

Teleperformance Group

Health & Safety Policy



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Alan Winters
 Group Chief Administrative Officer,
 Deputy Global Compliance Officer,
 Group Chief Privacy and Data Protection
 Officer

1. Introduction & Objectives

Teleperformance aspires to provide the highest standard of Health & Safety (“H&S”) for our employees, contractors and visitors. We aim to foster a positive H&S culture and reduce the risk of work-related illness or injury by providing a safe work environment.

The purpose of this H&S Policy is to set out how Teleperformance manages H&S in the workplace and our H&S management framework by defining who does what, when and how they do it. This H&S Policy is applicable to anyone entering our facilities, including employees, contractors and visitors.

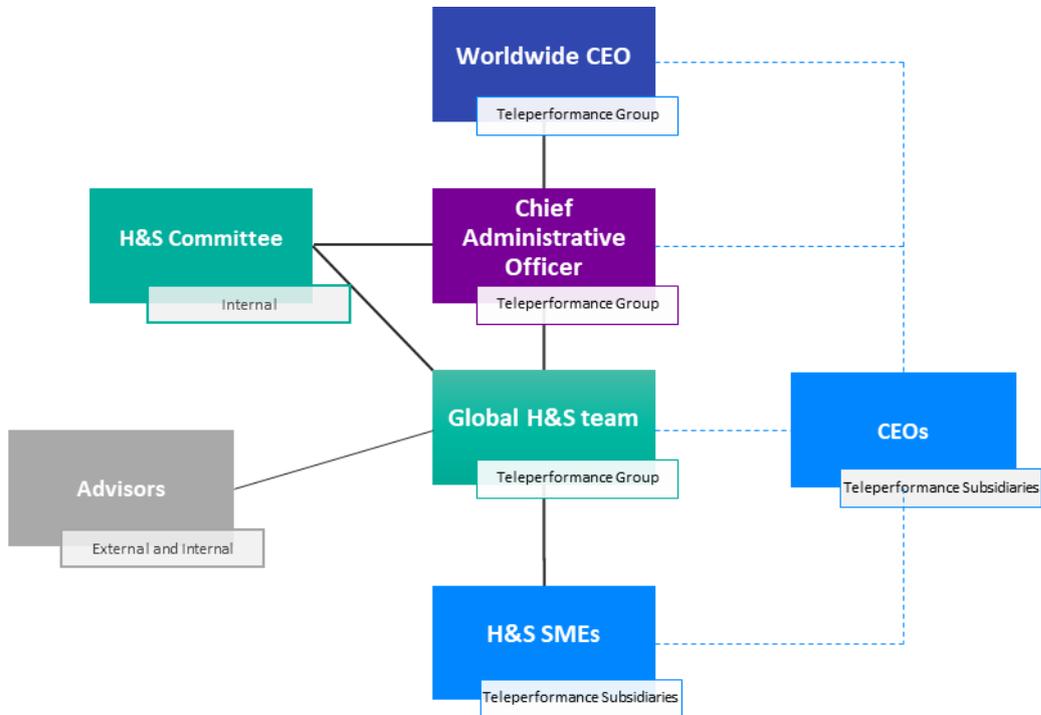
2. Statement of General Policy

Teleperformance is committed to:

- *Providing and maintaining safe and healthy working conditions, including safe equipment, workstations and furnishings;*
- *Performing risk assessments to identify, prioritize and address H&S risks arising in our workplace and from our workplace activities;*
- *Preventing H&S accidents and incidents at our sites, and responding quickly and effectively if an accident or incident occurs, in order to protect our employees, contractors and visitors;*
- *Providing all employees, contractors and visitors with appropriate training, information and resources to enable them to conduct their activities safely;*
- *Consulting with our employees and their representatives on matters affecting their H&S in the workplace;*
- *Evaluating our H&S performance through regular reviews and audits; and*
- *Complying with all applicable H&S laws and regulations and maintaining management systems to track the fulfillment of our compliance obligations.*

3. Organization and Responsibilities

3.1. Teleperformance H&S Organization



Each Teleperformance company is responsible for appointing one or more qualified and experienced H&S Subject Matter Experts (SMEs), who enroll in the H&S SME Learning Path and serve on the local H&S Committee. The H&S SME Learning Path provides in-depth training on this H&S Policy, H&S Site Inspections, Risk Assessments, Accident/Incident Reporting, Evacuation Drills and New Hire Orientation, among other topics. A Teleperformance H&S Toolkit is available on the Group intranet for all H&S SMEs to implement our H&S culture, as Teleperformance is committed to providing its employees and contractors with safe and healthy working conditions on a continuous basis by minimizing risks of ill health and injury in the workplace.

