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United Nations Global Compact

Communication on Progress
2014|2015

Sitel Corporate Social Responsibility



Experience shared.

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Statement of continued support by the CEO



Dear Stakeholders,

For another year, we are proud to be part of the United Nations Global Compact. And this year we are excited to confirm that we have extended what started as a localized initiative in our Spanish business unit to apply to our global Sitel operation.

As global corporate citizen, Sitel recognizes its obligations to act responsibly, ethically and with integrity in our interactions with all stakeholders be they our Associates, clients, suppliers, or the communities and environment in which we all live and work.

Sitel strives to treat all of our Associates with respect. We are mindful that we share a responsibility to provide opportunities for individuals and contribute to the well-being of the communities in which we operate.

I am pleased to confirm that Sitel reaffirms its support of the ten principles of the Global Compact in the areas of human rights, labor, environment and anticorruption. In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business operations.

Over 2014 and 2015, our main focus has been the development of a global Corporate Social Responsibility framework to provide a solid foundation for the implementation of corporate policies and practices that support the ten universally accepted principles.

Our global framework seeks to blend the principles of the Global Compact into Sitel's existing strategies, plans, cultures and operations.

Sitel is proud that many of our Associates are taking an active part in helping to drive this initiative.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Quintana', with a long horizontal stroke extending to the right.

Bert Quintana
President & Chief Executive Officer



About Sitel

About Sitel

Sitel is a leader in the global customer care outsourcing industry. We meet clients' customer care and transaction processing needs through 62,000+ Associates in approximately 100 customer contact center and related facilities in 21 countries.

Sitel provides world-class solutions from onshore, nearshore and offshore locations across North America, South America, EMEA and Asia Pacific. Clients receive the strategic insight, scale and diversity of offerings to ensure the best return on their customer investment through Sitel's award-winning services.

Sitel was originally founded in June 1985. In October 2006, ClientLogic and Sitel announced a definitive merger between the two outsourcing firms. When the merger was finalized on January 30, 2007, the newly branded Sitel emerged as a significant industry leader with the single most diversified client mix, vertical industry expertise and global footprint in the industry.

Sitel is a privately held company incorporated in Delaware, wholly owned by Groupe Acticall, S.A.

Sitel Worldwide



Revenue

Sitel annual global revenue was approximately \$1.4 billion per annum during this period.

About this report

This report serves as *Sitel Worldwide Corporation's* first Communication on Progress to the United Nations Global Compact (UNGC) initiative. Sitel Ibérica S.A. was the first affiliate company to join the UNGC in 2012 and this is the first year that we are reporting as global organization.

We have taken a decision to move from reporting a year in arrears to a current year basis, in line with many of our peers. To enable this change, this report reflects our performance and progress

towards meeting the UN Global Compact's principles during the two calendar years 2014 and 2015. This document also outlines our goals for continued improvement and plans to further build our corporate responsibility initiatives. Going forward, subsequent reports will annually track our progress against those objectives on a current year basis.

For further information about Sitel, please visit: www.sitel.com.

Scope of this report

This report relates to our global operations including those locations where we operate our own sites, those locations where we operate from client locations and the 60+ countries into which we provide services.

Sitel CSR Program

In 2014 Sitel launched a global Corporate Social Responsibility Program as a way of improving its business practices in the social and environmental arena.

At a fundamental level, Corporate Social Responsibility (CSR) involves looking beyond a profitability focus to a wider commitment to building a better society.

CSR challenges companies to take responsibility for their impact on the community and environment in which they operate regardless of whether this is through their actual business practices, how the company treats its Associates and/or through "extracurricular" activities such as charitable donations, or staff volunteering projects.

While we acknowledge the standards underlying CSR should be part of normal business practice, by formalizing this in a global program, we hope to make CSR an important element of our corporate identity.

CSR is meant to be a proactive program which aims to:

- Mitigate negative impacts and unethical conduct, by ensuring safe working conditions and the respectful and dignified treatment of workers and Associates;
- Assure our clients of the ethical conduct of company business;
- Establish, control and deliver company activities at a minimal potential pollutant level, providing guidance and direction for the implementation and operation of environmental controls;
- Establish, implement and maintain appropriate control over Health & Safety hazards;
- Integrate, where possible, socio-economic, environmental, occupational health and safety, human rights, and governance best practices into our business processes.



Sitel's CSR Program covers the following elements:

Human Rights and Labor. Upholding the human rights of our Associates.

- Working hours
- Wages and benefits
- Humane treatment
- Non-discrimination
- Freely chosen employment
- Child labor avoidance
- Freedom of association

Ethics. Corporate values and the way in which we conduct our business.

- Business integrity
- No Improper advantage
- Disclosure of information
- Intellectual property
- Fair business, advertising and competition
- Protection of identity

Health & Safety. Welfare of our Associates free from injury or illness.

- Occupational risk management
- Emergency preparedness
- Occupational injury and illness

Environment. Reducing the pollutants from and within our facilities.

- Environmental risk management
- Pollution prevention and resource reduction
- Waste disposal and recycling

Sitel's Global CSR Framework

We have designed our *Global CSR Framework* to foster Sitel's adherence to the law, ethical standards and international norms, as well as to incorporate social and environmental values into our business model.

Sitel's *Global CSR Framework* was designed taking into account key industry best practices, and is centered on a "PLAN-DO-CHECK-ACT" methodology of continuous improvement endemic in Sitel's business culture. Our framework is a management system approach that we believe will drive sustainable solutions.

