



How TTEC does business

Our Ethics Code for employees, suppliers and partners

ttec™

**“Each of us has an obligation to take ownership
in how TTEC conducts its business.
As a member of the TTEC team, you must
always consider how your actions affect
our integrity and credibility.”**

Kenneth D. Tuchman
Founder, Chairman and Chief Executive Officer

The important values and principles outlined in this document apply to the TTEC family of companies. When the document refers to “TTEC or “our company” the reference is to all TTEC companies and other entities that are directly or indirectly controlled by TTEC Holdings, Inc.

To report concerns or seek guidance about any issues covered in our *Ethics Code: How TTEC does Business*, contact the We Hear You helpline at +1888.788.0032 (U.S. and Canada) or go online at <http://www.ttecwehearyou.com> to view dialing instructions outside of North America.

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Message from our CEO

We are committed to doing business with integrity. The actions we take do not just impact us, they affect our clients and their customers, communities where we work, our business partners, and our colleagues. For more than 30 years, we have been providing exceptional customer experience for the world's largest companies and their customers; and making ethical business decisions in everything we do has been the key to our continued success. As we grow and expand our business into new markets, technologies and strategic service offerings, each of us has an opportunity to take ownership in how TTEC does business, and help us be the kind of company where the highest ethical standards guide how we do business and how we interact with each other.

Our Ethics Code, *How TTEC does Business*, is the ethical compass for our employees, vendors and suppliers on how we collaborate with our business partners, engage with the marketplace to compete for business opportunities, support communities

where we live and work, and most importantly, communicate what we expect from each other, as we deliver the highest quality of service and innovation to our clients and value to our shareholders.

When you take action, as a member of the TTEC team, I expect you to always consider how the decisions you make affect our credibility and reputation. Everything you do, as part of our business, should always demonstrate good business judgment, sound ethical principles and follow the standards outlined in our Ethics Code.

Our growing business operates in more than 25 countries on six continents, employs more than 50,000 professionals, and partners with hundreds of highly diverse suppliers. Our Ethics Code does not attempt to address every situation that you can encounter in our complex business. It is designed to provide clear guidance of our expectations on how we do business and how we want you to make decisions when working with us. From time to time, you will encounter ethical dilemmas or those who do not share our business standards. If you are not sure how to handle a difficult situation, if you become aware of a possible violation of laws or policies, if you see bad decisions being made, or if you simply have a question about the right course of action, please contact the We Hear You (WHY) helpline, our confidential employee and supply chain hotline, or speak to your team leader, your manager or your local company or Human Capital representative. You can also contact our Legal Department at ethics@ttec.com for help.

If you are not sure about what to do next, just ask. We welcome your questions, we will keep your queries confidential, and we will protect you against retaliation for raising good faith concerns about how we do business.

The Board of Directors, our management team and I have reviewed and approved our Ethics Code, *How TTEC does Business*. It applies to all TTEC employees, vendors and suppliers everywhere in the world, at every level in our organization, and to every company in the TTEC family.

How we do business matters to us, to our clients and to our shareholders. Please continue to help us make TTEC a place where business is done with integrity and where we all can be proud to work.

Sincerely,

Kenneth D. Tuchman
Chairman and Chief Executive Officer

Our ethics code and you

At TTEC, our values and our Ethics Code define how we do business and reflect our commitment to: Lead Everyday, Do the Right Thing, Seek First to Understand, Reach for Amazing, Act as One, Live Life Passionately.

We are in business to serve our clients, make a profit and create shareholder value; and we do so with integrity and without sacrificing our principles.

We are proud of our reputation for service excellence and doing business with integrity. Making hard decisions to always do the right thing is not easy. What is right is not always obvious in the complex world of global business. Our Ethics Code is designed to provide guidance on how we make the right decisions in the best interest of our customers, our company, our shareholders and our employees.

We are proud of our reputation for service excellence and doing business with integrity.

Our Ethics Code applies to our entire business, to all our employees, to members of our Board of Directors, and to our vendors and suppliers around the globe. If you work for a TTEC company or with TTEC as a contractor or a supplier, you have the

responsibility to read, understand and follow the core principles outlined in our Ethics Code.

TTEC takes great care in selecting our suppliers, contractors, agents, consultants and other business partners. We will only do business with companies that match our high standards of ethical business conduct, and only with those who comply with all laws that apply to their business.

