

# Supplier Code of Conduct

Procurement | June 2025

**CREATED:** April 2014

**LAST REVISED:** June 2025

**VERSION:** 1.3

*This document applies to all employees of Alorica, Inc. as well as any subsidiaries or affiliated entities of the respective companies, each of which is a separate legal entity, (as applicable, the "Company").*

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## INTRODUCTION – BACKGROUND

Alorica is committed to the highest standards of conducting business in a lawful, socially responsible and ethical manner, and expects all its Suppliers engaged in providing products and services to have a similar commitment.

Alorica’s Supplier Code of Conduct (“Code” or “Code of Conduct”) sets out the minimum principles that we expect our Suppliers to follow in their provision of products and services to Alorica and any of our affiliates. “Supplier(s)” means you as a company, including your officers, directors, employees, agents and contractors. Each member of your team is expected to read, understand and act in accordance with it.

In order to become or maintain the status of an approved Supplier to Alorica, all vendors must enroll in and complete the screening process through our Vendor Screening Management Program.

We recognize that customs, practices, regulations and laws differ around the world. This Code should be read as applying globally, but we would highlight that specific regional changes (for EMEA, APAC and LATAM) may apply.

This Code should be read in conjunction with (and is incorporated into) the agreement which governs our working relationship and sets forth the parties’ rights and obligations. There are other policies and documents that are incorporated into the agreement as well. We fully expect our Suppliers to read and act in accordance with those policies and documents. In case of a conflict between the Code and the agreement, the agreement controls unless as otherwise specified herein or as otherwise required by law. Suppliers will ensure any subcontractors it uses in furtherance of your provision of products and services to Alorica (if Alorica permits such use) understand and comply with the Code.

Compliance with this Supplier Code of Conduct is subject to an audit at the discretion of Alorica. Failure to comply with the Code of Conduct may result in discontinuance of current and/or the prevention of future business relationships between Alorica on the one hand and the Supplier and its affiliates on the other.

Suppliers are encouraged to reach out to their Global Procurement contact with any questions pertaining to the Code or whenever there are questions related to the appropriateness of any activity connected to their supplier relationship with Alorica and associated business conduct. In addition, reports of any ethically questionable behavior may be made using the Alorica Anonymous Reporting Hotline at 800-250-5189 or at [The Alorica Integrity Center](#) (hosted by Convercent, an independent third party provider).

## 1 ETHICS AND INTEGRITY

Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, their suppliers, customers and other third parties.

Suppliers are required to conduct their business in a responsible and ethical manner and to exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict of interest. In order to comply with this Code of Conduct, Suppliers must have high standards for corporate governance, carry out their business honestly and ethically, and operate in full compliance with all applicable laws, rules and regulations.

Suppliers must comply with all applicable anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act, and regulations in connection with their work for or on behalf of Alorica. Corruption, extortion, embezzlement, bribery and kickbacks in any form are strictly prohibited.

Supplier is prohibited from engaging in collusive or unfair business behavior that restricts free competition. Supplier will comply with all applicable antitrust and competitive laws. Supplier is encouraged to continuously improve their sustainability practices in their supply chain and counterfeit parts prevention measures.

## 2 GIFT AND ENTERTAINMENT

### 2.1 Prohibited

Alorica Suppliers will not offer, promise or provide to any Alorica employee a kickback, favor, cash, gratuity, entertainment or anything of value to obtain favorable treatment from Alorica. Alorica employees are similarly prohibited from soliciting such favors from Suppliers. This restriction extends to any family members of both Supplier and Alorica employees, or with any other persons with whom Supplier has or Alorica employees have significant personal relationships in exchange for obtaining or retaining Alorica's business. Note: Alorica employees are prohibited from accepting initial public offering (IPO) stock from Supplier.

### 2.2 Acceptable

As long as a gift is not intended to obtain favorable treatment from Supplier, and does not create the appearance of a bribe, kickback, payoff or irregular type of payment, or otherwise raise any potential conflicts of interest, Alorica employees may accept a gift from a Supplier as long as all the following requirements exist:

- The total value of a tangible gift or gifts is of nominal value (\$100 or less per year) or \$200 or less, per year, for intangible gifts/entertainment (such as event tickets, etc.);
- public disclosure would not embarrass Alorica;
- the gift is reasonable and appropriate consistent with Alorica's business practices, and;
- acceptance of the gift does not violate any applicable laws.
- Alorica's Executive Leadership Team and senior management of the intended recipient must approve acceptance of any gift that does not fit within these criteria.