3.2. Scope of H&S Policy

The scope of this H&S Policy covers Teleperformance Core Services sites including ARM and DIBS, whether leased or owned, shared or dedicated.

Language Line, TLS and Work-at-Home Agents are not included in the scope of this H&S Policy.

Teleperformance has several operations in which Teleperformance employees work at the client's premises. While this H&S Policy applies to our employees, the client's local H&S policy takes precedence for employees working at the client's premises. The manager of the Teleperformance operations at the client's premises is responsible for ensuring that an adequate local H&S policy and H&S arrangements are in place. In cases where the client does not have a specific H&S policy, the operations should, at a minimum, meet the requirements of this H&S Policy.

3.3. Teleperformance Responsibilities

The overall responsibility for the implementation of this H&S Policy lies with the Group Chief Executive Officer. The CEO of each Teleperformance company is responsible for the implementation of this H&S Policy in each of the sites it operates.

The day-to-day responsibility for ensuring this H&S Policy is followed is delegated to the company H&S SME in each Teleperformance company. If a Teleperformance company has several sites, the company CEO should specify in the company business plan who on the site level should support the company H&S SME. Each Teleperformance company is responsible for nominating an H&S Committee and/or team to evaluate H&S risks at each location and make recommendations to reduce these risks. The H&S Committee should include representation from the senior management team (e.g., CEO, CFO, EVPO, CHRO or CIO).

It is the responsibility of each Teleperformance company, typically the CEO and/or CHRO, to ensure that all H&S matters are discussed or communicated to employees' representatives, if such groups exist.

3.4. Employee Responsibilities

Each employee has a duty and responsibility to take reasonable care of their own health and safety, and that of others who may be affected by their acts or omissions. These duties include:

- *Cooperating with line managers and other department managers to ensure that safe and healthy work practices are maintained;*
- *Reporting any H&S concerns promptly to a local contact designated by the company CEO (or to the client's management when working in client facilities); and*
- *Acting responsibly in the workplace, attending H&S trainings, and refraining from unsafe behavior at work.*

3.5. Site specific hazards

Each Teleperformance company is responsible for performing a risk assessment of each of its sites and their surroundings, as site specific hazards can be linked to the building (e.g., staircases, corridors, parking areas, cafeteria, gym, dormitory) as well as the outside environment (e.g., risk of flooding, typhoon, earthquake, violence).

4. Local Risk Controls & Arrangements

Each Teleperformance company is responsible for having enough well-trained staff in each of its sites to properly manage H&S, ensure that employees attend H&S trainings, and implement risk controls to help the company identify, prioritize and address H&S risks.

4.1. H&S Risk Assessments

Each Teleperformance company is responsible for conducting an H&S Risk Assessment annually at each of its sites, to systematically check for all types of potential hazards. In addition, whenever a major change in the premises occurs (e.g., expansion, reconfiguration, etc.), a new H&S Risk Assessment should be done. After each H&S Risk Assessment, local management is responsible for implementing appropriate actions to mitigate the identified risks within a clearly defined timeframe.

4.2. Site Inspections

Each Teleperformance company is responsible for conducting site inspections, comprised of walk-around inspections to check on physical hazards (e.g., an emergency exit path blocked), equipment maintenance, dangerous conditions, and overall order in the site. These site inspections should be conducted monthly or more often if appropriate based on the applicable H&S Risk Assessment. If any potential risks are identified, local management is responsible for putting in place corrective actions within a clearly defined timeframe.

4.3. Accident, Incident and Near-Miss Tracking

Each Teleperformance company is responsible for implementing a process to analyze, monitor and report all accidents, incidents or near-miss accidents that occur in or around the premises. This process should include a requirement that local management put in place corrective or preventive actions to decrease the likelihood of future accidents or incidents that could result injuries to employees, contractors or visitors.

4.4. Detection & Alarm systems / Facilities equipment

Each Teleperformance site must be equipped with a system to detect and alert in case of a fire or other emergency. Local management is responsible for having the system tested regularly and keeping it properly maintained by adequately trained and competent personnel. Local management also is responsible for maintaining all equipment located on or near its Teleperformance site in good order and repair, and keeping any equipment testing and maintenance logs up-to-date according to local regulations.

