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SYKES Supplier Code of Conduct

Ethical conduct is core to the success of any business, but especially here at SYKES. Integrity is the core of our culture and character. Our clients trust us with their customers and that is not a responsibility we can take lightly. As a people intensive business, SYKES' employees are held to the highest standards of ethical behavior. This is how we have achieved the reputation we have in providing quality, world-class customer care. We expect the same from our suppliers, both domestic and foreign, and expect them to abide by this Supplier Code of Conduct, encompassing good corporate citizenship and sustainability.

SYKES will periodically assess its suppliers' compliance with this Code, which applies to SYKES suppliers and their subsidiaries, affiliates, and subcontractors (each a "Supplier") providing goods or services to SYKES.

Ethics and Standards of Conduct

Suppliers are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethics and behavior.

Business Integrity

Suppliers must comply with all applicable anti-corruption laws and regulations, including the Foreign Corrupt Practices Act (FCPA), UK Bribery Act (UKBA), and applicable international anti-corruption conventions. Suppliers shall not engage in any improper or unlawful activity including corruption, extortion, embezzlement, misrepresentation, or bribery to obtain an unfair or improper advantage.

Antiboycott Laws

In doing business with SYKES, Suppliers must comply with U.S. antiboycott laws. These laws prohibit actions or agreements to take action that could be considered to support or further an illegal boycott, such as

- Refusing to do business with, or agreeing not to do business with, other persons or companies (because of their nationality, for example);
- Furnishing information about affiliations, business relationships or transactions in or with a boycotted country (Israel, for example) or with any person or company believed to be blacklisted;
- Entering into agreements or letters of credit that contain prohibited boycott provisions; or
- Discriminating in employment practices (because of race, religion or nationality, for example).

Recording and Availability of Information

Supplier shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

Equal Employment Opportunity & Affirmative Action

SYKES observes and supports all applicable laws and regulations concerning equal employment opportunities and expects the same of its Suppliers. Suppliers shall, regardless of race, color, religion, national origin, disability, gender, age, sexual orientation, or any other protected classification:

- Select and employ individuals solely on the basis of ability, experience, training, intelligence, and integrity;
- Train, compensate, upgrade, transfer, downgrade or terminate individuals on the basis of need, demonstrated performance, and compliance with company policies;
- Encourage individual growth for self-development and performance improvement;
- Provide full equality for all employees through management practices and standard operational procedures; and
- Take affirmative action to employ and advance in employment minorities, females, protected veterans and individuals with disabilities.

Human Rights

SYKES expects Suppliers to treat all employees with respect, fairness and dignity, strictly prohibiting harassment in any form.

Freedom of Association

Suppliers will comply with any legal obligation it has to notify employees of their right to organize and bargain collectively with their employers and to engage in other protected concerted activity.

Whistleblower Protection and Anonymous Complaints

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistleblower confidentiality and prohibit retaliation.

Labor Practices

SYKES prohibits its Suppliers and their affiliates, subsidiaries, subcontractors and third party labor providers or recruiters from using labor below minimum legal employment age, involuntary labor, including child labor, prison labor, debt bondage, or indentured or forced labor. Suppliers must comply with all applicable wage and hour laws and regulations, including, but not limited to, those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and legally mandated benefits.

Prevention of Involuntary Labor and Human Trafficking

SYKES prohibits its Suppliers and their affiliates, subsidiaries, subcontractors and third party labor providers or recruiters from trafficking persons or using any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Supplier shall not withhold workers' original government-issued identification and travel documents.

Conflicts of Interest

Suppliers and Supplier representatives must not have a relationship with any SYKES employee that affects or might appear to affect the objectivity of the employee's judgment or that is or appears to be a conflict of interest.

