

TTEC Risk Management Policy

I. PURPOSE

Our complex global business spans multiple business segments, countries and time zones. At any time, somewhere around the globe, someone at TTEC makes decisions on behalf of the company that creates important obligations and potential risks for the Company. The purpose of this Policy is to outline the framework of how TTEC managements risks and who at the Company has primary responsibilities for Risk Management. This Policy is a living document and it will continue to evolve with the needs of our business. It will be reviewed periodically and revised when necessary.

II. POLICY

It is the Policy of TTEC that we manage our risks proactively. To manage risks we (1) stay at the forefront of relevant developments to understand and assess our risks; (2) communicate risks throughout the organization to keep all stakeholders informed about risks that impact their aspects of the business; (3) require business leaders to manage risk proactively in accordance with TTEC risk appetite and risk tolerance; and (4) maintain a risk assurance function that provides important oversight and validation that risks at TTEC are managed in accordance with the Policy.

What Risks Do We Manage?

TTEC is a complex, publicly listed business with global footprint, that serves varied business verticals in customer care, technology, consulting, and growth; all to promote and enhance customer experience and brand loyalty for leading companies around the globe. With that broad based business in mind, the risks we manage change and evolve. While specific risks that we manage may change over time, overall, we focus on the following category of risks:

- Strategy Execution
- Service Delivery
- Labor Risks
- Overhead Optimization
- Information Security Effectiveness
- Succession Planning
- M&A Effectiveness

- Global Compliance Effectiveness
- Geographic Concentration
- Health & Safety
- ESG and Related Reputational Risks

The overarching responsibility for TTEC Risk Management Program resides with TTEC General Counsel & Chief Risk Officer.

How Do We Identify and Test our Risks?

To identify and stay on top of its risks, TTEC performs three separate risk discovery exercises: (1) the enterprise risk management exercise (the ERM); (2) the legal & regulatory review; and (3) internal and external audit reviews.

The ERM

The Enterprise Risk Management Exercise (the ERM) is run by the TTEC Risk Department at least once every two years (Usually in the even calendar year). In the years that the ERM discovery is not performed, the prior year's ERM findings are reviewed and assessed for relevance allowing the business to continue its risk management mitigation process with focus on those risks that continue to be relevant.

The ERM exercise is run in one of three ways: (1) through a comprehensive survey of key enterprise leaders in each business segment and vertical, each business function, and geography; (2) through in depth open interviews of members of the Executive Leadership Team, their direct reports, and members of TTEC Board of Directors; (3) a comprehensive holistic review of global risks as seen by global public and private leaders, and by global consultancy firms and testing these risks against TTEC business environment and market place. In any given ERM year, TTEC Chief Risk Officer in consultation with the Audit Committee of the Board of Directors may use any of these three ERM approaches or a combination of any of them. In performing the ERM exercise, the TTEC leaders are asked to consider key risks in the Reputational, Operational, Financial, Legal & Regulatory, Public Company, Technology, and Competition realm and assess them in three dimensions:

1. Likelihood of Occurrence (remote to highly probable)
2. Impact on TTEC in terms of Severity (low to high – minimal impact to catastrophic impact)
3. How well TTEC is positioned to manage the risk (well to not at all)

The findings are analyzed with top risks based on likelihood of occurrence, severity of impact, and TTEC preparedness and are then summarized and presented for subsequent review to TTEC Executive Leadership Team and TTEC Audit Committee of the Board.

Once top risks are identified and agreed, each risk is assigned the risk owner and a project manager, who develop a comprehensive risk management and mitigation plans that are progressed during the course of the year and with respect to which, the Chief Risk Officer delivers a quarterly update to the Audit Committee of the Board. See Exhibit A, for ERM schematic.

Legal and Regulatory Review

The Legal and Regulatory Review is performed throughout the year by TTEC Legal Department. At the beginning of the year (Q1), TTEC General Counsel reviews prior year's Legal and Regulatory lists focusing on material laws and regulations that apply to TTEC's business. As a complex business spanning 25 countries and six continents around the globe, TTEC is focused on material laws and regulations only the compliance (or lack of compliance) with which may adversely impact TTEC, its business or its clients. Once the list is reviewed, it is circulated to each senior member of the Legal team around the globe for review and validation.

Once the annual review is completed, each subject matter expert on various legal and regulatory issues is responsible for an update to the list with new laws and regulations as they are adopted by relevant jurisdictions. TTEC legal subject matter experts stay abreast of legal developments in one of the following three ways: (1) subscribe to legal information dissemination aggregators like Law360 or Lexology (an American Corporate Counsel Association service) and foreign equivalents; (2) subscribe to information services run by major law firms which send out alerts and bulletins about legal developments; and (3) subscribe to regulatory pages on web services for key regulators (e.g. US Securities and Exchange Commission; US Department of Justice, the European Union Parliament and Regulatory Commission). At a monthly Legal Department leadership meeting the list is updated based on member input.

Finally, at the end of the year (during Q4), the Legal Department does a comprehensive sweep of any new laws adopted by relevant legislation that may come into effect as of the 1st of the following year.

As the comprehensive list of new laws and regulations is updated throughout the year, members of the Legal Department consider its impact on the business, assess potential risks of compliance and provide timely briefings to affected business segments and functions; they also work with TTEC program management office (the PMO) to plan and implement compliance initiatives to reduce and proactively mitigate risks presented by new or evolving laws and regulations.

In addition to this formal process, members of the Legal Department also engage in on-going monitoring of legal developments based on cases decided in court and law suits filed, to assess changing regulatory and legal landscape and its potential impact on the business, and advise affected business leaders accordingly.

