

VIGILANCE PLAN.



ABOUT THIS VIGILANCE PLAN

SITEL
GROUP



This plan outlines Sitel Group's commitment to prevent human rights violations throughout the organization and supply chain. In accordance with Article L. 225-102-4 of the French Commercial Code, Sitel Group introduces the following measures to identify and prevent human rights risks including health and safety and the environment. To comply with French Law, Sitel Group implemented the vigilance plan below. The plan is based includes measures to identify and prevent any serious violations of human rights, fundamental freedoms, health and

safety of people and the environment. The Vigilance Plan includes the five required measures set out Section 4.6.2 in the French law:

- 1** Risk mapping for identification, analysis, and prioritization;
- 2** Regular assessment procedures for the situation of subsidiaries, subcontractors, or suppliers with whom an established commercial relationship is maintained with regard to risk mapping;
- 3** Appropriate actions to mitigate risks or prevent serious harm;
- 4** Whistle blowing and reporting mechanism for the existence or emergence of risks prepared in consultation with the representative trade union organization within the Group
- 5** A system for monitoring the measures implemented and assessing their effectiveness. The development and implementation of the Vigilance Plan involves Global Corporate Social Responsibility and the departments of Compliance and Ethics, Treasury, Security, Legal, Procurement, Internal Audit, and Executive Leadership.



OUR VALUES

OUR PEOPLE

Sitel Group's 80,000 people across the globe connect many of the world's best-known brands with their customers – 3.5 million times every day. As a global customer experience (CX) management leader, we apply our 30+ years of industry-leading experience and the entrepreneurial spirit of our group's founders to deliver omnichannel experiences through voice, chat, social media and more to customers of our 400+ clients across all verticals – from Fortune 500 companies to local startups.

Our group's breadth of capabilities – powered by our ecosystem of experts including innsco, Learning Tribes, Sitel, Sitel Insights and TSC – go beyond business process outsourcing (BPO) to support every stage of the customer journey. We are redefining the contact center and improving business results by pairing innovative solutions – such as self-care and automation- with the human touch, emotion and empathy of our people. As a CX platform, we are powered by experts to deliver tailored CX solutions to fit our clients' needs through our consultative, customer-centric approach adding value at every touchpoint – regardless of location, channel or time of day. Learn more at www.sitel.com and connect with us on Facebook, LinkedIn and Twitter.

Sitel is one of the world's leading outsourcing providers of customer experience management. We collaborate with some of the best-known global brands to harness the industry's transformation and help consistently deliver outstanding customer experiences. With over 30 years of industry-leading experience, our 80,000 passionate and talented associates support more than 400 clients in 48 languages from 150 facilities strategically located in 27 countries. As we continue our commitment to promote ethical business practices, we will ensure our policies and procedures adhere to industry standards and laws enforcing the prevention of human rights violations throughout our organization and supply chain.

Be Bold

Seek innovation.
Stay open-minded.
Do more with less.
Be passionate.
Dare to be different.

Build Trust

Be authentic.
Lead by example.
Communicate fearlessly.
Actively engage.
Take ownership.

Work Together

Have fun.
Build relationships.
Leverage collective genius.
Inspire others.
Give back.

Wow Customers

Listen intently.
Show empathy.
Create unique experiences.
Add value.
Always over deliver.

BE
BOLD

BUILD
TRUST.