Ethical decision making

Our continued success depends on your ability to make decisions that are consistent with our core values. When faced with a difficult situation, asking yourself the questions below can help you make the right ethical decisions.

1. Is it legal? If you are unsure, contact Legal for guidance.
2. Does this comply with TTEC's policy? Check PolicyIQ for more information or talk to your manager, your Human Capital representative or Legal for guidance.
3. Does this reflect TTEC's values and culture? Check [Our Values](#) website or talk to your manager for guidance.

4. Could this adversely affect company stakeholders? If you are unsure, talk to your manager, Legal or the Ethics Department for guidance.
5. Would you feel concerned if this appeared in a news headline? If you are unsure, talk to your manager, Legal or the Ethics Department for guidance.

Reporting Concerns and Asking Questions

If you have a question about our Ethics Code, our policies, or laws that impact our business, or if you would like to report a violation, contact the confidential We Hear You helpline by following country specific We Hear You dialing instructions (as posted on Mosaic), or by going directly to <http://www.ttecwehearyou.com> for web access. You can also seek guidance from our Legal Department at +1.303.397.4397 or ethics@ttec.com.

We investigate all reports of suspected violation of our Ethics Code, laws and TTEC policies, and take prompt and appropriate disciplinary action when warranted. TTEC will keep the information it receives and the identity of those who report violations confidential, whenever permitted to do so by law.

[Employee Concern Policy](#)

Reporting in "good faith" does not mean you have to be right about the concern you have. It means that you need to be honest and believe that you are reporting in the best interest of the company.

Protection for whistle blowers against retaliation

At TTEC, we have an open-door policy, which means that employees have the opportunity to discuss issues of concern openly and candidly with management, Human Capital or the Legal Department. TTEC does not retaliate against those who report concerns in good faith. Those who are brave to "blow the whistle" on wrongful acts and those who cooperate with our investigations are protected against retaliation. Anyone who engages in an act of retaliation will be subject to disciplinary action, up to and including termination. If you believe you have been a victim of retaliation, you should report it immediately to our Legal Department.

[Employee Concern Policy](#)



Working as a team

To deliver excellence for TTEC and our clients, we build collaborative and highly engaged teams.

We attract the best creative talent from around the globe and retain our talent by treating our colleagues with respect, empowering their performance, and providing a safe and productive work environment.

We lead by example

We expect our leaders to create and maintain a positive working environment where employees and suppliers are inspired to excel and are comfortable asking questions and raising concerns. If you supervise others, you have a special responsibility to act as a role model. To do your part:

- Demonstrate your commitment to TTEC's culture of integrity;
- Make sure you and the people you supervise understand and abide by our ethical principles;
- Support those who report a suspected problem;
- Always escalate ethical concerns to the appropriate resource in the company;
- Never allow retaliation against those who raise concerns or participate in an investigation;
- Give those you supervise the information and training they need to perform their work; and
- Treat those who work with you fairly and with respect.

As a leader at TTEC, lead by example and always demonstrate and promote ethical standards in how TTEC does business.

[Standards of Conduct Policy](#)

We do not discriminate or harass

TTEC is committed to a work environment based on respect. We do not tolerate discrimination or harassment. TTEC makes employment and supplier selection decisions based on merit, and not because of a person's sex, race, color, age, religion, gender, gender identity or expression, sexual orientation, national origin, disability, genetic information, or any other status protected by law. Harassment in the work place can be verbal or physical

If you are uncomfortable with someone's conduct, say something. Remember that TTEC does not retaliate against those who report harassment or discrimination.

and may vary based on culture and customs of where the work is performed. Any conduct that is abusive, offensive, or has the effect of creating an intimidating work environment is unacceptable at TTEC.

[Harassment and Discrimination Prevention Policy](#)

We believe that diversity makes us better

As a global company, TTEC recognizes the value of different cultures, backgrounds and perspectives. We believe that our diversity contributes to our success and makes us stronger. We embrace our differences, and treat each other with respect and fairness. Commitment to diversity and inclusion are not just words at TTEC: it is how we conduct our business.

[Equal Employment Opportunity Policy](#)

We behave professionally in the workplace

A professional workplace is critical to our success. What we do and how we look has an impact on our reputation in the marketplace and on the quality of our interactions in the workplace.

