

Let's do this!

The Alorica U.S. Employee Handbook Revised August 2021



A little honesty here.

We're different than most places you've worked.





It's not just a job to us, it's an opportunity to do something pretty amazing, and love every minute doing it.

So, what do you say?

Together, let's change the game, rock the boat, surprise the naysayers, uplift the spirits, engage the audience... and repeat!



TABLE OF CONTENTS

Welcome to Alorica6	Non-Scheduled Closings 46	Perks	Food and Beverages98
	Open Door/	(Employment Benefits)67	Identification Badges 98
The Legal-ish Part	Communications Policy 47	401(k) Retirement Plan68	Safety99
(Employment Policies)16	Property Agreement/	Funeral / Bereavement Leave69	Solicitation
Affirmative Action and	Headsets	Health Insurance	Standards of Conduct103
Equal Opportunity	Expense Reimbursement49	Coverage/Savings70	Substance Abuse Policy106
Career Opportunities 18	Rehire Eligibility50	Jury Duty 71	Tobacco Use111
Communications and Media Policy19	Reinstatement Eligibility50	Military Leave 71	Visitors
Communication from	Religious Accommodation 51	Paid Time Off (PTO)	Weapons Possession
the Company 19	Health Care Regulatory	and Holidays72	•
Corrective Action 21	Compliance Policy52	Tuition Reimbursement72	Workplace Violence 117
Criminal Conduct and	Lactation Policy52	Workers' Compensation73	
Background Checks 22	Separation of Employment 54		Where We Get All Technical (Workplace Technology) 113
Disabilities and Reasonable		Time Off For More Important Things	Communication Monitoring114
Accommodations27	Everyone's Favorite Part	(Leave of Absence Policies)74	•
Employment Classifications30	(Payroll And Work Schedules) 55	California Pregnancy Disability	Computer Network Use Limitations -Prohibited Activities
Employment of	Timekeeping Policy56	Leave (PDL)	Computer Software and
Family Members30	Fair Labor Standards Act Employee Classifications 61	California Family Rights Act	Computer Crime115
Dating 31	Pay and Payroll Overview62	(CFRA)75	Passwords117
Employment Records34		Family and Medical Leave Act	Permitted Use of Internet and
Employment Verification34	Overtime	(FMLA)76	Company Technology117
Harassment, Discrimination	Pay Distribution62	Personal Leave	Personal Cell Phones and Other
and Retaliation35	Pay Period62	Reinstatement from Leave82	Equipment118
Sexual Harassment	Pay Statements	Return to Work from Leave82	Social Media
Other Types of Harassment39	Payroll Deductions63		Virus Detection124
Responsibilities 41	Payroll Garnishments 64	Your Side Of The Deal	
Zero Tolerance 41	Pay Transparency64	(Employee Responsibilities)83	Handy Links, Numbers
Internal Complaint Procedure42	Work Hours65	Attendance84	& Resources125
Legal Protections and	Work Schedules65	Business Practices85	
External Remedies	Day of Rest	Clean Workstation95	
Human Trafficking46		Confidentiality	
Immigration Law Compliance46		Dress Code	

Welcome to Alorica. Let's do this!

We don't blame you if you're a little nervous. Starting a new job is huge! But worry not—you're part of the Alorica family now, and we're here to support you as you learn the ropes and beyond. You wouldn't be here if we didn't believe in your awesomeness, because as you may have heard, at Alorica we live to create insanely great customer experiences—and that starts with inspiring, passionate people like you. What else makes us unique?

Call us crazy, but we think serving customers is awesome.

We believe that creating consistently satisfied customers is not just our goal, it's the only acceptable outcome. It's why we deliver dazzling, uber-connected experiences 24/7 for the world's greatest brands.

So what's the secret sauce?



Passion

Saying it with feeling to solve it for good. It takes doing everything with conviction and a constant eagerness to help others and solve problems. It's what you do when you were born to challenge the status quo. It's why you find the brightest, most spirited people and find ways to unleash their inner superhero.



Performance

Up, up, up—higher and better we go. to the next level and deliver results. Bring your A-Game. Shoot! Score! inspire people to give it their all—on a global scale—from empowering

Go big or go home.



Possibilities

Breaking down barriers to liberate outcomes. Challenge the status quo, inspire creative thinking, and generate innovative solutions. We paper and an entrepreneurial spirit, believing the sky is the limit. That's how you realign what the world at the expected ways—until you can blow them away.



Combine passionate people with powerful solutions and the possibilities are limitless. That's how our company became a world leader, and how you'll become one too. Joining together with fellow Aloricans in the common pursuit to deliver insanely great customer experiences.

But the job's not done. In many ways, we've just begun. And that's where you come in. You're about to help us all make lives better... one interaction at a time.

Pretty exciting stuff, wouldn't you say?

EMPLOYEE HANDBOOK 101

Smartphone down, ears up. Class is in session.





Yes, while this may be a bit drier than what you're used to, please try and pay attention. Our Executive and Human Resources teams worked really hard to give you everything you need to be successful here.

(Plus, there may or may not be a quiz at the end.)

Welcome to Alorica,

Sometimes referred to as ("the Company") in this document. We believe the success of our business is largely due to the quality of its employees (that's you), and the development of each employee's potential. Because the quality of our employees is the key to our success, we carefully select our new employees, so if you're reading this now, pat yourself on the back for being carefully selected! In turn, we expect employees to contribute to the success of the Company and its continued growth in the industry.

This handbook applies to all employees of Alorica, Inc. ("Alorica") in the United States, including Alorica subsidiaries and affiliated entities (the "Company"). As an employee, it is your responsibility to read and comply with the policies in this Handbook. If you have any questions or need additional information, please ask a member of management or your site Employee Experience Representative for assistance.

This handbook is designed to familiarize you with our major policies and highlight Alorica's practices and benefits. It cannot address every question you may have about your employment—if it did, we might just

be tempted to add telepathy to our many awesome services. So any lingering questions regarding Alorica's policies or procedures should be referred to Employee Experience or a supervisor. Employment with Alorica is "at-will." Alorica or its employees are free to terminate the employment relationship at any time, with or without cause or advance notice for any reason not prohibited by law. This "at-will" relationship cannot be modified, except by a valid employment contract or a written agreement signed by the President of the Company. The policies in this handbook and benefit plan documents are not intended to create a contract for employment and do not guarantee the continuation of benefits or employment. This handbook contains the policies and practices in effect at the time of publication. All previously issued handbooks and any prior inconsistent policy or benefit statements or memoranda are superseded by this document.

EMPLOYEE HANDBOOK 101

Because Alorica is an evolving organization, circumstances will require policies, practices, and benefits described in the handbook to change from time to time. As allowed by applicable law, the Company reserves the right to amend, supplement, rescind, or make exceptions to any provision of this handbook and/or any other Company policy at any time, as it deems appropriate at its sole discretion. In the event of a conflict between the policies in this handbook and any applicable law, the governing law applies. The handbook is Company property for internal use only. So please, no posting, sharing or spoken word readings from this handbook at your next open mic night. You'll have to come up with your own material.





THE LEGAL-ISH PART

EMPLOYMENT POLICIES

They're not just the law, they're how we roll here.

Affirmative Action and Equal Opportunity

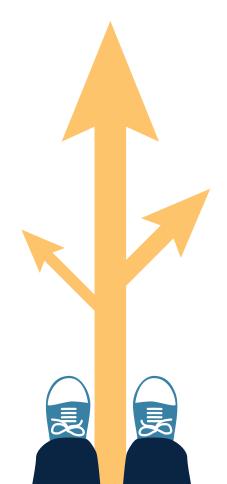
An honest appraisal. Respect at all times. These are deeply held core beliefs here at Alorica.

