



# Supplier Code of Conduct

2024



# TTEC Supplier Code of Conduct

*This TTEC Supplier Code of Conduct (“Code”) establishes standards for members of TTEC’s global supply chain to ensure our business relationships align with our values, policies, and applicable laws and regulations.*

This Code applies to any entity or individual that provides goods, services, or resources to TTEC, its affiliates, subsidiaries, or subcontractors, including vendors, contractors, manufacturers, distributors, consultants, or any other business partner that contributes to our business through the supply chain process (collectively referred to as “Suppliers”) anywhere in the world.

TTEC aspires to work with Suppliers who share our ethical standards and embrace our core values\*.

## Ethics & Integrity

*TTEC expects its Suppliers to conduct business and maintain corporate governance practices with the highest standards of honesty and integrity.*

**Conflicts of Interest:** Suppliers will avoid any actual or apparent conflicts of interest in their work with TTEC and will promptly disclose any known personal, family or business relationships with TTEC employees. Suppliers will support TTEC’s actions to remediate any actual or apparent conflict.

**Bribery & Corruption:** TTEC policy and global anti-bribery and anti-corruption laws prohibit unlawful payments or transfer of value and acts promoting unlawful payments and transfer of value, either directly or through intermediaries, for the purpose of obtaining or retaining business, or to influence a business decision. Suppliers will not offer or accept any form of bribery, corruption, extortion, or embezzlement, on behalf of themselves or TTEC. Further, Suppliers will not make unlawful payments nor will give, offer, promise to give, or authorize the offer, directly or indirectly, of anything of value to third parties, including government officials or officials of any political party, to influence business decision or obtain improper advantage for their or for TTEC’s benefit. Suppliers will implement monitoring, training, and enforcement procedures to ensure continued compliance with all anti-bribery and anti-corruption laws and this Code.

For purposes of this Code, the term “government officials” shall include employees of government agencies, quasi-governmental entities, companies owned or controlled by governments, public sector undertakings, departments, and other public institutions.

* TTEC VALUES:	Lead every day Do the right thing	Reach for amazing Seek first to understand	Act as one Live life passionately
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**Gifts:** Suppliers may not offer, solicit, or accept gifts, entertainment, favors, loans, gratuities, rewards, or any other things of value that might influence or appear to influence the judgment or conduct of the Supplier with respect to their obligations to TTEC. Suppliers will maintain gifts and entertainment practices consistent with reasonable standards in their business communities and operating geographies and avoid lavish or excessive gifts, entertainment, and other similar inappropriate business courtesies. Gifts and business courtesies may not be exchanged between TTEC and a Supplier (or potential Supplier) during competitive bidding, proposal requests, quotation process, supplier assessments, or contract negotiations.

**Lobbying & Political Activity:** TTEC Suppliers will not engage in lobbying of government officials (or activities resembling lobbying) on behalf of TTEC without TTEC knowledge and approval and only subject to TTEC's direction. Suppliers are responsible for determining if their interactions with government entities and other lobbying activities comply with relevant laws regulating such activities.

**Public Sector Procurement:** Activities that may be appropriate when dealing with non-public sector clients may be improper and even illegal when dealing with government agencies, quasi-governmental entities, government-owned or controlled entities, and entities subject to government procurement rules. Suppliers that support TTEC public sector business shall comply with all laws, rules, procurement regulations, and relevant contract flow down clauses as instructed by TTEC.

**Books & Records:** Suppliers will maintain their business records in compliance with applicable laws and regulations to accurately reflect their operations. When working with TTEC, Suppliers are prohibited from engaging in false or misleading accounting practices. Suppliers will ensure all relevant business records are retained for the period required by law. Travel expenses incurred by Suppliers while on TTEC business must follow all laws and contractual agreements including any applicable policies.