Employees are expected to conduct themselves in a professional manner at all times. Workplace dating or romantic relationships must not interfere with any employee's professionalism, including treating others with respect and refraining from behavior that may make others feel uncomfortable, such as overt physical displays of affection and using sexual language.

The appropriate professional dress may vary from country to country, but wherever in the world you work for TTEC your attire must represent us well as a professional organization which our clients trust with their most important asset, their customer relationship.

[Standards of Conduct Policy](#)

We maintain a safe and healthy workplace

At TTEC, our employees' safety is our priority. Each employee has a role to play to ensure a safe workplace. Stay current on best practices in safety by completing periodic safety training relevant to the job; and always comply with safety procedures and practices taught in injury prevention training.

[Workplace Safety Policy](#)

We have zero tolerance for violence in the workplace

Threats, violence and intimidation are not tolerated at TTEC. We will take immediate steps against violence in the workplace. Report all safety concerns and threats of violence immediately.

[Workplace Safety Policy](#)

We do not allow weapons at work

Firearms and/or weapons of any kind are strictly prohibited in the workplace, in TTEC vehicles or in an employee's possession while on TTEC's premises or at a TTEC-sponsored event or activity. If you or your coworkers are in immediate danger, contact law enforcement and TTEC Security immediately.

[Workplace Safety Policy](#)

We expect a drug- and alcohol-free environment

TTEC has a drug- and alcohol-free workplace policy. Intoxication adversely affects judgment and impacts the safety and security of our employees and visitors. Being in possession of or impaired by any intoxicant (alcohol, drugs or improperly used prescription medication) while conducting company business (on our premises or elsewhere) will lead to termination. If you attend a business function where alcohol is served, exercise good judgment, know your limits and arrange for transportation.

[Drug Free Workplace Policy](#)

If accidents or injuries occur, report them immediately.

Weapons in the workplace are strictly prohibited.

While some jurisdictions permit use/ possession of marijuana, TTEC does not.

We safeguard our employees' information: your right to privacy

As part of your employment, TTEC has access to your personal identifying information (home address and contact details, family, compensation, health and disabilities information, results of your background check, employment history and other sensitive information). We store and use this information and sometimes (with consent when required) transfer it to others, but only for business purposes. We are committed to respecting your privacy and to using best practices to safeguard this information.

Data privacy rules differ around the globe; we work to comply with data privacy laws of countries where we do business.

If, as part of your job, you have access to employees' private data, you must observe all restrictions for data access, take precautions to protect the data from misuse, and only access it on a need-to-know basis for legitimate business purposes. It is also our responsibility to never discuss or share (via email or otherwise) an employee's private data with other employees or third parties unless such persons have a 'need to know' and we have obtained approval from our immediate supervisor.

[Privacy Policy](#)

We adhere to fair pay practices

TTEC pays its employees for all time worked. If you believe that your paycheck is inaccurate, or if you have a question about your pay, please contact your supervisor, your Human Capital representative or the We Hear You helpline.

[Pay Policy](#)





Excelling in our business

We take pride in our ability to provide superior value to our clients and their customers through high quality innovative services. We treat our clients and their customers with honesty and integrity, and only make promises that we can keep.

We safeguard confidential information

While serving our clients and their customers, we have access to sensitive and confidential information. We protect this information diligently and expect it not to leave our secure environment. Never transfer confidential information outside the TTEC Global Network, including to your personal email address, or to non-company devices or storage locations. If you become aware of potential mishandling or 'leakage' of confidential information, we expect you to report the situation immediately.

[Information Security Policy](#)

We stand up to fraud

Fraud, theft, embezzlement and misappropriation of information or assets are serious offenses and have no place at TTEC. TTEC has sophisticated fraud and loss prevention programs, and if you engage in fraud, help others engage in fraud, or elect to ignore while others engage in fraud, you will be subject to disciplinary action, including termination. Fraud leads to loss of our clients' confidence in our services and costs business opportunities for TTEC and jobs for our employees. We pursue criminal and civil actions against those who engage in fraud.

[Policy Against Corruption](#)

We protect company assets

TTEC employees have access to valuable company assets (technology, equipment, cash and other property). We must use these assets only for legitimate business purposes. Never sell, loan, gift, take for personal use, or otherwise dispose of company assets without proper authorization. If you suspect theft or misuse of company property, report the situation immediately.

We always follow the consumer protection laws on telephone solicitations, do-not-call, and do-not-record laws.