WORK
TOGETHER

Wow!
CUSTOMERS

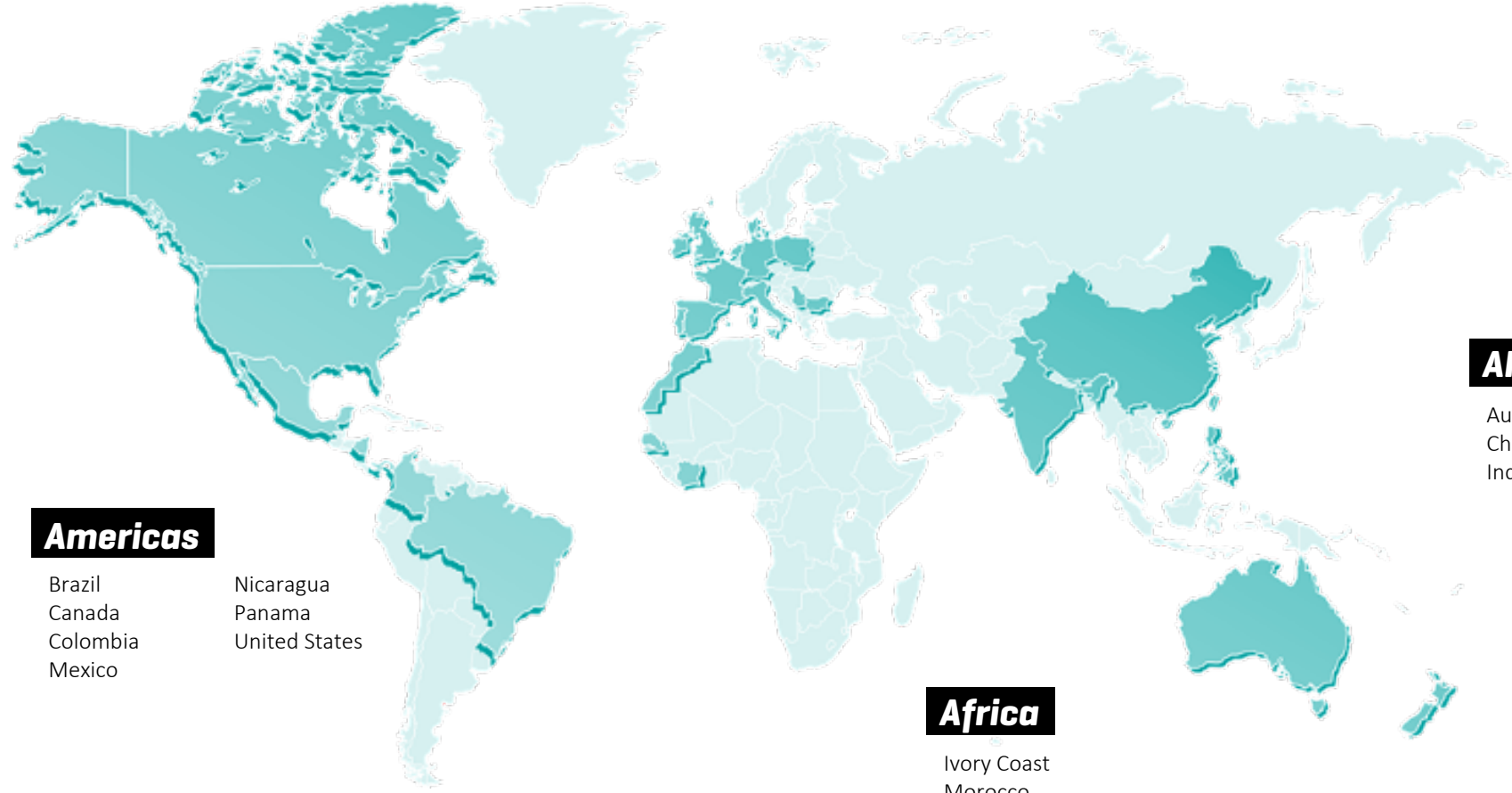
GLOBAL PRESENCE

LOCAL EXPERTISE

WITH OUR GLOBAL PRESENCE AND LOCAL EXPERTISE, WE ARE CLOSE TO OUR CLIENTS AND THEIR CUSTOMERS WHEREVER (AND WHENEVER) THEY NEED US

Europe

- Bulgaria
- Denmark
- France
- Germany
- Ireland
- Italy
- Netherlands
- Poland
- Portugal
- Serbia
- Spain
- United Kingdom



