best of advanced technology with human empathy to deliver enhanced customer care that is simpler, faster, and safer for the world’s biggest brands and their customers. The Group’s comprehensive, AI-powered service portfolio ranges from front-office customer care to back-office functions, including Trust and Safety services that help defend both online users and brand reputation. It also offers a range of specialized services such as collections, interpreting and localization, visa and consular services, and recruitment process outsourcing services. With nearly 500,000 inspired and passionate people who currently speak more than 300 languages, the Group’s global scale and local presence allows it to be a force of good in supporting communities, clients, and the environment. In 2022, Teleperformance reported consolidated revenue of €8,154 million (US\$8.6 billion, based on €1 = \$1.05) and net profit of €645 million.

Teleperformance shares are traded on the Euronext Paris market, Compartment A, and are eligible for the deferred settlement service. They are included in the following indices: CAC 40, STOXX 600, S&P Europe 350, MSCI Global Standard and Euronext Tech Leaders. In the area of corporate social responsibility, Teleperformance shares are included in the CAC 40 ESG since September 2022, the Euronext Vigeo Euro 120 index since 2015, the EURO STOXX 50 ESG index since 2020, the MSCI Europe ESG Leaders index since 2019, the FTSE4Good index since 2018 and the S&P Global 1200 ESG index since 2017.

Visit the Group at www.teleperformance.com

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Message from the Chairman and Chief Executive Officer



Dear Colleagues,

Integrity is one of Teleperformance's five core values, which -- along with Respect, Innovation, Professionalism and Commitment -- are the pillars of our corporate culture. At Teleperformance, each individual is responsible for acting with integrity at all times.

Our commitment to act with integrity means complying with the highest professional and ethical standards, as well as the spirit and the letter of the laws that govern our industry, our Group, and our operations. Conducting ourselves in an ethical manner and with integrity helps us earn the trust and respect of the people we serve and those with whom we work.

This Code of Conduct, which can also be found on the Group's intranet, is an essential resource for all Teleperformance colleagues. This Code of Conduct outlines Teleperformance's policies on business conduct and identifies the people who can answer any questions you might have about compliance-related issues. Please use it as a guide to help you make the right decisions and resolve any issues that may arise in connection with your professional duties. It has been designed as a resource to be used at all times throughout the year, and I encourage you to consult it regularly.

Our Code of Conduct cannot exist without us, the Teleperformance team. Continuous improvement and corrective action are an integral part of our Global Compliance Framework. If you have any questions or if you witness any inappropriate behavior, I strongly urge you to make use of the Ethics Hotline, our internal reporting system, to bring it to the attention of our Compliance Department.

Acting with integrity depends on each of us understanding and following the policies related to our standards for behavior. It is imperative that all of us at Teleperformance abide by the highest standards. We owe this to our clients, our partners, our shareholders, and ourselves. Let me thank all of you for your unfailing commitment to upholding the principles contained within this Code of Conduct and to promoting it both inside and outside the company.

Daniel Julien
Chairman and Chief Executive Officer

1. Introduction



Teleperformance SE (including all its subsidiaries, “Teleperformance” or the “Group”) adheres to the U.N. Global Compact, a United Nations initiative created to encourage companies to adopt a socially responsible attitude by committing to promote principles relating to human rights, international labor standards and anti-corruption, and to integrate those principles into their practices. It is a commitment that ensures that markets, business, technology, and finance operate for the benefit of economies and societies worldwide.

Teleperformance has made a formal commitment to combat all forms of corruption within the Group. In furtherance of that commitment, Teleperformance adopted this Code of Conduct.

This Code of Conduct contains the fundamental principles for assisting and guiding Teleperformance Workforce Members in respecting the laws and regulations that govern their activity. It forms part of the Global Compliance Framework adopted by the Group. It is appended to the Internal Regulations of each Teleperformance subsidiary, as applicable.

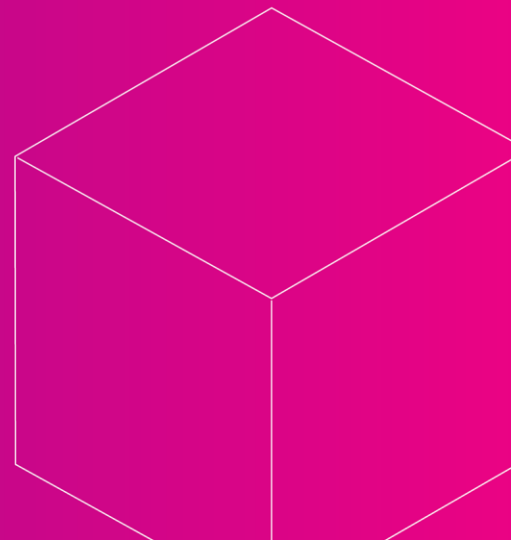
This Code of Conduct includes the Group’s Compliance policies regarding:

- Anti-money laundering
- Gifts, travel, and hospitality
- Donations, sponsorship, and philanthropy
- Political activities
- Facilitation payments
- Conflicts of interest



2. Overview of Teleperformance Global Compliance Program

- Overview of the Global Compliance Organization
- Presentation of the Organization
- Global Compliance Framework
- How to obtain information and answers
- How to forward suggestions.
- Definitions of Certain Terms used in this Code of Conduct
- Scope of application
- Compliance with Applicable Laws



Overview of the Global Compliance Organization

Presentation of the Organization

Teleperformance's Global Compliance Organization is a dedicated structure that stretches from senior management of the Group and the Audit, Risk and Compliance Committee of the Teleperformance SE Board of Directors to every level of the Group. This dedicated structure ensures that the policies and procedures of our Global Compliance Program are effectively and efficiently implemented Group-wide.

