



This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

United Nations Global Compact

2016 Communication on Progress

Human Rights
Labor Practices
Environment
Anti-Corruption



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. As an organization present in 21 countries, serving several markets, Sitel believes in its responsibility, as a global corporate citizen, to contribute to the development of the communities in which we operate.

We are mindful of our obligation 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. With an emphasis on responsible business practices, the United Nations Global Compact reflects our beliefs.

I am pleased to report that our Corporate Social Responsibility (CSR) program and related United Nations Global Compact initiatives continue to make progress.

Over the past couple of years, our focus has been the development of a global CSR program and the implementation of corporate policies to provide a solid foundation for practices that support the ten universally accepted principles. In 2016, we focused on making our global CSR program actionable and accessible to all levels of the organization. Communication and employee engagement have been our watchwords.

This year Sitel also introduced our Compass program that engages our Associates on what it means to work for Sitel and what we strive for. Our Compass points us all in the same direction and creates a shared experience by showing how our Values and leadership support a People-First culture that is deeply ingrained in everything we do.

As a people-oriented organization, our efforts have been focused on fostering a People-first culture, in which not only the wellbeing and the development of Associates are our priority, but those of all lives affected by Sitel.

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.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Quintana'. The signature is fluid and cursive, written over a light gray background.

Bert Quintana
President & CEO

Experiences are better when shared

Great customer experience starts with great people. As a leading global outsourcing service provider of customer experience management, Sitel combines knowledge sharing, a 'People first' culture and unparalleled excellence at both the global and local level.

With our wealth of expertise, we believe that sharing our knowledge with our clients and striving to grow our business sustainably is key to our success.

The United Nations Global Compact, with its thousands of participants from all over the globe, is all about sharing knowledge for a better world.

About Sitel

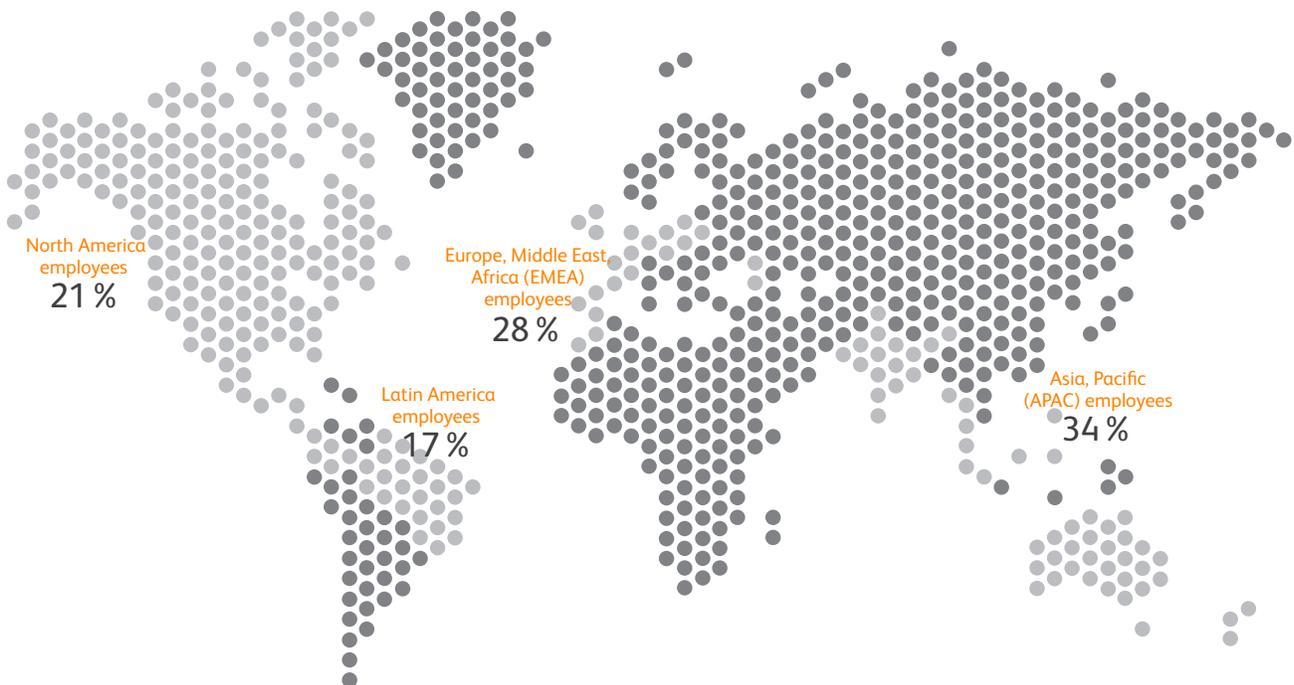
Keeping the promise of sharing outstanding experiences is how Sitel is helping the largest brands in the world retain and grow their customer base. Sitel combines knowledge sharing, global operational excellence, global strength and local flexibility with a 'people first' culture - a foundational framework to enhance the employee experience.

Sitel is a leader in the global customer care outsourcing industry and 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 at a Glance

A global leader in outsourced multichannel customer experience



Founded	Employees	Countries	Facilities	Languages	Clients	Revenue
1985	63,800+	21	110	40	230	\$1.4b

Experience shared.

sitel.com

With over 30 years of industry-leading experience, Sitel's 63,800 passionate and talented Associates support more than 230 clients in 40 languages from 110 facilities strategically located in 21 countries. Sitel was originally incorporated on June 19, 1985. In October 2006, ClientLogic and Sitel announced a definitive merger between the two outsourcing firms.

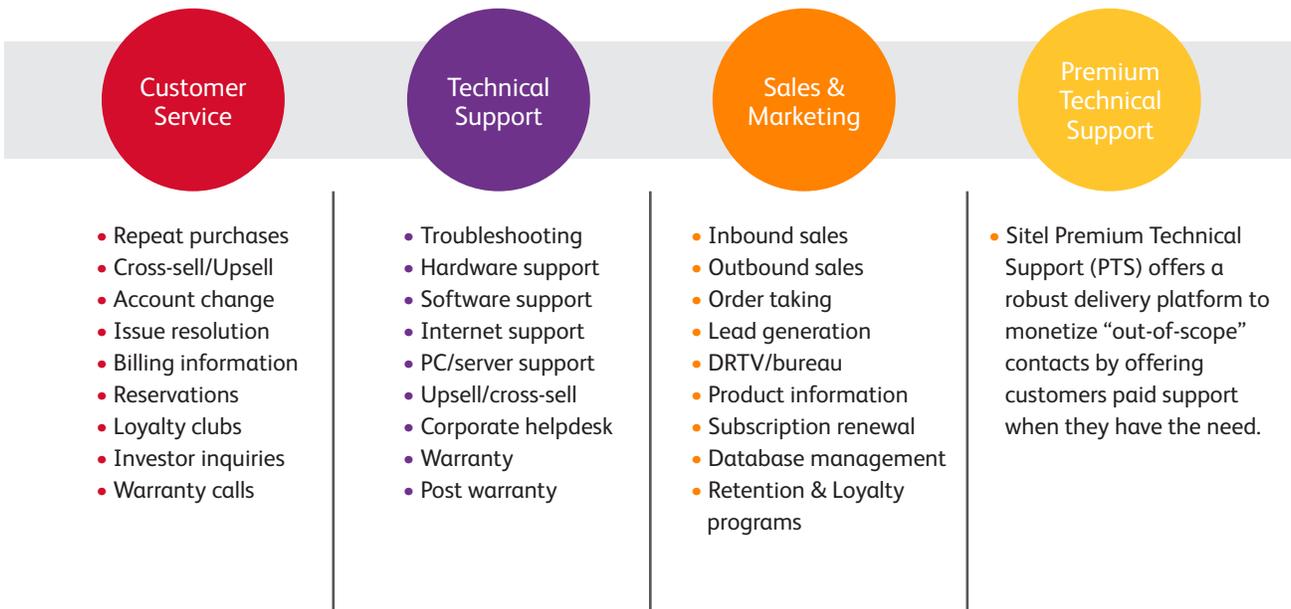
When the merger was finalized in January 2007, the newly branded Sitel emerged as a dominant industry leader with the single most diversified client mix, vertical industry expertise and global footprint in the industry. In 2015, Sitel was acquired by Groupe Acticall. Sitel's revenue for 2015 was \$1,427M.

