

STANDARDS of CONDUCT

LET'S TALK ABOUT IT



Last Updated: May 5, 2020

CEO Message

Our purpose statement, “We help people, one caring interaction at a time,” embodies who we are as a company and speaks to our core values. To create a spirit of trust with our brand partners and their customers, we must start from within as an organization.

To promote and encourage a strong culture of ethics and compliance within our SYKES family, we must reinforce our commitment and promotion of workplace integrity and professional conduct. The SYKES Standards of Conduct (SoC) provides information and resources to help employees understand company procedures and policies, as well as legal and regulatory obligations.

As integral members of the SYKES company, we are all expected to accept certain responsibilities to adhere to acceptable business principles in matters of personal conduct and to exhibit a high degree of personal integrity at all times. The SoC serve as a quick reference, outlining the guidelines expected of SYKES employees. We should all become familiar with these standards and refer to them often, as they may be updated to reflect modifications and changes in the law.

The SoC clarifies our organization’s mission, values and principles, linking them with standards of professional conduct. This helps ensure that SYKES remains a first-class company in which we can all take pride.

If you have any questions about these standards or your responsibilities, please contact your supervisor or your local Human Resources department. Should you require counseling specific to a situation not addressed in this resource, please talk to your supervisor or Human Resources representative.

Sincerely,
Chuck Sykes
President & CEO

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Introduction

To secure high ethical standards for business and professional conduct, SYKES relies on its employees to maintain both personal and professional standards of conduct and integrity. We must reinforce our commitment to, and the promotion of, workplace integrity and professionalism.

As a trusted partner for many of the world's leading brands, SYKES proactively works to ensure clients, customers and employees are protected at all times. By providing tailored guidelines and educational materials, we are committed to creating a strong and consistent ethical culture amongst our workforce.

The standards outlined in the SYKES Standards of Conduct (SoC) for Compliance and Integrity are not entirely new. They organize, summarize and update — into one convenient guide — policies that have been in place for years and new ones that our business encounters as a part of our digital transformation.

SYKES' SoC provides information and resources to help employees understand company procedures and policies, as well as legal and regulatory obligations. All employees who work for SYKES are expected to adhere to these standards. SYKES is a global organization, which places an enormous responsibility on all of us to manage ethics and integrity with great care.

It is your responsibility to be aware of the regional requirements that may have a global impact. For example:

1. Employees may be subject to the laws, rules and regulations of different countries and organizations, such as the European Union.
2. SYKES is a corporation organized in the United States, and U.S. law may apply even when business activities are conducted outside of the U.S. Similarly, other countries may apply their laws outside of their boundaries.
3. In the European Union, you may be covered by an agreement with an outside organization.

All SYKES locations adhere to common sets of conduct, rules and standards. Violations of rules and policies will be handled on a case-by-case basis, and

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discipline will be applied when warranted. The amount of discipline will depend on the type and severity of the violation as well as the employee's record of previous offenses (if appropriate). Depending on local laws, customs and agreements, specific rules of conduct and disciplinary procedures may differ from location to location.

These standards are the cornerstone of SYKES' commitment to integrity. You should be aware of and familiarize yourself with the specific rules of conduct and the disciplinary process that applies at your location. Your Human Resources department will be available to assist you with any questions.

A. SYKES Mission, Vision, Purpose & Culture

Mission Statement

To significantly improve the business of our clients and help consumers find and use the products and services they need by combining the power of machine intelligence with human ingenuity to modernize, optimize and integrate customer touchpoints across the commerce value chain.

Vision Statement

To be known throughout the world as a company that creates meaningful connections between brands and consumers, makes a positive impact in the lives of our people, and is a responsible and respected corporate citizen.

Purpose Statement

WE — act as one
HELP — answer the challenge
PEOPLE, — ensure every person matters
ONE — make each moment count
CARING — serve with thought + heart
INTERACTION — create a spirit of trust
AT A TIME. — be current

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The SYKES Culture

At SYKES, our ability to create and spread goodwill is global. We consider it a privilege to bring our best every day, serving each other, our clients around the globe, and our communities. Every day is about making a difference in other people's lives, and that includes the impact we have on employees' lives. Our purpose is to help people one caring interaction at a time and it defines how we act, how we make decisions, and who we are.