CSR Policies

Sitel has adopted a *Global Code of Conduct* and

Ethics which defines the ethical standards by which Sitel conducts its business and a *Supplier Code of Conduct*, which sets out the standards we expect of our suppliers. As a complement to the *Global Code of Conduct*, Sitel has adopted a *Corporate Social Responsibility Policy* to document Sitel's commitment to best practices in the area of CSR.

Through our CSR policy, Sitel recognizes the importance of establishing a documented CSR program to demonstrate sound:

- Social responsibility to our Associates, by providing safe working conditions and treating Associates and others with respect;
- Organizational health and safety awareness, by recognizing and controlling health and safety hazards across Sitel;
- Environmental stewardship, by controlling the impact of waste from business and the other impacts of business activities, products and services on the environment.

We believe

Sitel believes that conducting business with a high standard of professional conduct, ethics and proficiency is critical to our success and the success of our clients. We continually strive to improve our processes and procedures to achieve the highest quality and the best results for our clients in accordance with all applicable laws and regulations and in respect of the principles of the UN Global Compact.

The Ten Principles of the UN Global Compact

Human Rights

- **Principle 1.** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2.** Make sure that they are not complicit in human rights abuses.

Labor

- **Principle 3.** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4.** The elimination of all forms of forced and compulsory labor;
- **Principle 5.** The effective abolition of child labor; and
- **Principle 6.** The elimination of discrimination in respect of employment and occupation.

Environment

- **Principle 7.** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8.** Undertake initiatives to promote greater environmental responsibility; and
- **Principle 9.** Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- **Principle 10.** Businesses should work against corruption in all its forms, including extortion and bribery.



Human Rights

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2

Make sure that they are not complicit in human rights abuses

Sitel is an organization committed to the respect of human rights and upholding labor standards, and to ensuring all internal and external stakeholders are treated with dignity and respect.

Sitel's human rights practices are embedded within the company's policies, including the *Sitel Global Code of Conduct and Ethics*, the *Sitel Supplier Code of Conduct and Ethics*, and the *Sitel Global Corporate Social Responsibility Policy*. Sitel respects the principles of the UN Global Compact throughout our global operations.

All Associates are required to review and certify their understanding of and compliance with the *Sitel Global Code of Conduct and Ethics*. Key Sitel Associates undergo annual code of conduct and ethics training, in which they learn about the major components of the *Sitel Global Code of Conduct*, how it can be used to guide decisions and actions in specific situations, and what actions are appropriate to take when a violation of the *Code of Conduct* is suspected. This online training also serves to increase our Associates awareness of how to deal with everyday situations that challenge their ability to demonstrate respect and inclusion.

Suppliers are another important part of our business and we expect the same commitment from them as we do for ourselves. This is why we have established a *Sitel Supplier Code of Conduct and Ethics*. In order to do business with Sitel, suppliers are required to review and acknowledge their conformance with Sitel policy.

Reporting

Concerns about human rights or other issues can be brought to our attention via *EthicsPoint*, a confidential, integrated toll-free telephone and web-based hotline. *EthicsPoint* is staffed by an independent third party that is available 24 hours a day, seven days a week, with interpreters available for language assistance.

Country-specific guidance is also available through the *Ethics and Compliance Portal* on the Sitel global intranet. Reporting procedure and contact information for the *EthicsPoint* is also available on posters on notice boards in all sites, in the *Sitel Code of Conduct and Ethics* and in other relevant policies.

Reporters may use the *EthicsPoint* as a channel to report activities that may conflict with Sitel's logical and ethical standards or breach Sitel policies, such as the *Global Code of Conduct and Ethics*, the *Supplier Code of Conduct and Ethics*, the *Anti-Bribery and Corruption Policy*, the *Global Privacy Policy* and many other Sitel policies. Suspected accounting, financial, or audit matters, frauds, dishonest acts, bribery or anything that may affect the vital interest of Sitel or the moral or physical integrity of its Associates may be reported. Reports may be submitted anonymously where permitted by law.

Sitel's *Global Code of Conduct and Ethics* includes an open door policy and strictly prohibits retaliation against any person for making a report in good faith or cooperating in an investigation.

Policies

Sitel invests significant effort to promote policies that are consistent with our goals. Sitel has conducted a review of the company's relevant policies in order to embed Sitel's commitment against all forms of human rights abuses.

The Sitel Global Code of Conduct and Ethics defines the ethical standards by which Sitel conducts its business and the Sitel Global Corporate Social Responsibility Policy documents Sitel's commitment to best practices in the area of social and environmental responsibility. All Sitel policies are accessible to the Associates and available in the company's intranet.

Sitel has also published a *Corporate Social Responsibility Statement*, endorsed by our CEO, to stress our commitment to social responsibility by providing safe working conditions and treating our Associates and others with respect and according to the standards of the UN Global Compact, and by controlling the impacts of business activities, products and services on the environment. Copies of the CSR Statement are available in all Sitel sites across the globe and electronic copies are available both internally in the Sitel intranet, and externally in Sitel corporate website.

Sitel Footprints

Site Footprints is a CSR Program that aims to have a positive impact on the communities where we operate, through the expertise of the business and further enhancement of philanthropic, diversity and sustainability efforts on corporate responsibility in all Sitel locations around the globe. *Sitel Footprints* serves as the umbrella program for a number of CSR projects focused on *Education and Job Generation, Health and Wellness, Social Responsibility, and Environmental Conservation*.