Sitel provides fully integrated services that focus on customer service, technical support, sales and retention, back office processing services and complementary value-add solutions.

Sitel's ability to serve customers and track customer information across multiple channels, including phone, email, chat, SMS, etc., enables us to consistently provide positive, intelligent service on behalf of our clients.

The omnichannel call center requires an organization with the technology, processes, and expertise to effectively manage your customer interactions in their desired channels.

Visit sitel.com to learn more about the company.



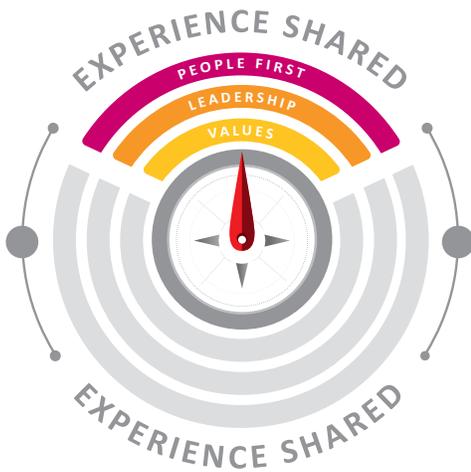


Sitel Values

Sitel's five values are:

- Accountability;
- Integrity;
- Open Communication;
- Teamwork; and
- Service Excellence.

These strong values, along with Sitel's People First culture, provide us a strong foundation to implement our CSR program worldwide and to ensure we respect the 10 principles of the United Nations Global Compact.



Compass

In 2016, we launched Sitel's Compass™, our company's guiding message about what it means to work for Sitel and what we strive for as Associates.

Sitel's Compass™ points Associates all in the same direction and creates a shared experience by showing how our values and leadership create and support a People-First culture.

Our Compass is:

- Our Values: our values define who we are as a company and what we expect from our Associates and how we do business and interact with everyone around us;
- Leadership: our leadership principles demonstrate our support and commitment to everyone; and
- People-first: together our values and leadership create a People-first experience, in which everyone can see possibility, feel appreciated, trust each other and belong;

People-first

We believe that when we live our values and take actions through the right leadership principles we create a culture in which People is our top priority. We call this People-First, which are four commitments we make to all of our Associates across the globe.

- **Possibility:** A culture where our people experience future opportunities for career growth. We aspire to be a company that provides possibility and future opportunities that will help people be successful in life as well as in work;



- **Appreciation:** A culture where our people feel appreciated. We want our Associates to know that they matter in a variety of ways and that they make the difference in our business;



- **Trust:** A culture where our people experience trustworthy leaders. We want to create an environment where our Associates can trust their leaders and understand how their work help support their own personal success and our company's success; and



- **Belonging:** a culture where our people experience and connect with their local teams, environment and communities. We want to foster a place where our Associates feel like they belong and help us make other people belong whether it is to our company, to their communities or to the society. We want them to be connected to each other, with their local communities and other Sitel teams across the globe.



All those pieces together create our People-first culture.



In 2016, Sitel implemented BOOST - Building on Opportunities From Streamlined Technologies. BOOST platform is an approach for connecting multiple systems, processes and tools into one system, which helps Sitel give its highly valued Associates more visibility of the employee related processes.

BOOST Human Resources module includes functionalities to support process improvement across many core HR areas. It improves efficiency and gives more transparency for the Associates, both agents and managers.

BOOST incorporates automation, self-service, and workflow capability to streamline submitting and executing HR requests and implementing career development processes and tools, among other functionalities.

- Recruiting
- Onboarding
- Performance & Goal Management
- Succession Planning
- Learning & Development
- Benefits
- Compensation
- Records Management

Sitel CSR Program

In 2014, Sitel launched a global Corporate Social Responsibility Program to facilitate improvement of its business practices in the social and environmental arena.

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

Sitel's CSR is based on four main Pillars:



Associates

Ensuring the human rights of our associates by providing a fair, safe and healthy work environment and promoting a People-first culture, which supports, among other things, professional development, wellbeing, diversity and inclusion.

Business Ethics

Cultivating an ethical corporate culture by defining proper business policies and practices on potentially controversial issues that might arise in a business environment, such as anti-corruption and governance policies.

Community

Supporting social transformation by developing strategic partnerships in local communities through the Footprints program, to make a positive impact on society while engaging employees in causes they find meaningful.

Environment

Managing our impact on the environment through sound environmental practices and decisions, such as reducing the pollution and the use of non-renewable resources at our facilities.

Our CSR Program covers the following provisions:

Human Rights & Labor

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

Ethics

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

Health & Safety

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

Environment

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

For Sitel, CSR is about taking accountability regarding our impact on the community and the environment in which we operate. Acting with integrity in how we conduct our business, being transparent and communicating openly with our employees and working together with our stakeholders is all part of our responsibility.

Sitel’s Global CSR Management System



We have designed our Global CSR Management System 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 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.

About this report

This report serves as Sitel Worldwide’s second Communication on Progress to the United Nations Global Compact initiative. Sitel Ibérica S.A. was the first affiliate company to join the UNGC in 2012 and Sitel, as a global organization, joined the initiative in 2015.

Last year 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, our 2015 report reflected our performance and progress towards meeting the Global Compact’s principles during the two calendar years 2014 and 2015. We are now tracking our progress against on a current year basis.

Scope of this report

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

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.

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.

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.



Experience shared.

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.

We are committed to upholding the dignity of all people and oppose human rights abuses. We respect all international human rights standards throughout our global operations at our 110 locations in 21 nations.

Policies

Sitel invests significant effort to promote policies that are consistent with our goals. Our commitments to human rights are embedded within the company's policies, including the Sitel Global Code of Conduct and Ethics, the Sitel Supplier Code of Conduct and Ethics, the Sitel Global Corporate Social Responsibility Policy and the Sitel Anti-Modern Slavery and Child Labor Policy. All Sitel policies are accessible to the Associates and available in the company's intranet.

All Associates are required to review and certify their understanding of and compliance with the Sitel Global Code of Conduct and Ethics upon joining Sitel. Relevant Sitel Associates undergo code of conduct and ethics training and annual refreshers.