B. Our Commitment to Employees, Customers & Communities

SYKES' SoC is a resource for our employees (including the employees of our subsidiaries) and anyone who represents SYKES. It is based on our high ethical standards for business and professional conduct. We are committed to the success of SYKES and providing quality and innovative services to our clients; however, we do not compromise ethical business practices.

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The SoC are the cornerstone to SYKES' commitment to integrity. All employees and officers worldwide who work for SYKES are expected to uphold these standards:

- We maintain high standards of professional conduct for employees both on and off the job.
- We observe and support all applicable laws and regulations concerning equal employment opportunities and do not tolerate race, color, religion, national origin, disability, gender or age discrimination, as well as discrimination in any other protected classification.
- We are committed to providing a safe and healthy work environment for all employees and visitors.
- We observe all laws and regulations governing business transactions, engage in fair competitive actions, and use company funds only for legitimate and ethical purposes.
- We protect the confidential and proprietary information of our company, our clients and our clients' customers.
- We properly use the company's and our clients' property and respect the SYKES Technology Asset Agreement and the technology asset agreements of our clients.
- We report any suspected fraudulent activities of which we may learn or observe.
- We act with the utmost integrity and professional courtesy, providing world-class service to our clients' customers, building loyalty to our clients' brands one customer at a time.
- We value the local communities in which we operate and are regular and active contributors to the needs of our communities.
- For certain employees deemed "key employees" (typically Director-level and above), there is an obligation to confirm agreement with these SoC on an annual basis.

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C. Our Commitment to a Culture of Integrity

Business behaviors play an important role in building and maintaining the integrity of SYKES. SYKES provides multiple avenues and processes through which we have the right, the responsibility and the obligation to raise questions, seek clarifications and report potential compromises. Through our commitment to use these processes, we reinforce the strong ethical cultural of SYKES.

How to Raise Questions or Concerns

Employees are encouraged and expected to raise any concerns they have regarding the practices of the company, its employees, or agents and are expected to report any suspected violations of applicable laws and regulations or company policies in all countries where SYKES does business. Avenues for raising questions and/or concerns include management, Human Resources, the Chief Legal Officer, Chief Compliance Officer, and HR Global Compliance.

When reporting an ethics concern:

- You will be treated with dignity and respect.
- Your communication will be protected to the greatest extent possible.
- Your concerns will be seriously addressed and, if not resolved at the time you call, you will be informed upon resolution.
- You need not identify yourself.
- If you do identify yourself, you may request that your identity not be disclosed to others.
- There is no penalty for calling and there will be no retribution. If anyone tries to stop you from calling, or retaliates because you do, they are subject to disciplinary action.

Consequences for Failure to Adhere to Company Policies, Procedures, or the Standard of Conduct

SYKES has developed policies and procedures. The SoC and SYKES' policies and procedures apply to all SYKES employees and subsidiaries. Due to the nature of our business, there are additional work rules and policies that must be followed within

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specific work programs or countries. All employees are expected to be familiar with the intent of these policies and procedures and to fully understand those that apply to their job duties. Violation of any of these rules, company policies, procedures, or the SoC may result in disciplinary action up to and including termination.

SYKES takes the commitment to business integrity seriously and will take appropriate action in response to all violations of our SoC, company policies or procedures. Allegations of misconduct are thoroughly investigated and if the investigation substantiates that a violation occurred, appropriate disciplinary or corrective actions are initiated. Typically, SYKES follows a progressive disciplinary process, however, based on the seriousness of the specific violation, a review of actions taken for similar violations is conducted and a decision is sometimes made to skip one or more steps. If a violation is serious enough to warrant possible termination, senior management may be involved to make a determination on an independent review of investigative documents and previous actions for similar circumstances.

