

webhelp*

COMMUNICATION ON PROGRESS







Human Rights at Webhelp







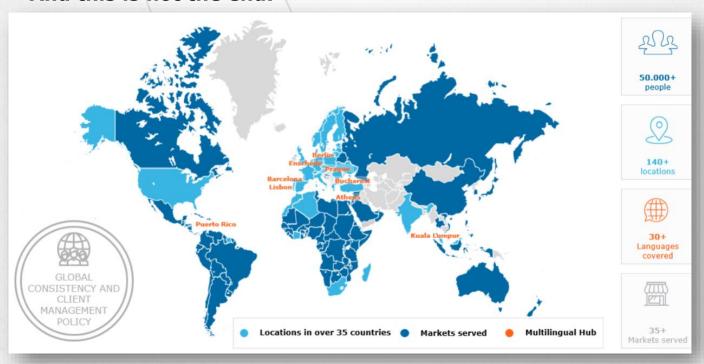




Dear Mr. Secretary-General,

Together, we both began writing Webhelp's history in 2000 and we have travelled a long way since. We are very proud of the significant growth Webhelp has had and its current mass global footprint.

And this is not the end!



We always sought ways to satisfy our clients while believing that the wellbeing of our colleagues is the key to our success. Webhelp is an organisation working to implement high level responsible practices whereby corporate social responsibility is everyone's business.



Our vision is that we should carry societal commitments, in the countries we operate within. We are pleased to confirm that Webhelp supports the ten principles of the Global Compact with respect to human rights, labour, environment and anti-corruption.

With this communication, we express our intent to advance those principles within our sphere of influence. In 2018-19, we continued our commitments to make the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company. You will read in our Communication on Progress (CoP) details about these initiatives and results.

Sincerely yours,



Fréderic JOUSSET Co-Founder



Olivier DUHA Co-Founder



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...AT A GLANCE

OUR CULTURE & VALUES

The people who work at Webhelp are driven by a set of core values that define who we are and how we engineer the ideal omni-channel customer experience. With these values in mind, we work passionately to ensure that our clients and customers are happy and recognised, that our business is succeeding and that Webhelp is a fantastic place to work.

This being said, our values are not only an external image of our company but a real attitude we are determined to have on a daily basis to drive our company's spirit and internal culture.

This is why these five key elements are the essence of Webhelp:



We are a people-first company

Motto: Always start with the people, then numbers.

#Recognition

We put our client at the heart

Motto: We take our client's best interests at the heart, that's how we go the extra mile.

#Commitment #Integrity

We are passionate game-changers

Motto: We try, we learn, we innovate to change the game.

#WOW

We strive to enjoy every day

Motto: Bring dun to work, and work will be fun.

#Unity

OUR CLIENTS

Webhelp works hard to build strong and strategic relationships with our clients. Through shared risk and reward contracting, we are jointly working towards performance, transformation or financially driven objectives.

The value we offer is tangible; partners measure our success in reduced costs, increased revenue, improved customer advocacy and through greater customer experience.

Meet some of our clients who are enjoying an engineered approach to outsourcing.



OUR BUSINESS

A large services portfolio covering the entire Webhelp's customer experience journey:

CARE

Customer service Complaints & Claims management Crisis & disruption management Loyalty management

TECHNICAL SUPPORT

Technical support services

SALES

Acquisition Sales assistance Onboarding Up-sales/X-sales Retention

CONTACT CENTER SERVICES

OUTSOURCING

SPECIALIST OUTSOURCING

PAYMENT SERVICES

Marketplace Payment Services Collection Services Credit Management



DIGITAL PROCESS SERVICES

Moderation Content Management Digital insight & e-reputation Social Media Interaction



REGULATED & LEGAL SERVICES

Legal claims management Privacy services KYC services

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MyStudioFactory

CX ADVISORY

Consultancy services Digital strategy & UX Transformation programme delivery

MANAGED SERVICES

CX measurement & Insight Analytics services Customer operations services People services