The *Sitel Footprints* program aims to support community projects in those areas we operate in and call home.

Sitel aims to partner with reputable organizations, including non-governmental and civil society organizations and make meaningful and sustainable contributions to the host countries and communities where Sitel operates.

Our goal

Sitel will provide ethical and safe working condition and respectful and dignified treatment of Associates and fully embed the company's commitment against all human rights abuses.

Sitel will engage suppliers in its corporate social responsibility program, by having suppliers acknowledge compliance with Sitel's *Supplier Code of Conduct and Ethics*.



Labor

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4

The elimination of all forms of forced and compulsory labor

Principle 5

The effective abolition of child labor

Principle 6

The elimination of discrimination in respect of employment and occupation

Sitel Associates are the core of our business, and we conduct our business with respect for and adherence to principles of diversity and equal employment opportunity. Sitel is further committed to providing a safe and healthy work environment that minimizes the incidence of work related injury, is free from harassment, discrimination, harsh treatment and acts or threats of violence. It is our goal to promote an environment that encourages open communication, promotes mutual respect and teamwork, and which encourages individuals to develop and learn.

Child, forced and compulsory labor

Sitel condemns all forms of compulsory labor. Sitel treats its Associates with dignity and respect and does not condone the use of forced, bonded or indentured labor, involuntary prison labor or the trafficking of persons.

Sitel upholds an environment where work is voluntary and Associates are free to terminate their employment. No Associate is required to surrender any personal document as a condition of employment.

Additionally, Sitel does not support child labor in any matter or form. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Sitel does not expose children to any situations - in or outside of the workplace - that are hazardous or unsafe to their physical and mental health and development.

Freedom of association

Sitel upholds its Associates' rights to join or refrain from joining worker associations in accordance with the law. Where worker organizations are legally recognized, Sitel recognizes those rights provided by law.

Sitel seeks to ensure that representatives of Associates and any personnel engaged thereby, are not subjected to discrimination, harassment, intimidation, or retaliation for reason of their being members of a union or participating in trade union activities, and that such representatives are afforded their rights under the law.

Non-discrimination and equal employment opportunity

Sitel employs a diverse workforce and does not tolerate unlawful discrimination.

Sitel seeks to provide a work environment free of unlawful discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, or marital status. At Sitel, Associates or potential Associates are not subjected to medical tests for any unlawfully discriminatory purpose.

Sitel is committed to equal opportunity for all qualified Associates and job applicants. Applicants and Associates are evaluated and compensated based on their qualifications, demonstrated skills, and achievements, in an environment free from unlawful discrimination.

Our commitment to equal opportunity is an investment in our people and our future growth. A company that attracts, selects, develops, and retains the best people will remain the industry leader. Sitel's ongoing efforts in this area will provide us with a critical competitive advantage in the marketplace.

All employment decisions - such as hiring, discipline, terminations, promotions, and job assignments - are based on Sitel's needs and an Associate's performance and potential. These decisions are made without regard to a person's gender, race, color, national origin, age, religion, sexual orientation, or any other characteristic protected by applicable law.

Sitel endeavors to address non-discrimination and gender equality through Sitel's internal hiring and promotion processes. Over 70% of our *Coaches*, *Managers* and *Site Directors* are promoted from within our diverse and global agent population. In 2014, 51.9% of Sitel's total workforce was composed of female Associates. In 2015, this percentage increased to 53.1%. Female Associates in leadership position - managers and above - increased 2.8% in the same period.

Sitel India has launched a *Women's Empowerment* program to help women to realize their potential and to offer key information for their personal development. The program focuses on gender equality and women's empowerment not only as human rights, but also because they are important for sustainable development.

In the first three quarters of 2015, Sitel India Associates had a total of 1,825 hours of activities related to women's empowerment, covering 1,269 female Associates in our four Indian sites. The activities included inspirational, educational seminars and activities to boost confidence and self-esteem, such as seminars and other similar activities on sexual harassment and women's safety, healthy hearth, stress management, personal health, bone mineral density, women's wellness activities, and cancer awareness, and even a *Women's Cricket Tournament* and a fashion show.

Professionalism and harassment

Sitel Associates are expected to be respectful of others' customs and traditions. We treat each other, our clients and their customers with respect, courtesy and dignity.

Each Sitel Associate throughout the world is entitled to work in a professional atmosphere, free from all forms of harassment. Sitel seeks to provide a work environment without harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of Associates or threat of any such treatment.

Sitel supports Associates in reporting any inhumane treatment without fear of reprisal or intimidation. Sitel prohibits retaliation against anyone who reports discrimination or harassment or who participates in an investigation of such reports. Sitel

strongly encourages its Associates to report any harassment to appropriate company officials.

Open door policy

Sitel operates under a set of values that illustrate how we do business and work together. We are committed to ensuring a positive work environment and to providing the best possible working conditions for our Associates.

Part of this commitment includes encouraging an open and frank atmosphere in which any problem, complaint, suggestion or question that is delivered in a respectful manner receives a timely response from management.

.....
All Associates are expected to treat each other with courtesy and mutual respect and are encouraged to offer positive input and constructive criticism to help improve relationships and the way we work together.
.....