The Chief Legal and Compliance Officer provides reports and updates to senior management of Teleperformance and to the Audit, Risk and Compliance Committee of the Teleperformance SE Board of Directors. More information about the Global Compliance Organization can be found on the Group's intranet.



The Global Compliance Organization includes the following leaders:

- Chief Legal and Compliance Officer
- Chief Privacy Officer
- Chief Compliance Officer

Global Compliance Framework

The Global Compliance Framework encompasses Teleperformance’s compliance policies and procedures, including this Code of Conduct. The components of the Global Compliance Framework can be found on the Group’s intranet. The Chief Legal and Compliance Officer is responsible for the Group-wide implementation and monitoring of the Global Compliance Framework.

How to obtain information and answers; How to forward suggestions:

As a Workforce Member, if you have questions, need advice or have ideas or suggestions, you can raise these with your Local Contact.



Your Local Contact is one of the following people:

- Your manager
- Your contact in your local Human Resources Department or local Legal Department
- A member of the Compliance Department, including your Privacy & Regulatory Compliance Officer (PRCO)
- The Code Champions

Definitions of Certain Terms used in this Code of Conduct

Corruption is dishonest, unethical, or fraudulent conduct to obtain a benefit or for other improper purposes. It includes criminally sanctioned conduct in which an individual (the corrupted person) solicits, approves, or accepts a donation, offer, promise, gifts, or benefit of any kind in order to perform, delay or refrain from performing an act that directly or indirectly falls within the scope of his/her individual duties. The benefits may be financial but need not be exclusively financial.

Corruption may take various forms, ranging from influence peddling to Facilitation Payments to Bribery. The people involved may be government officials or private individuals such as clients, suppliers, or business partners. Acts of Corruption are sometimes facilitated by the use of commercial intermediaries in an attempt to hide them or conceal them from potential investigations.

Generally, there are **two types of Corruption**:



- **Active Corruption**, which consists of offering someone a benefit in order to influence a decision or decision-making mechanism or in exchange for a benefit (authorization, right, supply, business, contract, financial gain, etc.)



- **Passive Corruption**, which consists of accepting or receiving a benefit (usually money or service) in return for using one's influence to affect a decision. Passive Corruption is not necessarily solicited, but it may be and it may include practices as serious as Extortion.

Facilitation Payment is a form of Corruption in which money is paid, typically to a public or government official, to ensure the performance or acceleration of certain administrative formalities or processes.

Bribery is a common form of Corruption where cash or any other gift of value is offered to another person in return for a favorable decision or result, inaction, or delayed action.

Extortion means demanding undue recompense in return for the grant of business, a contract or authorization, by exerting pressure that may range from occasional or daily demands for money to physical threats against individuals and their family.

Tax evasion is the illegal non-payment or under payment of taxes, usually by deliberately making a false declaration or no declaration to tax authorities.

Scope of application

This Code of Conduct applies to all of Teleperformance's economic operations, at the local, national, regional and/or international level.