Americas

- Brazil
- Canada
- Colombia
- Mexico
- Nicaragua
- Panama
- United States

Africa

- Ivory Coast
- Morocco
- Senegal

APAC

- Australia
- China
- India
- New Zealand
- Philippines



4 CONTINUOUS IMPROVEMENT PROCESSES

In 2019, Sitel Group supported continuous improvement processes throughout the organization which included the following:

Continued participation for the United Nations Global Compact;

- Appointing a Corporate Social Responsibility (CSR) Manger in November 2019 to oversee, support and develop the global CSR Strategy for Sitel Group;
- Enhanced training for all CSR Leads who assigned to support the global CSR Strategy and alignment with Sitel values in their local regions.

In 2020, Sitel Group supported continuous improvement processes throughout the organization which included the following:

- Enhanced tools within the Procurement Department to better support risk management, sourcing and vetting suppliers.

RISK MAPPING

Sitel Group has established necessary processes to identify and analyze internal risks that impact the organization including major risks related to human rights, fundamental freedoms, health and safety, and the environment. The risk management methodology has been aligned to **ISO27001:2013** to identify business, information security, legislative and regulatory requirements. The risk assessments defines criteria against which risk has been evaluated. This assessments is applied globally based on the Confidentiality,

Integrity & Availability (CIA) values. The risk management methodology is reviewed on an annually basis to determine continuous improvement needs. This risk management scheme includes expertise from the Internal Audit, Finance and Operations Department to supplement and support a risk and compliance framework.

Stakeholder dialogue is conducted to support the risk management scheme. This internal dialogue identifies and prioritizes risk and ensures consistency with Sitel Group's values and approach to CSR. The CSR Management Approach is based on Plan-Do-Check-Act (PDCA) and is included as part of the continuous improvement process.



**PLAN
DO
CHECK
ACT**



PROCEDURES

Sitel Group has established internal procedures to determine risk. All procedures are carried out through our Internal Audit team and requires participation and cooperation from necessary business units. All site locations follow Sitel Group's Global Operating Standards (GOS), values, and policies. Internal control mechanisms include:

INTERNAL AUDITS

INTERNAL AUDIT QUESTIONAIRES

SITE VISITS

Internal Audits include the monitoring of control systems in place to determine human rights violations. Based on audit findings, Internal Audit will provide recommendations to support prevention, mitigation and remediation activities. For risks identified, Internal Audit will supply a summary of implementation included a timelines and indicators to monitor the effectiveness and efficiency.

MITIGATE AND PREVENT

Sitel Group has included internal standards implemented by policies and procedures in order to mitigate and prevent internal risk. Global policies are used as the internal foundation for Sitel Group operations and serve to support an internal culture of compliance and integrity. Internal policies and procedures have been developed based on law, best practices and industry standards applicable to our Associates and third parties. Our Global standards ensure compliance with the 10 Principles of the United Nations Global Compact and international labor standards of locations where we operate.

NEXT PAGE:
POLICY REVIEW





HUMAN RIGHTS



POLICY REVIEW

We annually review all policies as part of our internal continuous improvement process. The following codes and policies address our stance and commitment of respecting human rights:

- Code of Conduct
- Corporate Social Responsibility Policy
- Corporate Social Responsibility Statement
- Anti-Modern Slavery and Child Labor Policy
- Anti-Money Laundering Policy
- Environmental Policy
- Supplier Code of Conduct
- Procurement and Vendor Management Policy
- UK Gender Gap Report
- UK Modern Slavery Statement



MEASURING

Internal training and awareness are essential elements to support individual accountability to follow Sitel Group's ethics and compliance standards. Internal training includes:

GLOBAL SECURITY AWARENESS

GLOBAL CODE OF CONDUCT

CSR STRATEGY AND ALIGNMENT

To measure the effectiveness and compliance of internal training, Sitel Group monitors the following indicators:

- Associate Sit and Tell Survey
- Percentage of employees trained on internal training (both required and voluntary)
- Internal Audits
- Reporting and Monitoring Associate Grievances
- Annual environmental reporting

PROTECT AND RESPOND

CRISIS MANAGEMENT TEAM

As part of our responsibility to protect and respond to risks that impact critical business operations and Associates, Sitel Group has developed the Global Crisis Management Team. This team manages any unexpected or unforeseen events with a negative impacting Sitel Group's Associates, reputation, business continuity, or our Clients. The Team is comprised of representatives through in various business units to support risk management.

