



We put our client
at the heart

Webhelp

Think Human

Code of Conduct

December 2022

We make
business
more human

WELCOME

One Code of Conduct for each of us and all of us.



Olivier Duha
Co-Founder & CEO

Ethical decision making can sometimes be a difficult path to follow. Doing the right thing at the right time for the right reason requires behaving with integrity and respect of the laws of all countries where we operate.

Webhelp invests in people and the environment we work in, because we know that when people thrive, it has a powerful impact on us, our customers and on our stakeholders. Webhelp believes that making business more human leads to a better customer experience – and a healthier company.

Our Code of Conduct is a fundamental reference in terms of ethics, social and environmental responsibility and in terms of financial and legal compliance. It is also the cornerstone of our ESG program “More Movement” focusing on its four pillars (People, Planet, Progress, Philanthropy) and upholds those principles in the performance of our activities.

To support ethical conduct and continuous improvement, this Code is here to help us take the right decisions as a game-changer and tells us how to interact with any kind of stakeholders. This code applies to us as a company, to each of us individually as well as to all our contractors/suppliers and all of them should respect its principles.

By making this Code of Conduct our own, we provide ourselves with the means to build, all together, a more sustainable and attractive future.

We all are the ambassadors of Webhelp’s fundamental values and culture pillars. Thank you, to all of you, for reading carefully this Code of Conduct and for following its recommendations in the entire Group.

Webhelp's values ...

Recognition

Acknowledgement of individual contribution is essential to ensure our collective success.

Integrity

We work with a positive attitude leading by example. We treat others the way we would expect to be treated.

Unity

Working as one team towards a common success takes precedence over personal interest.

Commitment

We honour the promises made to colleagues, clients and customers.

Wow

By 'going the extra mile' and embracing innovation we continually seek to amaze the people we work with!

... and Culture Pillars



We are a people-first company



We put our client at the heart

We are passionate game-changers



We strive to enjoy every day



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WHO DOES IT CONCERN?

- 1.1 SCOPE
- 1.2 SPEAK-UP

1.1 Scope

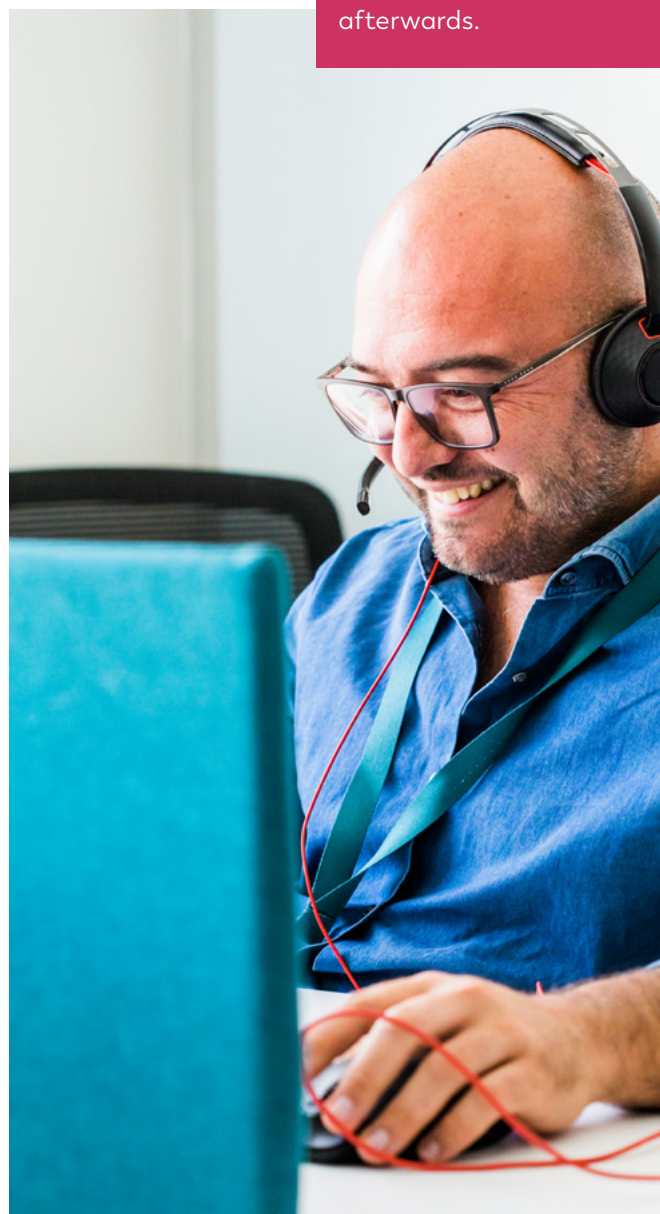
The Code of Conduct applies to all game-changers of the Webhelp Group worldwide. This includes all officers, directors, interim workers and third-party representatives (third-party sales agents, representatives, consultants, distributors, or intermediaries) who perform services for or on behalf of the subsidiaries and affiliate companies of the Webhelp Group (collectively "Webhelp"), and those who represent Webhelp's interests in any joint ventures.