Failure to comply with the above gift guidelines may result in discontinuance of current and/or the prevention of future business relationships between Alorica on the one hand and the Supplier and its affiliates on the other. Alorica employees who fail to follow the above-mentioned process will be subject to disciplinary action up to and including termination.

## 3 MANAGEMENT OF CONFIDENTIAL INFORMATION

"Confidential Information" means any information related to the fact or substance of negotiations, the terms of any agreement between Alorica and the Supplier, and also including, without limitation, all, or any part of, and originals or copies of, any information, in whatever form embodied that Alorica has identified as confidential, and all information concerning Alorica's past, current, and planned products, services, fees, customer financial institutions, customer data, concepts, methodologies, research, business activities, marketing plans, technical and/or platform interfaces. Confidential Information does not include information which: (a) is now generally known to the public or becomes known to the public; provided, however, that it does not become publicly known through disclosure by the Supplier; (b) is possessed by the Supplier in written form prior to its disclosure by Alorica; (c) is received by the Supplier lawfully and in good faith from a third-party who has no obligation to Alorica; or (d) is lawfully and independently developed or acquired by the Supplier without reliance in any way on the Confidential Information.

Suppliers may use Alorica Confidential Information only for the purposes identified and directed by Alorica and must report any actual or suspected violations to Alorica. Confidential Information must not be copied or disclosed to any third party except as expressly permitted in writing by Alorica.

Suppliers must safeguard Alorica Confidential Information using the same standard they employ to safeguard their own information of like kind, but in no event less than a commercially reasonable standard of care. Suppliers will be responsible for any unauthorized use or disclosure of Alorica Confidential Information by their employees, agents, and other representatives as well as another entity receiving or receiving access to Alorica Confidential Information from them. Upon completion or termination of the active supply relationship between Suppliers and Alorica, Suppliers must remove all Alorica Confidential Information from Supplier's systems and

records within 90 days, and certify doing so in writing to Alorica.

The foregoing shall be in addition to any other confidentiality obligations that Suppliers may have pursuant to a contract or other agreement with Alorica.

## **4 MANAGEMENT OF ALORICA PROPERTY**

When authorized to use Alorica property, supplies, equipment and other assets, Suppliers are required to do so responsibly. Suppliers must protect and use responsibly Alorica trademarks, copyrights, trade secrets and other intellectual property when authorized to use such assets, including compliance with licenses and terms of use. Suppliers must not use any trademark or any other intellectual property unless expressly permitted in writing by Alorica.

## **5 SUBCONTRACTORS**

Suppliers that employ subcontractors to supply goods or services to Alorica must disclose the names of all subcontractors to Alorica upon request. In addition, Suppliers are responsible for ensuring that all such subcontractors comply with this Code of Conduct.

## **6 CONFLICT OF INTEREST**

Suppliers will not enter into a financial or any other relationship with an Alorica employee that creates any actual, potential or perceived conflict of interest for Alorica. We understand that a conflict of interest arises when the personal interests of the Alorica employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed and corrected. To disclose any conflict of interest, suppliers can also go to [The Alorica Integrity Center](#) (hosted by Convercent, an independent third party provider).

## **7 FINANCIAL RESPONSIBILITIES**

Suppliers are required to accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices.

Suppliers are expected to comply with applicable standards and requirements for all communities, locations, and markets in which they conduct business. Additionally, Suppliers must use sound financial practices and ensure transparency in financial dealings by implementing and maintaining adequate internal controls.

## **8 SUPPLIER ENGAGEMENT**

Suppliers are required to provide an inclusive and nondiscriminatory working environment in which all their employees are valued and treated fairly. Unlawful discrimination or harassment in the workplace is not tolerated. Suppliers are required to comply with all applicable laws concerning discrimination in hiring and employment practices.

## **9 HEALTH AND SAFETY**

Suppliers are required to abide by all local laws, directives and regulations relating to health and safety in the workplace or in any other location other than the workplace where production or work is undertaken and to implement changes to accommodate any amendments to these laws, directives or regulations.

Suppliers are required to have strict procedures that prevent the use of illegal drugs in the workplace or in any other location other than the workplace where production or work is undertaken.

## **10 HUMAN RIGHTS/LABOR AND EMPLOYMENT LAWS**

Suppliers must be committed to and have respect for the protection and preservation of human rights. While it is the responsibility of each Supplier to define its own policy and approach to the issue of human rights, Suppliers' values and business principles must be consistent with that of Alorica and the United Nations' Universal Declaration of Human Rights. Suppliers are expected to comply with applicable international and local legal requirements in their countries of operation.