Alorica is a federal contractor/subcontractor, meaning we are a company that does business with the federal government. Alorica supports the government's requirement to take affirmative action to make sure that applicants and employees are not treated differently due to race, color, religion, sex, national origin, age, marital status, veteran status, sexual orientation, condition of mental or physical disability, genetic information, gender identity, including status as a transgender or transsexual individual, pregnancy and/or sexual orientation. Seriously, we walk the talk on this.

It is the policy of Alorica to provide attractive and rewarding employment. Our recruitment and personnel policies are administered on the basis of merit, regardless of race, color, religion, sex, national origin, age, marital status, veteran status, condition of mental or physical disability, genetic information, gender identity, pregnancy, sexual orientation or any other factor not related to job requirements and sound business practice.

Employment decisions will be made on the basis of each applicant's qualifications, experience and abilities.

The continuous development of an inclusive work environment yields great returns, not just in our organizational effectiveness and efficiency, but also to Alorica's bottom line. We take affirmative action to employ and advance employment of all persons.



A solid affirmative action program strengthens the workforce with a greater breadth of talent and viewpoints within Alorica. Additionally, it provides us with hiring practices and strategies, improved community relations and allows us to compete for federal government contracts.

Equal Opportunity Employment

Alorica wants to employ the best-qualified individuals for each position. Alorica promotes equal opportunity employment to all employees and applicants regardless of race, religion, color, sex, age, national origin or ancestry, marital status, sexual orientation, gender identity, including status as a transgender or transsexual individual, disability, veteran status, pregnancy, genetic information, medical status, or any other basis protected by federal, state or local law, ordinance or regulation. The objective of this policy is to ensure that individuals are treated consistently and according to the law throughout the employment process at Alorica. This policy applies to all aspects of the employment relationship, such as recruitment, hiring, training, promotion, compensation, benefits, transfer, discipline, lay-off and dismissal.

Career Opportunities

Come for the job. Stay for the career.

Hey, we want you to work here as long as it makes sense for both of us. We pride ourselves in making sure ambition and dedication are acknowledged. It's our goal to help you develop a life-long career with Alorica, so go ahead and check out the job openings posted on the Company Intranet and on Company bulletin boards as often as you want.

As a general rule, employees are required to remain in a position a minimum of six (6) months before being eligible for promotion or transfer to another department. An employee on any active corrective action (see page 21 for a description of corrective action) may not be considered for promotion or transfer.

Communications and Media Policy

(Sorry, your 15 minutes of fame won't be during work hours.)

Policy Purpose: Maybe you wanted to be a reporter, or a spokesperson, or even a member of the paparazzi, but that's not why we hired you. There are lots of reasons why a company must require that employees follow the corporate media policy. Alorica has put in place the following Communications & Media Policy in order to make sure (1) that clear and factual information is given to the public on behalf of the Company, (2) that you or any other employee of Alorica are not victims of inaccurate reporting, and (3) to make sure that any privacy and confidentiality concerns of both you and our clients are protected.

Communication from the Company

By accepting employment with and continuing to work for the Company, you are providing express written permission and consent authorizing the Company (including its affiliated entities and employees) to contact you manually or automated at any telephone number, including mobile/cell or similar device, or email address you provide at any time related to employment with or property

of the Company (or property of its clients) regardless of your employment status at the time of the communication.

If you provide a phone number for which you are not the owner, you confirm you are authorized to provide that number. You agree to pay any fee(s) or charge(s) that you may incur for incoming communications from us or outgoing communications to us, to or from any such phone number or email address, without reimbursement from Alorica.

To change your communication preferences or to revoke consent please write to the Company at EmployeeExperience@alorica.com. You may revoke your authorization for most communications, however you cannot revoke authorization for emergency or other legally required communications.

Internal and External Communications:

Communication on behalf of Alorica and any of its affiliates is restricted to Corporate Employee Experience, the Company's Executive Management, Corporate Communications or VP of Marketing. This policy applies to any kind of Company communications and announcements, including, but not limited to, email, posts, tweets and verbal communications made internally or externally.

This means all communications of any kind made on behalf of the Company with members of the media or any other external party (including interviews, answering any questions, providing quotes to be used in printed form, giving access to our facilities to the media, etc.) may only be done with the expressed prior consent of Corporate Employee Experience, the Company's Executive Management, or the VP of Corporate Communications or VP of Marketing. This policy applies across the board to all Alorica employees, including our agents and Site Directors.

The Press and Other Media:

Only specifically authorized people (Corporate Employee Experience, Company Executive Management, and the VP of Corporate Communications) can do interviews on behalf of Alorica with the press. In other words, if you do not know whether or not you can speak to the media on behalf of the Company, then you should not meaning that swanky new shirt will have to be saved for another occasion. Every once in a while, a member of the Local Management team may be given authorization from Corporate Employee Experience, the Company Executive Management, or the VP of Corporate Communications to communicate with the press on Alorica's behalf. Discussions about the identity of the Company's clients, their services, or other client information may be in violation of confidentiality obligations to the Company as an employee and may be grounds for dismissal.

What Should You Do If Contacted?

If contacted, questioned, or requested for an interview by anyone from the media (press) regarding Alorica, including either by phone, by email or in person:

- Respond, "no comment." (Here is your official chance to say that!)
- Tell your immediate supervisor, Employee Experience contact, and Site Director about the request.
- Tell the person to contact the Director of Public Relations for all media inquiries.

This policy should not be interpreted to interfere with your rights to discuss terms and conditions of your employment as provided under the National Labor Relations Act.

If a local newspaper wants to interview you about Alorica sorry, but no. If TMZ hits you up for the latest Alorica buzz uh uh, not allowed. If Oprah wants to have you on her show to discuss all the awesomeness of the company—well that would be sweet, but still, no.

Only the Company and the people assigned to speak for Alorica are allowed to do so. And yeah, it's a pretty important rule. Sorry, Oprah fans.

Corrective Action

We've all been in situations where a good thing goes bad. Alorica wants to provide a productive work environment for you, to encourage the maximum in human relations skills, and to take consistent and positive steps to resolve attendance, conduct, or performance concerns. So, Alorica has established policies to help you, and all employees, work efficiently and help correct any work-related problems. Naturally, let's hope we never get to any of them.

In cases where an employee doesn't follow the policies or meet job requirements, the employee will be issued a corrective action notice. The corrective action notice may be a Step I - Verbal Warning; Step II - Written Warning; Step III - Final Written Warning (Probation); or Step IV - Involuntary Termination. Management may, at their discretion, elect not to proceed through any or all steps in the corrective action procedure as some breaches of policy may warrant more advanced applications up to and including immediate termination.

Corrective action may begin at any step appropriate to the seriousness of the offense. Nothing in this Corrective Action plan alters or restricts the at-will employment relationship described earlier in this handbook.

Criminal Conduct and Background Checks

Because of the nature of our business, criminal conduct may result in an employee's reassignment or corrective action—up to and including termination (subject to applicable law).

The following provides you with some additional information about Alorica's background check process.

Types of Background Checks:

Pre-employment. A pre-employment, postconditional offer background check is required for any candidate being considered for employment (including rehires). Employment offers are conditional pending successful completion of a background check.

Post-Hire. An existing Alorica employee may be subject to a job-related background check for reasons including but not limited to the following:

- Change in job duties (e.g., transfer to a new role; change in responsibilities [including but not limited to job-related client requirements]: change in Company policy)
- Safety (e.g., circumstances which lead the Company to conclude an employee poses a risk to the safety or security of the Company, client, or customer; any of their employees; or member of the public)
- Audit result (determination, following a routine or ad hoc Company audit, that a required pre-employment background check was inadvertently not conducted)

- Post-hire follow-up
 - where employment or continuing employment was conditioned on resolution of a job-related criminal charge which was pending when original background check was conducted
 - where an existing employee is arrested or charged with or convicted of a job-related crime, the employee must report the arrest, charge, or conviction to Employee Experience. Reports must be made within five (5) days of the arrest, charge, or conviction. In such circumstances, the report may result in an employee's reassignment or disciplinary action up to and including termination of employment. Failure to make such a report may result in corrective action up to and including termination of employment. If an employee is not certain whether a crime is job-related, the employee should contact his/her supervisor. other member of management, Employee Experience, or the Company's reporting hotline.

