

# TTEC Modern Slavery Policy

## I. PURPOSE

This Modern Slavery Policy ("Policy") sets out the steps TTEC takes to comply with the UK Modern Slavery Act 2015, the Australia Modern Slavery Act 2018 and all other applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force (collectively, "Anti-Slavery Laws"), and our commitment to acting ethically and with integrity with the aim of preventing opportunities for modern slavery to occur within TTEC and its supply chain.

TTEC strongly objects to and has zero tolerance for any business practices that support, encourage, or permit slavery and human trafficking in any form.

To combat these risks, and to fulfill our responsibility under the relevant legislation, including but not limited to the Anti-Slavery Laws, we produce and publish a statement each year setting out the steps we have taken to ensure that slavery and human trafficking are not involved in how we do business or interact with others.

#### II. POLICY STATEMENT

TTEC has a number of policies which reflect our commitment to combating the risk of modern slavery within TTEC and in its supply chain. Our policies which contribute to minimizing the risk of modern slavery and human trafficking in our supply chain include our:

- TTEC Ethics Code: How TTEC Does Business (including our Employee Concern Policy), which requires us to adhere to fair pay practices in all the jurisdictions where we conduct business.
- Supplier Management Policy

We will continue to review our policies to ensure that they are effective and appropriate from time to time.

TTEC will not tolerate slavery in any aspect of our organisation. We hold our supply chains and ourselves accountable and we will ensure compliance with the provisions of the Anti Slavery Laws, in relevant aspects of our work.

Our Impact & Sustainability Report, issued annually and publicly distributed, declares our commitment to socially responsible and environmentally sustainable business practices.

#### **Ethics Code**

We have been proactively taking steps in our company and across our supply chain to minimize and whenever possible to eliminate the risk of slavery and human trafficking in our



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business. TTEC's code of business conduct, known as Ethics Code: How TTEC Does Business (<a href="https://www.ttec.com/ethics-code">https://www.ttec.com/ethics-code</a>) (the "Code") sets the standard for how the company interacts with its employees, clients, investors, business partners, competitors, and members of its supply chain. The Code champions doing business in a way that promotes human rights and condemns any forced labor, child labor, and human trafficking practices.

#### **Local Policies**

We employ rigorous hiring and sourcing procedures and have implemented robust employment policies and other controls to mitigate the risk of known forms of modern slavery and human trafficking in our own global business operations. Around the globe we rely on the clear statement of our policy with respect to child labor that can be found in our Code; but in countries where we do business where certain human trafficking or modern slavery practices may be a higher risk we also adopt specific local policies focused on local conditions, like our Child Labor Remediation Policy in the Philippines where we have a significant local presence.

## **Monitoring Legislation**

Furthermore, we are closely monitoring legislative developments in relation to prevention of modern slavery and human trafficking to make sure that our internal standards reflect the guidance included in those regulations and meet the highest international canons in that area.

#### **Our Supply Chain**

TTEC is committed to working closely with its suppliers to ensure that slavery and human trafficking risks are identified and managed proactively, with risks managed and mitigated by way of appropriate supplier assessment and selection process aimed at achieving reasonable assurance that none of TTEC's suppliers, nor their sub-contractors are involved in forced labor or human trafficking practices.

We believe that the business practices of our suppliers reflect on us and our reputation, and we seek to work with those who share our values. We expect our suppliers to comply with laws that apply to their businesses, and to have processes to ensure such compliance. In selecting our 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 suppliers to adhere to the principles outlined in the Code and to reconfirm their commitment upon any renewal of their engagements with TTEC. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.

Our standard supplier contract templates have clauses with language expressly requiring compliance with the Anti Slavery Laws and other applicable slavery and human trafficking legislation.

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## **Whistleblower Policy**

We take all forms of non-compliance with the Code extremely seriously. We provide a confidential helpline available in all countries (<a href="http://www.ttecwehearyou.com">http://www.ttecwehearyou.com</a>) for reporting of concerns or violations of our ethics Code or laws. This helpline is available to employees, suppliers, and the public at large. Those who report are protected against retaliation. TTEC encourages all our employees, clients and business partners to report any concerns related to our direct activities and ways of doing business, as well as our supply chain.

#### III. APPLICABILITY

This Policy applies to the employees of all TTEC companies worldwide, including subsidiaries and controlled affiliates, and all acquired companies subject to earn-out provisions, whether or not they trade under the TTEC brand or as part of a different trading platform.

#### IV. EXCEPTIONS TO THIS POLICY

There are no exceptions to this Policy.

# V. RESPONSIBILITY

Compliance with this Policy is the responsibility of all TTEC employees. Each member of the TTEC Executive Leadership Team (Executive Committee or its successor in responsibilities) is responsible for Policy compliance in his/her respective business segment and function. Failure to comply with the Policy will put TTEC at a substantial risk and may subject the company and employees to civil and criminal liability. Violations of the Policy will result in disciplinary action including termination of employment.

#### VI. RELATED POLICIES AND PROCEDURES

This Policy is aligned with other TTEC related policies and procedures, including without limitation:

- Ethics Code: How TTEC Does Business
- Supplier Management Policy

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