

TTEC Political Activity Policy

I. PURPOSE

The TTEC Political Activity Policy establishes the framework of how TTEC Holdings, Inc. and its global group of companies (collectively, “TTEC” or the “Company”) manage political activity.

II. POLICY STATEMENT

TTEC is committed to being a responsible corporate citizen wherever the company does business. It is our policy to comply with all applicable laws, rules, and regulations that apply to political activities in jurisdictions where we do business (“Relevant Regulations”), including what we expect from our employees while they are at work or acting on behalf of TTEC and how TTEC’s funds, assets, premises and resources (“TTEC Resources”) are used in connection with political activity.

For purposes of this policy, the term “Political Activity” is defined as direct or indirect support of political candidates, political parties, issue-specific and general ballot initiatives, and political action committees (and similar, collectively “PACs” and, for U.S. purposes only, “section 527” organizations); lobbying, politicizing in open forums, making or soliciting political contributions, attending political rallies or protests, and other similar activities.

The term “Political Activity,” for purposes of this policy does not include union organizing or speaking about conditions of employment, such as discussing wages, benefits, or terms and conditions of employment, forming, joining, or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their and their fellow employees’ mutual aid or protection, or legally required activities. The term “Political Activity,” for purposes of this policy also does not include casually sharing of political views with colleagues without applying pressure to conform to such views.

This Political Activity Policy provides TTEC employees with guidance for engaging in Political Activity, in the workplace, and in any other manner that refers to TTEC or their employment at the company.

Political Activities of TTEC Employees.

As a matter of policy and good corporate citizenship, TTEC generally encourages its employees to take an active interest in public service and good government, in the communities where they live and work. TTEC encourages and imposes no restrictions on the employees’ participation in legally permitted Political Activities, provided that such activities occur in employees’ individual (private) capacity and during non-work hours, without the use of TTEC Resources.

Equally important, it is a policy of TTEC that while political discussions by employees are not prohibited in the workplace, they also are not encouraged; and the company supports its employees' right to be free from being subjected to politicizing by others.

The following Political Activities require prior written authorization from (1) a senior (SVP or above) company officer and a senior member of the Legal Department, responsible for the business unit/geographic region where employees who wish to engage in such activities work:

- Political Activity, while at work at the Company's sites and elsewhere (including in client facilities) while during working hours;
- Any Political Activity in the company's name or on the company's behalf (please see Attachment A to this policy for the list of prohibited Political Activities that may fall into the category of activities performed "on behalf of" or "in the name of" the company).

Political Activity of any kind, while at client facilities or at business events that include TTEC clients, is strongly discouraged, and may not be engaged in outside of specific limited provisions of this policy; and, if at clients' facilities only in consultation with authorized client representatives and with strict adherence to clients' relevant policies.

Notwithstanding the foregoing, nothing in this policy prohibits TTEC employees to:

- engage in any lawful activity, including Political Activity, during non-working hours;
- make lawful personal political contributions of any kind;
- engage in activities protected by employees' right to organize or speak about their conditions of employment.

This policy is not intended to preclude or dissuade employees from engaging in legally protected activities.

Respect of Others.

Political views can be, and at times are, divisive and polarizing; and it is the policy of the Company that every employee at any level in the organization must respect the rights of others to disagree with political views of other employees in the organization without concerns for retaliation or harassment. Employees need to be careful to refrain from unwelcome politicizing and should always stop discussions that are not welcome by others. It is TTEC's policy that employees will not be harassed or threatened in the workplace for any reason, including their political views or views of others that they disagree with or support. TTEC reserves the right to stop political discussion/debate in the workplace in instances when a senior executive (director or above) in the executive's discretion (reasonably applied) reasonably believes such discussions to be polarizing, harassing, or otherwise disruptive in the workplace.

Nothing in this policy contravenes the policies outlined in TTEC Ethics Code: How TTEC Does Business.