We should all abide by the values, culture pillars and principles in this Code of Conduct when conducting the day-to-day business activities of Webhelp. It is everyone's business to ensure that the Code of Conduct is strictly and consistently respected across Webhelp. In addition, Webhelp's business partners, including joint venture partners, contractors, suppliers, resellers, distributors, consultants, sales agents and other third-party representatives, shall to all extent possible be made aware of the Code of Conduct and would be expected to apply similar values, culture pillars and principles to their own activities when conducting business with or on behalf of Webhelp.

Webhelp has a zero-tolerance approach to all forms of abuses and expects all game-changers conducting themselves in a professional, ethical and socially acceptable manner of the highest standards. Failure to comply with the principles or the spirit of the code or the policy framework will be considered a serious breach of Webhelp Code of Conduct and will be investigated. Breaches of the code or policy framework will result in disciplinary action, ranging from a verbal warning to the termination of your employment for serious breaches.

Training

It is required that every game-changer follows the mandatory training on this Code when joining Webhelp and on a yearly basis afterwards.



1.2 Speak-up

As employees of a company or as workers on behalf of a company, it can happen that we witness unacceptable behaviour that violates our Code of Conduct.

Webhelp strongly encourages its game-changers to raise their questions or concerns to their line manager, the Human Resources Department, and/or the Compliance Department. It is important that all managers establish a positive working environment and encourage their game-changers to communicate openly.

If a game-changer believes that informing their manager may present difficulties or that the reported irregularity would not result in appropriate follow-up, they can contact the Compliance Department by submitting a report at www.bkms-system.com/phonethics.

Besides, when a game-changer is concerned or suspects selflessly and in good faith that a breach of this Code of Conduct and/or applicable law has occurred or will occur, these suspicions may also be reported anonymously – if local laws allows it – at www.bkms-system.com/phonethics with all possible relevant information capable of substantiating the claim. Any such report will be received in confidence by the Compliance Department that will acknowledge receipt of the report and give its author a reasonable timeframe to consider its admissibility.

We will ensure a fair process in the case of an investigation, respecting the principles of confidentiality and presumption of innocence. All information communicated will be shared only with those persons who have legitimate reason to know either to ensure the concern is handled and/or the appropriate steps are taken.

Should a report not be followed by disciplinary or judicial proceedings, the data related to this report will be destroyed or archived after the closure of the verification operations.

Webhelp will not allow any retaliatory action to be taken against any game-changer for making a good faith report of a suspected breach of this Code of Conduct or applicable law. If a game-changer believes they has been retaliated against for reporting an issue, they should contact the Compliance Department.

As part of the whistleblowing process, Webhelp carries out automatic processing of personal data, in compliance with Webhelp Privacy Policy and with any applicable legal and regulatory requirements.





PEOPLE AND PLANET

- 2.1 HUMAN RIGHTS & LABOR LAW
- 2.2 DIVERSITY, EQUITY AND INCLUSION
- 2.3 HEALTH & SAFETY
- 2.4 ENVIRONMENT
- 2.5 COMMUNITY RELATIONS



2.1 Human rights and labor law

As a signatory of the United Nations Global Compact, Webhelp is fully committed to respect and support human rights throughout its operations and business activities worldwide, and to avoid complicity in human rights abuses. For this purpose, Webhelp is committed to abide by all national and international human rights laws and regulations, including the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.