**Invoicing:** Suppliers shall bill for goods and services accurately in compliance with relevant TTEC agreements and take appropriate and reasonable measures to assure the accuracy and integrity of their invoicing practices. Suppliers shall have appropriate controls in place to avoid submitting inaccurate invoices and making false or misleading entries on invoices or claims submitted for payment.

**Assets and IP:** Suppliers must respect intellectual property (IP) rights of TTEC and any third parties and not use any infringing materials in the goods or services they provide to TTEC. Suppliers must ensure TTEC's assets and resources are utilized in a legal, ethical, and respectful manner in compliance with applicable laws and regulations. Suppliers may only use TTEC's name and logo as permitted in writing by TTEC.

**Media and Investor Relations:** Unless explicitly permitted, Suppliers are not authorized to speak publicly on TTEC's behalf. Suppliers must obtain TTEC's written permission to cite TTEC as a client reference or testimonial.

**Data Protection & Security:** Suppliers working with TTEC must comply with relevant laws, regulations, and industry best practices related to personal information handling including transferring and processing of PII as well as contractual requirements respecting privacy and information security. Suppliers shall have appropriate controls to have adequate data protection measures in place, including confidentiality, security, and safeguards for sensitive information.



**Trade Controls:** Suppliers shall comply with all applicable trade laws and regulations, including the export control laws and regulations of the United States and other countries where TTEC does business that control the import, export, and re-export of the goods and services being provided to TTEC. Suppliers shall ensure that they are not subject to embargoes or other similar trade restrictions promulgated by the United States, the European Union, United Nations, or other countries where TTEC does business. TTEC does not do business with entities or parties on the relevant prohibited entities lists in countries where TTEC does business and expects its Suppliers to do the same. Suppliers shall ensure that information downloaded, transferred, exported, or otherwise utilized when providing goods or services to TTEC is not restricted under applicable trade laws or regulations.

**Fair Competition and Antitrust:** Suppliers shall comply with the applicable competition and antitrust laws and regulations.

**Insider Trading:** TTEC partners with Suppliers to successfully meet shared goals and obligations and in doing so may share confidential information. Insider trading laws and TTEC policy prohibit Suppliers' use of material non-public information obtained while serving TTEC to trade or tip others to trade in securities of TTEC, its clients, or those of other parties.

**Advertising and Sales Practices:** Suppliers shall uphold prevailing principles of integrity and transparency in their marketing and sales activities. This includes avoiding any deceptive practices, accurately representing products and services, and refraining from making unfair or false claims about competitor offerings.

**Artificial Intelligence (AI):** When utilizing artificial intelligence (AI) in serving TTEC, Suppliers shall maintain appropriate oversight of AI tools and proactively respond to issues to ensure their use is ethical, responsible, and adheres to applicable regulations. Suppliers shall adopt relevant best practices to address ethics concerns, promote transparency, mitigate bias, and safeguard privacy, intellectual property, and proprietary information.

## Health & Safety

*TTEC expects its Suppliers to maintain a healthy and safe work environment.*

**Workplace Safety:** Suppliers must comply with applicable health and safety laws and regulations and take appropriate measures to prevent workplace injuries and mitigate hazards.

**Emergency Preparedness:** Suppliers shall maintain response plans for emergency situations which prioritize employee and community safety, environmental protection, and business continuity, where applicable.

**Communicable Diseases:** Suppliers must comply with applicable local laws and regulations regarding the safeguards against transmission of communicable diseases. Suppliers utilizing TTEC facilities must also comply with any TTEC facility-specified requirements.



## Labor & Human Rights

TTEC expects its Suppliers to share in our commitment to maintaining a respectful and dignified work environment.

**Modern Slavery:** TTEC Suppliers will maintain zero tolerance for business practices that support, encourage, or permit slavery and human trafficking in any form. All work performed by Supplier employees must be voluntary; employees of Suppliers may terminate their employment at any time. Supplier's policies must prohibit any form of slavery or any other form of compulsory labor, including slave trafficking either directly or within their supply chain. Unless required by law, Suppliers will not hold or restrict an employee's access to their original passport or other government-issued identification, immigration, work permit or travel documents.