The Code of Conduct training takes Associates through the major components of the Sitel Global Code of Conduct & Ethics and educates on how it can be used to guide decisions and actions in potentially controversial 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.

Sitel has also published a Corporate Social Responsibility Statement, endorsed by our CEO & President, to stress our commitment with 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. Copies of the CSR Statement are available in all Sitel sites around the globe and electronic copies are available both internally in the Sitel intranet, and externally in Sitel corporate website.

Reporting

Concerns about human rights or other issues can be brought to our attention via EthicsPoint, which is a confidential, integrated toll-free telephone and web-based hotline.

Conduct that may be unethical, illegal, in violation of professional standards, or otherwise inconsistent with Sitel's policies, as well as anything that may affect the moral or physical integrity of its Associates may be reported.

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 Sitel 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.

Reports may be submitted anonymously where permitted by law and Sitel's Global Code of Conduct and Ethics strictly prohibits retaliation against any person for making a report in good faith or cooperating in an investigation.

Associate Engagement

We encourage all Associates to share ideas and work together to make Sitel a great place to work as we strive to treat all of our Associates with dignity and respect and enable them to achieve personal and professional success.

Sitel conducts 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. In 2016, all associates from 21 countries were invited to provide their feedback. We achieved an 85% response rate. The survey is managed by an external partner, to ensure confidentiality of feedback.

The goal is to give our Associates the opportunity to provide feedback on their experience with Sitel, allowing us to use the results to create targeted action plans that are led by Human Resources in partnership with leaders across the globe. Standard process and tools are utilized on our global Sit & Tell platform to ensure consistency in our approach.

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.

Compared to 2015, our Engagement Index increased 15%, and we gained a net increase of six points in the likelihood to recommend Sitel as a place to work (eNPS).

Data Privacy

Safeguarding fundamental rights in today's information society is a key issue for Sitel as more and more businesses use information and communications technologies in their daily operations. However, this growing use of technologies is creating many challenges in terms of privacy and the potential misuse of personal data.

Sitel's Information Security and Privacy are key areas to address this concern and, for this reason, Sitel has strict processes in place to protect our employee, client and customer data. Some of the privacy and security requirements Sitel complies with include:

- PCI DSS (Payment Card Industry Data Security Standard);
- ISO 27001;
- SSAE16 SOC1 and SOC2 (Service Organization Controls 1 and Service Organization Controls 2);
- GLBA (Gramm–Leach–Bliley Act, or Financial Services Modernization Act);
- SOX (Sarbanes–Oxley Act)
- European Union Data Privacy Directive,
- EU Member State Privacy Laws,
- HIPAA (Health Insurance Portability and Accountability Act),
- Client Specific Privacy Requirements and many others.

Supply Chain

Our Code of Conduct articulates commitments and the efforts that support our ethical standards, and Sitel Supplier Code of Conduct and Ethics reflects our values and expectations for our suppliers.

Suppliers are an 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.

As with all aspects of our business, Sitel conducts its 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 vendors must comply with all requirements passed through by Sitel clients and with any CSR requirements or policies from time to time adopted and communicated to vendors.

Sitel Global Procurement has developed a Global Procurement and Vendor Management Policy and Purchasing Guidelines and Procedures in order to ensure that the way in which we conduct procurement within Sitel is transparent and understood by all key stakeholders.

We expect our supplier to comply with our Code and apply those principles to their own suppliers in the delivery of goods and services for Sitel. These practices align us with our clients' expectations in terms of social responsibility, reflect our operating philosophies and core values and establish steady support of integrity in all procurement activities.



Sitel Footprints

Helping Others Belong

Our CSR efforts include not only what our company does, but also what our Associates do, a commitment that stems from our People-first culture. At Sitel, we call these Associate-led programs, Footprints, our way of walking together in our communities across the globe and leaving a legacy for future generations.

Our Footprints program is not only about giving back to the society; it's about building a collaborative and inspired team that cares about the other and wants a better future for all of us. It's also a way of making a positive influence, using our expertise to help the communities in which we operate.

Sitel Footprints engages our Associates in campaigns across the world, to make the lives of the local communities better through service. Whether it's painting a school building, organizing clothing drives, or raising funds for a good cause, Sitel Footprints can be seen in all corners of the globe.

Our current Footprints theme is to "help others belong". We strive to share our experience so that vulnerable groups can more fully belong in and contribute to their local communities. Specifically, we focus on two criteria that demonstrate our commitment.

- Poor/marginalized communities and youth. For example, education and preparation, tutoring, mentoring, book programs, school and training investments.
- At risk, underemployed adults. For example, job and skills training to increase access to work for excluded or disadvantaged groups, health and wellness education.

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.

Around the globe, we participate in various corporate social responsibility projects:

Footprints Activities Across the Globe

Teams of Sitel Associates participated in volunteer and charitable activities in North America, Latin America, Europe, Middle East, Asia and the Pacific. Here are some examples:

- >> Sitel Nicaragua Associates donated 1 day of their accrued vacation and raised \$50,109.38 for a non-profit organization that assists with the rehabilitation and social integration of disabled children and youth in Nicaragua.
- >> In the Philippines, Sitel Manila volunteers completed a service day repainting and repairing a nearby elementary school in Pasig.
- >> A team of Sitel Portugal volunteers, together with one of Sitel's clients, rebuilt a school shelter located in the city center of Lisbon.
- >> Throughout 2015, Sitel UK Associates at the Exeter site took part in a number of activities and fund-raising events to support their charity partner, Young Devon raising a total of £3,000.
- >> Sitel Brazil organized a toy drive for Children's Day. A total of 645 toys were collected and donated to 4 charitable organizations.
- >> Every Christmas, many Sitel sites around the world collect toys, food, clothing and toiletries to be given to children and families in need.
- >> Sitel India ran multiple stationery donation drives to support approximately 1,000 children in Mumbai rural area. More than 150 employees volunteered and devoted their time visiting the kids and distributing the items. At least 1,300 hours have been dedicated towards this activity.
- >> Sitel Philippines raised approximately \$1,400 in a fundraiser that included a bazaar and a beauty pageant. The amount was used to conduct an activity day with the patients at the Philippine Children's Medical Center in Manila.
- >> Many sites around the world run regular blood drives. In the last blood drive, Sitel Colombia collected 70 pints of blood for children with cancer and Nicaragua was able to collect 160 pints to local Red Cross. Sitel Portugal was able to collect 155 pints. Sitel India ran a Blood Donation Camp wherein 707 Associates participated donating blood and more than half of the donations went to Mumbai kids affected with thalassemia. Since one donation has the potential to save as many as 3 lives, those 4 countries only are potentially saving more than a 3,000 lives!

Using our Expertise to Improve Employability Denmark: Business oriented call center training

Sitel Denmark, in collaboration with the local job center, created a program to improve opportunities for long-term unemployed. The program is tailored in collaboration with both the job center and the local college. A call center education training has been specially design, which covers topics such as sales, communication, conflict resolution, IT-systems, among other relevant skills. The training lasts for 6-8 weeks and is offered by Sitel's coaches and trainers from the local college.