Components:

Subject to applicable law and by way of example only, Alorica's background check may include the following components:

- SSN Validation
- Criminal history
- Employment verification
- Education verification
- Professional references
- Personal references
- Motor vehicle records
- Credit history
- Debarment
- Fingerprinting

Criminal History:

The Company will only inquire about convictions and guilty, no contest, and nolo contendere pleas (subject to applicable law). Unless expressly required by law, the Company will not inquire about arrests which are no longer pending and did not result in a conviction; a criminal charge which was erased, dismissed, or nulled; a conviction which has been expunged, sealed, or statutorily eradicated, impounded by the Court, or absolutely pardoned;

anything pertaining to a juvenile record; or other matters which may not be considered by an employer in determining employment eligibility as a matter of law.

Authorization:

If and as required by law, the Company will require and obtain written authorization from an applicant or employee (if already hired) and provide any appropriate documentation, including any legally required disclosures, prior to conducting a background check. (Authorizations previously obtained from an applicant or employee will remain valid during employment as permitted by law.) Individuals may refuse to complete or sign a background check authorization form. However, such refusal may make the individual ineligible for employment or continuing employment, which in turn may result in a withdrawal of the individual's employment offer or termination (if already employed).

Evaluation of Criminal History:

A criminal conviction or plea is not an absolute bar to employment, but the information provided may

be considered by the Company in its employment decisions as permitted by law. Criminal history will be evaluated on an individualized, job-related basis and used only as needed for legitimate business purposes.

Various factors may be considered in determining the impact of criminal history on one's eligibility for new or continuing employment including but not limited to: nature of the job or job sought and the relevance of the offense to the specific position; nature and gravity of the offense; number of offenses; time that has passed since the conviction or plea and/or completion of the sentence; any relevant evidence regarding rehabilitation; whether employment or continuing employment of the individual would pose an unreasonable risk to the business; and any other relevant information, including information submitted by the individual.

Depending on the job or job sought and by way of example only, job related offenses may include, without limitation, those pertaining to violence. theft, and dishonesty.

Impact of Background Check:

If the Company determines that an applicant or employee has not satisfied the background check requirements specific to the position the individual has or is seeking (as applicable), the employment offer may be withdrawn, or employment may be terminated (as applicable).

If an existing employee does not satisfy a background check conducted in connection with a new role, the employee may be ineligible for not only the new role, but also the employee's existing role, which may result in the employee's termination of employment depending on the job requirements of the existing role and job-relatedness of the background check results to that role.

If background check results make an applicant or employee ineligible for the role the individual is seeking or holds, the individual may elect to apply and may be eligible for other positions, depending on the job requirements of the other role and the job-relatedness of the background check results to that role.

Notification and Dispute Process:

A notification will be sent to an individual if the background check results may in whole or in part affect the individual's eligibility for employment or continuing employment (if already hired). This communication will include a letter providing the individual an opportunity to dispute the background check results, a copy of the background check, and any other legally required documentation.

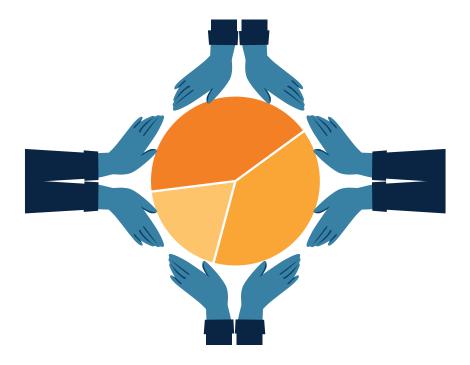
Candidates have a right to dispute the accuracy and/ or completeness of the background report obtained by the Company from a third-party background check vendor (a "Consumer Reporting Agency" or "CRA") by directly contacting the CRA. The CRA does not participate in any employment decision by the Company and will not be able to provide specific reasons the Company may choose to take an adverse employment action. If a candidate successfully disputes the results of his or her background check, consideration for employment will be re-evaluated in light of post-dispute, updated background check.

In addition, an individual is entitled to provide directly to the Company any additional information and/or explanation which the individual believes may be relevant to the Company's decision-making process. Such information will also be considered by the Company in evaluating an individual's eligibility for employment.

If the individual does not, within the reasonable time frame specifically provided by the Company, (i) satisfactorily explain to the Company his/her background check results, or (ii) successfully dispute with the CRA the accuracy or completeness of the record provided by the CRA, the Company will proceed with the proposed adverse employment action (including but not limited to a decision not to hire or termination).

Accurate Reporting:

The Company reserves the right to withdraw any offer of or terminate employment (if already hired) upon concluding the individual has engaged in falsification, omission, or other misrepresentation of any fact provided in connection with one's application for employment or continuing employment (including, without limitation, resume, application form, and verbal statements), regardless of when the discovery is made.



Disabilities and Reasonable Accommodations

Alorica's Commitment:

Alorica values its diverse workforce and is dedicated to complying fully with the Americans with Disabilities Act (as amended) and similar state and local laws.

To further our commitment, the Company will provide reasonable accommodations for known physical and mental disabilities of qualified individuals to enable them to apply for employment, perform essential job duties, and enjoy the benefits of employment—unless the accommodation would impose an undue hardship on the Company or post a direct threat of substantial harm.

The Company will also provide reasonable accommodations related to pregnancy, childbirth, lactation, and religion, as required by applicable law.

1. Employees granted a leave of absence, including but not limited to a leave as an accommodation, are required to apply accrued but unused PTO during an otherwise unpaid leave of absence, subject to applicable law.

What is an Accommodation?

Generally, an accommodation is a change to a policy or procedure, job duties or the employment experience. Examples of an accommodation include, without limitation: making facilities accessible. job restructuring, modifying work schedules, providing or modifying equipment, changing policies, reassignment to a vacant position, and leaves of absence.1

An employer does not have to eliminate an essential job function, reduce uniformly applied production standards, or provide personal items used in daily activities on and off the job as a reasonable accommodation.

The Accommodation Process:

To request an accommodation related to a disability, applicants and employees should contact the Leave and Accommodations (L&A) Department using the Company's designated self-service portal (if and as available) or by email at leave.accommodations@alorica.com. Other accommodation requests should be directed to local Employee Experience. Employees do not have to use

"magic words" to request an accommodation; they simply need to let their manager, Employee Experience, or the L&A Department know they need an adjustment or change at work for reasons related to their own medical condition. The request can be verbal or written and can be made by an applicant, employee, or someone on their behalf. Managers and Employee Experience who receive disability-related accommodation requests will promptly notify the L&A Department, which will take the lead on managing the process.

To allow Alorica to effectively consider and make an informed decision about the individual's request, the Company (through the L&A Department) may ask for information from the individual and/or his or her health care provider, where authorized. This information may include, for example, confirmation that the individual is disabled (if not known or obvious), the accommodation requested, disability-related limitations, and how the accommodation will help the individual in his or her employment.

The Company will not ask for more information or documentation than is needed to effectively evaluate and respond to an accommodation request. All information collected in connection with this process will be treated as confidential and will be maintained separately from the individual's personnel file and in accordance with applicable law.

Alorica is committed to working with employees to identify and provide reasonable accommodations, and we encourage employees to suggest specific accommodations. The Company is not required to grant the requested accommodation and can provide an alternative reasonable accommodation as long as it is effective. The Company will assess each request on a case-by-case and individualized basis.

An individual is not required to accept an accommodation offered by the Company. However, employees are expected to perform the essential functions of the job with or without an accommodation; rejecting an effective reasonable accommodation may interfere with the ability to satisfactorily perform their job.

The accommodation process is an interactive one. requiring collaboration by both the Company and the individual with a disability. An individual who does not meaningfully cooperate in the interactive process might jeopardize his or her ability to receive a reasonable accommodation.