Supplier Diversity

SYKES is committed to a diverse supply chain and expects the same from our Suppliers. Suppliers are expected to diversify their own supply chain to include minority-, women-, disabled-, and disabled veteran-owned businesses. We require our Suppliers to comply with:

- Section 503 of the Rehabilitation Act of 1973: Section 503 prohibits federal contractors and subcontractors from discriminating in employment against individuals with disabilities (IWDs), and requires these employers to take affirmative action to recruit, hire, promote, and retain these individuals.
- Vietnam Era Veterans' Readjustment Assistance Act of 1974: The Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) requires covered federal government contractors and subcontractors to take affirmative action to employ and advance in employment specified categories of veterans protected by the Act and prohibits discrimination against such veterans. In addition, VEVRAA requires contractors and subcontractors to list their employment openings with the appropriate employment service delivery system, and that covered veterans receive priority in referral to such openings. Further, VEVRAA requires federal contractors and subcontractors to compile and submit annually a report on the number of current employees who are covered veterans. The affirmative action and mandatory job-listing provisions of VEVRAA are enforced by the Employment Standards Administration's Office of Federal Contract Compliance Programs (OFCCP) within the U.S. Department of Labor (DOL). DOL's Veterans' Employment and Training Service (VETS) administers the veterans' employment reporting requirement.

Health and Safety

Suppliers must conform to all applicable health and safety laws and regulations, as well as applicable industry codes. Suppliers must have a program or mechanism(s) to enforce and monitor compliance with health and safety requirements. These programs or mechanisms must include occupational safety, emergency preparedness and occupational injury and illness.

Environmental

SYKES expects Suppliers to demonstrate a commitment to responsible environmental stewardship, including compliance with all environmental laws, pollution prevention and resource reduction to eliminate or reduce waste of all types, including water and energy. Suppliers are expected to also include environmental considerations in their business decision-making.

Conflict Minerals

Suppliers must ensure their products are responsibly manufactured and do not contain metals derived from "conflict minerals" – tin, tantalum, tungsten and gold, or their derivatives – that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (or any adjoining country).

Confidentiality

Suppliers may be given access to confidential and proprietary information belonging to SYKES. This includes, without limitation, information about our business operations, clients, customers, employees, suppliers, business partners, software, applications, tools, designs, methodologies, policies, procedures, information and technology systems, network infrastructure, patents and patent applications, financial and accounting data, cost and pricing information, market projections and analyses, strategies, research and development, and contract terms.

Confidential information also includes all non-public information that might be of use to competitors, or harmful to SYKES or its clients and client customers, if disclosed. Confidential information acquired in the course of a Supplier's work must never be used for personal advantage. Suppliers must protect SYKES' confidential information, use the information only as necessary to perform Suppliers' work duties, not disclose the information to any third party, and return or destroy the information as instructed by SYKES.

Technology Assets

During the course of performing services for SYKES, Suppliers may be given access to technology assets and infrastructure belonging to SYKES or its clients. Technology assets include, but are not limited to, hardware, software and physical storage components, telephones, voice mail, the Internet, the Intranet, electronic mail (e-mail), instant communications programs and services, and instant messaging products/chat systems. These resources are the sole property of SYKES, or its clients, and may only be used for authorized purposes, and are not intended for private personal communications.

Technology assets are to be used in a professional, ethical, and lawful manner. Use of these assets may be reviewed, monitored, and/or recorded at any time by SYKES for compliance with policies, standards, and quality control purposes, or as required by law. There should be no expectation of privacy of any kind related to the use of our technology assets. Suppliers waive any right of privacy in anything a Supplier or its personnel may create, store, send, or receive through any technology asset medium. Suppliers agrees that SYKES and/or its clients shall have the right to monitor all use of their respective technology assets.

If a Supplier has any questions about the use of, or the appropriateness of the Supplier's intended use of, SYKES' or its clients' technology assets, the Supplier will communicate the question to SYKES prior to taking action.

How to report concerns to SYKES

If you would like to report a concern or have a question for SYKES regarding this Supplier Code of Conduct, please send an email to sustainability@sykes.com or write to:

Attn: General Counsel
Sykes Enterprises, Incorporated
400 North Ashley Drive, Suite 3100
Tampa, FL 33602