If any Associate wishes to discuss any matter directly with someone at a level higher than their manager, they can do so, without fear of reprisal. Sitel's *Open Door Policy* may be used whenever job-related concerns or questions cannot be resolved directly between an Associate and his or her immediate supervisor, or if the Associate is simply not comfortable bringing the concerns to the supervisor.

Associates who have experienced conduct that may be contrary to Sitel policy may report their concerns to their immediate *Manager*, a member of the *Human Resources* department, or the *EthicsPoint* hotline.

Our *Open Door* philosophy is embedded in how our organization works every day. Because we are a virtual organization, often the open door is facilitated through access on email or *Skype*® and *Human Resources* via the *HR HelpDesk*. At all of our sites, leaders are accessible and are encouraged to walk the floor so that agents may easily ask questions or provide feedback.

One great example is that every week our *CEO* films and sends out a short video to keep our Associates informed about what is happening across the globe. Following every video, a brief survey is included so that any Associate can respond and provide feedback. Our *CEO* reads every single survey comment and personally responds as appropriate. Our executive team is constantly engaged in skip-

level meetings and discussions with Associates - since many of our leaders began their careers in the contact center, they are well-attuned to the needs of a frontline associate population and work hard to ensure a *People-First* culture in their daily actions.

Associate satisfaction

We encourage all Associates to share ideas and work together to make Sitel a great place to work as we strive to achieve our common goals of personal and professional success.

At Sitel, we administer a global annual employee survey called *Sit & Tell* through which we measure progress on our *People* strategy against employee engagement, and employee *Net Promoter Score* for all Associates. We use the results to create targeted action plans that are led by *Human Resources* in partnership with leaders across the globe for every region and function utilizing standard process and tools on our global *Sit & Tell SharePoint*.

Each business and function reviews their results with their Associates and identifies focus areas for action planning. They also assign a *Results to Action (R2A) Champion* to sponsor the action planning process. Each *R2A Champion* has a team of volunteers who are working to change their focus areas into actionable plans. The goal is to have an action plan charter in place that is shared with all of the Associates.

Global diversity and inclusion

As a global company, Sitel recognizes and celebrates the cultural differences among its workforce and provides a workplace that respects those differences.

At Sitel, we recognize the benefit of a diverse supply chain in our global markets with Associates, customers, and suppliers coming from diverse backgrounds and cultures. We believe that a culture of diversity and inclusion positively affects the workplace and drives superior business performance, which allows us to compete successfully in a global marketplace.

One of our fastest growing businesses is our *Work@Home* business, where our employees are able to work directly from their homes. We aim to recruit more Associates from the larger disabled population because of the ability of our *Work@Home* programs to suit the needs to those

persons with limited mobility or other disabilities. Notwithstanding the flexibility of our *Work@Home* programs, we further find that for physical disabilities, specifically, Sitel's contact center environment is also a great place to work. Many of our Associates, who have worked in physically demanding industries, like the military or construction, often appreciate Sitel job opportunities because of the comfortable working conditions and benefits.

Another example of actions to improve the opportunities for people with disabilities is the goal for our Spanish operation to have at least 2% of disabled Associates in the workforce. Sitel Spain collaborates with the *Discatel* Project whose main objective is to demonstrate the technical feasibility and economic and social performance of contact centers by allowing telecommuting from home or remote centers for people with physical disability. Our Spanish sites also work in a complementary way with the *Carmen Pardo-Valcarce Foundation* to print the local newsletter *Sitel Informa*. Almost 90% of *Carmen Pardo-Valcarce's* staff have disabilities and they teach the employees how to use tools and printing machinery, as well as all kinds of tasks from layout design to printing, filming and logistics.

Sitel's Procurement organization also seeks to increase Sitel's procurement of goods and services from minority, women and disabled business enterprises owned or controlled by minorities, women, the disabled and military veterans.

Training and development

Sitel provides learning and development opportunities to train all Associates in undertaking their jobs effectively and efficiently. It also promotes the continued growth and development of their careers. The aim is to identify learning needs, develop training programs and ongoing evaluation and monitoring of trained staff. All Sitel leading positions are required to undergo a specific leadership training plan.

Learning & Development at Sitel encourages all Associates to learn and grow through the benefits of continued and steady development.

With a combination of mixed training, classroom, distance and online, Sitel ensures its employees the

opportunity to participate in a learning environment and training uniform, consistent and effective:

- **Live training courses.** Based primarily on classroom training courses through the use of various tools, graphics and audio-visual support. Normally, physical documentation support and practical guidance, as well as exercises and quizzes are delivered.
- **On-line training courses.** Training courses are done through the Internet and/or telephone and not face-to-face. Supporting documentation, exercises and questionnaires are made available via the web.
- **Joint training courses.** Mixed courses include classroom, distance and online modules.
- **Continuous training courses.** Aimed at ensuring the maintenance and improvement of quality in the services we provide to our clients' customers as well as continual professional development and education of our Associates.

Sitel has a dedicated *Global Training Leader* and has invested heavily in its training organization. The focus has been on improving the training content and delivery to be more effective and efficient for our Associates.

In 2014, 4,535,699 hours of training were delivered to our Associates.

In 2015, Sitel delivered
4,450,985 hours
of training to its Associates

In addition, we are in the process of implementing a new performance, career development and online learning platform in 2016 for all Associates.