**Employment Fees and Penalties:** Suppliers cannot require employees to pay recruitment or employment fees as a condition of their employment, either directly or through third parties.

**Child Labor:** Suppliers will not use child labor. For purposes of this Code, "child" means any individual younger than the greater of age 15 or the legally defined age for lawful employment in the relevant jurisdiction.

**Wages and Working Hours:** Suppliers will follow applicable wage and hour laws and regulations including those for timely and accurate payroll, working hours, days of rest, and minimum wage requirements. Suppliers may not use wage deductions as a disciplinary measure, except in instances of fraud, at the direction of a regulatory agency, or when required by law.

**Non-Discrimination:** Suppliers will provide workplaces free from unlawful discrimination. Suppliers will not unlawfully discriminate in employment decisions, including screening, hiring, compensation, promotion, discipline, or termination, based on age, ancestry, caste, color, ethnicity, gender (including pregnancy, childbirth, or related medical conditions), gender identity or expression, sexual orientation genetic information, marital status, medical condition, mental or physical disability, national origin, protected family care or medical leave status, race, religion (including beliefs and practices or the absence thereof), political affiliation, military or veteran status, or any other considerations protected or required by applicable law.

**Harassment and Abuse:** Suppliers will actively promote a workplace free from harassment, sexual harassment, and other abusive conduct or inhumane treatment.



## Impact & Sustainability

*TTEC expects its Suppliers to share in its goal of being positive contributors to our communities and preserving our planet's natural resources.*

**Environmental Compliance:** Suppliers must comply with applicable environmental protection laws and regulations and maintain required permits or registrations.

**Sustainable Practices:** Suppliers shall balance their environmental impact by minimizing waste and engaging in efficient energy and water uses, and reuse-reduce-recycle programs wherever practicable.

**Community Impact:** TTEC encourages its Suppliers to share our commitment to community involvement by positively engaging with underserved populations.

**Responsible Materials Sourcing:** Suppliers shall exercise due diligence on the source and chain of custody of relevant materials in their supply chain to avoid conflict mineral materials from high-risk regions being utilized in the manufacture of goods used to supply TTEC.

## Compliance

*Suppliers are expected to understand and follow this Code and address instances of noncompliance in a timely manner, including notifying TTEC of their occurrence. TTEC reserves the right to modify or amend this Code and will provide Suppliers with reasonable advance notice of such changes.*

**Due Diligence:** TTEC may conduct due diligence or "background check" screenings on Suppliers, as permitted by law, prior to engaging in a business agreement. Failure to cooperate with and clear such screenings may result in termination of the business relationship with TTEC.

**Cooperation and Right-to-Audit:** TTEC reserves the right to assess compliance with this Code. Suppliers are expected to cooperate with any reasonable information requests initiated by TTEC to verify compliance. This Code is incorporated by reference with all TTEC Supplier contracts. A Supplier's failure to materially follow this Code or correct material non-compliance after becoming aware, may lead to immediate termination of the contract due to breach.

**Training:** Suppliers must ensure employees receive training and such training is inclusive of the relevant principles outlined in this Code.

**Retaliation:** Suppliers must prohibit retaliation in any form against anyone who, in good faith, reports any actual or potential violations of this Code or any other illegal or unethical behavior to the Supplier, TTEC, or a regulatory agency.

**Reporting:** Suppliers must promptly report any concerns arising out of their relationship with TTEC or its employees, including any suspected violations of this Code, by emailing [ethics@ttec.com](mailto:ethics@ttec.com) or via TTEC's We Hear You (WHY) Helpline at <https://www.ttecwehearyou.com>. TTEC will review and respond to all reports and investigate allegations of misconduct. Questions about this Code may be directed to [ethics@ttec.com](mailto:ethics@ttec.com).





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