4.5. Evacuation Drills

Evacuation drills help us observe and identify appropriate actions to reduce the risk of accidents and injuries, and serve the following purposes, among others:

- *Familiarizing all occupants with procedures;*
- *Identifying weaknesses in emergency communications, procedures and systems;*
- *Detecting equipment deficiency (e.g., alarms or lights not working, locked exit doors not opening automatically, etc.);*
- *Identifying any weaknesses in the evacuation strategy or employee behavior; and*
- *Testing the arrangements for disabled employees.*

Local management at each Teleperformance site is responsible for conducting one or more evacuation drills each year, depending on the site's staffing (e.g., number of shifts per day/night and turnover) and what has been set out in the site's H&S Risk Assessment. In any case, appropriate arrangements should be made to ensure that the majority of employees participate in at least one evacuation drill per year.

4.6. New Hire Training

To foster a positive H&S culture from each employee's first day in Teleperformance, all new hires should receive an in-person introduction to Teleperformance's H&S culture in the workplace and confirm they have understood the responsibilities of all parties.

The goal of the H&S New Hire training is to increase awareness around safe and healthy conduct and thus minimize the risk of unsafe or unhealthy behavior. This training should be practical and tailored to each site. The main issues to be covered include:

- *Responsibilities (employer & employees)*
- *Ergonomics*
- *Safe behavior in different situations*
- *Main risks of injuries and accidents in the workplace*
- *Evacuation procedures and roles (who does what)*
- *Emergency signage, exit routes & assembly points*

4.7. Other Trainings

Each Teleperformance company is responsible for providing additional training for specific roles & responsibilities in each of its sites. The training plan will be defined locally, depending on the organization and regulatory requirements, but should include at least the following:

- *H&S Subject Matter Experts (IOSH, NEBOSH among others)*
- *First Aiders*
- *Emergency Response Teams (Fire marshals, lock down teams, sweepers....)*
- *Site Management*
- *Specific teams e.g., (security, kitchen personnel, facilities, etc.)*

4.8. Communication & Awareness

Effective communication is a crucial part of fostering a positive H&S culture. H&S communication comes in various forms, including this H&S Policy, CEO Statements, H&S training, H&S procedures and controls, H&S reporting, and H&S awareness campaigns.

Each Teleperformance company is responsible for carrying out H&S communications locally at each of its sites using methods best suited to each site, such as videos, H&S awareness campaigns, posters, and/or CCMS communication. To support this effort, the Group provides communication tools, such as Group H&S Video & Global H&S Campaigns (Passion4U).

5. Global Monitoring & Auditing

5.1. Remote Auditing

Each Teleperformance company is responsible for uploading in TP Policy evidence of compliance with the Group's requirements in terms of H&S implementation across all its sites. Each piece of evidence should be renewed on an annual or bi-annual basis depending on the type of risk.

The evidence is audited by the Global H&S team at least annually to ensure compliance with international OHS guiding principles covering the following areas

- *H&S Responsibilities, Communication & Awareness*
- *H&S Preparedness*
- *H&S Risk Detection & Prevention*

Based on the audit, each site will be graded and, depending on the grade received in each category, local management, working with the Global H&S team, will put in place an action plan and timeline for improvement of H&S compliance and the uploading of new evidence for review by the Global H&S team.

5.2. Onsite H&S Inspections

In addition to remote auditing, onsite H&S Inspections are conducted by the Global Compliance Audit team in coordination with the Global H&S team.

The Global Compliance Audit team will deliver its report to site and company management with an overall result of the H&S inspection: Satisfactory/Unsatisfactory, Critical Finding(s), Findings and Observations. Following the report, site and company management will adopt a corrective action plan and timeline for each site based on the findings.

5.3. Full H&S Audits

Following internal compliance audits results – either remote audits in TP Policy or onsite H&S Inspections, if any critical/high level alerts are identified, based on a set of pre-defined rules and thresholds, a full H&S Audit in the site /company in question will be executed within 90 days.

5.4. H&S Reporting

Global H&S results are reported to the Executive Committee on a quarterly basis and to the Audit and Compliance Committee of the Teleperformance Board of Directors on a semi-annual basis.