In 2015, we also placed a special focus on our top-performing employees by launching three *Global Leadership Councils*. These councils focus on specific populations - *Operations Managers*, for example - to link high-potential Associates around the world together for best practice sharing, insight from our executives, and collaborative work. The council members work together to plan agendas and identify areas within the company where they can contribute to solving real business problems or finding innovative solutions to complex challenges. Our associates are truly enjoying being part of a global peer group, and we look forward to

expanding the council approach to other teams in 2016.

Each of our regions also sponsor a variety of activities dedicated to connecting Associates and promoting our *People-First* culture. Below are two examples from Sitel Philippines:

Manager Conclave: Over 100 managers and executive leaders came together to meet one another, build their professional skills, and learn to work more effectively as a team to share best practices across the region.

Experience Shared sessions: This activity started primarily as a platform to invite employees to share their Sitel experiences or life experiences that have contributed to their careers in a positive way. These activities happen on a weekly basis in our Baguio site and on a monthly basis in Manila. The theme is different for each session. Recent sessions have included topics such as helping single parents balance personal and professional life and how employees from para-professional roles, such as janitorial or security, can become full-time Associates.

Sitel University

Sitel University is the company's global learning management system which provides all Associates with a wide variety of online, self-paced, and instructor-led trainings, in multiple languages. This learning environment allows Sitel Associates all over the world to participate in a centralized and uniform training environment that has proven to be convenient and effective, and gives Sitel the opportunity to report on training participation globally.

Sitel University offers hundreds of courses on topics ranging from Sitel-specific content to compliance, management, leadership, team building and professional development.

Sitel University encourages Associates to continue to learn and grow through the benefits of e-learning. And above all, Sitel University is a symbol of the dedication Sitel has to its Associates, with a purpose of bringing out the true potential of each individual.

All Associates are required to participate in an online course that covers, among other topics, the *Sitel Global Code of Conduct and Ethics*, Corporate Social Responsibility, Privacy, Security and incidents

reporting. This course is a required annual certification.

Talent management and career opportunities

Sitel fills open positions by promoting Associates from within the company whenever possible, enabling our clients to benefit from trained, experienced personnel. Internal job openings are posted on our corporate intranet and within each site where Associates can submit an application for any posted position.

We invest in internal training programs to prepare Associates for advancement. Examples include our *Track Training* programs, designed to prepare Associates to become managers. Individual e-training courses are available through our learning management system, *Sitel University*. Depending on the individual goals, Sitel has pre-determined career paths to guide development towards a variety of positions. For example, there is a clear career path from *Agent*, to *Coach*, to *Operations Manager* to *Site Director* and above.

A formal talent management and succession planning program is used to help identify future leaders based on knowledge, skills, abilities, work ethic, performance, leadership abilities, key competencies and behavioral characteristics.

Sitel is committed to focusing on recruiting and retaining our agents by creating an environment that is positive, nurturing, and respectful. Career advancement based on individual strengths is strongly encouraged at Sitel. The ability to move up within the organization makes Sitel more than just a stopping point in an Associates' career.

Generally speaking, Sitel rarely recruits externally for *Coach* positions, as internal candidates can contribute notably more Sitel experience. Our job-posting system aids in internal promotion, traditionally filling 80% to 90% of advanced positions at Sitel. In-house training programs are conducted regularly to further prepare Associates for advancement.

In 2014, Sitel promoted 5.4% of its Associates to higher positions and in 2015 the promotions represented 6.1% of the staff.

Given the size of Sitel population,
this means that

1,441 and **1,737**
Associates were promoted
in 2014 and 2015, respectively

Work and personal life balance

Sitel believes that maintaining a professional/ personal life balance and creating a family culture within our facilities is critical to employee satisfaction and success.

At Sitel, one of our brand pillars speaks to our philosophy on work life balance - *Global Strength, Local Flexibility*. Indeed, we continue to promote local ways of working as part of doing business so that employees can work wherever, and to some extent, whenever they want. In fact, one of our fastest growing businesses is *Work@Home*, where our agents are able to work directly from their home. Additionally, we continue to invest in technology so that we can connect with each other no matter where we are located. It is typical for business meetings to be held virtually, utilizing Skype® and conference bridge services so that our employees are able to work effectively together, even if they are not together in one location.

In 2014, *Work@Home* agents constituted 2.9% of our total agent population, and the following year the percentage of Associates benefiting from this program increased to 3.8%. In our 2015 Associate engagement survey, when we asked each of our Associates to report on their work life balance, 79% of all participating Associates and 83% of *Work@Home* Associates reported being able to balance their work and life. We think we can continue to make progress as we support flexible working opportunities for our Associates.

In 2014 we had **1,445** *Work@Home* agents
In 2015 we have **1,995** *Work@Home* agents

As an example in the Philippines, aside from the attractive benefits package every Sitel Associate enjoys, the Sitel *Human Resources* team promotes work-life balance by bringing certain vendor services nearer to our Associates. Pamper and massage day, haircut day, pizza day or medical check-up days are just some of the activities done in partnership with different companies through the efforts of the Sitel *HR* team. General assemblies and client-sponsored events and parties are also a favorite because Associates are able to bond and build better relationships outside the workplace.

Sitel also holds *Corporate Social Responsibility* activities in all sites which are usually sponsored by both the company and the Associates themselves. Company-wide events, such as Christmas and year-end parties and *Battle of the Bands*, soccer championships, also bring the Associates together to celebrate their successes as one big Sitel family.