Section 1: Maintaining Diversity

Integrating the unique attributes and talents of a diverse workplace allows for greater flexibility and creativity in the workplace and the community. SYKES encourages diversity in its workplace and among its customers and suppliers. We are committed to equal employment and contractual opportunities without regard to race, color, religion, sex, national origin, disability, medical condition, sexual orientation, veteran status, age, or any other characteristic protect by law, and we will continue to:

- 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; and
- Provide full equality for all employees through management practices and standard operational procedures.

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Section 2: Drugs & Alcohol

The health and safety of our employees is important to SYKES and our customers and requires that we all work free from influence of any substance or activity that could prevent or impair safe and effective work activities. At no time are employees to perform their job while under the influence of alcohol, controlled substances (other than medications prescribed by a physician), or illegal drugs. The use, possession, distribution, or manufacture of alcohol or controlled substances, including illegal drugs, is prohibited on company property.

Section 3: Our Commitment to a Safe, Secure and Respectful Work Environment

SYKES is committed to maintaining a work environment that respects the dignity and contribution of each individual and permits us to work free from intimidation, coercion, or unlawful harassment, including sexual harassment.

Preventing harassment, discrimination and threats are a matter of respecting each other's rights and dignity. Discrimination and harassment infringe on an individual's right to work in an environment that is free from intimidating or offensive behavior and SYKES does not tolerate such actions. In addition, we do not tolerate acts of verbal or physical behavior that could lead to workplace violence. We must take all such issues seriously and promptly report them to management, Human Resources, the Chief Legal Officer and/or the Chief Compliance Officer without fear of retaliation.

We are committed to providing a work environment where all employees are treated with the respect and consideration they deserve. In order to maintain a pleasant, professional, and productive work environment, the company prohibits harassment in any form. Any conduct that insults the dignity of any employee, client or customer, or embarrasses the company in any way will not be tolerated.

Section 4: Commitment to Ethical Business Practices

SYKES and its employees shall always act with honesty and integrity in all that we do, including our business practices. Failure to do so not only places the employee(s) in question at risk of termination, but it may also jeopardize SYKES' relationship with its customers and could expose both the company and any individual employees involved to substantial fines, penalties, or legal action. SYKES expects all employees

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to exercise the highest degree of professional business ethics and integrity in all actions undertaken on behalf of the company. Employees at all levels must observe all laws and regulations governing business transactions, engage in fair and competitive actions, and use company funds only for legitimate and ethical purposes.

The term “conflict of interest” means any circumstance that could cast doubt upon an employee’s ability to act with total objectivity regarding the company’s interests. Employees should avoid situations in which there is, or may appear to be, a conflict between the personal interests of the employee and the interests of SYKES.

Personal Conflicts of Interest

We are all expected to make decisions that are in the best interest of SYKES and/or its customers, without any consideration to personal gain. Any current or future activity which is or could create a conflict of interest, either in practice or appearance, must be disclosed to the Chief Legal Officer and/or the Chief Compliance Officer for approval. This applies to employees, employee spouses, children and/or parents. Displaying favoritism or having conflicts of interest runs counter to SYKES’ core values and ethical culture. All actions made in the performance of our jobs must be done with integrity, honesty and fairness. Examples of personal conflicts of interest include (but are not limited to):

- Employment by a competitor or potential competitor;
- Placement of business with a firm owned or contracted by an employee or employee family member;
- Acting as a consultant to or conducting personal side-business with a current or potential SYKES customer, supplier, vendor, subcontractor, and/or competitor;
- Maintaining a financial interest in, or relationship with, a customer, fellow employee, supplier, vendor, subcontractor, competitor, distributor or any other organization that would create a conflict of interest.

Organizational Conflicts of Interest

Another type of conflict of interest involves the company, rather than any one individual employee. An “organizational conflict of interest” may exist where SYKES has, or may appear to have, interests that make it difficult to honestly, objectively,

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and effectively perform its duties and responsibilities. For example, an organizational conflict of interest may arise where:

- The nature of the work to be performed by SYKES may result in an unfair competitive advantage for the company; or
- The company had unequal access to non-public information or data related to the work; or
- The company's objectivity in performing the work is impaired or the company is otherwise unable to render impartial assistance or advice to the Government.