Periodically, at least once quarterly, TTEC General Counsel and Chief Risk Officer reports to the Executive Leadership Team on evolving legal risks.

Internal and External Audits

As a public company, TTEC is subject to an annual independent audit by a public accounting firm. As part of these audit services performed on behalf of the Audit Committee of The Board, TTEC's independent public auditors provide the Board of Directors and TTEC Management with their view on key risks impacting the business. These reports occur at least annually and usually more often.

TTEC's Internal Audit team, also performs periodic audits of the business based on a comprehensive annual audit plan developed by the Internal Audit Team, with input from Management and the Audit Committee of the Board. Director of Internal Audit reports their team's findings to process owners as audits are completed, and to the Chief Risk Officer and Chief Financial Officer at least quarterly. During quarterly Audit Committee Meetings of the Board, Director of Internal Audit reports his findings to the Audit Committee including progress made on remediation of prior findings. Based on the execution of the Internal Audit Plan, from time to time, the Director of Internal Audit provides input to the Audit Committee of the Board and to the full Board, if asked on the state of the business including its risks and the risk mitigation progress.

How Do We Promote Risk Awareness, Training and Communication?

It is the Policy of TTEC that its Management Team must be informed about risks relevant to the business. To that end, process owners provide periodic reports to the Management Team about existing or evolving risks and steps that the business must take to mitigate them. The process owners also provide periodic training for risks deemed important to the business. The training is provided in one on one sessions, via FAQ and other tools and communications distributed to those who are impacted by the risks; and via mandatory training available through TTEC University.

How Do We Manage Every Day?

It is the responsibility of each member of the TTEC Management Team (VP and above) to proactively manage risks that are inherent in the business segment or function that she/he is responsible for. The risk management must be performed proactively, appropriately budgeted and rolled out based on enterprise Risk Appetite as determined by the CEO and the Executive Leadership Team and enterprise Risk Tolerance as determined by the company's CFO.

Risk Appetite: Enterprise Risk Appetite is the level of risk that an organization is prepared to accept in pursuit of its objectives, and before action is deemed necessary to reduce the risk. It represents a balance between the potential benefits of risk taking and innovation and the threats that change inevitably brings.

Risk Tolerance: Enterprise Risk Tolerance is a financial term that speaks to the level of downside risk a company is able to absorb before its business and its shareholder value is materially impacted.

If risk cannot be managed based on the Company's appetite and tolerance, it must be transferred (with insurance or risk sharing with others). Each process owner must report the status of their risk management activities and recommend to the Executive Leadership Team whether the risk is within tolerable levels or whether it must be transferred.

How TTEC Transfers Risk?

TTEC annually procures a multi-level insurance program tailored to the needs of the business. TTEC Chief Risk Officer and Chief Financial Officer determine the level and structure of TTEC insurance program based on the needs of the business, its risk appetite and tolerance. The cost of insurance is considered as ordinary cost of doing business; it is budgeted annually.

How Risk Management Oversight and Assurance Are Performed?

TTEC Risk Management Oversight is performed by the Executive Leadership Team (its Executive Committee) via periodic (at least quarterly) reviews; and by the Audit Committee of the Board by periodic (at least twice annual) reviews. The Executive Leadership Team meets with key process owners (like Human Capital, Legal, IT, and Finance leadership) to periodically review risks and mitigation strategy and status. The Audit Committee of the Board reviews the status of TTEC Risk Management Program several times a year as part of its periodic meetings; it also reviews progress made on the Internal Audit Plan, related risk findings and mitigation progress at least quarterly; and meets with TTEC external auditors quarterly to review the enterprise risks.

1. Read and understand the content of the document and its enterprise implications;
2. Confirm that they has authority to sign the document by reviewing the Signature Authority Matrix; and
3. Confirm that all reviews and approvals have been timely obtained, as a pre-condition to the document being signed.

If the Signature Authority Matrix does not provide an express guidance for who is authorized to execute a certain type of a document, then the gap must be brought to the attention of the Legal Department that will facilitate an amendment to the Policy with appropriate approvals.

A failure to comply with this Policy will subject the employee to disciplinary actions, up to and including termination.

Except for the Board delegation of authority to management, the provisions in this Policy supersede any other policies or governing documents that may contain authorizations or directions contrary to this Policy. If you are aware of any document that is in conflict with this Policy, please bring it to the attention of the Legal Department to enable the harmonization of any conflicting provisions.

III. EXCEPTIONS TO THE POLICY

There are no exceptions to the Policy, but the Policy may be amended and expanded as directed by the Executive Committee of Management and the Audit Committee of the Board.

IV. APPLICABILITY

This Policy applies to TTEC Holdings, Inc. and all its subsidiaries and controlled affiliates, anywhere in the world, including 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.

V. RELATED POLICIES AND PROCEDURES

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

- Board Delegation of Authority to Management
- TTEC Signature Authority Policy
- TTEC Insider Trading Policy
- TTEC Policy on Policies
- TTEC New Country Entry Policy
- TTEC Anti-Corruption Policy
- TTEC Hiring Guidelines



Bringing *humanity* to business.

- Policy on Engagement of Outside Counsel

VI. RESPONSIBILITY FOR POLICY ENFORCEMENT

The members of TTEC Executive Leadership Team (Executive Committee or its successor in authority) and their direct reports are responsible for the communication, implementation and enforcement of the Policy

Any questions about the Policy shall be directed to TTEC Chief Risk Officer and Chief Financial Officer.

Last revised date: January 25, 2024