In Brazil, at the occasion of *Child's Day*, the Associates are invited to bring their small children to work. During the day, the *Human Resources* team takes the children on a site tour to teach children about their parent's workplace and work routine.

Health and safety

Sitel is committed to providing a safe and healthy environment for our Associates, clients, and visitors. Sitel makes every reasonable effort to promote, create, and maintain a safe and healthy workplace by providing safeguards against injury or hazards through maintaining proper equipment, materials, facilities, and Associate training.

Sitel recognizes that, in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances Associate retention and morale.

We are aware that to successfully create a safe and healthy environment we must ensure our Associates understand the risks to their health & safety and work together with us to avoid them. It is essential that our Associates receive information on risk identification and risk avoidance, and know how to react during an emergency situation.

Our commitment to achieve these goals is to establish the means to develop preventive activities, to improve communication, procedures, information

and training, and investigation of incidents and accidents.

Sitel is committed to an open communication with all Associates on workplace health and safety, encouraging Associate input and continual education to identify and solve health and safety issues, or other concerns relating to working conditions without fear of reprisal or intimidation.

Sitel has implemented a global business continuity management policy to set required standards for emergency preparedness in all sites. Safety of our people is the first priority and is addressed prior to any consideration regarding Sitel's or clients' business requirements.

All Sitel Associates take our *Privacy and Security Awareness Training* in which they learn about Sitel privacy, security and safety policies, practical examples on how to apply them both at work and personal life, and also learn to identify situations that pose a risk to the company's and their own security. This training has annual refreshers to ensure all Associates are aware of the main elements.

Our Brazilian sites have established a committee to develop preventative solutions and corrective measures for any occupational health and safety issues. The committee members representing the employees are elected by the Associates themselves. The committee members meet regularly and develop risk assessments and plans to reduce accidents, provide training, and other programs related to health and safety in the workplace.

Communication

Communication plays a key role in the success of any program or policy and serves as the foundation for consistent workplace practices.

Sitel has several established communication channels for our Associates. First, we have a quarterly online employee magazine called *The Globe* that is translated into five languages and showcases information from across the globe, including *Human Resources*, leadership and client updates, and highlights associates and community activities, like volunteerism and giving.

We also have a weekly video blog from our *CEO*, called *Five Minute Friday*, where he typically chats with another leader from across Sitel about important and timely business updates. Our *CEO* films these videos across the globe so that events happening all over Sitel are regularly captured for all Associates.

At the local level, each site spends time every week communicating with Associates via meetings, social media, and bulletin board postings. Best practices include suggestion boxes used by site directors to solicit ideas from Associates for improvements. In addition, we continue to invest in our strategy and resources for social media communications so that we can more readily access all of our Associates.

Communication is bi-directional fostering not only communications to Associates but from Associates to management

In addition to our traditional communication channels, we also have a variety of touch points with our Associates to provide opportunities for dialogue between leaders and Associates. Examples include *Experience Shared* sessions in the Philippines and Europe where we held focus groups to learn more about what Sitel Associates value and what motivates them. We also have quarterly *Site Director* and *Coach* boot camps and on-boarding trainings where we bring leaders together from across regions to learn best practices and make sure they have what they need to support our Associates.

Our goal

Sitel will comply with applicable work and labor legislation and regulations in the operation of our business and support dignity and respect in the workplace.

Sitel will engage suppliers in its corporate social responsibility program, by having them acknowledge compliance with Sitel *Supplier Code of Conduct and Ethics*.

Additionally, we will enhance the use of human resources information systems as a reliable, single system of Associate record providing consistent and accurate reporting of Associate information globally.



Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges

Principle 8

Undertake initiatives to promote greater environmental responsibility

Principle 9

Encourage the development and diffusion of environmentally friendly technologies

We are committed to the concept of sustainable development which requires balancing the good of the wider global community, the protection of human health and the environment with the need for profitable growth of our operations.

Sitel provides world-class customer care solutions from onshore, nearshore and offshore locations in 21 countries. As a service provider, Sitel activities have little impact on the environment when compared to other industries. Nevertheless, Sitel believes in being a responsible, environmentally aware company, minimizing, wherever possible, negative effects on the community, environment and natural resources.

Sitel strives to comply with applicable environmental laws and regulations in the operation of its business and explores opportunities to be a good steward of natural resources through actions such as recycling, operating paperless and the use of energy efficient equipment.

Sitel is committed to reducing pollutants associated with its business which may have adverse effects on the community, environment and natural resources, while safeguarding the health and safety of the public.

All Associates are expected to be respectful of the communities and environment within which we operate, safeguarding the health and safety of the Associates and the public.

Procurement

As with all aspects of our business, we conduct our procurement using the highest ethical standards and considerations. Our procurement decisions take into account not only price, quality and reliability of service, but also how potential suppliers treat the people, communities, and environment in their sphere of influence.

Sitel expects suppliers to comply with all local and national environmental legislation, regulations and directives to protect and improve the environment, and have processes in place to ensure compliance. Suppliers should have action plans in place to manage their environmental impact, e.g. energy reduction and waste management programs.

Our goal is to work with our suppliers to ensure full compliance with these principles, as they in turn

apply those to their own suppliers they work with in the delivery of goods and services for Sitel.