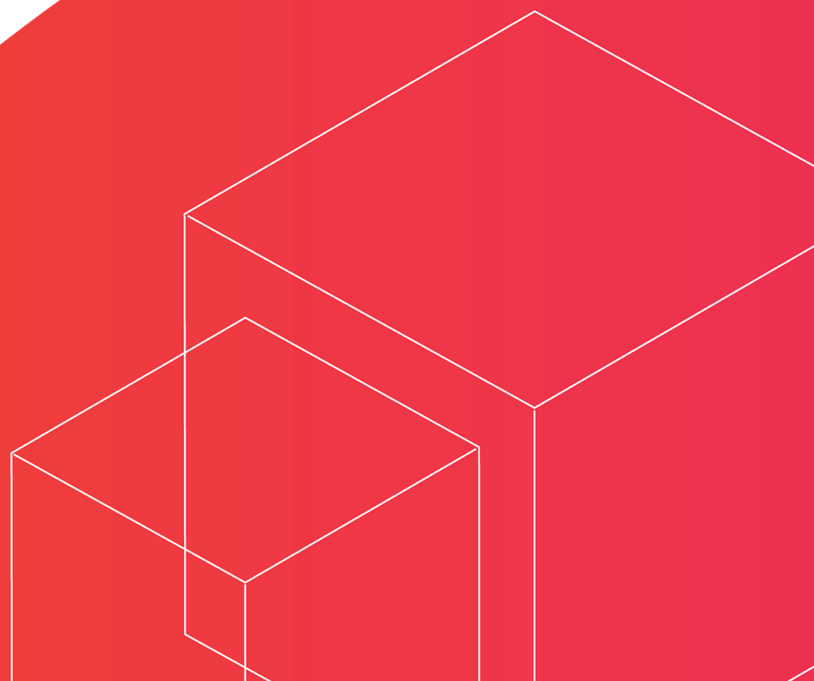


Compliance with law

Teleperformance Workforce Members must act in strict compliance with all laws applicable to them. In the event of employment or an assignment outside your country of residence, Workforce Members also must act in strict compliance with applicable domestic law in the location of their employment or assignment. In the event of confusion, lack of understanding, awareness, or doubt about the applicable law and/or its interpretation, Workforce Members must immediately consult with their Local Contact or their Privacy & Regulatory Compliance Officer or the Code Champions.

3. Principles of the Code of Conduct

- Anti-corruption
- Influence peddling
- Gifts, travel, and hospitality
- Donations, contributions, philanthropy, and sponsorship
- Political activities
- Conflicts of interest
- Anti-money laundering



Anti-corruption

Teleperformance, has a zero tolerance towards all acts of Corruption, Bribery or Extortion in any form.

As a global company, Teleperformance must comply with all applicable laws relating to Corruption, Bribery, and illegal payments, including the US Foreign Corrupt Practices Act, the UK Bribery Act, the French anti-corruption law known as Sapin II, and other similar anti-corruption laws in the jurisdictions where we do business. These laws generally prohibit the bribery of government officials and private individuals in the conduct of their duties. They also require that Teleperformance keep appropriate books and records, and they establish criminal and civil penalties for violations. We must always conduct Teleperformance's business in accordance with these laws.

Teleperformance Workforce Members shall not offer or accept bribes or any other kind of improper payment, including Facilitation Payments. In addition, Teleperformance employees shall not provide or accept other objects of value such as gifts, loans, discounts, or excessive hospitality expenses, or use the Group's funds to influence a decision under any circumstances. This concerns, among others, suppliers, clients, competitors, public authority representatives, political parties, individuals with political exposure, etc.

Teleperformance Workforce Members must refrain from offering, giving, promising, or soliciting, either directly or through a third party, any payment or supply of services, gifts, hospitality, or other benefits to obtain or retain business or a competitive advantage. In addition, Teleperformance Workforce Members shall not perform any act through a third party that they are not authorized to perform directly. These rules apply to transactions and interactions with government officials, companies, and private individuals.

HOW TO BEHAVE

Before entering into a relationship with a business partner, supplier or other third party, you must ensure that the appropriate financial and other due diligence has been conducted on that person or entity. Before engaging with a business partner, supplier or other third party, please contact your local Legal Department or Privacy & Regulatory Compliance Officer for guidance if you are unsure as to the appropriate procedures you must follow.

Examples

I have been told that hiring a local “consultant” could help us get all the necessary permits we need from a foreign government. This consultant requested a large retainer and said that he would use the money to “help move the process along”. Can I advance this retainer? Who should I contact?

No. You must not pay any retainer or any other sum until you have made sure that no improper payments are being made and you know exactly what services are being provided. You must consult with Teleperformance senior management.

I am responsible for setting up new offices and the local authorities have requested a payment before installing our phone lines. What should I do?

You must not make this payment unless it corresponds to legitimate fees relating to phone line installation.

Payments must not be made to intermediaries unless the payments are legal, comply with the terms of a written contract, and are made following delivery of a proper invoice. No payment may be made without appropriate documentation, including evidence of the work performed, and receipts must be provided for reimbursable expenses. Payments must never be made in cash.

I am attending an international trade show where Teleperformance is one of the exhibitors. We plan to give away Teleperformance-branded promotional materials, and I may invite some of the visitors, who may be government officials, out for drinks. Will I be in violation of anti-corruption laws?

Providing promotional materials to our clients is a legitimate expense when the materials are designed to demonstrate or explain our products and services as part of a trade show. Some anti-corruption laws and/or government policies may prevent you from providing any hospitality whatsoever to a government official, so you should ask the government official whether he or she is entitled to accept your hospitality.

Generally, no matter who your guests are, you must always be careful to ensure that the expenses are moderate and comply with the instructions in the “Gifts, travel and entertainment” section of this Code of Conduct. In all cases, you must keep a written record specifying the type of gift or hospitality and its justification, and you must ensure that the gift or hospitality cannot be considered to be given with the aim of improperly influencing a decision.

Influence peddling

Influence peddling occurs when a person offers or accepts promises, gifts, or any other benefit from another person in order for the recipient to use his or her position or political influence to obtain benefits, employment, tenders or any other favorable decision, typically from a government official or public authority.

At Teleperformance, influence peddling is strictly forbidden.

HOW TO BEHAVE

Teleperformance employees should be particularly careful, when they are working on behalf of the Group in matters involving representatives of a government agency or public authority, to ensure that there is no influence peddling or other form of Corruption or Bribery.

