



SYKES Human Rights Policy

Respect for human rights is fundamental to the sustainability of SYKES and the communities in which we have the privilege to operate. SYKES is committed to a culture of integrity, which means that everyone is treated with dignity and respect. SYKES' commitment to human rights is exemplified in the Standards of Conduct, a cornerstone for ethical behavior for all employees who work for SYKES and its subsidiaries.

SYKES Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

STAKEHOLDERS

SYKES is a global leader in providing customer contact management solutions and services in the business process outsourcing (BPO) arena. SYKES provides an array of sophisticated customer contact management solutions to Fortune 1000 companies around the world, primarily in the communications, financial services, healthcare, technology and transportation and leisure industries. SYKES specializes in providing flexible, high quality customer support outsourcing solutions with an emphasis on inbound technical support and customer service.

Headquartered in Tampa, Florida, with customer contact management centers throughout the world, SYKES provides its services through multiple communication channels encompassing phone, e-mail, web and chat. Utilizing its integrated onshore/offshore global delivery model, SYKES serves its clients through two geographic operating segments: the Americas (United States, Canada, Latin America and Asia Pacific) and EMEA (Europe, Middle East and Africa). SYKES also provides various enterprise support services in the Americas and fulfillment services in EMEA, which include multi-lingual sales order processing, payment processing, inventory control, product delivery and product returns handling.

SYKES proudly engages in business opportunities with customers, and maintains relationships with our shareholders, our communities and employees while adhering to a specific purpose: "We help people, one caring interaction at a time." SYKES' leadership drives excellence with the recognition that our entire value chain – our culture – is committed to this purpose.

RESPONSIBILITY

All levels of management within SYKES are responsible for ensuring that all team members understand and comply with our Human Rights Policy and our zero-tolerance approach to slavery, human trafficking, and human rights violations. The responsibility extends to ensuring that steps are taken to report and investigate any human rights issues which are identified.

Everyone to whom the SYKES Human Rights policy applies (including, for the avoidance of doubt, our suppliers) is responsible for preventing, detecting and reporting instances of human rights violations in any part of our business or in our supply chains. All employees are encouraged and expected to raise any concerns they have regarding the practices of the company. SYKES' employees and agents are expected to report any actual or suspected violations of applicable laws and regulations in all countries where SYKES does business. It is a right and it is an obligation.

The Board of Directors of SYKES, through our Vice President of Ethics and Compliance, has oversight responsibility of our Human Rights compliance strategy, and approving any required annual statements.



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EMPLOYEES

SYKES is committed to maintaining an environment for its employees that respects the dignity and contribution of every individual and permits everyone to work in an atmosphere free from intimidation, coercion, unlawful activity and human rights violations. SYKES is committed to fair employment practices to ensure that workers are not exploited, that they are safe and that relevant employment standards (including pay and working time) and health and safety laws are adhered to. We also support the global commitment to eliminating forced or compulsory labor and to effectively abolishing child labor.

As a people-first business, SYKES' employees are held to the highest standards of ethical behavior and integrity, with an expectation that they will comply with the company's Standards of Conduct. All employees receive training on the Standards of Conduct at the time of initial hire. In addition, that training and awareness is reinforced every year thereafter with quarterly communication reminders on the Standards of Conduct and SYKES' culture of integrity and an annual certification for all key employees. These communications incorporate information on the identification and prevention of slavery, human trafficking, and human rights violations. To help employees navigate through everyday business situations, managers encourage employees to have regular conversations about the Standards of Conduct, and materials are provided to assist in that effort.

Through this Human Rights Policy, as well as various other policies and the SYKES Standards of Conduct, employees are ensured:

- Treatment with dignity and respect.
- The communication will be protected to the greatest extent possible.
- Concerns will be seriously addressed.
- Complaints and concerns may be made anonymously.
- There will be no retaliation or retribution.

SYKES employees may notify their regional human resources representative, the Global Human Resources Compliance Department, or they may report a violation or suspected violation by calling the regional hotlines. These hotline numbers are listed in the Standards of Conduct Policy, the Standards of Conduct Communications, and can be found on SYKES' website.

SUPPLY CHAIN

Our supply chain supports our operational requirements. Our business is labor-intensive and therefore wages, employee benefits and employment taxes constitute the largest component of our operating expenses. In addition to capital expenditures for facility expansion and upgrades and maintenance and system infrastructure, other major purchasing includes facilities operations, hardware, data management and warehousing, telephone and data services, software maintenance, consulting, travel, and merger and integration expenses.