The accommodation process is also ongoing. Therefore, if a request is denied, an accommodation does not seem to be effective, an employee's job duties are modified, or his or her medical condition or work restrictions change, the applicant or employee is encouraged to provide additional information and/ or request a different or additional accommodation, as applicable.

Got questions? Get answers!

Employees may contact any member of management, Employee Experience (HR) or the L&A Department with questions about the Company's accommodation policy or process.

Discrimination, Retaliation, and Open Door Policy:

Alorica strictly prohibits discrimination based on all protected categories, including disability. The Company also prohibits retaliation for requesting or using a reasonable accommodation. Employees should promptly notify Alorica using any avenue of the Company's Open Door Policy, including The Integrity Center (Alorica's reporting hotline. which can be reached at www.theintegritycenter. com), of any suspected discrimination, retaliation, or failure to provide an accommodation.

Remember, if you see or hear something, say something! Acting with integrity-including Speaking Up if you believe something isn't right—is everyone's responsibility.

Employment Classifications

Employees are classified as one of the following:

Full-time:

If your actual worked hours are equal to or greater than 30 hours per week. Full-time employees receive Company benefits subject to the terms, conditions and limitations of each benefit program.

Part-time:

If your actual worked hours are less than 30 hours per week. Part-time employees are not eligible for Company benefits. Part-time employees retain their status unless and until notified of a change in writing.

Temporary/Seasonal:

If you work in a job established for a specific period of time or for the limited duration of a specific project or group of assignments. Temporary/Seasonal employees retain their status unless and until notified of a change in writing. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary/ Seasonal employees are not eligible for Company benefits unless required by law.

Agency Temporary:

A temporary worker who is not an employee of Alorica but an employee of an agency vendor and is paid wages by the agency and engaged on a temporary basis, free from control and direction of Alorica.

Employment of Family Members

Working closely with a family member is just not a good idea. And boy, are the annals of history filled with anecdotes to prove this. To prevent concerns that may result from the employment of family in a reporting relationship (one person being the other person's boss), family members may not hold a position less than two (2) levels removed within the reporting relationship. For purposes of this policy, a family member is defined as a spouse (including domestic partnership), child (including step-child), parent (including in-law), sibling, aunt/uncle, first cousin, grandparent, niece/nephew, individual sharing the same household, and/or person within a romantic relationship.

Any family member/relationship should be disclosed to Employee Experience to determine if another working arrangement is possible. Alorica, at its sole discretion, may decide that the relationship in question creates a conflict of interest, creates legal liability, or raises concerns about supervision, safety, security, or morale. Alorica may take whatever action it feels appropriate, according to the circumstances, up to and including transfer or termination.

For example, even if your brother-in-law is a really awesome guy, and it would make your spouse uber happy if you helped him finally get a job that doesn't involve frying anything, but the only available position would place him within two levels of you—then unfortunately, Alorica's family-member policies still apply—because we want you to both succeed in your job and enjoy drama-free holiday gatherings for a long, long time.

Exceptions to this policy must be approved by both the Chief Employee Experience Officer (CEEO) and the Chief Operations Officer (COO) or by the President/Chief Executive Officer (CEO).

Dating

Alorica is fortunate to have a fantastic team of employees interacting and building professional relationships with each other in the workplace.

At times we realize co-worker relationships may develop on a personal level that go beyond the workplace, such as dating and/or romantic or intimate involvement. This policy provides employees guidance on these types of relationships as they relate to or affect employment and the workplace to help: (i) foster compliance with Alorica's other policies; and (ii) maintain and avoid any such relationships interfering with a respectful and inclusive work environment.

Co-worker Relationships:

Co-worker relationships must be consensual and conducted in a professional manner at all times while in the workplace or when employees are otherwise acting on behalf of Alorica. Any relationship or interaction which interferes with the work environment or any employee's productivity, creates a potential conflict of interest, or otherwise violates Alorica policy, including the Harassment, Discrimination, and Retaliation Policy, will be

addressed with appropriate action depending on the circumstances, which may include disciplinary action up to and including employment termination.

Supervisor/Management — **Employee Relationship Limitations:**

Due to the potential for conflict of interest or other impact on individual employment and/or the work environment, Alorica prohibits supervisors and other members of management from dating or otherwise having romantic or intimate involvement with any employee who (i) directly or indirectly reports to that supervisor or (ii) is otherwise considered lower level relative to the other individual (i.e., a nonsupervisory employee or lower level supervisory employee in any department), unless the relationship has been expressly approved per this policy. If in doubt, it is always better to ask Employee Experience. While all employees are expected to abide by this policy, as with all policies, supervisors and other members of management are expected to lead by example by complying with policies, holding others accountable for compliance, and reporting any suspected non-compliance. Failure of supervisor or other members of management to do so may result in disciplinary action up to and including termination of employment.

Relationship Reporting Process:

Employees should contact their supervisor, Employee Experience, another member of management, or Alorica's reporting hotline if they become aware of any relationship that may be inconsistent with this policy.

For Example: You've learned your Team Manager (TM) is in an intimate relationship with your co-worker. What should you do? Notify Employee Experience or any avenue of the Open-Door policy to allow review of the matter.

If you are involved in a relationship at work that is or may be contrary to this policy (or you are a supervisor and become aware of an actual or potential relationship contrary to this policy) you MUST disclose it to Employee Experience immediately for proper review. In addition, employees who are offered supervisory or higher level managerial roles must disclose past relationships with any employee who would be considered a subordinate following the promotion. Further, you must contact Employee Experience before getting involved in a relationship at work that is or may be contrary to this policy.

EMPLOYMENT POLICIES

For Example: As coworkers, Pat and Chris are friends and occasionally date each other. Chris was just offered a supervisor role. Is disclosure of their relationship necessary? Yes, Chris must immediately notify Employee Experience to determine next steps.

For Example: A supervisor becomes aware of another manager being intimately involved with a direct report of the manager. What should the supervisor do? The supervisor must notify Employee Experience immediately.

*Above are only examples, and not inclusive of all situations that would require you to report a matter to Employee Experience.

Alorica will evaluate the nature of the relationship and take appropriate action, based on the circumstances. While all employees are required to notify Employee Experience of the relationship per policy, failure of a supervisor or manager to notify Employee Experience of any relationship contrary to this policy may result in disciplinary action up to and including termination of the supervisor/manager.

Exceptions to this policy must be approved by both a member of Employee Experience and a business leader, each of whom must be at a Vice President level or above.

Contact Employee Experience if you have questions or need further clarification about this or other policies.

As a reminder, Alorica strictly prohibits harassment of any type, including sexual harassment. Per the Harassment, Discrimination, and Retaliation Policy and Internal Reporting Procedure, employees should promptly escalate any concerns using any avenue of the Open Door policy without fear of retaliation.

Employment Records

Keep us up to date! Please update Employee Self-Service with any changes in your name, address, telephone number, marital status, number of dependents, direct deposit/pay card, beneficiary, and any other data that is kept in employment records.

Access to Employment Records:

Alorica strives to protect employee privacy. Employee personnel files are Company property. Access to these files is restricted to the employee and members of management and/or Employee Experience who have a legitimate business need-to-know. Employees who are granted access to personnel files are responsible for maintaining the privacy of employees.

Current employees are permitted to review their personnel files in the presence of Employee Experience within five business days of a written request to Employee Experience at a date and time that is mutually convenient for the employee and the Employee Experience representative. Employees may not remove any portion of the file from the premises, but may request a copy of any specific portion of their file.

Former employees and third parties who are not affiliated with the Company will be given access to employee files only in accordance with federal, state, or local laws or pursuant to a valid subpoena.

Employment Verification

All employment verification requests for current or former employees are managed by The Work Number via its website at www.theworknumber.com or via phone at 1-800 367-5690. Requesters should provide the present or former employee's Social Security number and the company code 12561.