Our Bounty Program provides financial incentives for our employees, suppliers and vendors who provide credible information for fraud detection and prevention.

Inspection of Personal Property

Our employees have access to our clients' and their customers' highly confidential and personal information. This information is valuable and often sought out by criminals. As a condition of employment, TTEC reserves the right to inspect desks, lockers, briefcases, handbags, laptops, personal electronic storage devices, and personal vehicles parked on company property to protect this information.

Expectations of Privacy on TTEC Global Network

TTEC Global Network is a company asset provided for business purposes only. TTEC monitors your activity on the Global Network without notification.

The monitoring includes information stored on your company computer, TTEC email system and mobile devices (whether or not company owned).

[Monitoring Use of Company Resources Policy](#)

Do not use the Global Network to:

- Access, transmit or store pornography, engage in online gaming or gambling or access websites that do not adhere to TTEC's values;
- Post messages about TTEC's or our clients' confidential and proprietary business information;
- Offend or harass clients, their customers or your coworkers.

[Acceptable Use Policy](#)

We protect TTEC intellectual property and proprietary information

Intellectual Property (IP) and innovation are critical to our business success. TTEC IP includes ideas, processes, trade secrets, technology, software, proprietary know-how, inventions, designs, marketing materials, pricing methods, brands and other creations protected by law. We make significant investments in the development and acquisition of IP and will enforce our rights and prosecute infringers to the fullest extent of the law. Unless otherwise provided by law, all IP created by our employees during their employment with the company is TTEC property.

TTEC's proprietary information is a very valuable asset. Always safeguard confidential and proprietary information that you

Our obligation to keep company confidential does not end with our employment. Never disclose TTEC information after you leave the company.

help develop, or have access to, as part of your job. Never use or disclose TTEC IP or confidential proprietary information without authorization and make sure that proper non-disclosure arrangements are in place before IP and proprietary information are disclosed.

We engage responsibly with social media

While we do not direct how you use social media on your personal time, exercise good judgment and consider carefully the impact when posting to social sites, internet chat rooms and blogs. When identifying yourself as a TTEC employee or as a TTEC vendor or supplier on social media sites always adhere to our company values, and take care not to offend our clients, our industry or your coworkers.

Never use social media to circulate knowingly false or misleading information regarding the company, our clients, customers, competitors, fellow employees or our vendors and suppliers. Confidential information about TTEC business relationships, performance, financial condition or legal issues should never be discussed in social media, as doing so may damage the company and violate laws. If you become aware of a negative posting about TTEC, bring it to management's attention so we can protect our brand, thus protecting our client relationships and your job.

[Social Media Policy](#)

We recognize and manage conflicts of interest

Conflicts of interest arise when our personal or financial interests interfere, or appear to interfere, with objectivity in our business decisions. Decisions we make on behalf of the company and in our personal lives should be carefully considered to avoid real and perceived conflicts of interest. TTEC expects its employees to recognize conflicts of interest and to deal with them through timely disclosure to the Legal Department or management.

Unless authorized to speak on behalf of the company, make sure that opinions you express are not associated with TTEC.

An appearance of a conflict may be just as damaging as an actual conflict. Facing a potential conflict of interest is not a violation, but not disclosing it in a timely manner can lead to termination of your employment/relationship with TTEC.

Early disclosure of a potential conflict can resolve most conflicts of interest and avoid an embarrassing situation that can lead to loss of business or employment. An appearance of a conflict may be just as damaging as an actual conflict. Facing a potential conflict of interest is not a violation, but not disclosing it in a timely manner can lead to termination of your employment/relationship with TTEC. If a conflict cannot be addressed through disclosure, it can often be addressed through re-assignment of personnel or change in how the business decisions are made.

Doing Business with Employees, Family and Friends

Generally, TTEC does not do business with employees and members of their immediate family.

A conflict of interest exists if you, a member of your family, or a close friend hold an ownership stake or an executive position in a company that is a TTEC supplier, business partner or a customer. We expect our employees, vendors and suppliers to notify us of such potential conflicts so we can proactively work together to avoid conflicts of interest. If you are directly involved in the supplier selection process with a company owned or represented by somebody with whom you have a personal relationship, notify your supervisor about this conflict immediately and remove yourself from the decision-making role in the selection process.

While members of the same family can work for our company, they should never work for each other or be in the same chain of command.

Similarly, in order to minimize the risk of a conflict of interest and promote fairness within the workplace, romantic relationships between co-workers in the same chain of command are discouraged.