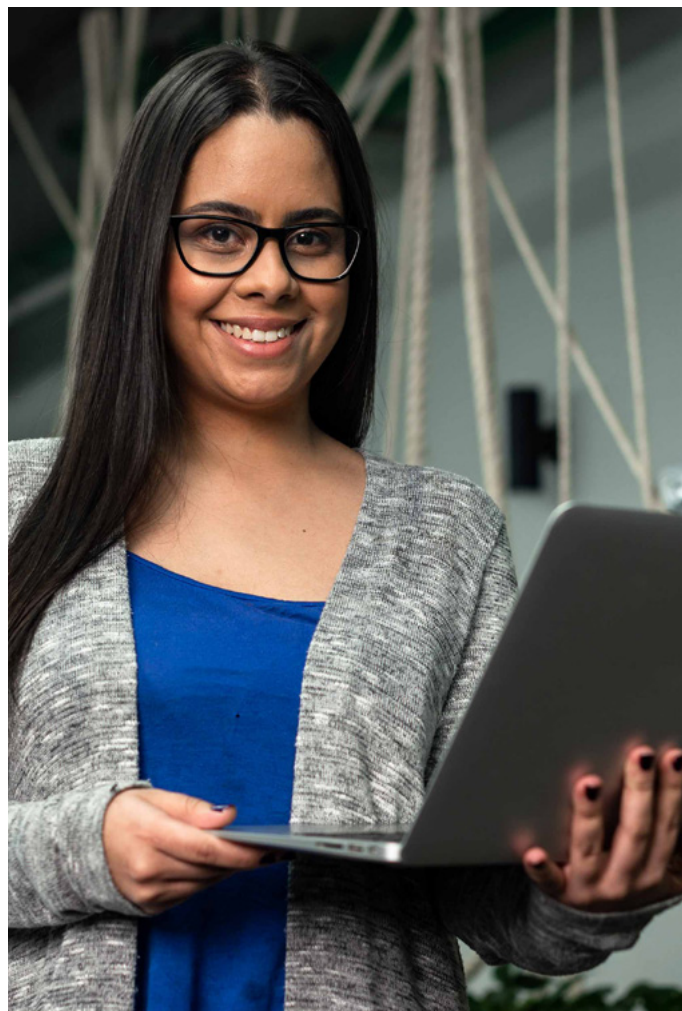
As an employer, Webhelp complies with all applicable local laws and regulations related to labour and employment including, but not limited to, laws and regulations concerning minimum wages, maximum hours of work according to local labour laws and regulations), days of rest, compensation, fair recruitment, equal employment opportunity and the freedom of association and collective bargaining.

+ Do's

- Treat all colleagues and external stakeholders with dignity, respecting human rights
- Report any form of human rights abuse in our value chain

✗ Don'ts

- Don't ignore abuses reported to you or misconducts you are aware of



As an absolute principle, Webhelp will not engage in nor support:

- the use of child labour;
- the use of forced or compulsory labour;
- modern slavery;
- human trafficking;
- the employment of illegal foreign labour.

Moreover, we will not conduct business with any joint venture partners, contractors, suppliers, resellers, distributors, consultants, agents or other third parties if we become aware that they engage in any such practices.

Regarding student work protection, Webhelp guarantees proper maintenance of student records, rigorous due diligence of educational partners and protection of student's rights in accordance with applicable law and regulations.

Please refer to our dedicated policy regarding Labor and Human Rights

2.2 Diversity, equity and inclusion

Webhelp is a place where each and everyone of us has an opportunity to develop its personal competences and support the collective development of Webhelp. Three fundamental principles underlie Webhelp organisation:

Non-discrimination: Nobody should be discriminated on age, disability, ethnicity, race, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or association (game-changers being free to associate with others, form and join organisation of their choice) or any other status protected by applicable national or local law, in hiring and other employment practices. Nobody shall be

required any pregnancy or medical tests, unless expressly and specifically authorized by the local regulation or prudent for workplace safety, and shall not improperly be discriminated based on test results.

Respect for each individual, including each game-changer's right to dignity and privacy. Everyone at Webhelp is entitled to a workplace free from any form of abuse and/ or harassment, whether physical or verbal, including, but not limited to, unwanted sexual advances, threatening conduct, and offensive comments or conduct. In addition, the privacy of game-changer information collected or held by Webhelp shall be respected and will be handled in accordance with applicable laws and regulations.

+ Do's

- As a manager or leader, contribute to build and promote a diverse, equitable and inclusive work environment, free of discrimination, harassment and conscious or unconscious bias
- As a leader, make all reasonable accommodations to meet our obligations under laws protecting the rights of people with different abilities
- Refrain from unpleasant or disparaging remarks or actions, in particular (but not limited to) on the basis of sex, age, religion, beliefs, nationality, culture, ethnicity, race, gender sexual orientation, disability, or family situation
 - Regularly complete our trainings on Diversity, Equity & Inclusion

✗ Don'ts

- Don't ignore or stay silent when you witness discrimination or harassment from colleagues or third parties – under whatever form (oral in face to face or remotely, in written, on a social media post, in internal messaging tool ...) discuss it with the colleague in question if you feel at ease or contact your line manager, HR team or use PhonEthics
- Don't ignore micro-aggressions or micro inequity because they seem "minor" such as insensitive jokes, deadnaming, misgendering on purpose. Discuss it with the colleague in question if you feel at ease or contact your line manager, HR team or use PhonEthics
- As a manager, don't turn a blind eye on inappropriate, harassing or discriminatory comments or behavior, under the pretext of a previously "friendly relationship" between colleagues



Please refer to our dedicated policy regarding Diversity, Equity and Inclusion.