Harassment, Discrimination and Retaliation **Purpose:**

The purpose of the policy is to foster a safe and respectful workplace free from harassment and discrimination, to define appropriate behavior at work, and to prohibit and prevent harassment, discrimination, and retaliation. At Alorica, we're committed to a workplace in which all individuals are treated with respect and dignity. Every Alorica employee has the right to work in a professional environment that promotes positive relationships and respect, and is free of discrimination, harassment, and retaliation.

Policy Statement:

In keeping with this commitment, Alorica has a zero tolerance policy with respect to harassment and discrimination: harassment or discrimination of applicants or employees because of race, religion, creed, color, national origin, ancestry, physical or mental disability, medical condition, marital status, age, military and veteran status, genetic information, sexual orientation, gender, gender identity, gender expression, sex, including sexual harassment, and

any other category protected by law is unacceptable, and will not be tolerated, period. Retaliation for reporting a good faith complaint of harassment or discrimination or participating in an investigation relating to such a complaint, will likewise not be tolerated.

Scope:

This policy applies to all employees of Alorica, including supervisors and non-supervisory employees, and prohibits harassment and discrimination of employees in the workplace by any person, including non-employees. It also extends to harassment by customers, vendors, independent contractors, and other third parties doing business with Alorica and further prohibits sexual harassment of applicants for employment, interns (whether paid or unpaid), contractors, and non-employees providing services to Alorica in the workplace.1

The Law:

Federal law prohibits discrimination—including harassment—based upon an individual's race, color, religion, sex, or national origin, as stated in Title VII of the Civil Rights Act of 1964. Federal law also prohibits discrimination based on disability (under the Americans with Disabilities Act as Amended [the "ADA"]) and based on age (under the Age Discrimination in Employment Act [the "ADEA"]). Many states and municipalities have passed similar laws and ordinances offering additional protections to employees, such as California's Fair Housing and Employment Act ("FEHA"), New York State Human Rights Law, and New York City's Stop Sexual Harassment Act.

An action does not need to rise to the level of violating federal or state law before it will be considered a violation of this policy. Alorica's policy prohibiting discrimination, harassment, and retaliation based on legally protected categories may prohibit a broader range of conduct than would be needed to meet a legal definition of "harassment," "discrimination," or "retaliation" as applied by the courts or governmental agencies.

Discrimination:

Alorica prohibits discrimination against employees and applicants on the basis of a protected classification (such as, race, religion, creed, color, national origin, ancestry, physical or mental disability. medical condition, marital status, age, military and veteran status, genetic information, sexual orientation, gender, gender identity, gender expression or sex). Discrimination can take the form of intentionally discriminating against an employee or applicant because of their protected characteristic, such as refusing to promote an individual because of their race, sex, or religion. Discrimination can also occur when an employer has a facially neutral policy or practice that unduly burdens employees in a protected class, and the employer does not have a legitimate business reason for this policy or practice.

Harassment:

Harassment is a form of employee misconduct. It is unwelcome or offensive behavior based on a legally protected category and may take many forms, including, but not limited to, slurs, jokes, comments, pictures, drawings, cartoons, gestures, physical assault, or blocking normal movement. Behavior that is not intended to be offensive can still constitute harassment.

Harassment in violation of this policy can occur in person, in writing, by telephone (including voice or text messaging), via the Internet (including email or through social networking sites like Facebook and Twitter) or any other means of communication. It may occur in the workplace and also outside the workplace, such as when on a business trip or attending a company event.

Sexual Harassment

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, gender identity and the status of being transgender. Sexual harassment may include offensive or unwelcome sexual advances, verbal comments or innuendo of a sexual nature, words of a sexual nature used to describe a person or depict a situation, or the display of sexually suggestive objects or pictures. Comments, physical touching of another person, or other behaviors which are not explicitly sexual in nature, may also constitute sexual harassment. Unwelcome sexual advances, requests for sexual favors and other verbal, physical, or visual conduct of a sexual nature constitute sexual harassment contrary to company policy when:

1. Submission to such conduct is either an explicit or an implicit term or condition of employment (including, but not limited to, promotion, training, timekeeping, and assignments); or

- 2. Submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual; or
- 3. Such conduct has the purpose or effect of interfering with work performance, or creating or maintaining an intimidating, hostile or offensive work environment.

Sexual harassment also includes the harassment of an individual based on that individual's non-compliance with gender stereotypes (for example, harassment of a man for being "too feminine"). Sexual harassment may occur between a man and a woman, between two men or between two women, or between multiple individuals regardless of their gender.

Examples of behavior that would be considered sexual harassment under company policy include, but are not limited to, the following:

- a. Unwelcome physical behaviors:
 - Physical contact.
 - Unwelcome physical advances such as unwelcome kissing, pinching, patting, or fondling.
 - Offensive body action such as leering, standing too close, or making sexually explicit gestures.
 - Assault or coerced sexual acts.

- b. Unwelcome non-physical behaviors:
 - Offensive comments such as repeated comments about one's anatomy, attire, or appearance.
 - Repeated jokes or remarks that are stereotypical or derogatory to members of one sex.
 - Unwelcome attention such as persistent unwelcome flirtation.
 - Unwelcome verbal advances such as expressions of sexual interest or sexual inquiries.
 - Unwelcome comments about an individual's body, sexual prowess or sexual deficiencies.
 - Favoring an applicant or employee because that person has performed or shown a willingness to perform sexual favors for a supervisor.
 - Unwelcome and persistent social invitations.
 - Unwelcome sexual propositions.
 - Sexually explicit or obscene messages on any medium including voicemail or computer.
 - Use of demeaning or inappropriate terms, such as "babe" or "honey".
 - Use of crude and offensive language.
 - Displays of pictures, posters, and/or cartoons that may be considered offensive.

 Sexual bribery, such as offering an evaluation, promotion, or other advantage in exchange for sexual favors or threatening punishment for refusal of favors (referred to as "quid pro quo" harassment).

Sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises or not during work hours.

Other Types of Harassment

Harassment based on other protected classifications (such as race, religion, creed, color, national origin, ancestry, physical or mental disability, medical condition, marital status, age, military and veteran status, genetic information, sexual orientation, gender, gender identity, or gender expression) is also strictly prohibited. Examples of behavior that would be considered harassment under company policy include, but are not limited to, the following:

- Negative verbal or written statements and/or other actions that are directed at an employee because of his or her protected classification, including use of offensive language.
- Verbal or written statements and/or other actions that demean a person because of his or her protected classification. Such statements and/or other actions need not necessarily be directed to a particular employee to be considered harassing. Offensive actions or statements that are seen or overheard by fellow employees can also create a hostile work environment.

Retaliation:

Retaliation is a form of discrimination that is unlawful under federal, state, and (where applicable) local law, and strictly prohibited at Alorica. Retaliation occurs when an employee or applicant is punished for asserting their right to be free from unlawful employment discrimination, including harassment. For example, it is against company policy to retaliate against an employee or applicant for taking any of the following actions in good faith:

- Filing, being a witness, or assisting in a discrimination charge, complaint, investigation, or lawsuit;
- Communicating with a supervisor, manager, or Employee Experience employee about suspected employment discrimination or harassment:
- Answering questions during an employer investigation of alleged harassment;
- Encouraging a fellow employee to report harassment:
- Refusing to follow orders that would result in discrimination:
- Resisting sexual advances, or intervening to protect others;

- Requesting accommodation of a disability or for a religious practice;
- Asking managers or co-workers about salary information to uncover potentially discriminatory wages.

Responsibilities

All Employees:

Employees are responsible for complying with and enforcing this policy against harassment, discrimination, and retaliation. If you believe you have been the victim of prohibited conduct or if you have witnessed such conduct, you must immediately follow the Internal Complaint Procedure outlined below so that the matter can be promptly investigated and addressed as appropriate. Employees are also expected to make truthful reports and cooperate in internal and government investigations.