Bribes/Facilitation Payments, Gifts and Gratuities, Donations/Contributions

Anyone representing SYKES must conduct business with customers, vendors and suppliers on the basis of service, quality, performance, and price without giving or accepting anything that could influence or appear to influence the business transaction decision, whether paid by company or personal funds.

Bribes, Kickbacks and Facilitation Payments

In the United States, it is illegal to provide, offer, or accept a kickback or bribe. A kick-back or bribe may be defined as any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and that has as one of its purposes the improper obtaining or rewarding of favorable treatment in a business transaction.

For customers and suppliers in or from foreign countries, similar restrictions on the giving or receipt of bribes and kickbacks apply. The Foreign Corrupt Practices Act and foreign country laws prevent the giving of anything of value, including money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, to individuals and agents associated with foreign governments for the purpose of obtaining or retaining business in foreign countries. Included in this prohibition is the provision of anything of value to third-party intermediaries (otherwise known as "facilitation payments") for the sole purpose of obtaining or retaining business or favorable treatment in foreign countries. The engagement of third-party intermediaries is not always prohibited, and each scenario or engagement should be treated on a case-by-case basis. If you have any questions or concerns regarding the engagement of a third-party intermediary, please contact

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SYKES' Legal and Compliance departments.

SYKES does not permit the offering or receipt of kickbacks and bribes. Employees are responsible for consulting and understanding the laws, regulations, and applicable policies before providing anything of value, including consulting contracts, to employees or agents of foreign governments.

Business Courtesies

Within the commercial business world, the giving and receipt of business courtesies can be considered part of a normal business relationship. The term "business courtesies" includes, but is not limited to, gifts, services, meals, entertainment, hospitality, or other things of value. SYKES does not provide or accept business courtesies from or to customers, actual or potential suppliers, service providers, or contractors that could be considered inconsistent with typical marketplace practices, frequent in nature, lavish or extravagant or otherwise obligate or appear to obligate us to act in any way contrary to the law, the company's business interests, or our SoC and ethical business practices.

It is the responsibility of each company employee to inquire about prohibitions or limitations of the recipient's organization before offering any business courtesy. When considering accepting a business courtesy, be aware that we all have personal responsibility to ensure that our acceptance could not reasonably be construed in any way as an attempt by the offering to secure favorable treatment.

Gifts and Gratuities in Government Business

Federal, state and local government departments, agencies and their employees are governed by differing laws and regulations concerning acceptance of meals, gifts, gratuities or any other item of value from firms or persons with whom they do business or over whom they have regulatory authority. What may be considered an acceptable business courtesy in the commercial business world could be unacceptable, or even illegal, for individuals or companies involved in state, local or federal jobs.

Company employees may not give any gift, gratuity, loan, meal, entertainment, hospitality or any other thing of value to government employees or agents.

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Donations/Charitable Contributions and Political Contributions

Company employees are not prohibited from making personal donations or contributions to charitable organizations; however, all such donations or contributions made on behalf of the Company or in the name of the Company must be pre-approved by relevant Company executives. Please contact the Human Resources or Marketing departments for further inquiries.

Company employees are not permitted to make political contributions on behalf of, or in the name of, the Company. Political contributions are anything of value given, loaned or advanced for the purpose of influencing or funding an election or political campaign. Not only are federal government contractors (which designation may apply to the Company) prohibited from making contributions or expenditures in connection with federal elections, but there are many federal and state laws governing political contributions. We encourage Company employees who have any questions or concerns with respect to political contributions to contact individuals within the Legal and/or Compliance departments.

Section 5: Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA)

Pursuant to the Foreign Corrupt Practices Act of 1977 (FCPA) and the UK Bribery Act of 2010 (UKBA), it is unlawful to:

- Use corporate or subsidiary funds or assets, either directly or indirectly, or authorize their use, for:
 - » Any improper or unlawful purpose, such as paying or offering to pay anything of value to a foreign official, political party, third party intermediary or private party for the purpose of exerting influence in obtaining or retaining business when such payment is illegal in the U.S., UK or other foreign jurisdiction;
 - » Payment of bribes or kickbacks to obtain privileges, concessions, special benefits or other improper advantage; or the support of any political party or candidate except as permitted by local written law.