The candidates have the option to apply for a job at Sitel at the end of the training period. The knowledge obtained in the training is valuable and improves the chances of the candidate landing a job at any other organization.

India: Student Leadership Program

Sitel volunteers provide career guidance to underprivileged students between 8th and 10th grade. Students are taught skills in the area of Leadership, Teamwork and Personality. Guidance on behaviour and hygiene is also given to the students in the 12-week mentoring program.

Latin America: Orphaned Starfish Foundation

In Latin America, Sitel supports The Orphaned Starfish Foundation (OSF), an organization that gives children the opportunity to develop vocational skills through computer technology and gain employment possibilities that will enable orphans, victims of abuse and at-risk youth to overcome the cycle of poverty and abuse.

Sitel has made partnerships with the local organizations supported by OSF to:

- Repaint classrooms in Brazil;
- Carry out donations, volunteering activities and spending quality time at the orphanage with the children in Nicaragua;
- Offer customer service and English courses to teenagers, run fundraisings and donate computers and school supplies in Colombia;
- Make in-kind donations to an orphanage in Panama.

Nicaragua: Free Language Improvement Program (FLIP)

Sitel Nicaragua offers free language improvement training to community members who already have some previous language knowledge. The training takes 3 months and at the end of the third month, the students have the option to apply for a job at Sitel. Since 2014, almost 900 candidates have enrolled in our FLIP program. Up to date we have 97 % success rate.

Philippines: Lapis, Papel Project

Sitel Philippines has partnered with the Department of Labor and Employment to develop the Lapis, Papel (Pencil, Paper) Project. The goal of the program is to help send a child laborer to school by donating educational supplies.

Poland: Sitel Language School

Sitel Poland offers a program for young people without work experience and enough work qualifications, particularly language skills, which prepares them for work at Sitel. The applicants are taught a foreign language and offered a job after the graduation exam.

UK: A Partnership to Help the Long-Term Unemployed

Sitel UK collaborates with Ingeus, an organization that supports people on employability programs back into work. Ingeus' support is aimed at the long-term unemployed, who are referred from the local job center.

Our UK recruitment team works closely together with Ingeus advisors giving an in-depth detail of our vacancies and working with their applicants to verify if they have any of the necessary skills and experience needed for the role and if any of the client could be upskilled to suit the role.

Sitel recruitment team also provides in depth feedback on what the applicant needs to do in order to make themselves more attractive to the market. Once an Ingeus applicant has been offered a role and starts with Sitel they begin their Sitel Colleague Journey, which involves our outstanding and award

winning training program. Since March 2015, when we started this partnership, there have been 100 Ingeus applicants who have started work with Sitel.

UK: Young Devon

Sitel UK has partnered with Young Devon, a charity that supports young people transitioning out of care, working towards employment and training opportunities.

The Young Devon trainees spend three days per week with Sitel learning the job, receiving full training in contact center skills and mentoring by our experienced coaches, and the remaining days are spent with the charity learning other work skills and obtaining qualifications in English and Mathematics.

Sitel has a commitment to provide a permanent role at the end of the traineeship provided candidates demonstrate the required standards of performance and attendance.

Relief Work

India: Helping Hand

Indian monsoon can generate heavy rainfall that every year displaces families and brings damages and losses to many people.

Sitel India helped 40 families impacted by Chennai floods by providing some basics needs item, such as groceries, school bags, notebook kits for children and other household items.

Philippines: Relief Assistance

The Philippines is prone to calamities and since 2013, Sitel Philippines has deployed a financial assistance program. The program is a suite of employee interventions including, BCP transport services, food, accommodation, financial assistance and government services. The initiative includes fund raising, the funds collected benefit affected employees and a portion of the collection is donated to the community through the Red Cross.

One of the venues we use to raise money for chosen charities of the different locations in the Philippines is Chill with Craig.

Part of his talk show is a series of games where the ultimate winner gets to choose a charity where money will be donated by Sitel on his behalf. So far we are able to donate to 4 chosen charities all over the Philippines for 2016.

Right after Typhoon Koppu (Lando) hit hard in the city, Sitel Baguio volunteers in partnership with Philippine Economic Zone Authority completed a clean up drive to help tidy up the surrounding communities.

Sitel Philippines also ran a Relief Assistance Drive to the affected individuals of the fire that hit several communities in Baguio City, which affected 30 families. A handful of Sitel employees were also affected by the said disaster whose houses got burnt down. Donation (cash and in kind) were raised and given to the affected individuals last June 2016.

Sitel Charitable Giving Fund

In March 2016, Sitel North America spearheaded an expansion of Sitel Footprints initiatives by creating a Charitable Giving Fund pilot. The Charitable Giving Fund is aimed at allowing North American sites to apply for a share of grant money that is then reviewed by a selected committee of individuals from Operations, Human Resources, and Executive Leadership, and granted monthly. This funds purpose is for Sitel to give back at a local level from a corporate standpoint, ensuring positive impact and showing our communities that Sitel is committed to investing in well-being and growth.

To date, the Charitable Giving Fund has granted over \$30,000 since its inception. Some recipients have included Veterans organizations, schools, and other nonprofits organizations that share Sitel Footprints mission.

The positive impact this fund has given is reflected in employee engagement, employee satisfaction, and an increased outward exposure for Sitel to remain committed and involved in our communities.

Award for Excellence in CSR

India Development Foundation, a leading national NGO committed to health, education and development of India, awarded Sitel India the Excellence in CSR Award for 2015-16 for its valuable contribution and support to the organization.

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



Experience shared.

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

The prohibition of compulsory and child labor has always been our company's practice and is expressly stated in Sitel policies.

Sitel does not support child labor in any matter or form. Only 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 development.

Sitel condemns all forms of compulsory labor. Sitel 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.

In 2016 Sitel developed an Anti-Modern Slavery and Child Labor policy, which contains guidelines, standards, and procedures intended to ensure that Sitel and those acting on its behalf understand and abide by the applicable anti-child labor, anti-human trafficking and anti-modern-day slavery laws, rules, and regulations.

As a matter of fact, forced and child labor are not an issue in our operations, as the majority of Sitel's staff are office based with permanent contracts.

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.

EWC in Europe

Sitel's European Works Council (EWC) dates back to 2010 and consists of management and employees representing Sitel affiliates in the European Union. The EWC, through its annual meetings, has proven its function as a forum for constructive dialogue and consultation between management and employee representatives on the progress of the business and any significant decision at European level that could affect their employment or working conditions.

Non-discrimination and equal employment opportunity

Sitel's commitment to equal opportunity is an investment in our people and our future growth. We firmly believe that a company that attracts, selects, develops, and retains the best people will remain the industry leader.

We employ a diverse workforce and do not tolerate unlawful discrimination. We seek 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 endeavors to address non-discrimination by fostering an environment in which everyone is treated equally and given the same opportunities. We are committed to ensuring we eliminate discrimination in all forms in our employment. We do so by:

- Evaluating and compensating Associates based on their qualifications, demonstrated skills, and achievements, striving to avoid any unconscious bias. All employment decisions - such as hiring, discipline, terminations, promotions, and job assignments - are based on Sitel's needs and on Associate's performance and potential. These decisions are made without regard to a person's cultural background, ethnicity, personal beliefs, or any other characteristic protected by applicable law;
- Facilitating the ability of Associates to raise issues regarding discrimination (or other matters such as bullying and harassment) through accessible reporting channels (e.g. EthicsPoint);
- Encouraging participation in the annual survey in which Associates are asked to express their views on workplace issues anonymously;
- Providing annual conduct and ethics trainings to key positions in the company which focus, among other things, on issues around diversity and respect; and
- A robust whistleblower procedure.

