



**Webhelp**

**CODE OF CONDUCT**

**FUNDAMENTAL PRINCIPLES**

**OF WEBHELP GROUP**

**September 15<sup>th</sup> 2020**



A white, cloud-like shape with three rounded lobes, centered on the page.

**Webhelp**

**CODE OF**

**CONDUCT**

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**WEBHELP'S VALUES  
AND CULTURE  
PILLARS**



# 1. Webhelp's values & cultural pillars



## Values

Acknowledgement of individual contribution is essential to ensure our collective success.

**Recognition**

We work with a positive attitude leading by example. We treat others the way we would expect to be treated.

**Integrity**

Working as one team towards a common success takes precedence over personal interest.

**Unity**

We honour the promises made to colleagues, clients and customers.

**Commitment**

By 'going the extra mile' and embracing innovation we continually seek to amaze the people we work with!

**Wow**



## Culture pillars



**We are a people-first company**  
Always start with the people, then numbers



**We put our client at the heart**  
We put our client's best interests at the heart, that's how we go the extra mile



**We are passionate game-changers**  
We try, we learn, we innovate to change the game



**We strive to enjoy every day**  
Bring fun to work and work will be fun



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**A WORD FROM**

**THE FOUNDERS**



## 2. A word from the founders

One Code of Conduct for each of us and all of us

What's the best way to lead the development of a company with a growth as explosive as that of Webhelp ? As the founders of a start-up which has enjoyed an amazing growth, that's a question we ask ourselves every day ! With this Code of conduct, we are giving a concrete answer: a tool that enables us to strengthen our dynamism and our durability.

Each colleague is determined to bring her/his own intelligence, empathy and experience to the table every day. Webhelp invests in people and the environment we work in, because we know that when people thrive, it has a powerful impact on us, our customers and on our stakeholders. Webhelp believes that making business more human leads to a better customer experience - and a healthier bottom line.

At the heart of this plan, we have the duty to be perfectly clear about our commitments. Our Code of Conduct is a fundamental reference in terms of ethics, social and environmental responsibility and in terms of financial and legal compliance. Its goal is to build a shared foundation made of trust and efficiency for ethical behaviour and responsible business practices. With this in mind we are on our way to achieve our aim : be the leader of customer experience and business process outsourcing. We can make it ! Our environment has everything to gain from our success. By making this Code of Conduct our own, we provide ourselves with the means to build, all together, a more attractive future.

This Code of Conduct is made of founding values and culture pillars of our Webhelp Group. It's here to remind us to be responsible and act in a transparent way. This Code of Conduct aims to help us take the right decisions.

We all are the ambassadors of Webhelp's fundamental values and culture pillars. Thank you, to all of you, to read carefully this Code of Conduct and to follow its recommendations in the entire Group.



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**OUR**

**MANAGEMENT**

**TEAM**



# 3. Our management team

This Code of Conduct must be the reference that guides all of us to adopt the right behaviour in our day-to-day professional life, everywhere in the world, in every branch of activity and at each level of the Company.

We all represent Webhelp community throughout the world; each one of us is responsible for the well-being of the Company. As executive board's members, we all commit to respect the principles settled in this Code of Conduct and we expect each one to do the same. (<https://www.webhelp.com/en-us/about-us/our-leadership/>)

Webhelp supervisory board		Executive committee <small>Incl. Olivier Duha</small>									
 Webhelp Co-Founder	 Webhelp Co-Founder	 GMD* - People & Business Development - Legal & Compliance	 GMD* - France - Southern Europe & MEA - Group Operations	 GMD* - Sales & Solutions	 GMD* - UK - People & Business Development	 GMD* - Finance & IT	 Group Management Committee				
 CEO, Investment Holding GBL	 Head of Investments, Investment Holding GBL	 Corporate Development Officer	 Chief Client Officer	 Chief Growth Officer	 Chief Technology Officer	 Chief Information Officer					
 Director, Investment Holding GBL		 CEO Nordics	 CEO Spain	 CEO Turkey & Jordan	 CEO Netherlands	 CEO DACH & Co-Chief of Global Sales					

\* Group Managing Director



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**WHO DOES THIS**

**CODE APPLY TO?**

**WHISTLEBLOWING**

**PROCESS**



## 4. Who does this Code of Conduct apply to ?

The Code of Conduct applies to all the employees of the Webhelp Group worldwide. This includes all officers, directors, employees, interim workers and third-party representatives (third-party agents, representatives, consultants, distributors, or intermediaries) who perform services for or on behalf of the subsidiaries and affiliate companies of the Webhelp Group (collectively "Webhelp"), and those who represent Webhelp's interests in any joint ventures.