TECHNOLOGY SERVICES

Contact centre technology services Automation services Digital technology services

ENTERPRISE SERVICES

Enterprise sales services



HEALTHCARE BPO

Pharmaceuticals sales Patient support services



HELPDESK & SPECIALIST SUPPORT

Reverse logistics Helpdesk services





HUMAN RIGHTS WITHIN WEBHELP

Webhelp considers it essential that all colleagues receive the same, fair treatment. The diversity of colleagues and cultures found in Webhelp are a significant resource. Respect is essential to a harmonious working climate in which colleagues' rights are respected and their dignity unquestionable.

OUR THREE MAIN 'HUMAN RIGHTS' AREAS OF FOCUS

DIVERSITY & INCLUSION

- The company's policy is to deal with every colleague without consideration for ethnic origin, colour, religious beliefs, sex and sexual preferences, age, nationality or any other personal characteristic that is protected under law.
- Our recruitment teams undergo nondiscrimination trainings

EMPLOYEE SENTIMENT

- The company encourages all forms of social dialogue with employee representative organisations and each of its colleagues.
- We have displayed a prevention of psycho-social risks process, targeting specifically stress and harassment issues.

CHARITIES

 It is important to Webhelp and its people that we dedicated time and resource to making a difference for those in need and the communities around us.

PROMOTION OF DIVERSITY & INCLUSION

Webhelp's policy is to deal with every colleague equally without consideration for ethnic origin, colour, religious beliefs, gender and sexual preferences, age, nationality or any other personal characteristic. This year, we launched a brand new global code of conduct.

Training

- Those involved in recruitment processes take an e-learning class on non-discrimation
- Assessment Centers are used to guarantee unbiased internal promotions
- All colleagues take an e-learning class on harassment

Equality of treatment

- The company ensures a zero-tolerance policy for discrimination towards recruitment and its own employees
- Webhelp strictly respects all individuals' privacy and right to dignity
- The privacy of employee information collected or held by Webhelp shall be respected, in regulations with GDPR policies

Employee representation & harassment issues

- The company encourages all forms of social dialogue with employee representative organisations
- We have displayed a prevention of psycho-social risks process, targeting specifically harassment issues
- Colleagues can alert their HR Management directly, without involving their superior via our dedicated online system

DIVERSITY & INCLUSION



A description of our PhonEthics program from our Code of conduct

You have a concern?

PhonEthics!

Webhelp strongly encourages its employees to direct any questions they may have relating to the principles outlined in this Code and the following domains:

- Financial, accounting, banking and the fight against corruption;
- Anti-competitive practices;
- Fight against discrimination and harassment at work;
- Health, hygiene and safety at work;
- Environmental protection.

Employees are encouraged to direct their questions or concerns to their line manager, the Human Resources Department, and/or the General Counsel's Department. It is important that all managers establish a positive working environment and encourage their employees to communicate openly.

In addition, if an employee is concerned or suspects that a breach of this Code or applicable law has occurred or will occur, these suspicions may be reported anonymously at phonethics@webhelp.com.

Any such report will be received in confidence by the General Counsel's Department.

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

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

Webhelp will not allow any retaliatory action to be taken against any employee for making a good faith report of a suspected breach of this Code or applicable law. However, any accusations that prove to be slanderous or made in bad faith may result in disciplinary actions.

DIVERSITY & INCLUSION

At Webhelp we care about diversity in every way and we make it a priority to support and encourage the inclusion of all people.

 Recruitment procedures are designed to reach eligible applicants from all sections of the community and we offer pathways into the organisation for the following key groups of people;



School leavers



Semi-retired/retired



Long term unemployed



Parents & Carers



Graduates & Veterans



Disabled people

DIVERSITY & INCLUSION

We care for and **support the careers of those with disabilities.**We work with organisations, such as 'Access to Work' to ensure that reasonable adjustments are made to our working environments, allowing those with disabilities to have successful careers.