Political Activities of the Company.

Any use of TTEC's Resources in connection with Political Activities can only be made in accordance with the Relevant Regulations, and only as provided in this policy. The use of TTEC Resources for Political Activities requires prior written approval from TTEC chief financial officer and TTEC general counsel/chief legal officer, acting together.

All lobbying activities in the name of the company or on TTEC's behalf, including without limitation participation in any trade groups or associations, must be aligned with TTEC's business strategy/interests and approved in advance in writing by TTEC chief marketing officer, the leader of the business segment that funds such participation, and TTEC general counsel/chief legal officer.

It is TTEC policy that supervisors, managers, or officers of the company cannot direct any employee to make contributions to, speak on behalf of, or support political causes of any kind. Any direct or indirect demands of this type should be immediately reported to the employee's human resources (People & Culture) partner and/or to TTEC's confidential We Hear You (WHY) helpline.

This policy serves as an assurance to employees that their decisions to engage or not to engage in lawful Political Activity will not impact employees' job security, compensation, or opportunity for promotion and advancement in the organization, regardless of their supervisors' or the Company's position on these political issues. It is TTEC policy never to retaliate against employees because they engaged in lawful Political Activity, in accordance with the guidelines provided by this policy.

TTEC also maintains a strict Policy Against Corruption, which is applicable to all operating units of the Company around the world and restricts TTEC's engagement in certain Political Activity related to foreign officials and political parties, as these terms are defined in that policy.

III. Applicability

This policy applies to all TTEC companies globally, including subsidiaries and controlled affiliates, and all acquired companies, whether or not they trade under the TTEC brand.

IV. Exceptions to the Policy

Generally, exceptions to this policy are discouraged, but may be made from time to time by TTEC's Chief Executive Officer in consultation with TTEC general counsel/chief legal officer.

V. Responsibility

Compliance with this policy is the responsibility of all TTEC employees. Members of the TTEC Executive Leadership Team ("ELT" and their successors in responsibilities) are responsible and personally accountable for their business segment/function's compliance with the requirements of this policy. TTEC's failure to comply with this policy may put TTEC at substantial risk and may subject the company and its officers to civil and criminal liability (which may include large monetary fines as well as jail time). Violations of this policy, including failure to report concerns about policy violations or corrupt conduct of others, may result in disciplinary action up to and including termination of employment.

VI. Related Policies and Procedures

This Policy is aligned with other TTEC policies on related subjects, including:

- **TTEC Ethics Code:** How TTEC Does Business
- **Policy Against Corruption**
 - Implicitly or explicitly suggest or give the appearance in any way that their personal political views, or the political views of the organization(s) they support, are endorsed or supported by TTEC;

Attachment A

Employees may not represent TTEC on policy issues except when it is part of their job to do so.

Accordingly, if employees participate in the political process or engage in Political Activity, they may not:

- Use TTEC Resources, including company stationery, email, telephone, computer, printer, copier, or other office equipment in connection with an employee's personal Political Activities;
- Provide political candidates or organizations access to TTEC's mailing lists, customer lists, employee lists, office space, office equipment, or any other TTEC Resources;
- Post a hyperlink to a political candidate's or organization's website or social media via TTEC's operated communication channel including TTEC email, website, social media, or similar channel;
- Allow the employee's employment at TTEC to be used or leveraged in support of, or against, any political candidate, issue, or cause; or
- Wear or display TTEC logos while engaging in political speech, attending political rallies, or any other in-person or online events that are publicly available or publicized.

When employees engage in Political Activity via channels that reference employees' TTEC affiliation (e.g., LinkedIn), the employee should expressly state that the views expressed, and the opinion shared in the content are those of the employee and not the Company.

The policy does not prohibit employees from wearing politically motivated clothing to work if such clothing is not intentionally provocative, divisive, hurtful, or offensive, provided it conforms to TTEC's dress code at the location in question.