We should all abide by the values, culture pillars and principles in this Code of Conduct when conducting the day-to-day business activities of Webhelp. Webhelp's management is responsible for ensuring that the Code of Conduct is strictly and consistently respected across Webhelp. In addition, Webhelp's business partners, including joint venture partners, contractors, suppliers, resellers, distributors, consultants, agents and other third-party representatives, shall to all extent possible be made aware of the Code of Conduct and would be expected to apply similar values, culture pillars and principles to their own activities when conducting business with or on behalf of Webhelp.



### Whistleblowing process

As employees of a company or as workers on behalf of a company, it can happen that we are the witness of unacceptable behaviour that violates our Code of Conduct.

Webhelp strongly encourages its employees to raise their questions or concerns to their line manager, the Human Resources Department, and/or the Legal & Compliance Department. It is important that all managers establish a positive working environment and encourage their employees to communicate openly.

If an employee believes that informing his manager may present difficulties or that the reported irregularity would not result in appropriate follow-up, he can contact the Compliance Department by submitting a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics).

Besides, when an employee is concerned or suspects selflessly and in good faith that a breach of this Code of Conduct and/or applicable law has occurred or will occur, these suspicions may also be reported anonymously – if local laws allows it – at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics) with all possible relevant information capable of substantiating the claim. Any such report will be received in confidence by the Compliance Department that will acknowledge receipt of the report and give its author a reasonable timeframe to consider its admissibility.

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 after 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 of Conduct or applicable law. If an employee believes he has been retaliated against for reporting an issue, he should contact the Compliance Department

As part of the whistleblowing process, Webhelp carries out automatic processing of personal data, in compliance with **Webhelp Privacy Policy** and with any applicable legal and regulatory requirements.



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**WEBHELP:**

**COMMITMENTS AS**

**A COMPANY**



# 5. Webhelp: Commitments as a company



## Compliance with law

We, at Webhelp, commit to comply with laws worldwide. Compliance with the law is obviously the fundamental principle. We are required in all circumstances to comply with the law and other obligations in force in any country in which Webhelp is located.

When local law or customs impose higher standards than those set out in the Code of Conduct, local law and customs should always apply. If, however, the Code of Conduct provides for higher standards, it should prevail, unless this results in illegal activity.

It is our personal responsibility to obey the laws, regulations and obligations, especially those that are linked to our business. Everyone is bound to avoid taking part in activities that could involve them or Webhelp in an illicit activity.

Above and beyond complying with the laws and regulations, we should all show integrity and fulfil the commitments we have made in our relations with colleagues, customers, suppliers and other group partners.



## Dealing with key stakeholders

We, at Webhelp, establish relationships based on mutual cooperation and loyalty with our joint-venture partners, contractors, customers, suppliers, resellers, distributors, consultants, agents and third-party representatives (“third-party stakeholders”).

It is one goal to achieve long-term relationships with third-party stakeholders who accept and share the principles outlined in this Code of Conduct. Our partners should understand, share and apply the same high standards of business ethics, in particular in terms of anti-corruption procedures, the protection of human and labour rights, as well as sustainable use of the environment.

We shall all act with complete integrity when dealing with third-party stakeholders and shall avoid conflicts of interest and report any actual or potential conflicts of interest that do arise (as described in the section on conflicts of interests below).

We should be extremely cautious of receiving or providing any gift whatsoever in a business context. Gifts & Hospitality include items such as cash or cash equivalents including entertainment, gift cards, product discounts and non-business activities. Any such gifts & hospitality must be limited to items of very low value, such as, in the case of giving a gift, items branded with the Webhelp logo. We may never accept or provide cash gifts or payments, whether to a government official or a private person. Under no circumstances shall we accept a gift & hospitality or benefit from a third-party stakeholder that could influence, or give the appearance of influencing, a business decision relating to that third-party stakeholder.

**See in particular our dedicated policy regarding Gifts, Hospitality and Travel and our Third-Party Due Diligence Procedure.**

## PhonEthics!

If you have a concern about compliance with law or dealing with key stakeholders, you can speak to **your line manager, the Human Resources Department, the Compliance Department** or submit a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics).