In the period covered by this report, the following number of issues were raised in EthicsPoint with respect to discrimination and harassment, which were all investigated appropriately:

- EMEA: 0
- North America: 10
- Latin America: 10
- APAC: 21

We are proud of and appreciate our talents. In 2015, more than half (51 %) of Sitel's total workforce was composed of female Associates. In 2016, we were able to maintain the same proportion, favorable to the female gender. Female Associates in leadership position - managers and above - represented 38.7 % in the same period.

Improving Equality in Sitel

India: Women Empowerment

Sitel India truly believes that empowering women is key to improve gender equality. Empowered women contribute to the health and productivity of whole families and communities, and they improve prospects for the next generation.

On International Women's Day, Sitel India arranged different session for female Associates, which included educational seminars and activities to improve their health and wellbeing, such as a Talk Show by gynecologist on wellness, self-defense training on safety and security, a consultation desk by nutritionist, among other activities.

This is part of Sitel India Women's Empowerment program, which helps women to realize their potential and to offers key information for their personal development.

Spain: Equality Plan

Since 2013, Sitel Spain maintains an Equality Plan, by which they commit to ensure effective equality of opportunities to both male and female employees, to balance the presence of men and women in our staff, to implement practices to avoid gender discrimination, to provide better conditions to allow reduce inequality and to promote awareness of the cause.

In fact, Sitel Spain consistently offers equality training to all its Associates as part of the company program to promote equality between genders in the Spanish facilities.

The charts below show Sitel workforce by several key metrics¹



1. Estimated based on existing database platform. Reporting year covers the period between 1-October of the previous year to 30-September of the mentioned year (2016 corresponds to the period between 1-Oct 2015 to 30-Sep 2016).

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 makes available an Ethics hotline (EthicsPoint) which enables Associate to report any concerns anonymously. Sitel strongly encourages its Associates to report any harassment to appropriate company officials and prohibits retaliation against anyone who reports issues or who participates in an investigation of such reports.

Anti-harassment Training

>> Brazil: Every year, Sitel Brazil partners with one of the most prestigious Brazilian law firms to offer an anti-harassment training to all its managers and coaches. The purpose of the training is to bring them awareness on harassment prevention and includes topics such as what constitutes harassment, unacceptable conduct, reporting, consequences, and how to deal with a potential harassment situation.

>> Colombia: Sitel Colombia created the Employee Disciplinary Committee to improve communication with its Associates and help preventing issues that may affect the workplace. In the Committee meetings, Associates can discuss about harassment, develop skills to face such harassment situations, share ideas and share best practices with other teams. Everyone is allowed to participate and express its opinion.

>> India: Sitel India conducts regular seminars and sessions with its Associates to improve awareness of the issue. In addition to the seminars, the Internal Complaint Committee (ICC) gives Associates a fair chance to be vocal about any grievances.

>> Nicaragua: All Sitel Nicaragua leaders receive Fair Treatment refreshers every 2 months. The refreshers include guidance and reminders on subjects such as empathy, being a leader, how to support their peers, how to deal with conflict, leadership, among other relevant points to ensure all leaders know the expected behavior, how to lead by example and how to deal with potential situations that may involve human rights abuse.

>> Panama: At Sitel Panama, all coaches and managers undergo training on sexual and other types of harassment that can happen in the workplace. Anti-harassment is also part of the Track Trainee Program, the succession program, since it trains and build Sitel Panama's new leaders.

>> Spain: Sitel Spain has signed an Anti-harassment Policy with the Unions, in which Sitel commits to fight against harassment not only from managers to employees, but from employees to managers and to employees between themselves.

Open door policy

Sitel is 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. Our Associates 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. 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.

Our leaders are accessible and are encouraged to walk the floor so that agents may easily ask questions or provide feedback.

Sitel 5-Minute Friday

Every week, Sitel's CEO & President films 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, which is read by our CEO and responded as appropriate.

Global diversity and inclusion

At Sitel, we respect cultural differences and recognize the benefit of a diverse supply chain in our global markets with Associates, customers, and suppliers coming from diverse backgrounds and cultures.

We strongly believe that a culture of diversity and inclusion positively affects the workplace and drives superior business performance by bringing multiple perspectives, which allows us to compete successfully in a global marketplace. This focus is part of our People-first Belonging commitment. We want to ensure that all Associates from across the globe and from different cultures and backgrounds are welcome at Sitel.

Sitel India: Celebrations and Festivals

Sitel India respects and recognizes that its Associates come from the most diverse backgrounds and makes a point in including all of them in the celebrations.

Festivals are an important part of the Indian culture, so Festival are also part of Sitel India activities schedule, which includes the main religious groups:

- Diwali: the Festival of Light is one of the biggest and most auspicious Hindu festivals in India.
- Eid: the festival of Eid marks the end of Ramadan, one of the five pillars of the Islamic faith and is sacred to Muslims. For Eid, Sitel India runs a weeklong inter process competition.
- Christmas: compared to other religious festivals, Christmas is quite a small festival in India, due to the number of people who are Christians, but Sitel India also includes it in its celebration calendar.



Sitel
Work@Home
Solutions™

Our Work@Home business is one of the fastest growing businesses in Sitel. The fact that Work@Home employees work directly from their homes, allows us to recruit more Associates from a larger and more diverse population, that includes war veterans, people with disabilities, with limited mobility or with other health issues and personal restrictions, that otherwise would be excluded from certain positions due to the fact that daily commuting becomes a challenge.

Sitel Brazil Disability Inclusion Program

Blind and Visually Impaired Massage Therapists

As a way of providing job opportunities to individuals with disabilities, Sitel Brazil hires blind and visually impaired massage therapists to offer free massage for the Associates in the office. The trained massage therapists go from Associate to Associate offering 5 to 10 minutes of massage at their desks. Sitel Brazil started the program, back in 2013, with a small team of therapists, as an opportunity for the blind and visually impaired massage therapists to be included in our company, and as a way to improve the Associates' wellbeing. This inclusion program proved so successful, that at the end of 2015, Sitel Brazil had already 26 massage therapists as part of their workforce. Now, this number increased to 43 therapists!

Inclusion Workshop

Sitel Brazil held inclusion workshops to its leaders. The first workshop was called "Sensory Experience Workshop", in which all managers and team leaders participated in activities to raise awareness of the challenges that people disabilities face every day at work. The workshop aimed at preparing the leaders to receive and include Associates with disabilities in their operations more appropriately and included activities to simulate common situations at the workplace and how to facilitate everyday life at work.

In the second workshop, called "We Are All Equal", coaches and managers were exposed to experiences of prejudice involving disabled people, and had the chance to hear some success stories from disabled employees who had overcome some obstacles, and learned how to deal with challenging every-day situations.