2.3 Health and safety

A safe, healthy and eco-friendly working environment: Webhelp shall ensure compliance with the applicable laws and regulations regarding health and safety standards and reducing health risks and occupational hazards wherever possible by implementing dedicated internal procedures and personal training. Webhelp provides its game-changers for instance with reasonably accessible and clean toilet facilities and potable water. Dining, food preparation and storage facilities shall be sanitary.

+ Do's

- Identify hazards and reduce risks to an acceptable level
- Consult game-changers and promote health and safety standards and expectations

✗ Don'ts

- Don't compromise on health, safety and physical integrity of our colleagues and external stakeholders involved in our business



Please refer to our dedicated policy regarding Health, Safety and Environment

2.4 Environment

Webhelp is engaged in reducing the environmental impact of its operations, and particularly their carbon footprint across all three scopes through the implementation of targeted actions worldwide and the regular monitoring of their efficiency.

Webhelp applies a precautionary approach to environmental protection through the performance of dedicated risk assessments, and the implementation of corresponding mitigation measures. Webhelp is also committed to the principle of risk prevention and seeks to implement the highest standards to guarantee the health and safety of game-changers and other stakeholders, including through the implementation of dedicated internal procedures and the delivery of targeted trainings.

+ Do's

- Whenever making a business decision, assess the environmental impact and minimize our environmental footprint
- For business travel, always consider the less carbon-emissive option (visio vs travel, train vs plane, carsharing vs taking a car alone ...)
- Speak to your local and / or regional Greenhelp teams regarding ideas, challenges or for information

✗ Don'ts

- Don't ignore or stay silent when you witness faulty equipment leading to energy inefficiency and increased carbon emissions or hurting biodiversity

2.5 Community Relations

Webhelp is fully engaged vis-à-vis local communities, and is committed to detect, prevent and mitigate any negative impacts that its operations might unintentionally have on these communities. In this respect, Webhelp invests in multiple community actions at global and local level, and undertakes to avoid forced eviction and the displacement of populations because of its operations.

Webhelp contributes to charitable causes and sponsors activities that align its values. Any sponsorships and donations must always be reviewed and approved prior to being made and must be accurately recorded in Webhelp's books and records.

+ Do's

- Always select carefully the sponsored/charitable organisations, based on their experience and reputation
- Make sure that all sponsorships/donations requests are managed within the Compliance Portal at <https://compliance.webhelp.com>

✗ Don'ts

- Don't make any sponsorship/donation on behalf of Webhelp without receiving pre-approval
- Don't make any sponsorship/donation if it gives rise to an actual or perceived conflict of interest

Please refer to our dedicated policy regarding Health, Safety and Environment





BUSINESS INTEGRITY

- 3.1 COMPLIANCE WITH LAW
- 3.2 BRIBERY AND CORRUPTION
- 3.3 GIFTS AND HOSPITALITY
- 3.4 CONFLICTS OF INTERESTS
- 3.5 THIRD PARTIES
- 3.6 FAIR TREATMENT OF CLIENTS AND SUPPLIERS
- 3.7 COMPETITION LAW
- 3.8 ANTI-MONEY LAUNDERING & TAX EVASION
- 3.9 ECONOMIC SANCTIONS
- 3.10 FRAUD



3.1 Compliance with law

We, at Webhelp, commit to comply with laws worldwide. Compliance with the law is obviously the fundamental principle. We are required in all circumstances to comply with the law and other obligations in force in any country in which Webhelp is located.

When local law or customs impose higher standards than those set out in the Code of Conduct, local law and customs should always apply. If, however, the Code of Conduct provides for higher standards, it should prevail, unless this results in illegal activity.

It is our personal responsibility to obey the laws, regulations and obligations, especially those that are linked to our business. Everyone is bound to avoid taking part in activities that could involve them or Webhelp in an illicit activity.

Above and beyond complying with the laws and regulations, we should all show integrity and fulfil the commitments we have made in our relations with colleagues, customers, suppliers and other group partners.

Do's

- Conduct business with the highest respect of antibribery laws and Webhelp internal policies
- Inform your local Compliance leader if you become aware of any requests made by customers, suppliers or any third parties for improper payments

3.2 Bribery and corruption

Webhelp is committed to winning business through fair, honest and open competition in the marketplace and is intolerant of bribery or any other form of corruption either directly or through a third party. Webhelp maintains strict compliance with all anti-bribery, anti-corruption, extortion, embezzlement and bribery laws applicable to its businesses and operations around the world. Further, it is absolutely forbidden to use Company money or resources to make political contributions.