They will help and support you.





## Employment practices

As an employer, Webhelp complies with all applicable local laws and regulations related to labour and employment including, but not limited to, laws and regulations concerning minimum wages, maximum hours of work according to local labour laws and regulations), days of rest, compensation, and the right to collective bargaining.

As an absolute principle, Webhelp will not engage in nor support:

- the use of child labour;
- the use of forced or compulsory labour;
- modern slavery;
- human trafficking;
- the employment of illegal foreign labour.

Moreover, we will not conduct business with any joint venture partners, contractors, suppliers, resellers, distributors, consultants, agents or other third parties if we become aware that they engage in any such practices.

Regarding **student work protection**, Webhelp guarantees proper maintenance of student records, rigorous due diligence of educational partners and protection of student's rights in accordance with applicable law and regulations.



## Treatment of employees

Webhelp is a place where each and everyone of us has an opportunity to develop its personal competences and support the collective development of Webhelp. Three fundamental principles underlie Webhelp organisation:

- **Equality** of treatment: Nobody should be discriminated on age, disability, ethnicity, race, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or association (employees being free to associate with others, form and join organisation of their choice) or any other status protected by applicable national or local law, in hiring and other employment practices. Nobody shall be required any pregnancy or medical tests, unless expressly and specifically authorized by the local regulation or prudent for workplace safety, and shall not improperly be discriminated based on test results.
- **Respect** for each individual, including each employee's right to dignity and privacy. Everyone at Webhelp is entitled to a workplace free from any form of abuse and/ or harassment, whether physical or verbal, including, but not limited to, unwanted sexual advances, threatening conduct, and offensive comments or conduct. In addition, the privacy of employee information collected or held by Webhelp shall be respected and will be handled in accordance with applicable laws and regulations;
- **A safe and healthy** working environment: Webhelp shall ensure compliance with the applicable laws and regulations regarding health and safety standards and reducing health risks and occupational hazards wherever possible by implementing dedicated internal procedures and personal training. Webhelp provides its employees for instance with reasonably accessible and clean toilet facilities and potable water. Dining, food preparation and storage facilities shall be sanitary.

## PhonEthics!

If you have a concern about employment practices you can talk to **your line manager, the Human Resources Department, the Compliance Department** or submit a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics).

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**WEBHELP:**

**COMMITMENTS AS**

**MEMBERS OF THE**

**COMPANY**



## 6. Commitments as members of the company



### Fair treatment of clients and suppliers

We dedicate our energy to make our clients satisfied and this should always be our priority.

We shall treat our customers and suppliers honestly and fairly, whatever the size of their company. Webhelp undertakes not to knowingly misrepresent its products or services in its advertising, public statements or promotional offers to its customers.

Employees who negotiate contracts should ensure that all statements, communications and presentations are trustworthy. Negotiations are carried out in compliance with the rules of ethics and legality.

Webhelp has provided systems allowing evaluations of its facilities and operations, and those of its subcontractors and next-tier suppliers.

To its clients, Webhelp has also developed and maintained management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill its continuous improvement objectives. Webhelp has a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, next-tier supplier(s) and customers.



### Fair competition

Webhelp believes in fair, honest and open competition. We shall strictly comply with applicable competition/anti-trust laws in all countries in which we engage in business. These laws prohibit agreements or conduct that may restrain or affect fair competition and trade.

We do not obtain competitive intelligence by illegal means including through bribery.

Moreover, we shall not exchange or disclose commercially sensitive information with competitors, especially information relating to trade secrets. We should always ensure that the nature and purpose of any communications with competitors do not have a negative impact on fair competition.

## PhonEthics!

If you have a concern about fair treatment of clients and suppliers or fair competition, you can speak to **your line manager, the Human Resources Department, the Compliance Department** or submit a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics).

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## Conflict of interests

A high level of loyalty and integrity is expected from all of us. Unless prior authorisation has been obtained from Webhelp, we may not engage in work for an existing or potential competitor while we are still employed by Webhelp. A conflict of interest is not necessarily a problem by itself but failing to declare and manage one properly may have negative consequences for the employee and Webhelp.