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The following actions are also prohibited:

- Accepting payment or anything of value whether characterized as a bribe, kickback, or otherwise, and whether intended to be for SYKES or personal use, if payment and/or receipt of such is illegal, or is designed to cause you to grant a privilege, benefit, concession, or other improper advantage to the payer.
- Establishing for any purpose, an undisclosed or unrecorded fund or asset of SYKES or any of its subsidiaries.
- Failure of an employee to report any suspected breach of the FCPA or UKBA to their line manager or to the Anti-Fraud Hotline.
- Under the FCPA and UKBA, the company must maintain books, records, accounts and controls so that:
 - » All transactions have management's general or specific authorization;
 - » Transactions are recorded in conformity with Generally Accepted Accounting Principles (GAAP) and assets are accounted for (even petty cash);
 - » Access to assets is only in accordance with management's authorization; and
 - » Recorded assets are reviewed periodically for conformance to existing/actual assets.

A company can violate the record keeping provisions of FCPA and UKBA if a foreign subsidiary creates false records to conceal a corrupt payment and the company subsequently incorporates the subsidiary's information into its books and records.

Violators of the FCPA face serious criminal penalties:

- Fines up to \$2,000,000 for companies (officers, directors, or agent of the company may face imprisonment).
- Fines up to \$100,000 per violation for individuals (cannot be reimbursed by the company), plus up to five years in prison.
- Under the Alternative Fines Act: penalties can result in fines up to twice the gain or loss from the offense.

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- Violators of the UKBA face serious criminal penalties:
- Fines for companies and individuals with a maximum fine of £5,000 per summary offense increasing to unlimited fines for an individual found guilty on indictment.
- Imprisonment of an individual up to 12 months per summary offense increasing to up to 10 years for an individual found guilty on indictment.
- Senior directors and officers of a company found guilty of a bribery offense may also be subject to fines and imprisonment

Violators of the FCPA also face significant civil fines of \$10,000 per violation for companies and individuals (officers, directors, employees, agent of the company, or stockholder acting on behalf of the company).

Violation of the FCPA or UKBA may result in disciplinary action up to and including termination.

Antiboycott Laws

U.S. antiboycott laws prohibit U.S. companies and their subsidiaries from participating in or cooperating with any international boycott unless the boycott has been approved by the U.S. government. One important boycott that is not supported by the U.S. government is a boycott of Israel enforced by certain member countries of the Arab League.

Because SYKES is a U.S. based company, all SYKES operations worldwide must comply with U.S. laws pertaining to boycotts. 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

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provisions; or

- discriminating in employment practices (because of race, religion or nationality, for example).

SYKES is required to report any request to take action or provide information that would violate these prohibitions. A boycott request is any request (whether written or oral) to supply information, take action, or refrain from any action that could be considered to support a prohibited boycott. Boycott requests can be subtle and indirect, so be alert for questions such as whether SYKES conducts business in Israel or imports goods or services from Israel.

U.S. Embargoes and Sanctions

SYKES is required to comply with U.S. economic embargoes and sanctions that restrict SYKES from doing business with certain countries, groups and individuals, including organizations associated with terrorist activity and narcotics trafficking. Unless expressly permitted by the U.S. Treasury Department's Office of Foreign Assets Control, economic sanctions prohibit doing business of any kind with targeted governments and organizations, as well as individuals and entities that act on their behalf.

SYKES and its subsidiaries may not approve or facilitate transactions by a third party that SYKES or its subsidiaries could not do directly. Prior to selling or attempting to transact business in a new country, you must review the matter with the SYKES Chief Legal Officer to ensure compliance with U.S. embargoes and sanctions.