We celebrate and encourage diversity throughout the year in a variety of different initiatives. Below are just a few examples of two different events; Disabled Persons Day and Women's Day.



International Day of People with Disabilities Learning Sign Language



International Day of People with Disabilities Matching celebrities with their disability



Women's Day Make up workshop



Women's Day
Flowers, chocolates and traditional ribbon offered

EMPLOYEE SENTIMENT

As a people first company its imporant for us to offer our colleagues the opportunity to voice their opinions, feedback to the business and truly feel that their voices are heard.

This is done through a variety of different initiatives:



Your Call is our annual global people engagement survey, designed around both Advisors and Non-Advisors. It's an opportunity for our people to feedback on their satisfaction around Engagement, Working Conditions, Management, Recognition & Performance, Development & Communication. As a business we build our annual action plans based on our colleagues' feedback from Your Call. It's their opinions that truly drive our way of working. We continuously communicate back to our people on 'Your Said, We Did' progress updates to ensure they are aware of the changes their feedback created.



WoW Pulse is the Webhelp approach to measure our performance on strategic accounts through the perception of our stakeholders and provide the insights to be 1st in the benchmarks.



We are committed to listening to our colleagues' questions and feedback. Aside from the surveys throughout year, they can also send in their questions via our online form. Your Questions Answered features queries from our colleagues that our COMEX members answer. All responses are displayed onto WISE for the Webhelp World to see.

Each month we pick a designated question to be answered via video.



CHARITIES

It is important for Webhelp to extend our every-day work activities and **make a difference** to our surrounding communities. Our Webhelp sites are proud to support numerous charities and local actions.

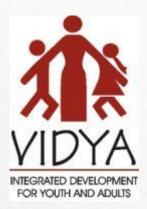
Here are just a few of out **many organisations** that we've committed to across our geographies:





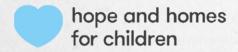












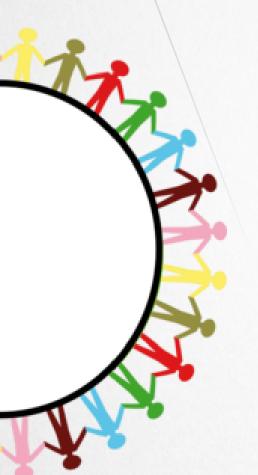


CHARITIES





















Making today matter

WE ARE
MACMILLAN.
CANCER SUPPORT

AND MANY MORE...





WEBHELP FOUNDATION: SHARED

- The speed and nature of globalisation, technological change and innovation, changes in work organisation, environmental change and demographic trends take very different forms across countries.
- These transformations are affecting many traditional jobs and employment relations while creating new job opportunities in emerging economic activities.
- Workforce employability is essential to turn structural change into an opportunity for all
 - Launched in December 2016, with the effective support of "Fondation de France", the SHARED Foundation is committed to:
 - Professional insertion by fighting against THE SOCIAL DIVIDE
 - Inclusion through EQUAL OPPORTUNITIES FOR ACCESS TO HIGHER EDUCATION
 - TRANSMISSION OF DIGITAL SKILLS as a lever for employability
 - The SHARED Foundation has three main objectives:
 - SUPPORT charities and trusts that echo the Foundation's mission and that do not currently have the means to achieve their objectives
 - INVOLVE all Webhelp Employees by making it THEIR foundation
 - TRANSLATE our commitments in the way we operate across the Group



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Webhelp SHARED Foundation currently supports 9 NGOs in 8 different countries, all facilitating the future employment of the population vulnerable to social risk.

THE ACTIONS OF 2018 - 2019

Baby Lab

Webhelp SHARED Foundation has made possible the acquisition of technological materials that facilitate the training and development of digital skills for at least 250 young persons. **890 people** have already been benefitting from this NGO's programs, making it one of the most successful projects the Foundation supports.