Management:

Managers, supervisors, and Employee Experience have a leadership role and their behavior must provide a model of the standards required by Alorica. They must also ensure that employees are aware that harassment, discrimination, or retaliation will not be tolerated and that complaints will be treated seriously. Any member of management who becomes aware of a complaint of harassment, discrimination, or retaliation or who observes or becomes aware of such a situation must immediately report the matter to Employee Experience, as outlined above. Failure to do so will result in disciplinary action, up to and including termination.

7ero Tolerance

Alorica has a zero tolerance policy when it comes to any sort of harassment, discrimination or retaliation.

Corrective action, up to and including termination of employment, will be taken against any employee who engages in this type of behavior. While the company maintains zero tolerance for harassment, discrimination, and retaliation, the correction action taken will correspond to the relevant facts and circumstances, including the gravity of the misconduct.

Any supervisor, manager, team manager, or Employee Experience employee who has knowledge of any sort of harassment, discrimination, or retaliation must promptly notify Alorica using the company's internal complaint procedure. Failure to take action to end or report such behavior, as required by this policy, will result in corrective action, up to and including termination.

Alorica's Internal Complaint Procedure

Regarding Discrimination, Harassment, and Retaliation

- 1. If you believe you have witnessed or experienced harassment, discrimination, or retaliation, you should immediately notify your supervisor, team manager, a member of the Employee Experience Department ("HR"), other management employee with whom you are comfortable, or the company's Reporting Hotline. You may call Alorica's toll-free Reporting Hotline at any time at 800-250-5189 or online at theintegritycenter.com.
- 2. You may initiate an internal complaint verbally or in writing. While no special form is required, the Employee Experience Department has a complaint form available for use here: engage.alorica.com/hr/forms/. You may also submit a complaint by providing the information requested via the Reporting Hotline describing the concern and relevant details (e.g., description of concerning event/action/issue, location, timing, and any witnesses).

- 3. Any supervisor or manager who is notified of any complaint of harassment, discrimination, or retaliation—or is aware of any situation that may constitute harassment, discrimination, or retaliation—must immediately notify Employee Experience using the contact information above, either verbally or in writing.
- 4. Alorica has an open door policy. Human Resources representatives, management, and the company's Reporting Hotline are available to receive complaints from employees during normal business working hours, with or without appointments.
- 5. When Alorica receives a complaint, it will conduct an impartial, fair, timely, and thorough investigation which provides all parties appropriate due process and enables the company to reach reasonable conclusions based on the evidence collected. The investigation will be conducted by a qualified person trained to conduct such investigations.
- 6. Alorica will take every reasonable step to promptly resolve complaints.

- 7. Confidentiality of the complaint, complainant, and investigation will be maintained to the fullest extent possible, consistent with conducting a complete investigation.
- 8. No one should be considered to be in violation of this policy because an investigation is being conducted.
- 9. Alorica will interview all relevant witnesses. including the complainant, and review all relevant documents. Employees who are interviewed as part of an investigation are expected to fully cooperate and share information they may have regarding the investigation. Failure to do so may result in corrective action. Dishonest statements made during an investigation will likewise result in disciplinary action, up to and including termination of employment.
- 10. Alorica will communicate with the complainant (in writing, when possible) regarding the status of the complaint, investigation, results of the investigation, and that appropriate action was taken, and give the complainant an opportunity to respond. However, details pertaining to other applicants or employees will generally not be

- disclosed to the complainant in the interest of the privacy. If the complainant has any complaints about the results of an internal investigation of sexual harassment and related retaliation. he or she may also contact Alorica's VP, Workforce Compliance & Diversity as an additional resource at EEOconsultant@alorica.com.
- 11. Alorica will track all investigations and maintain written records of all investigatory steps, any findings or conclusions of the investigation, and any remedial actions taken.
- 12. If an investigation confirms that an allegation of a violation of this policy is substantiated, remedial measures will be taken, including appropriate discipline, up to and including termination of employment.
- 13. Alorica shall not tolerate retaliation against any employee for use of this Internal Complaint Procedure or any external complaint procedure. for assisting in the investigation of a complaint, or for otherwise assisting in a complaint. However, misuse of a complaint procedure or false reporting will not be condoned and will result in disciplinary action, up to and including termination.

Legal Protections and External Remedies

While Alorica sincerely appreciates the opportunity to receive and address workplace concerns, this Internal Complaint Procedure does not replace the right of any employee to file a charge or complaint of discrimination, harassment, or retaliation under any available municipal, state, or federal law. If you believe you have suffered discrimination, harassment or retaliation, you may—in lieu of or in additional to utilizing this Internal Complaint Procedure—choose to pursue legal remedies with the following governmental agencies at any time.

Federal Agency:

The Equal Employment Opportunity Commission (the "EEOC") enforces federal anti-discrimination laws, including Title VII of the 1964 Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.), the ADA, and the ADEA. The EEOC has district, area, and field offices where complaints can be filed or an individual can contact the EEOC through the following methods:

Website: www.eeoc.gov

Email: info@eeoc.gov

1-800-669-4000 (voice) / 1-800-669-6820 (TTY)

State Agencies:²

California

The California Department of Fair Employment and House (the "DFEH") enforces California antidiscrimination laws, including the Fair Employment and Housing Act ("FEHA"), codified as Cal.Gov. Code § 12900 et seq. An individual can contact the DFEH through the following methods:

Website: www.dfeh.ca.gov

Email: contact.center@dfeh.ca.gov

1-800-884-1684 (voice) / 1-800-700-2320 (TTY)

^{2.} For a full listing of appropriate state and local agencies, please contact Alorica's Employee ExperienceDepartment. Additionally, if a claim of harassment involves physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

New York

The New York State Division of Human Rights ("DHR") enforces the Human Rights Law ("HRL"), codified as N.Y. Executive Law, art. 15, § 290 et seq., which applies to employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and nonemployees regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the DHR or in New York State Supreme Court. Complaints with the DHR may be filed any time within one year of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged discrimination. An individual may not file with DHR if they have already filed a HRL complaint in state court. Complaining internally to Alorica does not extent your time to file with DHR or in court. The one year or three years is counted from the date of the most recent incident of harassment.

You do not need an attorney to file a complaint with the DHR, and there is no cost to file with DHR. DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. The DHR can also be contacted as follows:

Website: dhr.ny.gov

Email: complaints@dhr.ny.gov

1-888-392-3644 (voice) / **718-741-8322** (TTY)

Local Protections:

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights ("CHR"). Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York. An individual may also call 311 or (212) 306-7450 or visit https://www1.nyc.gov/site/cchr/index.page.

^{*}Text is for U.S. phones only. Standard message and data rates apply.

Human Trafficking

And like the Federal Government, Alorica is committed to a work environment that is 1000%. unequivocally free from human trafficking, forced labor, and unlawful child labor. We strongly believe that we are responsible for promoting ethical and lawful employment practices. Which means these practices are also required to be followed by our suppliers, subcontractors, or business partners worldwide. If you or someone you know needs assistance, please contact the National Human Trafficking Resource Center at 1-888-373-7888.

Immigration Law Compliance

Alorica is committed to full compliance with federal immigration laws. These laws require that all employees complete a Form I-9 provided by the Department of Homeland Security and provide documentation of his/her identity and legal authorization to work in the United States. Alorica participates in the E-Verify program.

All offers of employment and continued employment are conditional on receipt of satisfactory evidence of identity and legal authorization to work in the United States.

Non-Scheduled Closings

Dangerous weather, asteroids, swarms of angry

bees... we've got a plan for these and other unexpected events to ensure you're aware of any last-minute need to close any Alorica facility: Our Emergency Status Hotline telephone number from Employee Experience/Site Management. For your safety and convenience, please make sure you've got this number programmed into your phone so you can call during severe weather conditions or other non-scheduled events. We'll keep you in the loop by continuously updating the Hotline messages.