Examples

I am working on an RFP for a tender abroad. I have been told that I should contact a local influential person in the country to get this tender. May I do it?

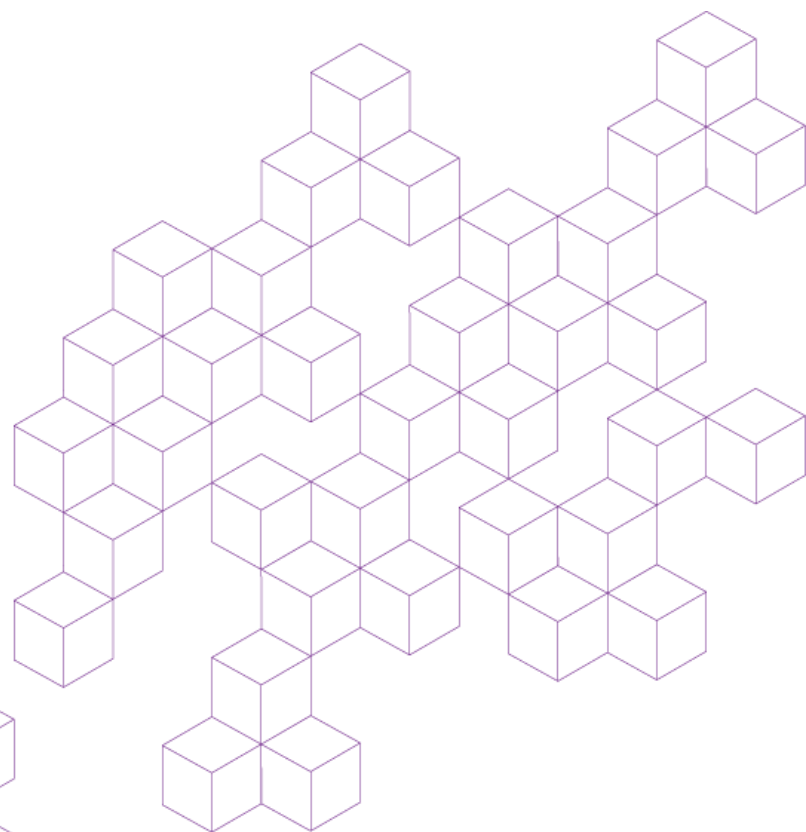
No. You must consult your Local Contact, the Legal Department of the country concerned or the Group Compliance Department to obtain advice as to how to proceed.

I am involved in obtaining the necessary permits to build a new Teleperformance contact center abroad. I have been told that I should contact a local influential person in that country to get the permits. May I contact this person?

No. You should not contact the local person. You must consult your Local Contact, the Legal Department of the country concerned or the Group Compliance Department to obtain advice as to how to proceed.

I am working on the acquisition of a foreign company by Teleperformance. I have been told that the services of an intermediary located in that country are compulsory as part of the procedure for getting the necessary regulatory approvals. What should I do?

You must contact your Local Contact, the Legal Department of the country concerned or the Group Compliance Department to obtain advice as to how to proceed.



Gifts, travel, and hospitality

When someone receives something of value without having paid the fair market value for it, he or she has received a gift. For the purposes of this Code of Conduct, travel and hospitality mean giving or receiving something of value, such as meals, drinks, admission tickets, transportation, travel costs, accommodation, or allowances, without paying for it.

Teleperformance requires its Workforce Members who engage with clients, prospective clients, business partners, vendors, suppliers and other third parties to follow certain guidelines in considering offering or accepting gifts, travel and/or entertainment.

Teleperformance generally permits the giving and receiving of business gifts and hospitality **under the following conditions:**

- they are reasonable in value and frequency.
- they are appropriate and customary business courtesies.
- they are consistent with the laws and lawful business practices applicable in that jurisdiction.
- no inference can be made that the gift, travel, or hospitality could influence either the Teleperformance employee in a business decision or the performance of his/her duties for Teleperformance, OR the business decisions of the person receiving them.
- they are proper in appearance and without risk of embarrassment or harm to the reputation of Teleperformance or of the person receiving the gift, travel, or hospitality.

In all cases, you must keep a written record specifying the type of gift, travel and/or hospitality, its justification, and you must ensure that the gift, travel and/or hospitality cannot be considered to be given with the aim of improperly influencing a decision.

HOW TO BEHAVE

Teleperformance Workforce Members should not give or accept any lavish or excessive gifts or benefits, whether monetary or non-monetary, directly or indirectly, to or from any government official, client, supplier, subcontractor or any other third party. Gifts or invitations should never influence a Teleperformance Workforce Member's business decision or be seen as influencing the person receiving them.

Examples

I have been offered a gift that I think is intended to influence my decision on a Teleperformance business matter. What should I do?

Politely refuse the gift and report it to your Local Contact, your Privacy & Regulatory Compliance Officer or to the Code Champions.