FAHCI

Webhelp SHARED Foundation supports the social & economical promotion of the persons with disabilities from Ivory Coast, building their employability. Through this partnership, the foundation made possible the refurbishment of the multimedia room that is currently used for training that develops digital skills. The estimated number of direct beneficiaries of this project is **50 people**.



Ivory Coast



Adolescere

Through the partnership with Adolescere, we aim to support the education of risk target groups and offer aid the young foreigners that come to the association asking for help in finding a job in Braga (language courses, prep of CVs, prep for Interviews, etc.). The estimated number of direct beneficiaries of this project is **45 people.**

Hope and Homes for Children

Webhelp SHARED Foundation has contributed to improving the life of **15 young adults** from different counties in Romania through education and employability. Two of the direct beneficiaries of this project have acquired the skills necessary for independent living and the education that would help them access the job market.



Romania





INTRO

There is a constant focus and development toward delivering the best possible working conditions and evolving our processes to suit our colleagues' needs.

OUR FIVE MAIN 'LABOUR' AREAS OF FOCUS

PLANNING AROUND COLLEAGUES' NEEDS

Webhelp is a people first company.
 Therefore it is highly important to us to ensure we have systems and processes in place to support our colleagues and respect their work-life balance.

INTERNAL CAREER PROGRESSION

 One of the best ways to show our people that we value them is to provide them with real career opportunities and to grow with us.
 So we have set an internal career progression system to do just that!

HEALTH & SAFETY

 As an organisation spread across the globe hiring thousands of people, we cannot take any risks in the workplace so Health & Safety is something we have always have in mind and have prepared for.

EMPLOYEE BENEFITS

 Happy and healthy colleagues are the best kind! So we have put in place a number of employee benefits to make our colleagues as happy as possible at work and outisde of work.

WebHEALTH

 WebHEALTH has been developed and put in place to focus on colleagues' health and well-being, inside and outside of work.

PLANNING AROUND COLLEAGUES' NEEDS

- Many actions have been undertaken in regard to our colleagues'
 work schedules to meet their needs and respect their overall
 work-life balance.
- Our countries have implemented a variety of different approaches to achieving this balance. Below are just a few:
- Employees can access our workforce management system giving them the ability to check their upcoming shifts, access holiday information and request to swap a shift. This system is regularly updated to ensure the needs of our employees are met. It also acts as a real-time, two-way communication tool between agents and managers.

Colleagues have the opportunity to swap a day off by making requests for exchanges.

- Schedules are sent to all advisors by email at least 2/3 weeks in advance. This period cannot be shortened to less than 7 days.
- Our system allows the advisors to self-schedule, for example they can rank up to 3 time slots among a panel and to be granted their preferred time slot if available.
- Our agents have access to their schedules online with their smart phone or digital tablet. This is a real asset in a work life balance perspective.
- Our disabled colleagues are offered longer break times in order to compensate the time they need to move from their working position to the resting areas.

PLANNING AROUND COLLEAGUES' NEEDS

- Work@Home has successfully been applied in one of the larger customer teams in the Netherlands and we are currently assessing if this can be introduced elsewhere
- PAS: People Advisory Services which is split into 3 separate areas (Specialist HR, People Partners, People Services). The benefits of using this team are plural: consistency, instant support, clear escalation routes, impartiality, confidential, subject matter experts and mitigation of risk. On the other side, some risks are at stake if not calling PAS: increased risk of appeals, increased risk of employment tribunals and increased risk of ACAS claims.

PAS deliver a clear methodology on tranaing and delivering to people who are at the core of everything they do. Indeed, through a variety of methods, they will coach and guide managers in: learning new skills, find personal success, development etc to create a two-way interactive learning experience. An advisory service is in place tu understand clients' requests enabling them to tailor advice taking this into account.



 Systems allow colleagues the opportunity to assess their working environment and request changes/consultations to improve their comfort whilst at work.