HUMAN RIGHTS

With operations in 28 countries, we embrace our cultural differences with respect to local customs, local laws, rules and regulations. We treat others with respect and value the diversity of our Associates as outlined in our **Global Code of Conduct**. Supporting and inclusive environment means creating a workplace free from harassments, discrimination, harsh treatment and acts of threats of violence.

Sitel Group's four CSR pillars exemplify the framework to prevent human rights violations by also including the Universal Declaration of Human Rights, the Organisation for Economic Cooperation and Development (OECD) guidelines. Sitel Group's Global Anti-Modern Slavery and Child Labor Policy, Corporate Social Responsibility Policy and Environmental Policy address the following priorities respecting human rights and fundamental rights:

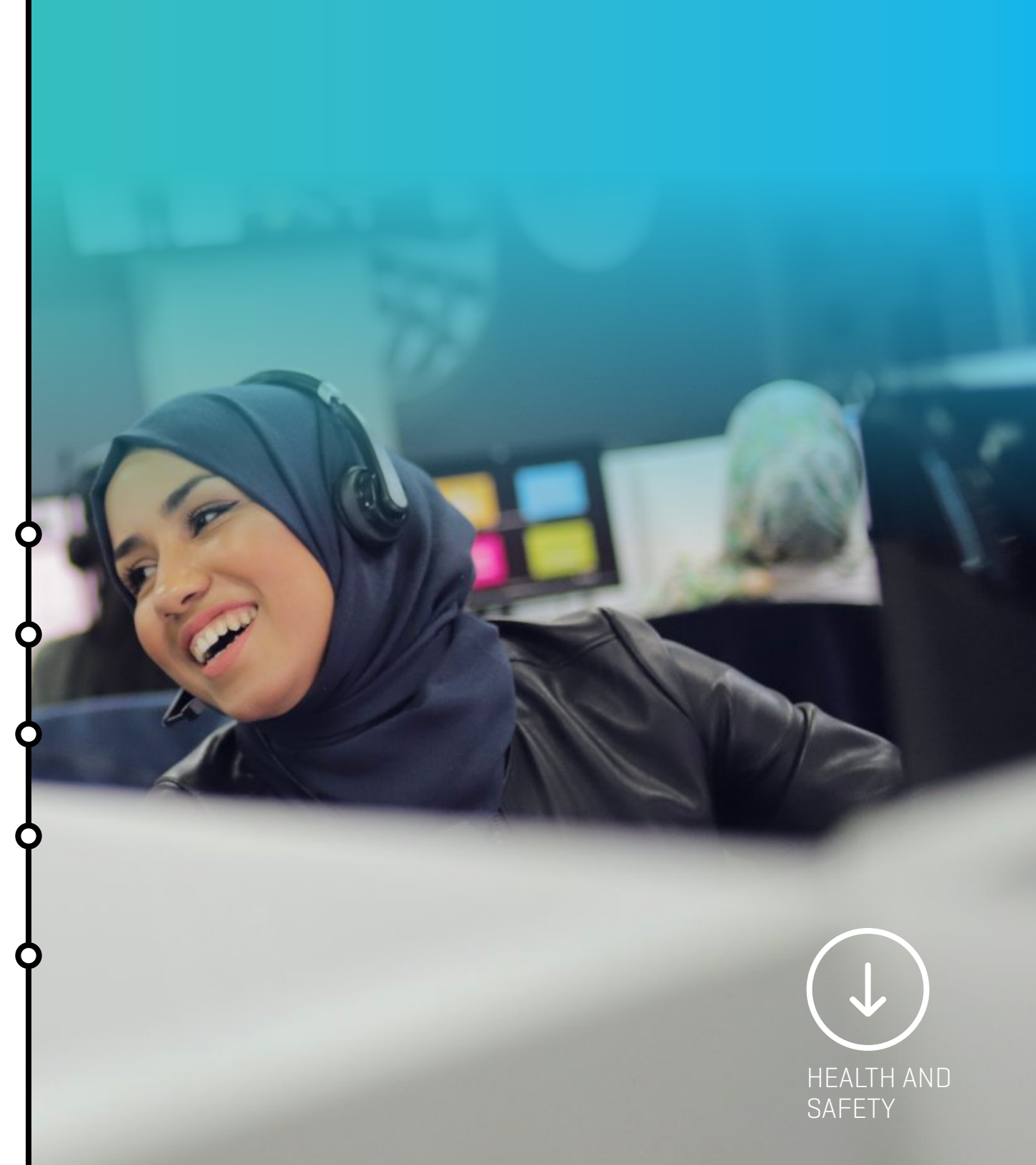
Elimination of forced labour and discrimination