CHANNEL/RESOURCE	TYPES OF QUESTIONS OR CONCERNS (Examples Only)
Your Alorica Direct Supervisor	Questions Or Concerns About Day- To-Day Job Expectations; Office Or Team Policies, Practices Or Procedures; Scheduling; Training; Workplace Safety; Team Member Or Client/Customer Conflicts; Or Disagreement With Employment Decisions.
Other Member Of Alorica Management	Same As Above If You're Not Comfortable Contacting Your Direct Supervisor, Or If You're Not Satisfied Or Still Have Questions After Speaking With Him Or Her.
Alorica Employee Experience (A.K.A. HR)	Same As Above If You're Not Comfortable Contacting, Or Not Satisfied Or Still Have Questions After Contacting Your Direct Supervisor And/ Or Other Member Of Management; Or If You Have Questions Or Concerns About Alorica Policies, Practices, Or Procedures.
The Integrity Center (provides anonymous reporting option)	Same as above if you're not comfortable contacting, or not satisfied or still have questions after contacting any other channel of the Open Door Policy; or to report suspected violations of Alorica policy, ethics or legal obligations; or to make an anonymous report of any nature.
VP Workforce Compliance & Diversity @ EEOConsultant@alorica.com	If you have a complaint about the results of an investigation into concerns of harassment, discrimination or retaliation at Alorica, Alorica's VP Workforce Compliance & Diversity is another channel to support you.

Open Door/Communications Policy

At Alorica, we put *integrity* in *every interaction*.

And, an important part of doing that is maintaining a *Speak Up!* culture. That means we want to hear from you if something doesn't seem right, if you have other concerns or even if you have questions about your job or Alorica in general. Now, these aren't just words—we truly believe that when employees Speak Up!, it creates a better employee experience and makes us a better company. It's also the right thing to do—and doing the right thing is what we're all about.

So where do you go with a question or concern?

We have an App Open Door Policy for that. Alorica's Open Door Policy strongly encourages you to use any of our communication channels— such as your Alorica supervisor, any other Alorica manager you're comfortable with, an Employee Experience representative (a.k.a. member of Alorica's HR team) or The Integrity Center. The Integrity Center is Alorica's reporting hotline which is operated by an independent third-party. It can be used anonymously and is available 24/7 online at theintegritycenter.com; by phone at 800-250-5189 (or a country specific number which can be found on The Integrity Center homepage); or by text at 702-766-3761*. Reports are reviewed and handled by a member of Alorica's incident management team or another designated subject matter expert. Any of our reporting channels can be used without fear of retaliation it's always *safe* to *Speak Up!* at Alorica! And remember, each of us is responsible for helping to make sure we maintain an open and inclusive workplace environment.

So what Open Door Channel should you use?

Well, that's easy—it's up to you! However, the chart below may provide some guidance to help you find the resource best suited to assist with the question or concern you have. While there are no limits on whom you can contact, to help ensure your inquiry gets promptly and effectively addressed, where possible, please let the resource you contact attempt to resolve or escalate the matter before contacting another resource.

Nothing set forth in this policy is intended to or should be construed to interfere with any employee rights. This includes the right to report concerns, make lawful disclosures and communicate with any governmental authority regarding potential violations of law, as well as any right to engage in concerted activity provided under Section 7 of the National Labor Relations Act.

For more information, also see Alorica's Policy and Internal Complaint Procedure Regarding Discrimination, Harassment, and Retaliation located earlier in this Handbook.

Property Agreement / Headsets

All newly hired employees will receive and sign a Property Agreement during the onboarding process. You must sign this agreement outlining the responsibilities and procedures concerning receipt and care of Company-owned property.

With exception to our Work at Home agents (who are required to provide their own equipment) and select locations, non-exempt employees hired as Customer Service Representatives (CSRs) at Alorica call centers are issued a headset. Let's face it—this is an important piece of equipment considering we're on the phone all day!

Except in states where prohibited by law, each CSR receiving a headset will have a \$15.00 security deposit deducted from each of their first two paychecks for a total deposit of \$30.00. This deposit will be returned to you at the end of your employment, when you return the headset to your supervisor or a member of Employee Experience.

If you lose your headset you may be charged an additional security deposit, but if it stops working properly we'll get you a replacement headset right away. You are responsible for securing it, and

making sure it's in good working condition. If it's damaged (outside of normal wear and tear), or not returned upon separation of employment, you will forfeit the \$30.00 deposit, unless otherwise prohibited by state law.

So basically what we're saying is, imagine your headset is an adorable baby duckling, giant chocolate bar, winning lotto ticket, or whatever will help you safeguard it and there should be no problem!

Expense Reimbursement

Alorica will reimburse your authorized personal expenditures related to the conducting of the Company's business, subject to applicable law. Alorica will only reimburse actual expenses incurred; the Company does not pay "per diem."

Where required by law, the Company reimburses employees fully for any necessary and reasonable expense incurred in the performance of their duties for the Company. Any questions regarding expense reimbursement should be directed to your supervisor or Employee Experience.

Rehire Eligibility

Eligibility for getting hired again is determined based on how you left Alorica the last time. The decision to rehire an employee is an individual decision based on a number of considerations. including the circumstances surrounding your previous termination, your time and attendance record, and your job performance. Below are the categories of separation and the respective eligibility provisions.

Voluntary Termination (if you quit your job):

If you worked through the first two (2) weeks of employment, you are immediately eligible for rehire. If you guit and didn't work through the first two (2) weeks of employment, you may apply for consideration of employment after a six (6) month waiting period.

Involuntary Terminations (if Alorica requested you leave your job):

If you were involuntarily terminated because of reductions in work force/position eliminations, you are immediately eligible for rehire. If you were involuntarily terminated for performance or

behavioral issues, you are eligible to reapply with us three years from the last day of your previous employment period. If you were involuntarily terminated for fraud, theft, falsification of records or other similar reasons, you are ineligible for rehire. Look at the Separation of Employment section for more detailed information. Exceptions to this policy must be approved by the Chief Operating Officer (COO) and the Chief Employee Experience Officer (CEEO).

Reinstatement Eligibility

If you are rehired within 30 days of leaving, you are reinstated with your initial service date in effect at the time of the most recent termination date. You will be immediately reinstated to your previous benefits selection, if applicable. You will not be able to change selections until the next Open Enrollment Period. You must pay any missed premium deductions.

If you are rehired after a separation of greater than 30 days, you will be subject to the New Hire eligibility requirements for benefits.

This policy applies to regular full-time employees only; temporary or seasonal personnel are not eligible for an adjusted service date. If you transfer within the Company or its subsidiaries, you will retain your original service date.

Religious Accommodation

Alorica prides itself on diversity and respects the religious beliefs and practices of all employees. If you request an accommodation for such observances, when a reasonable accommodation is available that does not create an undue hardship on the company's business, we will do our best to make it work. If your religious beliefs or practices conflict with your job, work schedule, or with the Company's policy or practice on dress and appearance, or with other aspects of employment, and you seek a religious accommodation, you must request the accommodation through Employee Experience. You may make the request verbally or in writing, although written requests are encouraged. In order to help us meet your needs and reach an accommodation in the shortest possible time, it is useful if you provide the following information:

- 1. A description of the accommodation you are requesting:
- 2. The reason you need the accommodation;
- 3. A brief explanation of how the requested accommodation will help resolve the conflict between your religious beliefs or practices or lack thereof and one or more work requirements; and
- 4. Any additional information about your religious beliefs or practices and the request that will be useful in evaluating your request.

We are committed to working with you to reach a reasonable accommodation. Please keep in mind that while we encourage you to suggest specific accommodations that will meet your needs, the Company is not required to grant the specific requested accommodation and reserves the right to provide an alternative, effective accommodation to meet your needs without imposing undue hardship on the Company.

Health Care Regulatory Compliance Policy

Alorica takes its commitment to maintain privacy and confidentiality of Protected Healthcare Information seriously. Alorica will take appropriate corrective action against any employees and contractors who violate any of the Company privacy policies or any federal or state confidentiality laws or regulations, including the health Insurance Portability and Accountability Act of 1996 ("HIPAA").