HEALTH & SAFETY AT WORK

Webhelp identifies, trains and uses necessary staff and competent resources to drive Health & Safety practices on each location. This is carried out in a variety of different forms across our sites:

 We allocate responsibilities, such as First Aid, Fire Marshall and Health & Safety Representative

 Webhelp trains some colleagues in the First Aid Course. Enough employees are certified to ensure that at least one is always present on-site.

Our sites have been equipped with defibrillators.



HEALTH & SAFETY AT WORK

- The health & safety of our people is of the uptmost importance, which is why we have a robust monitoring programme which allows us to reduce and minimise accidents and incidents.
- Our accident reporting procedure was introduced with the aim of reducing the total number of accidents; we've seen significant improvement in accident performance even since.
- Below is an example of our accident rate for our UK sites :

All Site Totals: January – December				
SITE	Accidents	Accident Frequency Rate - (AFR)	RIDDORS	Accident Incident Rate - (AIR)
Derby	4	1.14	0	
Dearne	18	5.93	2	126.50
Dunoon	1	3.25	0	
Falkirk	9	4.84	0	
Glasgow	2	1.61	0	
Greenock	0	0	0	
Kilmarnock	6	4.51	1	144.27
Rothesay	2	14.4	0	
Warrington	3	6.05	0	
All Site Totals	45	3.61	3	3.85



WebHEALTH

WebHEALTH was created to offer support and care for our employee's wellbeing at work. Through this programme we take responsibility for their actions/choices on-site and encourage healthy lifestyles. We continuously launch initiatives to revolutionise health and wellbeing within the workplace.

WebHEALTH is divided into 5 core areas of focus; nutrition, fitness, WebHEALTH communication, wellbeing and the working environment.

To drive this programme we have also enrolled WebHEALTH Warriors. These are enthusiastic ambassadors who provide additional support their fellow Webhelp colleagues by promoting, encouraging and inspiring them to think about their own health nutrition in the workplace but also outside of work.



OBJECTIVES

The goal is to implement global WebHEALTH standards across all our sites. To achieve this we will ensure that all our employees are provided with a healthy and well-balanced working environment.

BENEFITS

Through achieving our goal, our employees will experience an improvement in their health and morale. Employee engagement will also benefit from these healthier life choices, along with productivity and business performance.

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WebHEALTH

Since the launch of WebHEALTH, we have achieved great successes through the launch of initiatives as well as raising awareness to internationally recognised days related to health and wellbeing.

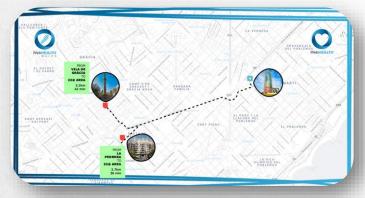
Here are some of the examples of and how they incorporate our 5 core areas of focus; nutrition, fitness, WebHEALTH communication, wellbeing and the working environment...



International Yoga Day:
Yoga positions as well as the
benefits of yoga were shared
across social media, as well as
some live classes in some of our
sites!



World Cancer Day:
With so many people beig affected by cancer, we encouraged our employees to raise awareness through engaging in cancer prevention talks, fundraising events both on and off site and supplying healthy breakfasts and lunch to our teams!



WebHEALTH Walks:

Some of colleagues embraced the challenge and joy of walking by completing some incredible distances.



World Health Day:

Whether it be through promoting healthy nutritious diets, fun engaging exercises or the importance of mental wellbeing, World Health Day gave us the perfect opportunity to promote our commitment to health and wellbeing at Webhelp.