Sitel's Procurement organization in the United States 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

Whether it is for advancing in a current role or exploring new avenues, Sitel offers training and development opportunities to extend our Associates' knowledge and skills.

We provide learning and development opportunities to train all Associates in undertaking their jobs effectively and efficiently. We also promote 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.

With a combination of mixed training, classroom, distance and online, Sitel ensures its Associates the opportunity to participate in a learning environment and training uniform, consistent and effective.

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.

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, for this reason, in 2016, we implemented a new performance, career development and online learning platform.

In 2015, Sitel delivered 4,450,985 hours of online training to its Associates. In 2016, 4,507,309 hours were delivered.

In 2015, we placed a special focus on our top-performing Associates by launching three Global Leadership Councils. These councils link high-potential Associates around the world together for best practice sharing, insight from our executives, and collaborative work. In 2016, we expanded leadership development by launching two high potential programs to prepare leaders for future opportunities.

Talent management and career opportunities

Sitel is committed to focusing on recruiting and retaining our Associates by creating an environment that is positive, nurturing and filled with opportunities. 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.

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.

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.

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.

Sitel Track Training

Sitel believes in preparing its Associates for taking up challenges that will allow them to successfully launch a career.

Sitel has developed the Coach Track Training and the Operations Manager Track Training Programs that aim to improve the continuity of our leadership by building a pool of trained coaches and senior-level coaches ready to be promoted as opportunities occur. The apprentice program includes a multi-step process that rewards participants as they achieve designated milestones. The timeline for each candidate is flexible and the program tailored to the candidate's needs, competencies and ambitions.

The number of internal promotions are consistently increasing over the years. In 2016, internal promotions to higher positions increased 3.3 percentage points when compared to the previous year.

Excellence Club in Sitel Colombia

To recognize its Associates, Sitel Colombia created the Excellence Club, a group consisting of the top performers that recognizes the top performers. Every month, the group participates in a VIP lunch with the country and regional board of directors and receives prizes. Top performing Associates are always proud to be part of the group and the fact that they are able to have a closer contact and speak openly with the board of directors is a great incentive to drive their careers forward.

Work and personal life balance

At Sitel, as part of our People-first culture, we believe that maintaining a professional/personal life balance and creating a family culture within our facilities is critical to employee satisfaction and success.

We seek to promote local ways of working so that Associates can have more flexibility and are able to balance their personal lives with their career. In fact, one of our fastest growing businesses is Work@Home, where our agents are able to work directly from their home. To make it happen, we invest in technology so that we can connect with each other no matter where we are located.

Our 2016 Associate engagement survey showed a 14 percentage points increase, when compared to the previous year, in the question regarding work-life balance for all participating Associates.

Some of our sites are able to provide flexible work schedules to their Associates to accommodate personal needs and allowing them to balance their everyday commitments with work.

We think we can continue to make progress as we support flexible working opportunities for our Associates.

Health, safety and wellness

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.

In line with our People-first culture, safety of our people is the first priority and is addressed prior to any consideration regarding Sitel's or clients' business requirements. Therefore, it is essential that our Associates know how to react during an emergency situation.

Sitel Business Continuity Management

Sitel has implemented a Global Business Continuity Management policy to set, deploy, test, monitor and report on the required standards for emergency preparedness in all sites and has assigned a dedicated resource, the Director of Business Continuity Management, to manage the program and ensure its ongoing effectiveness and continuous improvement.

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.

All Sitel Associates take our Security & Privacy Awareness Training in which they learn about Sitel security, privacy and safety policies including, practical examples on how to apply them both at work and in their personal life. They also learn to identify situations that pose a risk to the company's and their own security. This training requires annual recertification to ensure all Associates are aware of the main elements and any changes that may have been made to our policies and standards.

Health & Safety Activities

>> Brazil: Sitel Brazil 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.

>> Nicaragua: Sitel Nicaragua has established a committee that holds semi-annual trainings to all Associates covering points such as first aid, evacuation procedures, among other critical point. The Nicaragua committee also holds bi-monthly seminars in order bring awareness to Associates about having a safe and healthy work environment.

>> Colombia: Every year, Sitel Colombia promotes a health week to offer Associates information and activities that help to educate them and offer suggestions for healthier living through a variety of health topics. Health screenings are also offered, such as dental and eye checkups and hearing tests. The Associates also go through regular medical check up to prevent occupational diseases. Healthy feeding is encouraged by collaborating with the onsite cafeteria to make available for the employees a variety of balanced meals and healthy snacks. Physical activities are also encouraged through the Self Care program that offers rumba dancing therapy and employee discounts in spas and gyms.

>> Denmark: Sitel Denmark has partnered with a stress coach in order to offer Associates the opportunity to talk to an external party, as this often can be easier on the Associate.

>> India: Monthly Seminar sessions are arranged for Associates on across Sitel India. Talk shows arranged by doctors on Stress Management, Diabetes, Eye checkup Camp, First Aid Training, Healthy Lifestyle are a few examples of health activities.

>> Nicaragua: Every year, Sitel Nicaragua offers free flu vaccinations to all Associates. The vaccination campaign is coordinated with the country Health Ministry. This activity started back in 2012 and every year more and more Associates adhere to the campaign after seeing the benefits of this preventive measure. This year, 450 Associates received from the free flu shots.

>> Panama: Every quarter Sitel Panama invites specialists that will provide information on dental health, nutrition, eye care, etc. The health specialist also do some tests, such as blood and eye tests at the site and advise in case the Associate needs to seek medical support.

>> Philippines: Sitel Philippines keeps its Associates healthy by offering a wide range of health related activities. Examples of activities are: Flu Vaccine Shots available to employees who would like to take them at a lower rate compared to market price, Zumba Day for employees to work out by dancing their hearts out, Yoga Day, Sitel HR Café Series on Wellness with Physicians onsite discussing health related topics like heart disease, smoking cessation, stress management, etc. Sports are also encouraged through the Sportsfest program, in which Associates are given a venue to compete with each other on specific sports like basketball, volleyball, badminton and cheer dance. This aims to promote healthy living through physical activities, as well as camaraderie, sportsmanship and teamwork among the different teams

>> Poland: Sitel Poland Associates count on many activities to promote a healthier routine at work, such as zumba dance classes, anti-stress massage so that every Associate can have a great relaxing massage during the break, fruit days for a healthier diet, among other activities. Sitel Poland also promotes a healthier life by offering to all employees a reduced-price Sport Card to encourage sport activities in their free time.

Sitel is positive that employee wellbeing is an important factor for a healthy environment. Our Associates count on leisure areas, anti-stress programs and regular activities to minimize the stress and cultivate the feeling of belonging among our Associates.

Maternity Arrangements at Work

>> Brazil: Sitel Brazil launched an antenatal program called "Sitel - 9 months with you". The program included prenatal and parenting classes. The future moms learned how to bathe the baby, nutrition, hygiene, and other important tips from health professionals. A doctor explained and answered questions on pregnancy, childbirth and child health. All participants received a small gift and pampering products for the mom-to-be and the baby.

>> Denmark: All women, who are pregnant, meet with our Health and Safety representative in order to congratulate them on their pregnancy and to find out, if Sitel can do anything to make their pregnancy easier etc. by offering reduced work hours, the right kind of ergonomic office chair and so on.