As part of my job, I organize numerous meetings and trips. Now a hotel where I often book rooms for Teleperformance employees has offered me a free weekend for my parents' wedding anniversary. Can I accept it?

No. Even if you are not personally going to benefit from the gift, accepting the offer gives the appearance of accepting a benefit to influence your business decisions and makes it difficult to remain impartial when you arrange the future hotel accommodation for Teleperformance.



Donations, contributions, philanthropy, and sponsorship

Charitable donations, contributions and sponsorships are gifts given for a charitable purpose or to support a particular charitable or philanthropic cause. A charitable donation, contribution or sponsorship can be in the form of cash, services or new or used goods. It can also include emergency or humanitarian aid, development aid support, and medical care assistance.

As a responsible corporate citizen, Teleperformance believes in contributing to the communities where we work by supporting worthy charitable causes, organizations, and activities through **our Corporate Social Responsibility Committee**.

Example

While at a jobsite, I was approached by a local community member about giving a donation to a local charitable organization. What should I do?

HOW TO BEHAVE

Any charitable donation or contribution to, or sponsorship of, a charitable cause or activity on behalf of Teleperformance must be approved in advance in writing by the Chair of the Corporate Social Responsibility Committee (csr@teleperformance.com)

When contributing to a charity or sponsoring a charitable cause or activity on behalf of Teleperformance, the Corporate Social Responsibility Committee must ensure that the recipient is a bona fide charity, appropriately registered or licensed in the local jurisdiction, and that the contribution is in line with our corporate values and policies.

Donations or contributions to, or sponsorship of, a charity associated with a government official are not permitted.

All approved charitable donations, contributions or sponsorships must be properly accounted for and accurately reported in the Group's books.

You are free to give to charitable organizations on your own behalf using your own money.

If Teleperformance is being asked to donate, you should refer the request to your Local Contact or the Chair of the CSR Committee (csr@teleperformance.com) for further consideration.

Political activities

Teleperformance observes strict political, religious, and philosophical neutrality.

Accordingly, Teleperformance's policy is not to make financial contributions to political candidates, elected representatives or officials, political parties, or religious organizations.

Teleperformance respects its employees' right to participate as individuals in the political process as long as they make sure that they do not represent Teleperformance, and their activities are not viewed by others as participation by or on behalf of Teleperformance.

HOW TO BEHAVE

If you choose to do so, participate in political activities in your own name and outside of work hours and work locations.

Never use Teleperformance premises, materials, supplies, equipment, or other resources for political activities.

Do not use Teleperformance's corporate image, logos, stationery, or other Teleperformance-branded materials to support your political views.

Respect the beliefs of others.

If you participate in any political decision-making process that addresses any matter related in any way to Teleperformance, its business, industry, clients, or employees, you must inform your local Legal Department or Privacy & Regulatory Compliance Officer and abstain from discussion and voting on such matters.

Examples

I do some volunteer work for a local political candidate whose policies are very much in line with Teleperformance's values. May I use the copy machine to run off a few flyers?

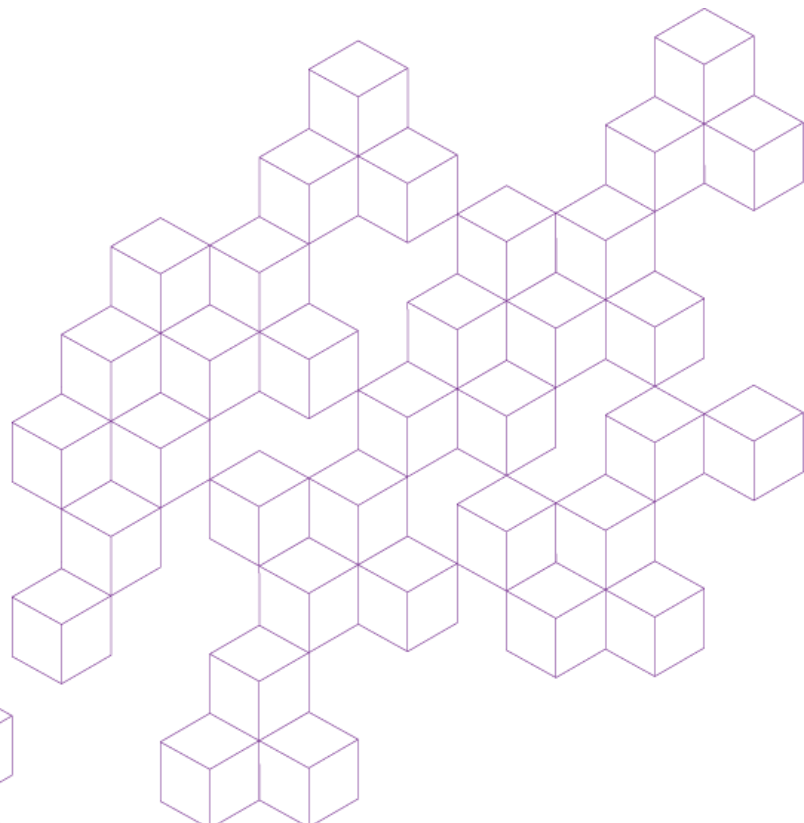
No. Teleperformance prohibits the use of company resources of any nature as well as any participation during working hours to support personal political activities.

