



Risk management and internal co x | Webhelp-risks.pdf x | Whisper – Information Security & x +

webhelpgroup.sharepoint.com/sites/wise-communities/whisper/Documents/Forms/AllItems.aspx?RootFolder=%2Fsites%2Fwise-communities%2Fwhisper%2FDocuments%2F1-Poli...

Uygulamalar Webhelp OA

SharePoint Search this library

WISE Webhelp Think Human

Whisper – Information Security & Privacy Not following Share

Share Copy link Sync Download Export to Excel Power Apps Automate

Documents > 1-Policies > Compliance > Compliance policies

Name	Modified	Modified By	Checked Out To	Category
20170606 Anti-Bribery & Ethics Policy.pdf	May 7, 2019	Agathe Curis		



GİZLİ [WEBHELP / VFTR]

Bu doküman 17.08.2020 tarihinde Vodafone Türkiye ile paylaşılmıştır.



Webhelp's Anti-Bribery & Ethics Policy

Version April 11th 2017

Scope of this Policy

This Policy applies to all "Covered Persons". "Covered Persons" includes all officers, directors, employees, and "Third-Party Representatives" (third-party agents, representatives, consultants, distributors, or intermediaries) who perform services for or on behalf Webhelp and its affiliates and subsidiaries (collectively "The Company"), and those who represent the Company's interests in any joint ventures.

Commitments of The Company and Covered Persons

The Company is committed to the highest standards of ethical behavior and integrity in its business activities in France and abroad.

The Company has adopted this Anti-Bribery & Ethics Policy (the "Policy") to strengthen its commitment to integrity in its business practices and compliance with applicable laws worldwide. This Policy addresses compliance with the principles and objectives of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions dated December 17, 1997 and the relevant implementing legislation which includes the relevant provisions of the French Criminal Code and the French Labor Code which prohibit corruption of domestic and foreign public officials as well as private or commercial bribery ("French Anti-Corruption Laws").

Covered Persons acting for, or on behalf of The Company are responsible for maintaining the highest standards of business conduct in accordance with these anti-corruption laws and this Policy.

Overview

The purpose of this policy is to ensure that all Covered Persons comply with the relevant provisions of the French Criminal Code and the French Labor Code and especially the "Sapin II" law which prohibit corruption of domestic and foreign public officials as well as private or commercial bribery ("French Anti-Corruption Laws"). Other relevant legislation may include the U.S. Foreign Corrupt Practices Act (the "FCPA"), the U.K. Bribery Act 2010 (the "Bribery Act"), and other applicable anti-bribery laws and regulations of the local jurisdictions in which The Company operates.

- 2 -

GİZLİ [WEBHELP / VFTR]

Bu doküman 17.08.2020 tarihinde Vodafone Türkiye ile paylaşılmıştır.

Code of Conduct denetimlerine ilişkin Web sitesinde yer alan bilgi



<https://www.webhelp.com/tr-tr/risk-management-and-internal-control-procedures/>

employees.

The heads of corporate support departments (Finance, IT, HR, Legal) also inform their teams of specialized personnel at meetings and training sessions.

Oversight of the internal control system

Group senior management

The Executive Committee monitors the internal control system to ensure that the system is relevant and suited to the Group's objectives.

This includes regular reviews on the part of management and supervisory staff. It falls within the scope of their day-to-day activities and ensures that each organizational process is consistent with the Group's vision and strategy.

As part of the monitoring, internal audits are performed with the assistance of an external audit firm. Those audits aim at ensuring that internal rules are known, and internal control is consistent within the Group. In 2019, audits have been conducted in subsidiaries in South Africa, Turkey, Italy, Czech Republic and Morocco.

Webhelp risks

GİZLİ [WEBHELP / VFTR]

Bu doküman 17.08.2020 tarihinde Vodafone Türkiye ile paylaşılmıştır.

Code of Conduct Risk Değerlendirmesine İlişkin Web sitesinde yer alan bilgi



<https://www.webhelp.com/app/uploads/2020/03/Webhelp-risks.pdf>

Risk Category	Risk Description	Impact	Mitigation
Legal	Compliance	The Group is subject to numerous laws and regulations, such as the European Union's <i>General Data Protection Regulation</i> (GDPR), that requires new compliance obligations regarding the handling of personal data, the French anti-corruption legislation (<i>Sapin II</i>), the FCPA, the UKBA, and the duty of care. The Group also has to meet all contractual commitments to its clients. Non compliance could lead to significant financial penalties (up to 4% worldwide revenue concerning the GDPR, and 5M euros concerning Sapin II), lawsuits, and a negative reputational impact.	Personal data protection Webhelp has invested heavily to become a market performer on data compliance. It is amongst the first in the industry implementing "Binding Corporate Rules." This project and all supporting documentation has been assessed by the French Data Protection Authority (CNIL) to ensure the highest level of compliance and is currently being assessed by co-lead authorities. Audit are also regularly carried out by clients. Anti-corruption The implementation of the anticorruption French law known as "Sapin II" is one of the major compliance concern over the past year. Webhelp has carefully reviewed its contracting procedures. The Group is also compliant with the FCPA and UKBA.
Financial	Market risk (foreign exchange risk)	A significant part of Webhelp's revenue is denominated in different currencies. Therefore, unfavorable fluctuations in foreign currency exchange rates could have an adverse effect on the Group results.	The Group hedges currency risk for different currencies to which the Group is exposed.
		Credit risk is the possibility of a financial loss	A portion of trades receivables is financed by non-recourse factoring agreements, either at

GİZLİ [WEBHELP / VFTR]

Bu doküman 17.08.2020 tarihinde Vodafone Türkiye ile paylaşılmıştır.