>> Nicaragua: In addition to the legally mandated paid maternity leave, Sitel Nicaragua allows the female Associates to come to work an hour later than normal or leave an hour earlier. This way we ensure that the mothers have time to breastfeed their children and can balance their professional and personal life.

>> Spain: Allowing more time to rest is very important for pregnant women. At Sitel Spain, pregnant women get 20 minutes extra break per day if working full time so that they can have a more comfortable shift.

Communication

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

We understand that being transparent and keeping our Associates informed of our business decisions allows us to work together to find solutions and points for improvement of the Sitel's business practices. Sitel has several established communication channels for our Associates:

- Globe Magazine: 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;

- **Five-Minute Friday:** a weekly video blog from our CEO, in which 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.
- **Inside Sitel:** an electronic newsletter that provides relevant information regarding the organization, such as announcements, structure changes, and new staff joining the company.
- **Huddle calls:** regular conference calls to provide company updates, keep teams on course and share success stories.
- **Corporate intranet:** an internal share point site in which all company policies, procedures and other relevant information are available to Associates.
- **Meetings, social media, and bulletin board postings:** at the local level, each site spends time every week communicating with Associates. 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 goes in two directions: transmitting information to another party is one direction, but the other party's response is also important:

- **Sit&Tell:** engagement survey where you can share your experiences with your leaders on what's working well and what areas we can improve.
- **EthicsPoint:** an anonymous hotline for reporting concerns or issues that may be unethical, illegal, in violation of professional standards, or otherwise inconsistent with company's policies. Anyone can report an issue, including associates, clients, suppliers, contractors, visitors, etc.

- **Direct communication with HR or management:** Associates are encouraged to share ideas, concerns and issues directly with their direct superior or with local Human Resources.
- **Suggestion boxes:** many of our sites make suggestion boxes available in order to be used by site management to solicit ideas from Associates for improvements.

In addition to the traditional above-mentioned communication channels, we also have a variety of touch points with our Associates to provide opportunities for dialogue between leaders and Associates:

- **Boot Camps:** 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.
- **Team huddles:** scheduled team face-to-face and/or virtual meetings to quickly touch-base, update, listen and generate synergy between the group.

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.



Experience shared.

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.

Our strategy to foster environmentally sustainable growth for Sitel comprises two main areas: running efficient operations and working sustainably.

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 is committed to reducing pollutants associated with its business, which may have adverse on the environment, while safeguarding the health and safety of the public. We expect our Associates to be respectful of the environment within which we operate.

Carbon footprint and use of resources

Sitel's environmental footprint consists primarily of carbon emissions generated from employee travel and electricity. Smart travel saves money and reduces greenhouse gas emissions. Where and whenever possible, we promote the use of virtual collaboration tools and videoconferencing. This avoids unnecessary travel, is more efficient for us, and is better for the environment.

Our efforts to encourage the adoption of available communication technologies continue to help us manage business travel, even as we have expanded into growth markets and increased our year-end headcount by more than 2,400 employees.

When looking for new locations, we prioritize areas with good public transportation, since employee commuting is also a large contributor to our footprint.

In fact, one of our fastest growing businesses is Work@Home, in which our Associates are able to work directly from their home, dramatically reducing the need for travel and, consequently, these Associates' carbon emissions.

Going Green with Work@Home

In 2014, Sitel had approximately 1,400 Work@Home Associates and in the following year, this figure increased by almost 70%, and now we are currently operating with a headcount of 2,400+ Work@Home Associates.

Considering that an average of 268 gallons of gas is burnt per year by an average commuter in the US, our 2,400 Work@Home Associates can potentially save more than 643,000 gallons of gas in one year (approximately 5,700 metric tons of CO₂).

We are constantly looking for new opportunities to reduce demand and to be more efficient. This includes energy retrofit projects such as LED lighting upgrades and building management system improvements.

Energy Efficiency Projects

>> Spain: Sitel Spain replaced all its Seville facility's 3500 fluorescent tubes by low energy LED lighting, which will bring estimated savings of approximately 172,000 kWh in one year. This represents a reduction of 44% of the electricity consumption. LED technology has a general life expectancy of 50,000 hours, which will also reduce the need of constant replacing of the lighting, thus reducing hazardous waste disposal and the environmental impact.

>> Colombia: Sitel Colombia has recently replaced all its facilities lighting by LED technology. A total of 810 fluorescent tubes were replaced by LED lighting, which represents estimated savings of approximately 255,000 kWh per year, or 36 % less electricity used in the facility lighting.

Sitel Serbia: BREEAM certification

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.

Additionally, waste prevention and recycling are powerful ways to use less energy, reduce greenhouse gas emissions, and contribute to a healthy climate. Our sites have recycling programs in place to minimize landfill impact and the release of harmful gases due to its production and disposal process.

Helping the Environment

>> India: Sitel India volunteers planted 370 sapling trees in support of the Go Green initiative that aims to create environmental awareness among Sitel Associates. Every year, our Sitel Mumbai volunteers run a beach cleanup drive after the India's annual Festival procession to help tidy up the area. The Festival is a traditional procession in which people go to the streets to celebrate.

>> Nicaragua: At least twice a year, Sitel Nicaragua volunteers gather to visit schools and parks to plant trees, clean up and help beautify those places

>> Panama: Sitel Panama volunteers joined Ancon (Asociacion Nacional para la Conservacion de la Naturaleza, or Association for the Nature Conservation), in a beach cleanup day. ANCON is a non-profit organization that protects and conserves Panama's natural resources through various projects and programs with the local community and businesses.

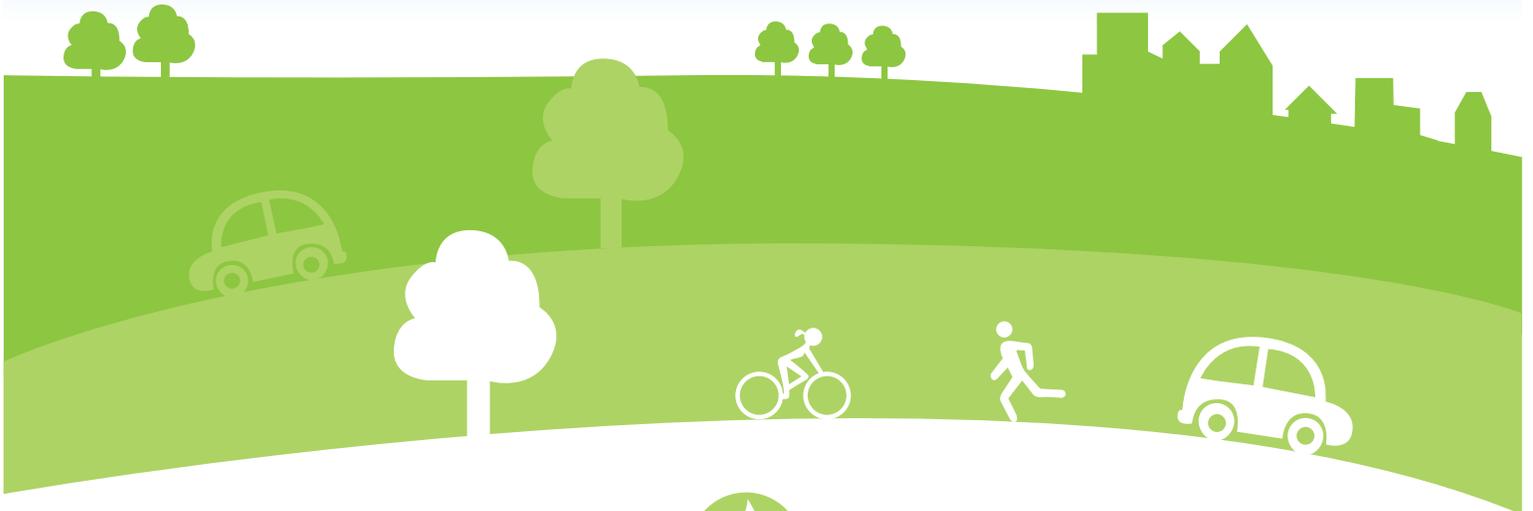
>> Philippines: Sitel joins the neighboring companies in the Yearly Clean Up Drive in Baguio.