[Employment of Relatives and Close Personal Relations Policy](#)

Employment Outside of TTEC

When you work for TTEC as a full-time employee, we expect your undivided time and attention. Accepting outside employment, while working for us, can impact your productivity and may also create a conflict of interest. Before accepting any employment or business commitment outside of TTEC,

Employees may not serve on a board of directors for a company that competes with, supplies goods or services to, or purchases services from TTEC.

including providing consulting or related services, consult with your supervisor and receive written approval. Employees with outside jobs or businesses must continue to meet performance standards of their TTEC role and may not conduct personal or outside business during TTEC working hours or do so using TTEC's property, information, supplies, equipment, or our Global Network.

Serving on Boards of Directors

Serving on a board of directors can be prestigious, and it can serve a worthy cause. Unfortunately, it also can lead to a conflict of interest, if the organization is controversial, does not align with TTEC's values, or competes with TTEC or our clients. To avoid potential conflicts of interest, serving on a board of directors for any organization (whether or not such service is compensated, whether or not the organization does business with TTEC, and whether or not it is for-profit) requires advance written approval. Discuss the opportunity with your supervisor before accepting it, and if approved, contact our Legal Department for a formal conflict clearance.

Self-Dealing and Corporate Opportunities

While working for or with TTEC, you may learn about business opportunities. Benefiting personally from such opportunities without disclosing the details to TTEC or using TTEC's name and contacts for personal benefit creates an unacceptable conflict of interest.

You may take advantage of such business

opportunities or share them with others only after disclosing the matter to TTEC and confirming that there are no objections.

Acceptable gifts and entertainment are nominal in value, infrequent, unsolicited, and appropriate for the intended business purposes. Gifts of cash or cash equivalents and "adult entertainment" are never acceptable.

Gifts and Business Courtesies

Business gifts and entertainment can be used effectively to enhance working relationships, celebrate successes and promote our brand. All business courtesies should be guided by good judgment, discretion, moderation, and transparency. Giving or receiving anything of value is not appropriate, if it creates an obligation, appearance of bias, or when it is intended to influence a business decision. Because the giving and receiving of business courtesies can create a conflict of interest, we must use these courtesies very carefully to make sure that they are appropriate, support legitimate business goals and do not impact our reputation. Gifts and entertainment for government officials are subject



to special and very strict rules and therefore such gifts and entertainment are prohibited unless approved by our Legal Department.

[Gifts and Entertainment Policy](#)

We run a sustainable business

As a responsible corporate citizen, TTEC strives to do business in a sustainable manner. We expect our employees, vendors and suppliers to balance their environmental impact by avoiding waste and engaging in innovative energy and water uses, and reuse-reduce-recycle programs. TTEC supports and encourages its employees, vendors and suppliers to lead initiatives designed to preserve our planet's natural resources. TTEC complies with environmental laws and regulations wherever we do business. We are proud of our contributions to a more sustainable world, by providing good jobs in a safe environment to underserved populations around the globe.

We give back to our communities

The company contributes to the economic and social welfare of communities where we work through the TTEC Community Foundation, which focuses its support on society's most pressing issue - education. While TTEC Community Foundation invests resources in schools and educational organizations' programs supporting students from underserved populations, our employees lend their time, expertise and innovation to educational initiatives around the globe where they work.

Over the past several years, the TTEC Community Foundation donated more than US \$2,000,000 globally with a focus on supporting education initiatives for underprivileged children in the U.S., the Philippines, Mexico and Brazil.

Doing business transparently

TTEC competes effectively on our merits, and in so doing deals honestly and fairly with our clients, competitors and suppliers. We always follow client procurement rules; and while we proactively market our services, we expect our employees to compete ethically and always remain honest in how we promote and represent our capabilities, experiences and services.

We understand and abide by competition laws

We expect our employees, vendors and suppliers to comply with competition (antitrust) laws that prohibit agreements between

Do not engage in discussions with a competitor on how we may set prices together, manipulate market opportunities, or divide a market.

competitors and agreements with TTEC's vendors to limit competition. Bid-rigging practices, inappropriate information sharing, price fixing, and market, customer, or territory allocations are all practices prohibited by competition laws. Use of confidential competitor pricing and project pursuit strategies

is also prohibited. Casual information exchanges can be illegal, if the intent is to corrupt the procurement process. TTEC does not tolerate such conduct and will subject violators to disciplinary actions, including termination. Teaming or joint venturing with competitors in pursuit of project opportunities is not a violation of antitrust laws.