Anti-bribery and anti-corruption laws are complex, and the penalties for individuals and Webhelp can be severe. This policy should be reviewed alongside this Code of Conduct for guidance on improper payments, engaging and monitoring third parties, business gifts and hospitality, and political contributions, facilitation payments, sponsorships and donations among other topics.

In particular, reasonable and bona fide hospitality and promotional business expenditures that seek to maintain cordial relations are recognized as legitimate part of doing business. Nevertheless, such advantages may however only be given or accepted if they serve a legitimate business purpose and do not serve to obtain or grant an improper advantage.

Don'ts

- Don't offer, promise or give, either directly or indirectly, a financial or other advantage which could be interpreted as a bribe to another person or organisation to encourage them to provide commercial advantage or favour to Webhelp
- Don't exert, by whatever means, improper influence over a prospect, client and/or any associated person during a bidding process

Please refer to our dedicated policy regarding Anti-bribery and Ethics

3.3 Gifts and hospitality

Because a gift/hospitality may create an appearance of undue influence on those with whom Webhelp does or seeks to do business, game-changers should be extremely cautious of receiving or providing any gift/hospitality whatsoever in a business context. Gifts & hospitality include items such as cash or cash equivalents including entertainment, gift cards, product discounts and non-business activities. Any such gifts & hospitality must be limited to items of very low value, such as, in the case of giving a gift, items branded with the Webhelp logo.

Expenditures for the benefit of family members of customers, prospects, or foreign government officials or payment for activities as side trips or visits to touristic attractions are strictly prohibited.

+ Do's

- Disclose any gifts or hospitality received or offered from/to a third party in the Compliance portal
- Make sure the value of the gifts/hospitality you offer is reasonable

✗ Don'ts

- Don't offer a gift, consideration or advantage to someone knowing it will be used to facilitate an offence under any legislation in your country or elsewhere

Please refer to our dedicated policy regarding Gifts & Hospitality

3.4 Conflicts of interests

A high level of loyalty and integrity is expected from all of us. Unless prior authorization has been obtained from Webhelp, we may not engage in work for an existing or potential competitor while we are still employed by Webhelp. A conflict of interest is not necessarily a problem by itself but failing to declare and manage one properly may have negative consequences for the game-changer and Webhelp.

We should avoid any actual or apparent conflicts of interest between our own personal interests or affiliations and those of Webhelp or its customers. For example, potential conflicts of interest may arise where we have:

- a direct or indirect financial or beneficial interest (e.g., through a family member or a close relationship);
- an employment relationship with a Company competitor, supplier, customer or counterparty;
- accepted benefits from a Company competitor, supplier, contractor or other third party.

+ Do's

- Always inform your manager of an actual or an apparent conflict of interest situation
- Make sure that conflicts of interest are disclosed and managed using the Group Compliance Portal

✗ Don'ts

- Don't place yourself in the position of hiring, supervising, managing, career planning or negotiating fees of one of your family members or relative or close personal friends
- Don't act on situations where your personal interests could appear to influence your business decisions within Webhelp

Please refer to our dedicated policy regarding Conflict of interest



3.5 Third Parties

We, at Webhelp, establish relationships based on mutual cooperation and loyalty with our joint-venture partners, contractors, customers, suppliers, resellers, distributors, consultants, agents and third-party representatives (“third-party stakeholders”).

It is our goal to achieve long-term relationships with third-party stakeholders who accept and share the principles outlined in this Code of Conduct. Our partners should understand, share and apply the same high standards of business ethics, in particular in terms of anti-corruption procedures, the protection of human and labour rights, as well as sustainable use of the environment.

We shall all act with complete integrity when dealing with third-party stakeholders and shall avoid conflicts of interest and report any actual or potential conflicts of interest that do arise (as described in the section on conflicts of interests above).

Do's

- When choosing a supplier, include our mandatory ESG criteria in your selection process
- Should you have a concern, raise it with the team responsible for the project and the Compliance department

Don'ts

- Do not ignore or stay silent when you witness suppliers going against our code of conduct rules – require business review discussion to adjust

Please refer to our dedicated policy regarding Third Party Due Diligence

3.6 Fair treatment of clients and suppliers

We dedicate our energy to making our clients satisfied and this should always be our priority.

We shall treat our customers and suppliers honestly and fairly, whatever the size of their company. Webhelp undertakes not to knowingly misrepresent its products or services in its advertising, public statements or promotional offers to its customers.

Game-changers who negotiate contracts should ensure that all statements, communications and presentations are trustworthy. Negotiations are carried out in compliance with the rules of ethics and legality.

Webhelp has provided systems allowing evaluations of its facilities and operations, and those of its subcontractors and next-tier suppliers.