I am active in the local political community where I live. Do I need to disclose these activities to Teleperformance?

Disclosure is required only in certain instances. Please speak with your local Legal Department or Privacy & Regulatory Compliance Officer to find out if disclosure is appropriate in your case.

I have been asked to contribute to a political party candidate's campaign. Am I allowed to make such donations?

Yes, as long as the donation is made on your own behalf using your own money. Donations must not be made on behalf of Teleperformance or made to benefit Teleperformance in any way.

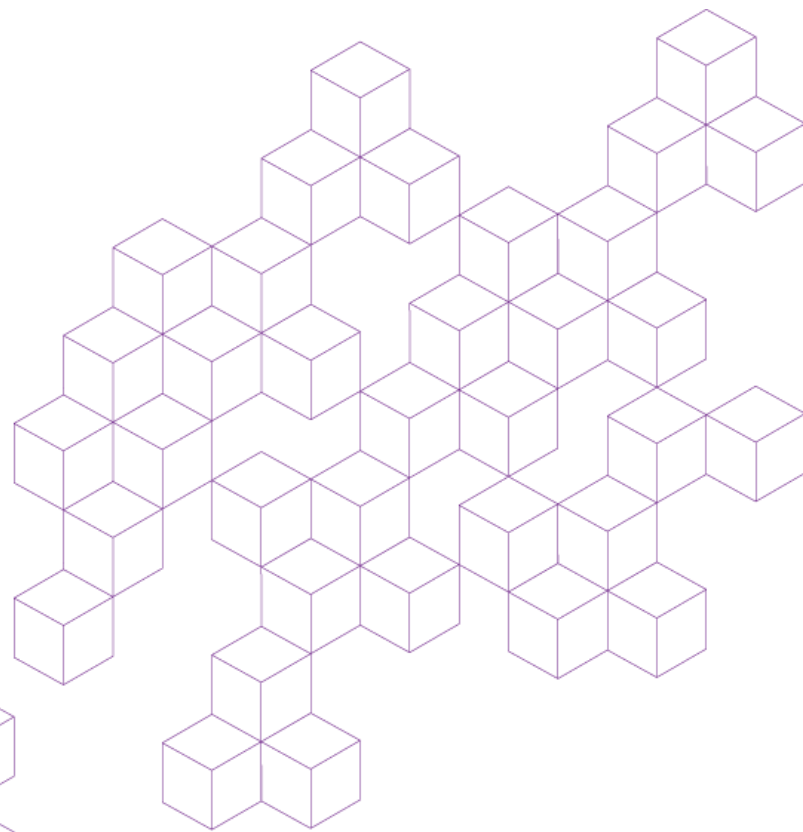


Conflicts of interest

A conflict of interest may occur when a Teleperformance Workforce Member has a financial, business, or personal interest or activity that interferes or conflicts, or appears to interfere or conflict, with Teleperformance's best interests or reputation. There are many situations that are or could be perceived as a conflict of interest, such as:

- A situation that interferes with your duties or responsibilities to Teleperformance, or that affects your ability to act in the best interests of Teleperformance.
- A situation in which you, a family member or friend receive an improper benefit, including money, services, or other gain, as a result of your position with Teleperformance.
- A situation in which you learn about a business opportunity through your position at Teleperformance and you, a family member or friend use it for personal benefit or otherwise against Teleperformance's best interests.

You are required to make informed business choices in the best interests of the Group. You should avoid any situation in which your personal interests, or the interests of your close friends or relatives, are -- or appear to be -- in conflict with Teleperformance's best interests.



HOW TO BEHAVE

When you conduct professional activities, you must act only in the best interests of Teleperformance, and refrain from benefiting or taking advantage of any situation, either directly or indirectly through a third party, for your own gain or that of others. You must identify actual and potential conflicts of interest in advance and comply strictly with the Teleperformance's established procedures in specific areas of operation, such as procurement, subcontracting and business development. You must also comply with the regulations that apply in your country, or the country concerned. You must disclose in writing to your manager and local Legal Department all your outside interests or those of your family members that create, or could appear to create, a conflict of interest. Avoid using Teleperformance resources to achieve personal gains or benefits of any kind. This includes Teleperformance office equipment, materials, time, resources and/or intellectual property.

Examples

While performing my job, I discovered a great business opportunity that may be worth a lot of money. May I take the opportunity for myself?

If the opportunity is within Teleperformance's line of work or related to a Teleperformance business partner or supplier, you must disclose the opportunity to your manager, local Legal Department or Privacy & Regulatory Compliance Officer and follow their advice.

You must avoid outside jobs or employment that could affect your performance at Teleperformance. If you are unsure, seek the advice of your Local Contact.

My spouse works for one of Teleperformance's competitors. We don't talk about work at home, and I cannot see what my spouse does in his or her professional life. Yet some of my colleagues have suggested I am in a compromising situation. What should I do?