We do not need the confidential information of others to succeed

We compete and succeed in the global marketplace because of the strength of our innovation and service offerings. We do not use competitors' information nor knowingly infringe IP of others. Never use confidential information of others for TTEC without permission of data owners. If you come into possession of such information, do not share it with others and discuss the best way to handle the information with our Legal Department. If anyone at TTEC pressures you to do otherwise, report the situation immediately.

All software programs and applications operated on our Global Network must be appropriately licensed.

TTEC exercises best efforts to ensure that proper licensing and permissions are obtained when we use IP of others in our work, incorporate licensed technology into our service offerings; or reference logos of our vendors, partners and clients in our communications. Contact TTEC IT or the TTEC Legal Department if you are not sure whether the IP, technology or materials you are using are properly licensed.

We support fair labor practices

TTEC respects and protects the rights of those who work for us, and provides appropriate working conditions and fair wages. Forced labor, child labor and other human trafficking practices have no place in our business and we do not knowingly do business with others who do not have similar standards.

We proactively manage our suppliers

Our vendors and suppliers are TTEC's important business partners; and we expect best service, best products, and best value from them. We treat our vendors fairly by using a transparent procurement process and never abuse our relationships by seeking to gain an unfair advantage. We do not seek anything of value (gifts, entertainment, favors) from our suppliers, and we are careful to comply with our gifts and entertainment policies, when such courtesies are offered to us. Our procurement practices encourage and never restrain fair trade.

TTEC encourages and supports small, disadvantaged, women- and minority-owned businesses.

The business practices of our vendors and suppliers reflect on us and our reputation, and we seek to work with those who share our values for business integrity. We expect our suppliers to comply with laws that apply to their businesses, and to have processes to assure such compliance. In selecting our vendors and suppliers, we undertake due diligence to make sure that they are financially sound and embrace transparent procurement processes, sustainability, fair trade, and labor and employment best practices. We require all vendors and suppliers to annually acknowledge their willingness to comply with the principles outlined in our Ethics Code: **HOW TTEC DOES BUSINESS.**

All of our vendors and suppliers must adhere to the core principles outlined in our Ethics Code.

We do not engage in corruption

TTEC does not offer or pay bribes to obtain, retain or facilitate business and we do not conduct business with those who do. We understand and comply with laws against corruption in countries where we work, and we expect our employees and our vendors and suppliers to be vigilant to avoid even an appearance of corruption in our business. Anything of value offered to influence a business decision can constitute a bribe that violates our policies and our clients' policies.

TTEC will not tolerate violations of the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, or TTEC Policy Against Corruption. Any employee who fails to abide by these important principles will be terminated, and any vendor or supplier who fails to abide by these principles will have its contracts terminated and business relationship severed.

Procurement consultants and others who are paid contingent on contract awards represent a special corruption risk for TTEC. Such arrangements are subject to senior management approval and such service providers are vetted carefully before we agree to engage their services.

“Bribes” can come in many forms: money, lavish gifts and entertainment, vacations, employment opportunities and favors.

Kickbacks are special forms of bribery where a portion of a contract value is “kicked back” by a service provider to a person responsible for a contract award.

TTEC is vigilant to avoid kickbacks in our business and will terminate any employee, vendor or supplier who engages in the practice.

[Policy Against Corruption](#)

We honor trade restrictions

As a global company, TTEC complies with all trade and export control laws of countries where we do business. These laws are complex (can conflict among jurisdictions) and, if your role in the company involves cross-border transactions, work with our Legal Department to assure compliance. Employees who violate trade and export control laws put TTEC at significant risk.

TTEC takes trade restrictions very seriously, educates employees on the restrictions and their implications, expects vendors and suppliers to understand these restrictions, and will terminate violators.



Sharing restricted technologies or information with foreign nationals (including TTEC employees) may be prohibited, even if the technology or information never leaves its country of origin. This so-called "deemed export" is subject to the same export control rules as any physical export.

Boycotts

All TTEC business activities (even those that originate outside of the U.S. or performed through our non-U.S. subsidiaries) are subject to U.S. laws that prohibit participation in certain boycotts and other restrictive trade practices against countries that are deemed "friendly" to the U.S. (for example, the Arab League boycott of Israel). TTEC does not engage in illegal boycotts. If you encounter a request for boycott compliance, coordinate our response with the TTEC Legal Department.