Abolition of child labour

Freedom of association and collective bargaining;

Right to a healthy and safe working environment

Rights and respect of the communities where we live



HEALTH AND SAFETY



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HEALTH AND SAFETY

HEALTH AND SAFETY

Sitel aims to protect our Associates in the workplace and prevent workplace accidents. Internal Audits are continuously conducted to measure the safety and security for each site. Workplace accidents and incidents are reported, recorded and analyzed to determine the root cause for future prevention. Health and safety standards are maintained through local requirements and adhere to Sitel global standards. We encourage all of our Associates to act in a safe manner, participate in safety drills and training and report any unsafe conditions to Human Resources or Facilities personnel.

ENVIRONMENT

Sitel Group strives to reduce our carbon footprint by operating in an environmentally friendly and responsible partner. We joined the CDP in 2017, as part of our efforts to report and reduce greenhouse gas emissions with respect to climate change and water waste. We continually foster awareness to support an environmentally friendly behaviors in the workplace.

SUPPLY CHAIN

Sitel strives to maintain the highest standards of employee conduct and ethical behaviour. In all of our dealings with suppliers, we strive to ensure that the highest ethical standards are reached at all times. We have adopted policies to address workplace issues such as working hours, child labour, forced labour, non-discrimination, freedom of association, health and safety and the environment. These policies apply to our own business, and we encourage businesses throughout our supply chain to adopt and enforce similar policies in their own operations. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Our Supplier Code of Conduct addresses requirements specific to human rights, fair labor conditions, health and safety and environmental responsibility, business ethics and integrity (anti-corruption and bribery), and regulatory compliance. All suppliers are required to adhere to this Code of Conduct. We are continuously improving our procurement practices to enhance internal compliance throughout every aspect of the supplier life cycle.

WHISTLEBLOWER MECHANISM- ETHICS POINT

We have zero-tolerance for unethical behavior and corruption in any form. Any possible conduct violations viewed as unethical, illegal, in violation of professional standards or otherwise inconsistent with Sitel Group's policies and procedures, which may affect the moral or physical integrity of its employees, can be reported using Ethics Point for further investigation. This third-party, 24-hour hotline is available to report ethical violations anonymously.

This hotline is accessible by internal and external stakeholders to report areas of concern such as human rights, environment, health and safety, fraud or conflict of interest. The alerts are received through our reporting systems and assigned for investigation. Sitel Group prohibits retaliation for good faith reports or suspected misconduct.

MONITORING

It is essential to monitor the effectiveness of internal policies and procedures throughout our business unites. Sitel's Internal Audit, Human Resources, Sitel Group administers internal surveys to query employee satisfaction and areas of risk or concern. Additional indicators include attrition, absenteeism, accident rate, greenhouse gas emissions, Associates who have completed voluntary and required training, grievance resolution rates.



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