As an example, in the US facilities, all utilized cleaning products are “green chemicals”. The Sitel Procurement team also negotiates with suppliers to provide the preferred choice of recycled paper in our sites.

Carbon footprint and use of resources

Sitel encourages the use of technologies that improve efficiency and conserve resources.

Business travel is a large contributor to the environmental footprint in our industry. Most notably, web and teleconferencing greatly reduces the need for business-related travel. By providing Associates with multiple conferencing options and collaboration solutions, Sitel encourages the use of the available technology, whenever possible, in order to reduce business travel, which, in turn, reduces the company’s carbon footprint.

New equipment purchased is assessed for energy efficiency. For example, purchasing energy efficient computers and other electrical and electronic equipment is a smart way to reduce energy consumption.

Examples of other actions that are being implemented, where possible, are the use of motion sensors for lights, use of low energy LED lighting, scheduling of air conditioning units turn on and off, shutting down computers when not in use, etc.

Additionally, waste prevention and recycling are powerful ways to use less energy, reduce greenhouse gas emissions, and contribute to a healthy climate. Everything we consume - from a sheet of paper to computers - requires energy for its manufacture, transportation and disposal. This energy is usually produced by burning fossil fuels and releases carbon dioxide and other greenhouse gases into the atmosphere. Our sites have recycling programs in place to minimize landfill impact and the release of harmful gases due to its production and disposal process.

Associate engagement in energy efficiency and carbon reduction can help change behavior in the workplace, to reduce unnecessary energy consumption and cut your organization's carbon emissions.

Sitel is developing a system to track, manage and reduce the use of natural resources and the greenhouse gas emissions of our sites. While saving energy is an obvious strategy - reducing waste, reducing the use of copy paper and saving water is also really effective.

As an example, Brazil implemented a water saving program in the sites. Many actions were taken, such as awareness campaigns, maintenance of water pipes, and installation of water pressure reducing valves and water-saving toilets. The Brazilian sites were able to reduce water consumption from

16,904,000 cubic liters in 2013 to 12,754,000 in 2014 - representing almost a 25% reduction of the water consumed.

Sitel Serbia operates from one of the few certified green buildings in Belgrade. The building has received the BREEAM certification that sets the standard for best practice in sustainable building design, construction and operation and is one of the most comprehensive and widely recognized measures of a building's environmental performance. BREEAM includes aspects related to energy and water use, the internal environment (health and well-being), pollution, transport, materials, waste, ecology and management processes.

Our goal

Sitel will seek to meet the requirements of all applicable legislation providing for protection of the environment, our Associates and the public and set higher targets where appropriate.

Sitel will assess and implement practices and technologies that reduce waste, and support environmental stewardship, and encourage our Associates to incorporate into their work activities practices that decrease impact on the environment.

A woman with short blonde hair and blue eyes is smiling at the camera. She is wearing a light-colored top. In the background, there is a large bookshelf filled with books and other items, slightly out of focus.

Anti-Corruption

Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery

We strive for excellence in what we do and how we do it. At Sitel we value integrity and ethical behavior in the conduct of our business. Sitel is committed to compliance with anti-corruption and anti-bribery laws in the countries in which we do business and to implement policies and procedures that prohibit bribery and corruption by our Associates and anyone representing our interests.

Sitel does not tolerate any form of bribery or corruption. Under no circumstance shall any Associate or anyone acting on Sitel's behalf give, pay, offer, promise to pay, or authorize the giving or payment of money or any other thing of value to any foreign government official or Sitel client, vendor or other business partner for any improper purpose or in violation of applicable law, including the local laws of any relevant country.

Sitel has a *Compliance and Ethics* department headed by the *Vice President of Global Compliance* reporting directly to the *Chief Legal Officer* of Sitel. Designated compliance contact persons assist with the implementation of Sitel's compliance program.

We have achieved compliance with key industry standards which provide all Associates with a consistent management framework to apply to ethical behavior.

Sitel also maintains adequate accounting books and records and keeps a system of internal accounting controls sufficient to provide reasonable assurances that, among other things, transactions have been executed in accordance with generally accepted accounting principles

Sitel's *Internal Audit* team performs financial and compliance audits throughout the year, covering processes that are potentially subject to ethical deviations, such as bribery and frauds.

Sitel's global policies include the *Global Code of Conduct and Ethics*, *Supplier Code of Conduct and Ethics*, *Global Anti-Bribery and Corruption*, *Global Anti-Money Laundering*, *Global Risk Management*, *Fraud Management*, *Global Security and Ethics Incident Management*, *Global Information Classification*, *Global User Access & Approval*, and other security awareness and usage policies.

All Sitel Associates and, where appropriate, third party contractors or vendors, are required to report any fraud, security and ethically related incidents following the *Sitel Security Incident Reporting* procedure to enable response, investigation and

incident resolution. The mandatory reporting of suspected or actual fraud or ethical conduct matters is managed through Sitel's existing global incident reporting procedures, with training developed to maintain awareness of the incident reporting obligations.

Operational adherence is managed through our *Management System* that is aligned to ISO 27001 standards to ensure that controls for the secure management of all data required to manage and deliver the services are in place and are assessed on an ongoing basis for effectiveness with a view to continual improvement. Relevant management information and reporting are shared with clients as part of established escalation management and periodic business review processes.