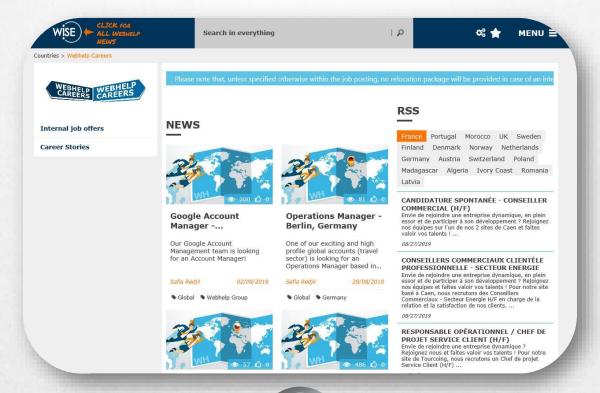
CAREER PROGRESSION

Webhelp aims to provide equal employment opportunity for all and our countries are constantly finding innovative channels to accomplish that. We strongly believe in encouraging internal career progression, as a business it is our responsibility to support this development and provide the necessary opportunities. This is done through a variety of different initiatives across our countries.

WISE Careers page

As a people first company, we want to ensure we are providing our colleagues with opportunities to develop and progress on their chosen career path.

New job opportunities from across all regions and countries are updated on our internal careers page for our people to explore.



CAREER PROGRESSION

Assessment centers

In order to promote internal mobility within our group and career progression, we have our own personalised Assessment Centers dedicated to assess and select the right profiles for our vacancies

It consists of the following 3 key elements to ensure fair, consistent and effective internal recruitment.



Tailored to Webhelp

All exercises are tailored specifically to our way or working, outlining frequent situations to measure the candidate's potential

Multi Assessers

Different assessers join in to benefit from multi perspectives on one single candidate

Multi Assessments

Different exercises are conducted to assess a variety of competencies (role play, interviews and case studies)

EMPLOYEE BENEFITS

We recognise the need to support the interests of our colleagues and know that by doing this it will help maintain and improve the workplace effectiveness and performance.

Below are a few examples of what we have put in place:



Childcare



An online benefits portal, offering a variety of discounts including money off holidays, shopping and technology (employee app)



Star Awards: recognition programme to showcase outstanding colleagues throughout our business



Pension



Support towards health insurance

EMPLOYEE BENEFITS



Training/Sports rooms



Rest rooms



Fruits baskets



Prayer rooms



Length of service and birthday celebrations



Free transportation to and from some of our sites



Breastfeeding rooms



WEBHELP'S ENVIRONMENTAL COMMITMENTS

Webhelp is committed to environmental protection and upholds that principle in the performance of its activities. Webhelp ensures compliance with national, European and International environmental laws and regulations and puts in place appropriate management systems and performance measurement tools.

THESE COMMITMENTS ARE CARRIED OUT IN A VARIETY OF DIFFERENT FORMS:

INITIATIVES

 Our people dedicate their time and efforts into designing incredible actions on site to bring ambitions to life.

CHANGES ON OUR SITES

 With over 140 sites dotted across the globe, there are endless opportunities to reduce the impact our offices have on the environment.

CHARITIES

 As a group of passionate game changers driven by innovation, we feel it is our responsibility to continuously develop new and exciting ways of working.

WEBHELP'S ENVIRONMENTAL COMMITMENTS

We are all responsible for contributing to the reduction of our environmental impact wherever possible: every small step counts. We should all implement environmentally-friendly processes and apply all measures required in order to reduce any negative impact on the environment.

As an office-based company our 2 main environmental impacts are:

1. production of waste

2. CO2 emissions from consumption of energy.

Our **environmental commitments** are to reduce these five elements through:



Reduce, reuse & recycle materials



Prevent pollution by effective controls



Implement energy efficient measures



Educating our people on environmental best practices



Continuously improving our sites to be more eco friendly

TRAVEL

At Webhelp we put in place a variety of eco-friendly solutions towards travel.

Not only in the travel options we offer but also through encouraging low emission solutions.

All of this with aim to reduce our carbon footprint.