This could create the appearance of a conflict of interest. To protect both yourself and the Group, you should disclose the facts to your manager, local Legal Department or Privacy & Regulatory Compliance Officer.

In addition, you and your spouse should take steps to ensure that confidential or proprietary information about both companies is protected and not disclosed to the other party. For example, you should not share your Teleperformance log-in or password with your spouse or anyone else.

Anti-money laundering

Money laundering is the concealment of the origin or source of illegally obtained money or property, or the process of making illegally gained proceeds appear to be legal. Money laundering also includes assisting with the placement, concealment, or conversion of direct or indirect proceeds of a crime or offense. Reverse money laundering is the process of disguising a legitimate source of funds that are to be used for illegal purposes.



At Teleperformance, has a zero tolerance to money laundering and reverse money laundering.

Teleperformance Workforce Members must ensure that Teleperformance does not receive or assist in any way with the proceeds of any criminal activity. This could constitute a criminal offense of applicable money laundering or reverse money laundering laws.

Payments must not be made to intermediaries unless the payments are legal, comply with the terms of a written contract and are made following delivery of a proper invoice. No payment may be made without appropriate documentation, including evidence of the work performed. Receipts must be provided for reimbursable expenses. Payments must never be made in cash.

HOW TO BEHAVE

Teleperformance Workforce Members must be alert to any unusual or suspicious activity or signs of money laundering and report this to the Group Finance Department in Paris.

When dealing with suppliers, do not wire funds to an account outside the supplier's country of activity or to a third-party bank account. Do not make payments in a manner that is outside the normal course of business and do not split payments between different bank accounts.

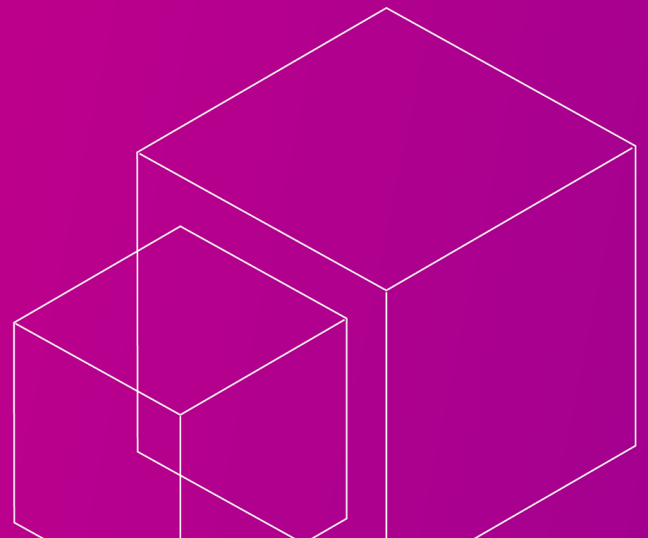
When receiving money from clients, be alert to payments from multiple bank accounts, from a bank account located in a tax haven, from foreign bank accounts outside the client's country of activity, an early payment outside the normal course of business, as well as payments made in cash. You must report any such activity to the Group Finance Department in Paris.

Example

I was asked by a long-standing supplier to pay a portion of the supplier's invoice by wiring funds to a bank account in the name of someone other than the supplier. What should I do?

You must immediately bring this unusual request to the attention of the Group Finance Department in Paris and follow their advice.

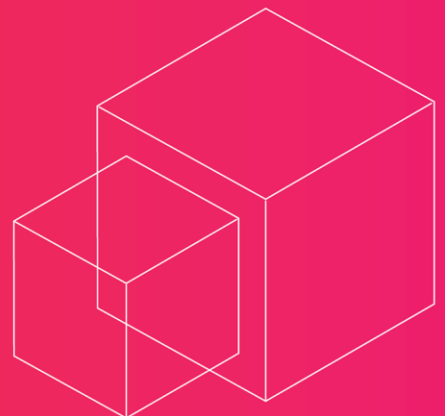
4. Enforcement of the Teleperformance Code of Conduct; Disciplinary sanctions





Any Teleperformance Workforce Members who have attempted to breach or have breached this Code of Conduct, whether by negligence or willful misconduct, **will be subject to disciplinary sanctions in accordance with applicable laws and regulations, including administrative measures and criminal penalties, as well as disciplinary sanctions** provided for in the Internal Regulations of the Group of which they are a Workforce Member or corporate officer.