Demands for boycott cooperation may appear in requests for proposal or contract terms. We must report them to the U.S. government, even if we decide not to pursue a project opportunity.

Sanctions and Trade Embargoes

TTEC is prohibited from doing business in certain countries and with certain groups and individuals, because of trade sanctions or embargoes enacted by countries where we do business. The list of countries affected by trade embargoes and the scope of sanction restrictions changes often, depending on geopolitical developments in countries where we serve clients. When considering a project opportunity in a new country or with a new client, consult the TTEC Legal Department to make sure that we do not violate trade sanctions inadvertently by pursuing an opportunity.

Export Controls and Immigration

Many countries where we do business have rules regulating export of products, services, software, technology, communication equipment and technical information. These rules are complex and ever changing. Before exporting anything of value, contact the TTEC Legal Department for assistance, and consider whether an export license must be obtained before the goods leave

the country of origin. Before sending employees into a foreign jurisdiction, consider whether visas are required and contact the TTEC Legal Department for assistance.

We engage in politics responsibly

We encourage our employees, as well as our vendors and suppliers, to be politically active and to support candidates and causes of their choice. While an individual can engage in politics without restriction, political activities of public companies are highly regulated. The regulations dictate what TTEC can and cannot do and what our officers, directors, and employees can and cannot do in the name of the company. These laws are complex, varying widely among different countries where we do business. Seek guidance from the Legal Department on laws that regulate political contributions before committing the company. TTEC employees should avoid campaigning while at work, except for company-sponsored activities.

TTEC does not reimburse employees for political contributions employees make in their personal capacity.

We understand how to do business with government clients

When doing business with government clients beware of special rules that apply to client interactions, service delivery and public procurement laws for securing government work. Failure to follow these rules precisely may lead to TTEC not getting paid for the work we performed, and may also result in criminal prosecutions, penalties and fines.



The following is a summary of a few key laws and regulations that apply to the procurement and delivery of U.S. government work:

- **Timekeeping and Cost Tracking.** Accurately reporting time worked and costs incurred on each project is important to keep track of and accurately capture project costs, to bill the client in accordance with strict contract requirements.
- **Federal Acquisition Regulation (FAR)** are rules that govern the U.S. government contracts procurement process, including how government contracts are solicited, negotiated, awarded, and performed; how contractors account for their costs; and how U.S. government projects are documented and audited.
- **Truth in Negotiations Act (TINA)** requires U.S. government contractors to provide accurate project cost and pricing information to support procurement negotiations and evaluations.
- **False Claims Act (FCA)** invites taxpayers to report waste and improper claims for payment, with financial consequences of a FCA violation being potentially up to three times the amount of any wrongful claim, even without intent to defraud. Improper charges by our vendors and suppliers may also result in a TTEC FCA violation.
- **Anti-Kickback Act (AKA)** prohibits accepting, soliciting, or offering kickbacks to secure government work; it also prohibits the inclusion of kickbacks in government contract pricing.
- **Procurement Integrity Act (PIA)** prohibits government employees from soliciting or accepting (and contractors from offering) future employment, gifts, gratuities or entertainment as a quid pro quo for contract awards; it also prohibits unauthorized disclosure of information developed by government agencies and competitors for contract procurement purposes.
- **Intellectual Property Developed by TTEC**, while working under a government contract, belongs to the government.
- **Mandatory Violations Disclosure.** When working on government projects, TTEC is required to disclose in a timely manner any circumstances where we have credible

evidence that we may have violated applicable law or received overpayment. TTEC requires our employees, vendors and suppliers to disclose promptly any concerns about violating laws or receiving overpayment under a government contract, and requires all senior employees involved in our U.S. government business (known as principals) to certify periodically whether they are aware of any circumstances that require disclosure.

- **Health Care Fraud, Waste and Abuse.** TTEC must take steps to prevent and detect fraud, waste and abuse when providing services to its clients who offer Medicare plans. We encourage our employees, vendors and suppliers to report suspected fraud, waste or abuse through the We Hear You helpline or by going directly to <http://www.ttecwehearyou.com>.

Violation of regulations that govern U.S. government work results in criminal sanctions, fines, imprisonment, and significant civil penalties against the company and individuals involved. It may also result in TTEC's suspension or debarment from doing U.S. government work.