Suppliers must ensure that security forces, whether private or public, contribute to the safety and security of individuals and communities without infringing on rights or freedoms as it is important for companies and organizations to adhere to these policies to maintain a responsible and ethical approach to security.

Suppliers must respect restrictions on the export or re-export of goods, software, services, and technology. They should also comply with trade restrictions involving certain countries, regions, companies, entities, and individuals.

## **11 MODERN SLAVERY AND HUMAN TRAFFICKING**

Suppliers will not use forced labor, whether in the form of prison labor, indentured labor, bonded labor, or human trafficking in any form. Alorica requires all Suppliers to comply with all applicable legal requirements of slavery, forced labor and human trafficking laws (e.g. UK Modern Slavery Act of 2015).

## **12 CHILD LABOR**

Suppliers will not use child labor. Suppliers are required to comply with applicable child labor laws and employ only workers who meet the applicable minimum legal age requirement in their countries of operation.

## **13 COMPENSATION, WORKING HOURS & CONDITIONS**

Suppliers are required to comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours in their countries of operation. Suppliers must have a disaster recovery plan for emergencies. Suppliers must ensure that their facilities meet appropriate safety standards.

## **14 ENVIRONMENT**

Alorica is committed to reducing the impact of its operations on the environment and work with Suppliers with the same commitment. Suppliers must comply with all applicable environmental laws and regulations in their countries of operation. Alorica expects Suppliers to support its environmental goals and targets by addressing Suppliers' environmental risks and impacts such as energy usage, water efficiency, waste reduction and sustainable resources management in its operations e.g use of renewable energy sources, monitoring of greenhouse gas emissions from its supply chain.

Suppliers are expected to implement practices that protect forest biodiversity and ecosystems. They should commit to zero deforestation and ensure their operations do not contribute to the illegal logging or degradation of forests. Suppliers must also support sustainable forestry practices that contribute to the conservation of forest resources.

Suppliers must respect the legal and customary land tenure rights of communities, including the rights of indigenous peoples. They should avoid activities that result in the involuntary resettlement of local communities and ensure that any land acquisition is done ethically and in compliance with local laws and international standards.

Suppliers must recognize the importance of water resources and uphold the rights of local communities to access clean water. They should minimize water usage, prevent water pollution, and invest in water

conservation and recycling technologies to reduce their water footprint.

## 15 FREEDOM OF ASSOCIATION

Suppliers must respect the right of workers to form and join trade unions and bargain collectively; or, where law prohibits these freedoms, facilitate parallel means of communication, association and/or bargaining.

## 16 COMMUNITY/PHILANTHROPY

Suppliers are strongly encouraged to provide resources to support and contribute to the communities and countries in which they operate. Our nonprofit partner Making Lives Better with Alorica (MLBA) is one opportunity to give back to local communities in need.

## 17 ALORICA SUPPLIER CODE OF CONDUCT

For additional information regarding the Alorica Supplier Code of Conduct, Suppliers are encouraged to go to the Alorica website at [www.Alorica.com](http://www.Alorica.com).

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## DOCUMENT INFORMATION

INFORMATION	DETAILS
Document Owner	Sourcing and Procurement
Category	Procurement
Affected Location(s)	All Alorica Locations
Parent Document(s)	
Child Document(s)	

## CHANGE LOG

AUTHOR	DESCRIPTION OF CHANGE	DATE REVISED
Dulce Navarrete	Creation of document	04/28/2014
Adam Grossman	Reviewed and Approved	10/31/2016
Jerome Dela Cerna	Converted into new Alorica format – V.1.1	03/07/2017
Adam Grossman	Revised, Reviewed and Approved	10/31/2018
Bing Prima-Patino	Revised, Reviewed	9/30/2023
Cece Pan	Reviewed and Approved	12/04/2023
Sunny Yu	Revised, Reviewed and Approved	1/10/24
Bing Prima-Patino	Revised, Reviewed	6/26/2025

## APPROVAL HISTORY

APPROVED BY	ACTION	APPROVAL DATE
VP Compliance/Sessions	Review & Approval – v1.0	05/13/2015
VP Compliance/Sessions	Review & Approval – v1.1 NF	05/23/2017

## REVIEW POLICY

*This document must be reviewed bi-annually at a minimum or following any changes for relevance. All modifications must have approval from the Alorica VP Procurement and counsel appointed by Alorica. This policy must be reviewed annually for relevance, however, as our business plan evolves so must this document to reflect all changes that may place. All policy changes will reflect compliance with all government and industry regulations, as well as agreeable client safeguards.*