Insider Stock Trading / Hedging / Pledging

Because stock of SYKES is publicly traded, there are certain important restrictions and limitations imposed on you under federal securities laws. Any violation of these restrictions may subject the company and you (where permitted by law) to serious criminal and civil liabilities and sanctions, including possible criminal fines. Such action would also severely damage the company's reputation and business relationships.

There are no exceptions for transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency expenditure).

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If you become aware of any material information relating to the company which has not yet been made available to the public by press release or otherwise for at least two full business days, you and your family members and relatives are strictly prohibited from buying or selling SYKES shares, or directly or indirectly disclosing such information to any other person who may trade in SYKES shares.

You should assume that any information, positive or negative, that might affect the company's stock price or otherwise might be of significance to an investor in determining whether to purchase, sell, or hold SYKES stock would be "material".

Examples include:

- A potential new contract, customer, or supplier (or loss of an existing contract, customer or supplier),
- Important new product developments,
- Significant threatened litigation,
- A potential acquisition or disposition of a business,
- A potential refinancing transaction or an important financing transaction,
- Internal financial or budget information that departs in any way from what the stock market would expect.

Also, because serious problems could be caused by an unauthorized disclosure of internal information about the company, you should not discuss internal company matters or developments with anyone outside of the company, except as required in your performance of regular employment duties.

The Company has also determined that there is a heightened legal risk and/or appearance of improper or inappropriate conduct if you engage in certain types of transactions, such as hedging transactions and trading on the margin/pledging transactions.

Hedging transactions can be accomplished through several ways, including through the use of prepaid variable forwards, equity swaps, collars and exchange funds. Such hedging may permit you to continue to own Company securities obtained

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through employee benefit plans or otherwise, but without the full risks and rewards of ownership. In such a scenario, your objectives may not be aligned with those of the Company. Therefore, you are prohibited from engaging in such transactions unless specifically approved in advance by the Company's Chief Legal Officer.

Margin accounts are problematic because Company securities held in a margin account can be sold by a broker without your consent. Similarly, if Company securities are pledged as collateral for a loan, the broker may sell the shares without your consent if you default on the loan. Therefore, to avoid a forced sale at a time when you may possess material, non-public information or during a blackout period, you are restricted from trading on margin or pledging Company securities unless it is in accordance with certain Company-approved procedures. Please consult with the Company's Chief Legal Officer to determine if your proposed transaction conforms with such procedures. Additionally, for directors and officers of the Company, approval of the Chief Legal Officer, President and Chairman of the Board is required and the following limitations imposed:

- i. The number of shares to be pledged cannot exceed 15% of your total holdings of Company stock held in that margin account; and
- ii. You must continue to hold unencumbered shares in an amount that equals or exceeds the number of shares required to be retained by the individual pursuant to the Company's stock retention guidelines.

If you have any doubts as to your responsibilities under this policy statement, please seek clarification and guidance from SYKES' Chief Legal Officer.

Your Behaviors

Protection of Company and Customer Assets

All employees must strive to preserve and protect the company's and its customer's assets. You are expected to use good judgment and common sense when accessing these assets. These assets may not be taken, used, diverted, altered or destroyed without proper authorization.

All employees are expected to refrain from converting assets to personal use. All property and business of the organization shall be conducted in the manner designed to further SYKES' interest rather than the personal interest of an individual

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employee. Employees are prohibited from the unauthorized use or taking of SYKES' equipment, supplies, materials or services. Prior to engaging in any activity on SYKES time that will result in remuneration to the employee or the use of SYKE's equipment, supplies, materials, or services for personal or non-work-related purposes, employees shall obtain the approval of local Human Resources.

Technology assets include hardware, software and physical storage components, telephones, voice mail, the Internet, the Intranet, electronic mail (e-mail). Assets also include instant communications programs and services and any and all instant messaging products/chat systems. Employees using the Intranet and Internet are subject to the same laws and company standards of professionalism as any other business activity.

SYKES and Client Technology Assets

During the term of your employment, you will be exposed to some or all of SYKES and its clients' technology assets and infrastructure. 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), and include instant communications programs and services and any and all instant messaging products/chat systems currently in use or added by SYKES from time-to-time. These resources are the sole property of SYKES, or its clients, and may only be used for authorized purposes to assist in the daily performance of your job, and are not intended for private personal communications.