We should avoid any actual or apparent conflicts of interest between our own personal interests or affiliations and those of Webhelp or its customers. For example, potential conflicts of interest may arise where we have:

- a direct or indirect financial or beneficial interest (e.g., through a family member or a close relationship);
- an employment relationship with a Company competitor, supplier, customer or counterparty;
- accepted benefits from a Company competitor, supplier, contractor or other third party (as described in the above section on Dealing with other stakeholders).

### PhonEthics!

If you have a concern about a conflict of interest you can speak to **your line manager, the Human Resources Department, the Compliance Department** or submit a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics).

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## Bribery and 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 either directly or through a third party. Webhelp maintains strict compliance with all anti-bribery, anti-corruption, extortion, embezzlement and bribery laws applicable to its businesses and operations around the world. Further, it is absolutely forbidden to use Company money or resources to make political contributions.

Anti-bribery and anti-corruption laws are complex, and the penalties for individuals and Webhelp can be severe. All persons doing business on behalf of Webhelp, including third parties, are required to comply with our **Webhelp's Anti-Bribery & Ethics Policy ("AB&E Policy")**. This policy should be reviewed alongside this Code of Conduct for guidance on improper payments, engaging and monitoring third parties, business gifts and hospitality, and political contributions, facilitation payments, sponsorships and donations among other topics.

In particular, reasonable and bona fide hospitality and promotional business expenditures that seek to maintain cordial relations are recognized as legitimate part of doing business. Nevertheless, such advantages may however only be given or accepted if they serve a legitimate business purpose and do not serve to obtain or grant an improper advantage.

**See our dedicated policy and specific policies to cover all appropriate subjects, in particular the Gifts, Hospitality and Travel Policy.**

### PhonEthics!

If you have a concern or a question about bribery and corruption you can speak to **the Compliance Department** or submit a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics).

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## Anti-money laundering & tax evasion

In order to avoid becoming involved in money laundering, Webhelp requires its employees to report to the Compliance Department if an employee knows or suspects that an entity or an individual with whom Webhelp conducts business (including customers, joint-venture partners, contractors, suppliers, resellers, distributors, consultants, agents or other Third-Party Representatives) may have been engaged in, or benefited from, criminal activities, including activities prohibited under this Code of Conduct in the sections on trading securities, Fair competition, bribery and corruption, import/export regulations and sanctions. We make sure we don't facilitate tax evasion by our stakeholders (customers, suppliers...)

[See our dedicated policy regarding Economic Sanctions.](#)



## Financial and business records

Webhelp has a responsibility to keep and maintain complete and accurate books and records. We shall promptly and properly record all financial transactions in accordance with company policies and shall maintain appropriate supporting documentation. These rules apply no matter how small the payment may be.

We should all cooperate with any requests made by internal and external auditors and meet their expectations. We should not create or participate in the creation of false or misleading business records or accounting entries. We shall claim prior approval for any expenses incurred on behalf of Webhelp in accordance with Webhelp policies. We should not claim expenses for reimbursement unless such expenses have genuinely been incurred within the scope of a project or activities carried out on behalf of Webhelp.

## PhonEthics!

Should you be aware of incomplete or inaccurate information or statement appearing in Company business records or financial accounts you can speak to **the Compliance Department** or submit a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics).

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## Confidential information

We shall take due care in handling any confidential information held by Webhelp in relation to our services, products, processes, patents, know-how or personnel, or our industrial, strategic and financial operations. Such information shall not be disclosed or made public without prior authorization by Webhelp.

In addition, our customers, suppliers and other business partners often provide confidential and proprietary information to us. Webhelp is a trustworthy partner to them. We should all handle information and data provided by third parties with caution, in accordance with the terms and conditions under which that information was disclosed to Webhelp and in compliance with all applicable laws and regulations. The general rule is not to disclose information about Webhelp or its clients or partners, unless Webhelp policies or the law expressly requires you to.

Access to government-classified information requires specific authorisation, depending on the level of sensitivity. Any exchange or disclosure of classified information or equipment shall strictly comply with the relevant and applicable security processes in place.





## Protection of personal data

We all are bound to ensure that Company resources are used appropriately, efficiently and for legitimate business purposes. All of Webhelp's resources or Client's resources made available to Webhelp must be protected against unauthorised or inappropriate access, usage, destruction, and against theft and fraud.

No one may remove any Company or Client property for his own personal use or make it available to any other person to be used for the benefit of parties other than Webhelp.