U.S. government regulations provide special "whistle blower" protections to our employees who report violations of regulations that govern U.S. government work.



We understand our responsibility to our stockholders

As a publicly listed company, we believe in good governance and transparency in our financial reporting. We manage and disclose information about our business in accordance with all applicable laws and regulations, providing appropriate access to stockholders.

We maintain accurate records

We invest in and maintain the accuracy of our business records to manage our business, forecast financial performance, meet our reporting and audit obligations, develop effective management reporting and make informed business decisions. Our employees are expected to keep accurate books and records, to record financial, operational, labor and employment, and health and safety information accurately and in a timely manner in accordance with generally accepted accounting principles. Falsification of business records or inaccurate record keeping will result in disciplinary action, including termination. [TTEC Records Retention and Destruction Policy](#) provides guidelines on handling, archiving and periodically destroying company records (in digital and paper forms). Concealing, destroying or altering records subject to legal hold instructions is a violation of company policy.

We disclose our financial results accurately

Accurate reporting of our revenue, operating income and other results of operations is our legal and fiduciary obligation to our stockholders, creditors and the regulators who oversee our listed securities. As a public company, we are subject to regulations of the U.S. Securities and Exchange Commission and the listing rules of the NASDAQ Securities Market. We disclose our financial results of operations accurately and timely as required by relevant law.

All documents relating to active investigations, legal actions or audits must be preserved and maintained until directed otherwise.

Our Executive and Senior Financial Officers are subject to the [TTEC Ethics Code for Executive and Senior Financial Officers](#). We have well publicized channels for employees and our vendors and suppliers to report concerns about our accounting and financial reporting practices.

If you have concerns about TTEC's financial reporting or internal controls, report them to the company's Chief Financial Officer, General Counsel or any member of our Board of Directors. Our confidential We Hear You helpline is available for employees who wish to report through a hotline or prefer anonymous reporting.

We have policies against insider trading

While working for the company, any one of our employees, vendors or suppliers may become aware of material information about TTEC or other public companies that is not available to other investors. TTEC Insider Trading Policy and U.S. federal securities laws prohibit trading in public securities, while in possession of material non-public information. During periods when TTEC

"Material non-public information" is information that is not known to the general public and which a reasonable investor would consider relevant and material when making securities investment decisions (decisions to buy, sell or hold company stock).

financial information is not yet available to the public, our Insider Trading Policy imposes trading blackouts for senior company executives and employees involved in financial reporting and investor relations functions. The Insider Trading Policy also requires that executive officers pre-clear their trades in TTEC securities. The Policy also prohibits sharing material non-public information with others (a process known as "tipping").

The rules that apply to trading in securities while in possession of insider information are complex and highly technical. The violation of these rules may result in significant fines and criminal liability. If you have questions on whether you may trade in TTEC securities, given the information that you have, please direct them to the TTEC Legal Department or to the We Hear You helpline.

[Insider Trading Policy](#)

We manage media and other inquiries responsibly

As a publicly traded company, every public statement we make may impact our stockholders and the value of our stock. Securities laws prohibit selective information disclosure and only authorized TTEC representatives may speak on behalf of the company.

"Our mission has remained steadfast - create an exceptional experience for our clients' customers and deliver sustainable economic value for our stockholders."

*Kenneth D. Tuchman
Founder, Chairman and Chief Executive Officer*

When speaking about our business or our clients at public forums or casual gatherings, be aware that what you say will be attributed to TTEC and may be quoted by media without your knowledge or consent. If you are asked for information about TTEC by a financial analyst, journalist or stockholder, direct the inquiries to our Investor Relations Department. All queries from lawyers, government investigators or law enforcement officers should be directed to the TTEC Legal Department.

As a private citizen, your opinions are your own, but as a TTEC employee you speak on behalf of our company and must be careful not to impact our business, our clients or our stockholders with unauthorized comments.

We practice good governance

TTEC believes that good corporate governance is a cornerstone for building and preserving stockholder value. We review our governance practices periodically against best practices for Delaware and NASDAQ listed companies and monitor and adopt leading trends in corporate transparency, internal controls, risk management, corporate responsibility, and board oversight of management's activities. As we expand our footprint and diversify our service offerings through organic growth and acquisitions, our strong governance principles create a sound foundation for our complex and global business.



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