To its clients, Webhelp has also developed and maintained management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill its continuous improvement objectives. Webhelp has a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, next-tier supplier(s) and customers.



3.7 Competition law

Webhelp believes in fair, honest and open competition. We shall strictly comply with applicable competition/anti-trust laws in all countries in which we engage in business. These laws prohibit agreements or conduct that may restrain or affect fair competition and trade.

We do not obtain competitive intelligence by illegal means including through bribery.

Moreover, we shall not exchange or disclose commercially sensitive information with competitors, especially information relating to trade secrets. We should always ensure that the nature and purpose of any communications with competitors do not have a negative impact on fair competition.

+ Do's

- Inform your line manager and your local Compliance Leader if we have inadvertently received or used confidential information related to competitors
- Report to your line manager or by using PhonEthics any concerns about price fixing, allocation of market shares or information sharing between competitors

✗ Don'ts

- Don't assist a customer/supplier to illegally bias any tender requirements/process
- Don't assist a customer/supplier in preparing tender documents and technical specifications
- Don't exchange competitively sensitive information or discuss tenders with competitors

3.8 Anti-money laundering and tax evasion

In order to avoid becoming involved in money laundering, Webhelp requires its game-changers to report to the Compliance Department if another game-changer knows or suspects that an entity or an individual with whom Webhelp conducts business (including customers, joint-venture partners, contractors, suppliers, resellers, distributors, consultants, agents or other Third-Party Representatives) may have been engaged in, or benefited from, criminal activities, including activities prohibited under this Code of Conduct in the sections on trading securities, Fair competition, bribery and corruption, import/export regulations and sanctions. We make sure we don't facilitate tax evasion by our stakeholders (customers, suppliers...)

+ Do's

- Ensure the Due Diligence process is conducted on third parties before establishing a partnership with them
- Pay a specific attention to third parties that are controlled by public officials or by politically exposed persons (PEPs)

✗ Don'ts

- Don't establish a relationship with any third party if the screening process has not been fully conducted
- Don't accept any payments from entities other than the customer's own accounts



3.9 Economic sanctions

As a global business, Webhelp purchases goods and services from a diverse set of suppliers. Webhelp also provides services to customers all over the world. Therefore, it is essential that Webhelp carefully complies with all applicable regulations that govern trade regulations, embargos, sanction lists, and import and export restrictions.

+ Do's

- Comply with international and national sanctions and embargoes and involve the Compliance department when considering new projects with entities from sensitive jurisdictions

✗ Don'ts

- Don't assume that all information provided by third parties is accurate without verifying key information

Please refer to our dedicated policy regarding Economic Sanctions

3.10 Fraud

Misappropriation of resources or assets, manipulation of data, deliberate mistatements or omissions in financial reporting, may constitute fraud. Similarly, giving false information to a client in order to secure a contract may constitute a fraudulent act leading to the imposition of penalties on Webhelp, as well as civil or criminal proceedings.

As part of its commitment to ethical conduct, Webhelp does not tolerate any form of fraud or intentional mistatements. A financial internal control framework is in place to protect the Group against frauds.

Fraudulent acts or suspicion of such acts must be reported to the line manager and/or the Compliance Department.

+ Do's

- Ensure that all reports, records and data are accurate and properly stored
- If you are a manager, identify the fraud risks and vulnerabilities in your scope of responsibility
- Contact immediately your manager or Compliance department when you suspect a fraudulent activity or when you have a doubt

✗ Don'ts

- Don't manipulate information, data and software without being authorized
- Don't bypass internal processes
- Don't open emails or attachments from unknown senders





ASSETS AND DATA

- 4.1 PROTECTION OF COMPANY ASSETS
- 4.2 CONFIDENTIAL INFORMATION
- 4.3 SECURITY
- 4.4 PERSONAL DATA
- 4.5 FINANCIAL AND BUSINESS RECORDS
- 4.6 RESPECT OF WEBHELP'S IMAGE
- 4.7 COMMUNICATION MEDIA SOCIAL NETWORK

4.1 Protection of company assets

Webhelp's assets are key to its long-term development. We all have a duty to take care in handling or dealing with Webhelp's property (including any tangible and intangible property of any kind) in order to avoid loss, theft or unlawful use resulting in serious damage. To this aim, Webhelp ensures that its assets are protected against misappropriation or manipulation. Use of Webhelp's property for personal benefit is for instance prohibited.

Webhelp shall respect intellectual property rights and safeguard customer information. It shall manage technology and know-how in a manner that protects intellectual property rights.