>> Poland: In cooperation with the local ecological waste removal company, Sitel Poland collects waste paper. Once a month, the eco waste company collects the paper and the money generated from recycled paper waste is donated to a foundation called VIVA, which supports local animal shelters.

>> Portugal: Sitel Portugal collects all used tonners and send them to an organization that recycles them and donates the money generated to charitable organizations. Since 2015, Sitel Portugal collected 80 kilograms of recyclable tonners that were converted into more than a 1,000 Euros, donated to a local scouting association, a cancer research organization and an animal shelter.



Going Green with @home Agents Saving the Environment with Virtual Agents



According to
U.S. Census Bureau:



The average round
trip commute is

24 miles
per day



GAS

and the average
commuter burns

26 gallons
of gas
per year
sitting in traffic

...so, our 2,400
contact center agents
working-at-home...

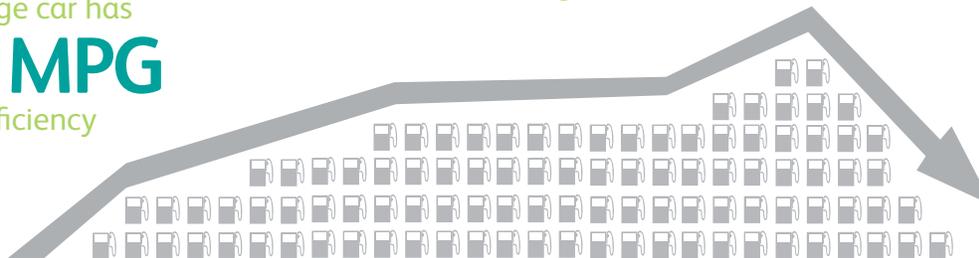


are saving more than
643,000
gallons of gas per year!
avoiding the emission of more than

5,700
metric tons of CO₂

which is the carbon sequestered by
5,409 acres of U.S. forests in one year.

... Average car has
25 MPG
efficiency



Experience shared.

sitel.com

Anti-Corruption

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



Experience shared.

At Sitel, we value integrity and ethical behavior in the conduct of our business. Sitel is committed to complying 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 has the privilege of doing business in many countries and regions around the world. In every single location, associates at every level have the responsibility to know and follow laws and regulations that apply to our business. 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 organization reporting directly to the company's Chief Legal Officer. Designated compliance contact persons assist with the implementation of Sitel's compliance program.

The Legal Department and Sitel's Compliance Team are responsible for setting enterprise-wide standards with respect to anti-corruption laws and interactions with clients and government officials. We have achieved compliance with key industry standards which provide all Associates with a consistent management framework to apply to ethical behavior.

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

Operational adherence is managed through our Management System that is aligned to the ISO 27001:2013 standard to ensure that controls for the secure management of all data required to 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 Global Security team interacts with all sites across the globe to ensure all Associates are aware of and understand Sitel security standards and to ensure that actual and potential incidents of fraud and corruption are identified and managed appropriately.

All Sitel Associates and, where appropriate, third party contractors or vendors, are required to report all fraud, security and ethically related incidents. 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.

For greater awareness of the Sitel EthicsPoint among Associates, the company distributed EthicsPoint posters to all locations - for prominent display - promoting the reporting of concerns via a 24-hour hotline. In addition to the posters, a brief tutorial was included reminding all Associates about the Sitel's EthicsPoint.

Sitel's Finance and Accounting organization is responsible for maintaining adequate accounting books and records and appropriate controls at all levels of the organization that ensure accuracy of our financial reporting, including the investigation of potential fraudulent financial activity or results. Such controls provide reasonable assurances that, among other things, transactions have been executed in accordance with generally accepted accounting principles.

Sitel's Internal Audit team is responsible for evaluating, testing and monitoring accounting control systems on an ongoing basis to ensure, as far as reasonably possible, that the controls in place continue to be appropriate and function properly. As of September 30, 2016, Sitel's

Internal Audit conducted and reported 18 financial control and compliance audits covering processes that are potentially subject to ethical deviations, such as bribery and frauds. Generally speaking, all sites are audited on a 4 to 7 year cycle, depending on the risk profile of that particular site.

Sitel policies require anti-corruption training for Associates with job responsibilities that are relevant to such training. In 2016, Sitel trained more than 1,300 applicable Associates worldwide, and more Associates will be trained until the end of the training year. In the last training year, Sitel trained 98 % of the applicable Associates, which represent 1,600 trainings delivered.

Our Code of Conduct requires that all Associates comply with all laws and regulations governing our company's behavior. When this is not the case, information is reported internally within the organization to senior management and, as appropriate, also shared with the Executive Board and the internal auditors.

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 an anti-corruption culture within the organization and send clear messages to all Associates and business partners that corruption and bribery is unacceptable.

Proportionate procedures:

Our 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.

Management directives define and clarify the desired behavior of our Associates. The outputs of the control procedures provide the basis for mitigating business risks according to their potential impact. Examples of activities that support these controls in Sitel include:

- EthicsPoint, where Associates may report any concerns to Sitel compliance, ethics and whistleblowing hotline;
- Sit&Tell Associate satisfaction survey with questions on workplace environment;
- Background checks in accordance with policy and where permitted by country specific law;
- Associate handbooks defining 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.

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 major suppliers sign up to Sitel's Supplier Code of Conduct and Ethics;
- All suppliers sign up to the 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.

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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;
- Quarterly Audit Committee: report on enterprise level risks; and
- EthicsPoint Group: review of current EthicsPoint hotline cases.

ABOUT SITEL

As caring for customers becomes the differentiator that drives consumer engagement and spend, Sitel is advancing its position as a world leader in outsourced customer experience innovation.

With over 30 years of industry-leading experience, Sitel's 75,100 passionate and talented associates support more than 400 clients in 48 languages from 146 facilities strategically located in 22 countries.

Combining comprehensive customer care capabilities, leading omnichannel solutions and unparalleled expertise across industries, Sitel collaborates with some of the best known global brands to help consistently deliver outstanding customer experiences.

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Experience shared.