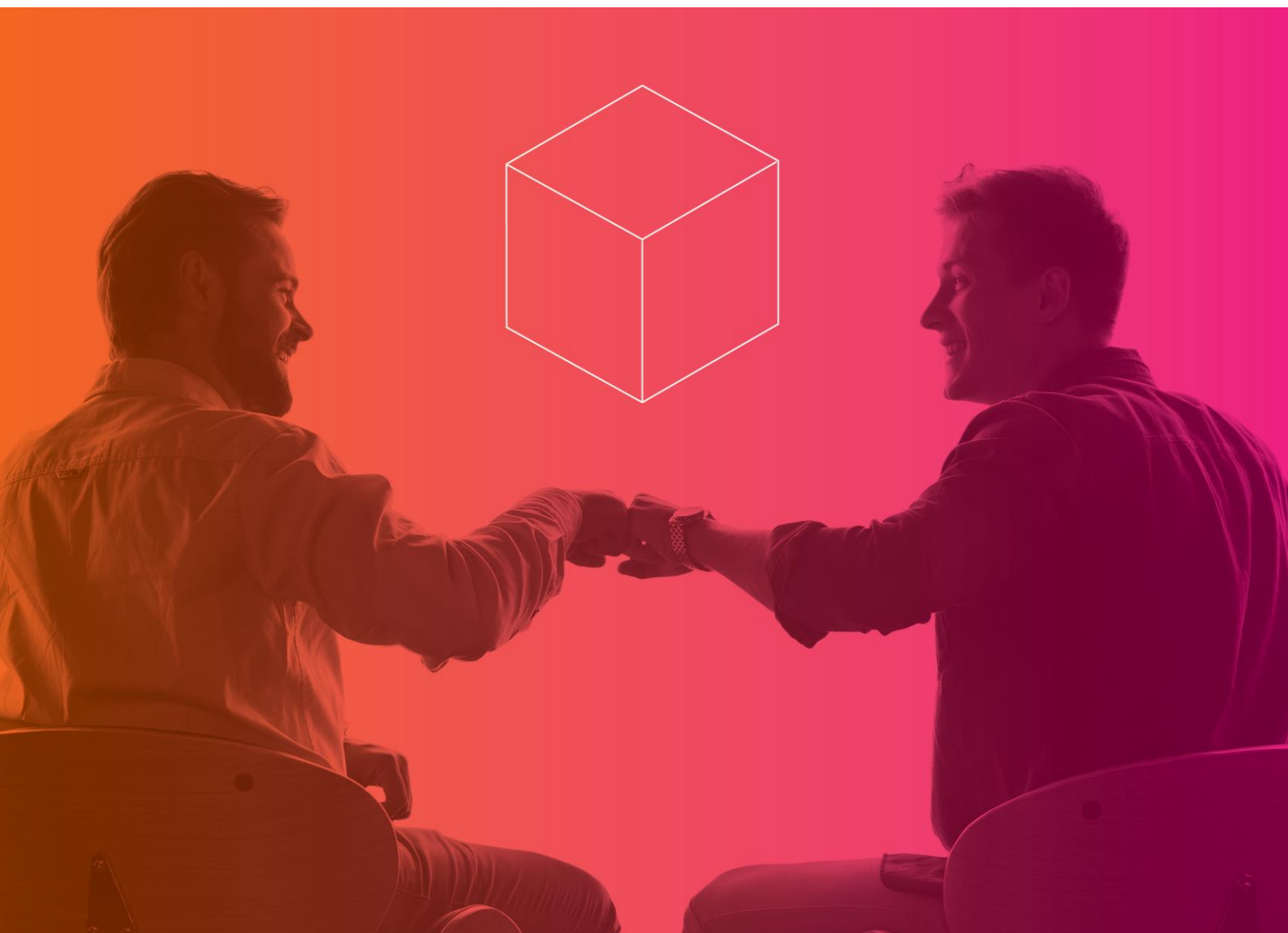
5. Global Ethics Hotline and Protection of whistleblowers



Teleperformance encourages a culture of openness.

Where each person may raise concerns and views about our Code of Conduct and be confident that they will be heard by management. We are all responsible for ensuring the application of and compliance with this Code of Conduct. We understand that you may have concerns about certain practices and need advice and guidance in order to make sure that you comply with this Code of Conduct.

If you need guidance on any topic related to this Code of Conduct, please contact your manager. If you believe that informing your manager may present difficulties or that the reported irregularity would not result in appropriate follow-up, the Ethics Hotline is another method for reporting potential breaches. There are several ways of reporting suspect behavior:



1. Contact one of the following people:

- Your local Chief Human Resources Officer
- Your local Chief Legal Officer
- Your Privacy & Regulatory Compliance Officer
- The Chief Executive Officer for your country
- The Regional Chief Executive Officer for your region



2. Use the Global Ethics Hotline:

We encourage Teleperformance Workforce Members to use the [Global Ethics Hotline](#) to report when they personally, acting in good faith, reasonably, believe that wrongful business conduct has taken place, is taking place or is about to take place. Reports made through the Global Ethics Hotline will be investigated in accordance with the procedures set forth in the Global Ethics Hotline Policy.

No retaliation will be made against anyone who in good faith, reasonably and selflessly reports wrongful business conduct through the Global Ethics Hotline, subject to the terms of the Global Ethics Hotline Policy and applicable laws and regulations. Any Workforce Member who reported through the Global Ethics Hotline and believes they are being subjected to retaliation should immediately report this via the Global Ethics Hotline.

Reports will be treated with confidentiality within the limits of the law.

The Global Ethics Hotline Policy and information about the Global Ethics Hotline are available on the Group intranet.



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