+ Do's

- Protect computers, desks and work environments
- Only use Company provided or agreed-to-use devices to access Company's information

✗ Don'ts

- Don't leave your laptop unlocked/unattended in public
- Don't grant access to IT tools to individuals who do not have the proper authorization to access those tools

4.2 Confidential information

We shall take due care in handling any confidential information held by Webhelp in relation to our services, products, processes, patents, know-how or personnel, or our industrial, strategic and financial operations. Such information shall not be disclosed or made public without prior authorization by Webhelp.

In addition, our customers, suppliers and other business partners often provide confidential and proprietary information to us. Webhelp is a trustworthy partner to them. We should all handle information and data provided by third parties with caution, in accordance with the terms and conditions under which that information was disclosed to Webhelp and in compliance with all applicable laws and regulations. The general rule is not to disclose information about Webhelp or its clients or partners, unless Webhelp policies or the law expressly requires you to.

Access to government-classified information requires specific authorisation, depending on the level of sensitivity. Any exchange or disclosure of classified information or equipment shall strictly comply with the relevant and applicable security processes in place.

+ Do's

- When working in public spaces, take extra care to keep the information private from public viewing: Install a privacy filter on your devices and make sure no one else can see your screens

✗ Don'ts

- Don't make business related phone calls in busy public areas (airports, trains, etc.)
- Don't reveal sensitive or confidential information to relatives, close friends or coworkers

Please refer to our dedicated Information Security Handbook

4.3 Security

Webhelp provides its game-changers with IT equipment, means of communication and data in order to perform their duties. Every individual is responsible for using these resources in compliance with the enforced security policy, in order to limit the exposure of Webhelp's information systems to external threats.

Cyber attacks, which aim at illegally obtain sensitive information or personal data in order to exploit it, can have a devastating impact on our business activities including those of our clients. We must all act responsibly and in line with our Group policies and guidelines.

+ Do's

- Report all phishing attempts you receive to the Information Security department
- In case of mistakenly providing credential details, inform your line manager and change your password immediately
- Always be suspicious when receiving emails asking for personal or sensitive information
- Notify your Line Manager or local IT department if any Equipment containing or able to access Assets becomes lost, stolen, or missing

✗ Don'ts

- Don't communicate any credentials even if the request seems to be honest and trustworthy
- Don't send any Company or Client information to anyone inside or outside the company who is not authorized to receive it
- Don't hesitate to contact the Information Security Department for any questions or concerns

Please refer to our dedicated
Information Security Handbook

4.4 Personal data

We all are bound to ensure that Company resources are used appropriately, efficiently and for legitimate business purposes. All of Webhelp's resources or Client's resources made available to Webhelp must be protected against unauthorised or inappropriate access, usage, destruction, and against theft and fraud.

No one may remove any Company or Client property for their own personal use or make it available to any other person to be used for the benefit of parties other than Webhelp.

In particular, Webhelp is committed to respect key principles related to personal data protection set out in applicable laws and regulations. Webhelp manages a large volume of personal data and is particularly concerned with issues relating to data processing, data retention and confidentiality. Webhelp's Binding Corporate Rules (BCRs) have been approved and are legally binding and are to be enforced by every person working at Webhelp.

+ Do's

- Report any personal data breach
- Collect personal data only to the extent it is strictly necessary to fulfil a lawful or legitimate purpose
- Share personal data (even if protected with password) only on Webhelp professional communication tools

✗ Don'ts

- Don't collect personal data if there is no legitimate purpose
- Don't assume that personal data collected for one purpose can be used for other purposes

Please refer to our dedicated
Data Privacy policies

4.5 Financial and business records

Webhelp provides its game-changers with IT equipment, means of communication and data in order to perform their duties. Every individual is responsible for using these resources in compliance with the enforced security policy, in order to limit the exposure of Webhelp's information systems to external threats.

Cyber attacks, which aim at illegally obtain sensitive information or personal data in order to exploit it, can have a devastating impact on our business activities including those of our clients. We must all act responsibly and in line with our Group policies and guidelines.

+ Do's

- Be accurate and fair in recording and maintaining our accounting books and records (including filing an ex-pense report, preparing a financial report or simply completing a time sheet)
- Report any situations where you are pressured or asked to make something illegal or unethical