They 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 the company 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 company technology assets. By using these assets you waive any right of privacy in anything you create, store, send, or receive through any technology asset medium and consent to monitoring of your use of SYKES and its clients technology assets by SYKES.

Only properly licensed software can be installed and used on company computers and related equipment. No software is to be installed until a proper license is purchased and assigned to a specific computer. No unlicensed software can be downloaded at any time. Only authorized SYKES personnel may perform software

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installations.

SYKES considers software piracy a serious violation of company policy and does not condone or tolerate the use of unlicensed software on any company equipment. Any misuse of software or violations of copyright laws must be immediately reported to the local systems administrator or corporate help desk.

You are expected to use good judgment and common sense when accessing company technology assets. If you have any questions about the appropriateness or usage of SYKES or its clients' technology assets, you should seek the advice of your supervisor.

Business Records and Documentation

Each of us have a personal responsibility to ensure that we preserve and protect Company information by making prudent and effective use of SYKES' resources and properly and accurately reporting their financial condition.

All financial reports, accounting records, reports, expense accounts, timesheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation, or financial reporting is contrary to the policy of SYKES and may be in violation of applicable laws.

If you have any questions about the appropriateness or usage of SYKES or its customers' assets, talk with your supervisor.

Non-Disclosure and Confidentiality

During your term of employment, you will be placed in a position to become acquainted with confidential information and materials regarding SYKES and its clients.

- Confidential information and materials include all information belonging to SYKES or SYKES clients.
- You may use such confidential information and materials **during your employment** and solely for the purpose of your job.

The SYKES Confidentiality Policy does not allow you to discuss internal company

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matters or developments with anyone outside of the company, except as required within regular employment duties. No confidential information should be used directly or indirectly for personal gain. The obligation to preserve confidential information continues even after employment ends.

Cooperation in Investigations

SYKES values the trust our communities and customers place in our organization and we uphold that trust by cooperating with investigations and audits. To protect the integrity of investigations and audits, we are not to destroy or alter records in response to an investigation or audit, or when one is anticipated. Additionally, we are not to make false or misleading statements to investigators or discuss an investigation with anyone, unless instructed to do so by investigators. If employees are contacted by an investigator or law enforcement agent, they should know that they have the right not to speak to that investigator or agent or may choose to do so only with an attorney present.

We respond and fully cooperate with government and third-party investigators. If you learn that a government agency or a third party is conducting an investigation or requesting information pertaining to a suspected violation of the law (through issuance of a subpoena, document request, or merely questioning employees), immediately report it to SYKES' Chief Legal Officer or VP of Global Corporate & Operational Compliance, so the process through which we respond can promptly be put into place.

Reporting Policy

A U.S. federal law requires all U.S. publicly traded companies to establish a procedure for employees to report, on a confidential and anonymous basis if desired, fraud in accounting, internal accounting controls, and auditing. In response to this law, SYKES has established an Anti-Fraud Program to address any employee concerns regarding financial reporting.

An employee with a good faith concern related to financial reporting should report that concern, in writing if possible, to their supervisor, the Human Resources office, or the Compliance office. Employees are encouraged to sign such reports so that follow-up questions may be directed to the employee if necessary during the investigation. The company will treat all complaints and reports confidentially.

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All such reports, no matter how received, will be reviewed by SYKES' Chief Legal Officer who will determine what, if any, action is required to be taken. The results of all actions taken or not taken on all complaints will be submitted to the Audit Committee of SYKES Board of Directors for review. Employees submitting written, signed reports will be notified of the results of the investigation.

SYKES employees have a right and responsibility to report questionable or fraudulent activity through our report line. We'll investigate and then take any action deemed appropriate.

Anti-Fraud Reporting Hotline:

USA 1-888-337-7515

International + 1-770-582-5218

Last Updated: May 5, 2020

STANDARDS of CONDUCT

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RESPECT



SECURITY



SAFETY



ETHICS