In particular, Webhelp is committed to respect key principles related to personal data protection set out in applicable laws and regulations. To this end and under the guidelines of the Compliance Department, Webhelp implements technical and organisational measures in accordance with the General Data Protection Regulation (EU 2016/679) « GDPR » and with several recommendations' issues by national authorities where processing of personal data are performed.

See our dedicated policy [here](#).

### PhonEthics!

If you have a concern about the respect of confidential information or the protection of personal data you can speak to **your line manager, the Human Resources Department, the Compliance Department** or send an e-mail to [privacy@webhelp.com](mailto:privacy@webhelp.com).

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## Respect of Webhelp's image

We are a responsible not to make use of information in a way that would harm Webhelp or any of its clients and protect Webhelp's reputation by our behaviour, or declarations on any medium (written media, radio and television, photographic media, social networks, e-mails, telephone exchanges).

Hurting Webhelp's image will hurt all of us.



## Protection of Company's assets

Webhelp's assets are key to its long-term development. We all have a duty to take care in handling or dealing with Webhelp's property (including any tangible and intangible property of any kind) in order to avoid loss, theft or unlawful use resulting in serious damage. To this aim, Webhelp ensures that its assets are protected against misappropriation or manipulation. Use of Webhelp's property for personal benefit is for instance prohibited.

We should treat our computers, our desks, our work environment with respect.

Webhelp shall respect intellectual property rights and safeguard customer information. It shall manage technology and know-how in a manner that protects intellectual property rights.

### PhonEthics!

For any incident, damage or malfunction related to any Company property you can speak to **your line manager, the Human Resources Department, the Compliance Department** Procurement and Security or submit a report at [www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics) .

They will help and support you.





## Import/export regulations and sanctions

As a global business, Webhelp purchases goods and services from a diverse set of suppliers. Webhelp also provides services to customers all over the world. Therefore, it is essential that Webhelp carefully complies with all applicable regulations that govern trade regulations, embargos, sanction lists, and import and export restrictions.



## Environmental protection, sustainability and corporate social responsibility (CSR)

Webhelp is committed to environmental protection and upholds that principle in the performance of its activities. More generally, **the Company's new statement** « Making business more human » affirms Webhelp's general commitment to high standards of social and environmental responsibility, ethical conduct and continuous improvement.

Regarding **environmental protection**, Webhelp ensures compliance with national, European and international laws and regulations and puts in place appropriate management systems and performance measurement tools.

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.

Regarding CSR issues, Webhelp's goal is to harmonise the several local initiatives under one global brand Webhelp which is the umbrella for all activities. Its global CSR program focuses on 3 topics :

- **People** : « Putting people first » with impact sourcing, community support by each local entity, diversity ; and inclusion and wellbeing ;
- **Planet** : « Paying our part » with actions regarding energy efficiency, recycling ; obtaining environmental certifications to have eco-friendly sites ; minimising our waste and developing environmental initiatives ;
- **Progress** : « making business better » with sustainable partners, performing controls and governance through IT tools and policies in accordance with local regulations ; implementing best practices for data protection and sharing the start-up mindset.

In addition, Webhelp has created its own CSR foundation "Think Human" for education and inclusion. Webhelp has also identified a Company representative for ensuring implementation and periodic review of its management systems. The Company has a CSR representative that reports directly to executive management and has the responsibility and authority to manage social and environmental compliance for the business.



**Webhelp is part of the United Nations Global Compact. As such, it adheres to the following ten principles:**

- 1** **Respect**  
and support internationally recognized human rights in your area of influence
- 2** **Ensure**  
that your company does not participate in any way in the violation of human rights
- 3** **Support**  
freedom of association and effective recognition of the right to collective bargaining
- 4** **Eliminate**  
all forms of forced and compulsory labour
- 5** **Eradicate**  
all forms of child labour in your business
- 6** **Stimulate**  
all practices that eliminate any form of discrimination at the workplace
- 7** **Assume**  
a responsible, preventive and proactive approach towards environmental challenges
- 8** **Develop**  
initiatives and practices to promote greater environmental responsibility
- 9** **Promote**  
the development and diffusion of environmentally friendly technologies
- 10** **Fight**  
Corruption in all its forms, including extortion and bribery





# Think Human

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<http://www.webhelp.com>

[www.bkms-system.com/phonethics](http://www.bkms-system.com/phonethics)

This Code of Conduct is not intended to create new or additional rights for any third party.