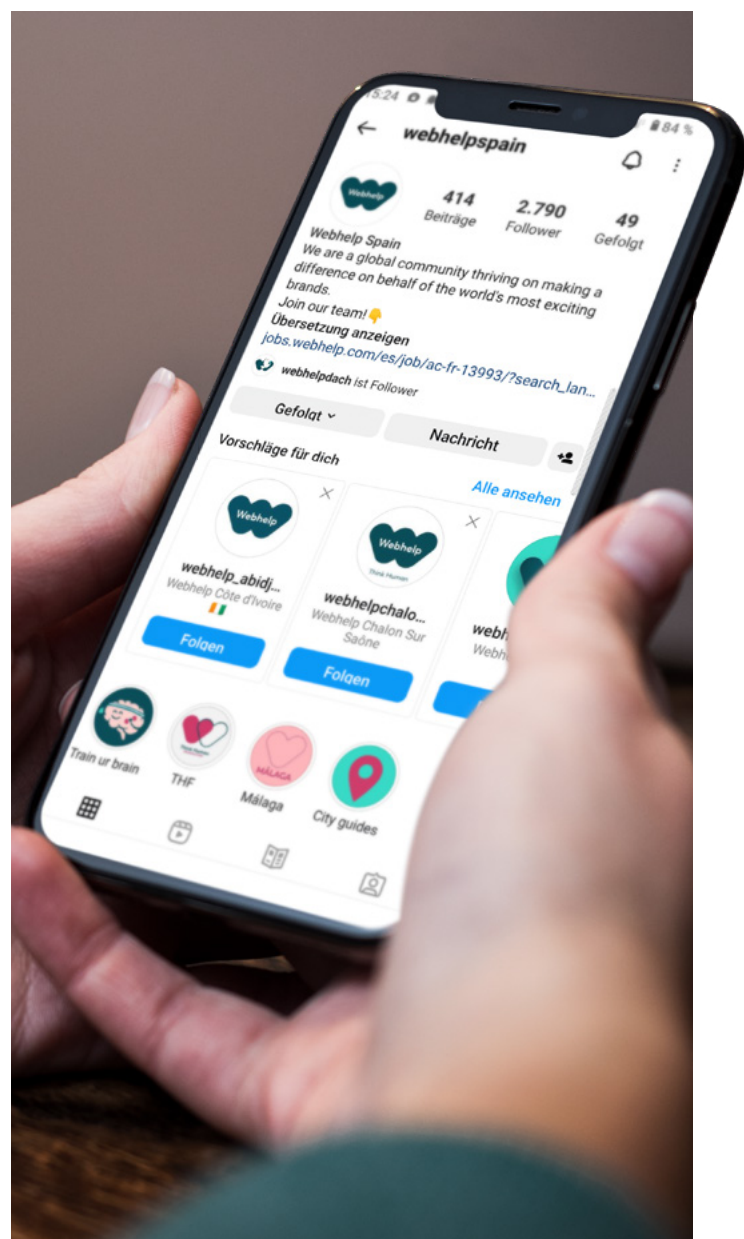
✗ Don'ts

- Don't make false or misleading entries to conceal improper activities
- Don't share innacurate/incomplete information (financial statements) to a third party in order to secure the company's interest

4.6 Respect of Webhelp's image

We are a responsible not to make use of information in a way that would harm Webhelp or any of its clients and protect Webhelp's reputation by our behavior, or declarations on any medium (written media, radio and television, photographic media, social networks, e-mails, telephone exchanges).

Hurting Webhelp's image will hurt all of us.



4.7 Communication media / Social network

At Webhelp we are committed to creating unforgettable human experiences for today's digital world. The realm of social media is an integral part of the lives of our game-changers and clients alike. We encourage our game-changers to enjoy their social media platforms, but also emphasize the importance of acting in a professional manner when referring to Webhelp online. We encourage our game-changers to reshare our official posts and tag their own posts with hashtags such as #wearewebhelp and our people engagement program names. We do not allow our game-changers to post or comment in name of Webhelp, unless explicitly authorized to do so – e.g. our social media managers.

We put our clients at the heart, but are a provider, therefore do not use or tag our clients' names, nor share any client or company related information online. Finally, should you like to share any frustrations or disagreements with colleagues, we encourage you to share them in private message or reach out to your manager or the Human Resources Department, and/or the Compliance Department to resolve any situation.

Social media is notorious for misinterpretations and viral reactions which could harm both our company's reputation and your own.

+ Do's

- Always use common sense when posting content on Social Media. If in doubt, leave it out. Remember that what you post on the Internet is permanent and what you write can have real world consequences
- Feel free to support Webhelp on Social Media. The easiest way of doing this is by liking, commenting, sharing and retweeting company posts
- You are an important ambassador for our company and we're happy for you to say that you work for Webhelp; however, you must state clearly that the views/opinions expressed are your own
- Be respectful of Webhelp's culture and values as well as other cultures, religions and values

✗ Don'ts

- Don't access Social Media platforms via your personal devices in any operational areas unless you are authorized to do so
- Don't let any incorrect, confidential or non-public content about Webhelp or its clients be posted on Social Media. Confidentiality policies and laws always apply
- Don't speak on behalf of Webhelp unless you are asked or authorized to do so





Think Human

WEBHELP SAS

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France

webhelp.com

bkms-system.com/phonethics