Shuttles

we have shuttles in place across some of our sites to improve colleagues' travel expériences ensuring safe commutes. This allows us to reduce carbon emissions leveraging one single vehicle



Discounted public transport

We encourage the use of public transport to minimize the excessive emissions via personal vehicles. Offering discounted travel on local public transport

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Initiatives

Carpooling

Sharing is caring: our colleagues often carpool to and from work as a way to help protect our planet and spend some quality time together

Electric vehicles and charging stations

For futuristic colleagues we have charging stations in place for their individual electric vehicles. As a company offering high tech solutions to our clients, we need to be able to do the same for our colleagues

Bike WebBike Bike renting



RECYCLE

With our extensive global footprint and office space presence we put a lot of effort into recycling the resources that we consume in our everyday business.

Across all our sites we ensure a certain standard of recycling is respected. (paper, plastic, glass, ink cartridges, etc.) However this isn't enough for us, we believe in extending our recycling portfolio through exciting and creative new initiatives.



Food Waste Collections

Across our sites, thousands of meals are consumed by our colleagues during their break time. To minimize the food waste, collection bins have been put in place.

Solar panels

We rely heavily on electricity to run our offices therefore we've put solar panels in place to join the future's battle against over-consumption of nuclear energy, one roof at a time!





Old mobile phones collected, disposed and donated to charity

With today's use of mobile phones, we've partnered up with EEKO who have set up recycling stations for old and unused mobile phones. All proceeds of these boxes are donated to charity KIKA Stichting Kinder Kankervrij, an organization for children with cancer.

REDUCE

With our extensive global footprint and significant colleague population, naturally a lot of resources are consumed and at times unfortunately wasted. We are very conscious of our consumption and put a variety of different initiatives in place in order to reduce our waste.

Alternatives to single-use plastic

- We gift all new colleagues with reusable water bottles upon arrival within the company to instill and encourage the 'zero waste' mindset.
- We've eliminated all disposal water cups once accompanying our fountains. This was a great way to urge our colleagues to use their own water bottle.

Paper free policies

- We've ditched the old fashion paper payslips and employment contracts. We now handle such documents online in a digital format.
- Deplayment of CASPER tool for note taking
- Some of our sites have gone above and beyond committing to a zero-paper policy. A pledge that we strongly encourage and strive to accomplish across the rest of the Webhelp world.

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Innovatives ways of working

As a company whose core business is driven by innovation, we feel it is our responsibility to think out of the box and introduce innovative ways of working to help protect our planet. Our countries have worked hard to implement inventive solutions and long-term initiatives related to our environmental engagements.

Here are a few examples of what happens in our countries:

"Think Green" promotion campaign

Our 'Think Green' campaign is designed around the three R's of sustainability: Reuse, Recycle, Reduce. The mission is to educate and encourage our colleagues to improve their green footprint.

Operation "Switch off the lights"

We are well aware that our energy and electricity consumption is significant based on our size as an international company. For this very reason, we regularly conduct 'switch off the lights' operations.

World Environment Day

This year we celebrated World Environment Day by showcasing a series of colleagues videos and how they live environmentally-friendly lives.



Internal Communications

We have a whole stream of internal communications dedicated to environmental topics. They all frequently publish articles related to environmental news and projects Webhelp is engaged into.

Innovatives ways of working

Participation in reforestation campaigns

We have engaged in reforestation campaigns with the 'ReforestAction' organization via donations. We have also launched the 'Green Media Challenge': in order to engage our external audiences via our social networks, we organize quizzes about the environment and we plant a tree for each correct answer.





World Clean Up Day

We support and actively take part in community clean ups to encourage our colleagues to be active game-changers.



Webhelp Beehives

Last but not least, we set up beehives on our different sites to make our own honey and take part in the bee's protection.





ANTI-CORRUPTION

Webhelp is committed to winning business through fair, honest and open competition in the marketplace and is intolerant of bribery or any other form of corruption.

Webhelp maintains strict compliance with all anti-bribery and anti-corruption laws applicable to its businesses and operations around the world.