Sitel Anti-Corruption Program

As a United States-based company, Sitel's anti-corruption program is based around the *U.S. Foreign Corrupt Practices Act - FCPA*. However, it also seeks to set a clear global standard for its approach to honest and fair dealing, which meets the legislation in all its countries of operation - such as *UK Anti Bribery Act* and the *Brazilian Anti-Corruption Act*. The program has 6 key principles:

Tone at the top

Management's "tone at the top" is vital for establishing a transparent and company-wide culture against corruption.

The top-level management of Sitel is committed to preventing bribery by persons associated with Sitel. They foster a culture within the organization in which bribery is never acceptable.

Sitel's top-level management is committed to sending clear and regular messages to all Associates and business partners that corruption and bribery is unacceptable, such as communications from the company's *CEO* reinforcing the need for *Code of Conduct and Ethics Training*, and referencing the

compliance obligations on quarterly town hall meetings.

Top management is also involved in developing the company's corruption-prevention procedures by setting prevention policies, assigning management to develop, implement and monitor procedures, as well as supporting centralized controls for procurement procedures.

Proportionate procedures

Sitel's procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of its activities. They are also clear, practical, accessible, effectively implemented and enforced.

At the entity level, internal controls have been developed that help ensure that management directives for the entire organization - such as financial analysis and integrity, and adherence to applicable laws and professional standards financial analysis and integrity, and adherence to applicable laws and professional standards - are appropriately carried out. They define our corporate culture and clarify the desired behavior of our Associates, management team, and board members.

The outputs of the entity-level control procedures provide the basis for mitigating business risks according to their potential impact. Examples of activities that support these controls in Sitel include:

- ASAT (Associate Satisfaction Survey) with questions on workplace environment;
- *EthicsPoint* - Associates may report any concerns to Sitel compliance, ethics and whistleblowing hotline;
- *Background Checks* in accordance with policy (minimums per country or specific account) and where permitted by country specific law;
- *Associate Handbook* defines fraud and action to be taken; and
- *FCPA Anti-corruption Policy* published on the Sitel intranet to employees and incorporated as part of Sitel's vendor registration procedure.

Risk assessment

Sitel assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The

assessment is periodic, informed and documented. Sitel performs comprehensive risk assessment activities that identify and weigh risks that help define priorities including:

- *Management Compliance Questionnaire* reviewed quarterly by Sitel's Finance team;
- *Internal Audit* reports;
- *Internal Audit annual Enterprise Risk Assessment* to identify potential risk areas and collating conclusions; and
- *Site Compliance Questionnaire* to identify key risk areas.

Due diligence

Sitel applies due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of Sitel, in order to mitigate identified bribery risks.

Sitel has implemented mandatory requirements for screening and conducting integrity due diligence assessments of our business partners:

- All suppliers sign up to *Sitel's Supplier Code of Conduct and Ethics*, and Anti-corruption commitment;
- Business credit checks as standard, and *Office of Foreign Assets Control (OFAC)* as required, to minimize business risk;
- Increasing percentage of supplier contracts are centrally reviewed and tendered, enabling a standardized and consistent process.

Additionally, due diligence procedures in the recruitment process enables Sitel to hire the best candidates. Poor hiring decisions can hurt Sitel in a variety of ways - increased turnover, increased burdens on co-workers, compliance problems, and even business ethics issues.

Communication and trainings

Sitel seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organization through internal and external communication, including training that is proportionate to the risks it faces.

A key element in the *Anti-Corruption Program* is capacity-building and regular training of all

Associates. Our training ranges from online courses, dilemma-training modules and other Sitel awareness activities. Sitel strives to constantly improve and tailor the training program in order to ensure that our commitment against corruption is known throughout the organization.

All Associates are required to review and certify their understanding of and compliance with the *Sitel Global Code of Conduct and Ethics*. Additionally, Sitel requires key Associates to undergo annual code of conduct and ethics training, in which they learn about the major components of the *Sitel Global Code of Conduct and Ethics*. The certification process is completed via a web-based training and certification program. This web-based training covers anti-corruption and anti-bribery, among other subjects. This online training is provided in the Associate's local language, is available around the clock, and provides participants with a comprehensive understanding of what is, and is not, permissible as they undertake their responsibilities each day as Sitel Associate. In addition to the online curriculum, Sitel's *Legal Department* provides support for Associates should they have questions.

Monitoring and review

Sitel monitors and reviews procedures designed to prevent bribery by persons associated with it, and makes improvements where necessary. Anti-bribery and anti-corruption policies are dynamic and require Sitel to perform ongoing monitoring of its compliance programs and adapting to changing business environment in order to remain effective.

Sitel has established internal checks needed to monitor and review anti-bribery policies that include financial monitoring, bribery reporting, incident investigations, reporting from the *Risk* and the *Audit Committee*:

- *Policy Working Group*: annual review of Sitel anti-corruption policies;
- *Risk Committee*: monthly meeting involving key departments reviewing current plans and risks arising enabling discussion of new risks;
- *Quarterly Audit Committee*: report on enterprise level risks; and
- *EthicsPoint Group*: review of current EthicsPoint hotline cases.

Our goal

Sitel will regularly refresh conduct training to keep our Associates engaged and updated on the main areas of concerns.

Additionally, Sitel will engage suppliers in its anti-corruption program, by having them acknowledge compliance with anti-corruption laws and the *Sitel Supplier Code of Conduct and Ethics*.

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