SYKES is committed to working closely with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

Discrimination

SYKES is committed to providing a work environment where all employees are treated with the respect and consideration they deserve. Discrimination in any form is not tolerated at SYKES, and we maintain a pleasant, professional, and productive work environment. It is important that employees report any conduct that insults the dignity of any employee, client or customer.



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Anti-Harassment and Anti-Bullying

SYKES does not tolerate harassment against, or committed by; an employee, leader, contractor, customer or vendor, nor does it tolerate any form of repeated, unreasonable workplace behavior that intimidates, offends, degrades, or humiliates any person (what can be referred to as workplace “bullying”). Harassment or bullying of a co-worker is prohibited whether at work, or outside of work, if the conduct outside of work disrupts the workplace or interferes with an employee work performance.

Safety

Safety is more than just reduced risk of injury for SYKES’ employees and guests. It is joining together to build a fun, protected environment where we can create great work. SYKES’ Employee Safety Protocols can help all employees contribute to safety in the workplace.

Diversity

Diversity is embraced at SYKES. We recognize that a diverse labor force with a mix of backgrounds, skills and experiences drives new ideas and innovations, providing us with a sustained competitive advantage.

Forced Labor, Child Labor, and Human Trafficking

SYKES respects and protects the rights of its employees. SYKES does not tolerate forced labor, child labor, and other human trafficking practices and they have no place in our business. We will not knowingly do business with those who do not maintain similar standards.

We provide equal employment opportunities to all qualified candidates and employees.

Freedom of Association

Social dialog takes place at different levels within the organization, and may exist in different forms depending on culture, practices and applicable regulations in the various countries.

All SYKES employees have the right to collective bargaining. All employees may freely join or associate with organizations without interference, retaliation or discrimination.

Open Door policy

SYKES creates a work environment where there is a free and open flow of communication between employees and the Company. While SYKES holds scheduled employee meetings and sends out regular communications regarding its business, every day creates an opportunity for management to seek out ideas from employees and for employees to share thoughts with management. The door is always open for a chat or for discussing new ideas or complaints, in good business times and bad. SYKES listens to employees and takes their comments seriously. The direct personal relationship between employees and their managers ensures the best environment for resolution of issues.



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OUR DUE DILIGENCE AND RISK MITIGATION

To mitigate the risks of human rights violations, SYKES has both internal, employee-focused human resources policies, as well as external, supplier-focused statements, and a Standards of Conduct Policy.

SYKES has a number of human resource and supply chain policies in place. We confirm the identities of all employees and confirm that they are of minimum legal employment age. All of SYKES' policies and procedures relating to human rights are applicable to our home-based employee work force as well.

We conduct the appropriate background due diligence investigations on our suppliers. As an organization with operations in multiple countries worldwide, we organizationally stand behind the prevention of modern-day slavery and human trafficking across our global operations.

All supplier contracts undergo a formal review process, which includes procurement, departmental and legal review and sign-off to ensure that our suppliers meet our rigorous standards with respect to the prevention of human trafficking and modern slavery.

Our statement for the "Prevention of Involuntary Labor and Human Trafficking" prohibits our suppliers and their affiliates, subsidiaries, subcontractors and third-party labor providers or recruiters from using labor below minimum legal employment age, or trafficking persons or using any form of slave, forced, bonded, indentured, or prison labor. Our suppliers are prohibited from withholding workers' original government-issued identification and travel documents upon request. We define "involuntary labor" to include 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.

Monitoring Effectiveness

SYKES management expects high standards of both employees and our suppliers. We actively consider opportunities to further extend our due diligence and auditing processes to prevent modern day slavery and human trafficking in our supply chains and across our business.

In particular:

- SYKES' employees are held to the highest standards of ethical behavior and integrity, with an ongoing expectation that they will comply with the company's Standards of Conduct.
- SYKES continues to expect our suppliers, both domestic and foreign, to abide by our Code of Conduct, which outlines our expectations for suppliers' ethics and standards of conduct, business integrity, human rights, and labor practices.
- SYKES routinely evaluates our internal policies, Standards of Conduct, and staff training to ensure continued and timely compliance to prevent slavery and human trafficking.

As we have outlined in this policy, SYKES will continue to advance our efforts to protect human rights and prevent its violations in our business and our supply chains.