AT WEBHELP, ANTI-CORRUPTION MEASURES AND PRINCIPLES RELY ON THREE MAIN PILLARS:

PREVENTION & AWARENESS

 This step is to proactively reduce fraud through the development of policies and specific trainings.

DETECTION & SURVEILLANCE

 This step is to identify potential fraud and implement measures in order to minimise or reduce the impact.

INVESTIGATIONS & CORRECTIONS

 This step focuses on responding at the earliest and in the most effective way possible after the identification of a suspected fraud.

ANTI-CORRUPTION

Webhelp has adopted a number of compliance measures and has further launched a wider workstream to either adopt additional compliance policies or to bring the existing policies to compliance with the latest legal requirements and obligations.

The compliance measures implemented within the Group are the followings:

Anti-Bribery Code of Conduct, disciplinary procedures and employee training:

- The Code of Conduct is an umbrella procedure containing general and fundamental principles of the Target in various areas, including prevention of bribery and corruption, whistleblower reporting, protection of personal data, prevention of conflicts of interests, environmental protection, etc.
- The Gifts, Travel and Expenses Policy is a specific policy setting more detailed guidance on acceptable behaviours with respect to offering or receiving various advantages
- A Conflicts of Interest Policy is currently being developed and is intended to strengthen Webhelp's commitment to integrity in its business practices and compliance with applicable laws worldwide in line with the Code of Conduct and policies and to help the employees to understand and address situations when conflicts of interests may arise.

ANTI-CORRUPTION

Whistleblowing system

The whistleblowing system, PhonEthics allows employees to raise questions regarding bribery and corruption and require them to report violation or suspected violation of the Anti-Bribery & Ethics Policy to the offices of General Counsel of the Group, either by direct contact or via email.

Due diligence procedures to evaluate third parties

This policy sets out due diligence requirements that are required to be complied with prior to engaging in a business relationship with any potential business partners. It includes specific risk factors and red flags and requires a due diligence questionnaire to be filled-in for both third parties and clients.

Control procedures and structure of the compliance and control teams

An annual audit program covering a number of Webhelp countries with respect to compliance with local anti-bribery laws and a Group anti-corruption program is currently being worked on in order to be deployed as soon as possible. It is intended that it will contain a self-assessment questionnaire to be completed annually by each Webhelp country.

INDIVIDUAL DATA PROTECTION

In addition to the basic requirements of quality of service, Webhelp ensures data security and privacy protection.

We strive to uphold the principles of responsible purchasing and to ensure the security and privacy of both internal and customer data.

The Group has a strong focus on the implementation of a continuous improvement approach. The principles and rules relating to Information Security are defined in the Information Security Framework, which applies to the whole group.

The framework is intended to ensure the availability, integrity, and confidentiality of information and services provided, as well as traceability of actions. It is based on best practices in terms of Information management and Security in particular requirements regarding protection of personal data in each country (CNIL, OPC, CNDP, etc.), on the ISO 27002 standard, as well as on PCI-DSS v3.0 standard for credit card holder data environments and of course on (EU) 2016/679 of 27 April 2016 on personal data protection ("GDPR").

INDIVIDUAL DATA PROTECTION

The objectives of our information security strategy include:

- Protection of Webhelp's data assets, as well as of those of its clients.
- Continuity of Webhelp's operations, as well as of the services provided to its customers
- Compliance with regulations
- · Protection of brand reputation

Strict measures are put in place to ensure data security and privacy. These include for example:

- Strong access control, careful handling of security storage, and formalised exchange:
 - Access to sensitive data is allowed only after identification, authentication, and checking of access rights.
 - Sensitive data may only be accessed by clearly identified persons who need to acquire that information for carrying out their duties.
 - Data that might contain personal information is considered sensitive data and is processed by Webhelp in compliance with regulatory and legal requirements.
- Data protection requirements are included into our employment contracts. Additionally, a specific confidentiality agreement recalling good security practices is signed by each employee.