Employees who work with our healthcare industry projects are required to refer to and review the Alorica Healthcare Compliance Policy and Playbook.

Lactation Policy

The Company is dedicated to providing a supportive environment to allow breastfeeding employees to express milk during work hours.

Company Responsibilities:

Alorica shall provide the following for employees who seek a lactation accommodation.

- Flexible Breaks for Milk Expression: If possible, break time to express milk shall run concurrently with any authorized break time already provided to employees. If additional time is needed beyond authorized paid rest breaks, additional reasonable unpaid break time will be provided to an employee to express milk.
- A Private Place to Express Milk: The Company will provide breastfeeding employees with a clean, private room (not a toilet stall or restroom), with access to electricity or alternative devices.
- A Safe Place to Store Milk: Expressed milk may be stored in Company-provided shared refrigerator(s) or in the employee's personal cooler; coolers can be stored in the lactation room or another location arranged between the employee and Employee Experience.

Employee Responsibilities:

- Communication: Employees who wish to express milk during their workday should notify management or Employee Experience of their request for a lactation accommodation. They should also note their desired break times, so that appropriate arrangements can be made to address the needs of both the employee and the Company.
- Maintenance of Milk Expression Areas: Breastfeeding employees are responsible for cleaning up after themselves in the lactation area.
- Milk Storage: Employees are welcome to store expressed milk in an on-site Company refrigerator. Because Company refrigerators are shared by Alorica employees, employees may wish to label expressed milk with their name to avoid inadvertent disposal or misuse.
- Use of Sign-Up Sheets to Share Lactation Room: When there is more than one breastfeeding employee in the office or on-site, employees should use a designated lactation room sign-up sheet—maintained by Employee Experience—to indicate when each individual plans to use the lactation room.

Employees are encouraged to address any questions about the Company's lactation support program to their Employee Experience representative.



Separation of Employment

We all know that sometimes things just don't work out. It sucks, and we surely hope it never happens. But now's the time to go over the terms of a potential goodbye.

Separation from Alorica is classified as voluntary (you initiated leaving the company) or involuntary (the Company initiated you leaving). If an employee resigns voluntarily, they must give a minimum two-week written notice and are expected to work with pay during their last two weeks of employment, and continue to perform to acceptable standards. After submitting your resignation notice, you may complete an Exit Interview with Employee Experience. This allows you to communicate your views on working at Alorica, and helps us continue to improve the employment experience.

Upon separation from the Company, you are expected to return all Company information and property, such as badges, files, manuals, keys, and computer equipment (including headset).

You will receive your final paycheck on the next scheduled payday or within the time required by law. Please note that bonus payments will not be made after an employee's separation from the Company unless mandated by state law.

Alorica does not pay out remaining accrued and unused PTO upon termination of employment, unless mandated by state law.



EVERYONE'S FAVORITE PART

PAYROLL & WORK SCHEDULES

The ins and outs of clocking in and out and other guidelines for managing your shift.



WORK SCHEDULES AND PAYROLL

Timekeeping Policy

Alorica is committed to complying with all applicable timekeeping and wage payment laws and making sure its non-exempt (a.k.a. hourly) employees are paid accurately and completely for all hours worked. This policy is designed to help hourly employees and their supervisors understand the company's timekeeping and wage payment expectations. It contains key expectations but is not an exhaustive review. Alorica will comply with any applicable law more generous to employees than this policy might appear to provide. Employees are also encouraged to contact their supervisors or Employee Experience with any questions.

Before we get into expectations, let's review some key timekeeping concepts.

What is Work Time?

Work time is all hours worked for Alorica—whatever, whenever, wherever! For example, work includes regular duties, administrative tasks, training, addressing system issues, logging in/out of and opening/closing computer networks and applications, and travel on behalf of the company; whether it occurs at an Alorica site, a client site, or at home—and whether it's performed before, during or after regular working hours.



WORK SCHEDULES AND PAYROLL

What About Technical Issues?

Work time includes time spent addressing company or client computer, network, and other technical issues (including any issue experienced while logging in or out). The amount of time that may be required to address a technical issue will vary—and there is no limit on the time—but we always aim to get the issue fixed as soon as possible. Therefore, employees are expected to promptly notify their supervisor of any technical issue so it can get quickly resolved. Employees will be paid for the time they spend reporting and working on system issues. so employees must record all such time. In instances where technical issues cannot be resolved within 30 minutes, an employee's supervisor may relieve the employee of all duty. As a reminder, employees who are relieved of all duty and free to engage in personal activities are not working—and not on the clock.

For additional information on reporting and resolving technical issues, employees should refer to Alorica's **US WAH IT Support Policy** (which can also be found on the Employee Experience page on Engage under Guides & Policies).

What Are Breaks?

- Breaks are off-duty periods provided by company policy or law. They're for eating, stretching, checking what's trending, phoning home (especially if it's been a while!), or simply doing nothing. In other words, employees are relieved of all duty and are not working.
- Short rest breaks are paid, and longer breaks (typically 30 minutes or more) are unpaid.
 They are always off-duty and uninterrupted.
- Subject to applicable law, hourly employees who work at least a six- (6) hour shift are provided one (1) paid rest break of ten (10) minutes (plus time to get to and from the rest area) and one (1) unpaid meal break of at least 30 minutes; employees who work at least an eight (8) hour shift are provided two (2) paid rest breaks of ten (10) minutes each (plus time to get to and from the rest area), and one (1) unpaid meal break of at least 30 minutes.¹ Managers may allow or require a different break duration or schedule based on business needs, but never less than what the law provides.²

^{1.} California employees should refer to EIS for the timing, duration and frequency of meal and rest breaks.

^{2.} This policy is not intended to limit an employee's ability to take breaks to use bathroom, which can be used as needed, or for an authorized accommodation permitted by law (such as those pertaining to lactation, disability, pregnancy and religion).

- All breaks must be taken away from one's workstation. Breaks may be taken away from company premises.
- Notwithstanding company policy or other management-approved schedules, employees are entitled to meal and rest breaks permitted or required by law, which may be different or more generous than what is outlined here. Contact Employee Experience for local rules.

What is Travel Time?

- Travel time is time spent traveling for the company, excluding the "personal commute." Travel time includes travel in a single workday, out-of-town and overnight. Travel time is paid work time. (The personal commute, unpaid meal breaks and other off-duty time other than paid rest breaks are unpaid—even when out-of-town on business.)
- The personal commute is travel between one's home (or other home base) and work. Personal commute time during which no work is performed is typically unpaid, off-duty time. If an employee regularly works at home and is required to report to a work site, travel between home and the work site is paid time.

What are Waiting and On-Call Time?

- Waiting time is when employees are on the job but waiting to work or waiting for instruction or assignment. It's paid work time unless employees are relieved of all duties and free to engage in personal activities without restrictions on where they can go and what they can do.
- On-Call time is when employees have been relieved of duty but told they may be called back to work. Whether on-call time is paid depends on a variety of factors, such as the extent of restrictions on movement, required response time and frequency of being called.

What is PAD Time?

Hourly employees are not permitted to perform any work before clocking in or after clocking out of the timekeeping system. Employees who clock in/out using a computer are automatically paid daily "PAD Time" to cover all time spent logging in/out of and opening/closing computer systems and applications at the start of, during, and at the end of their shift (including at the start and end of meal breaks). PAD Time is in addition to the time hourly employees are paid while they are clocked in.

PAD Time can be viewed on the "Summary" and "Other Paid Hours" tabs of an employee's timesheet in EIS. It is shown on these tabs as a decimal which represents the time as a percentage of an hour: for example, 0.05 is 5% of an hour or three minutes, and 0.10 is 10% of an hour or six minutes. The PAD Time shown in EIS normally should cover all time spent logging in/out of and opening/closing computer systems and applications, but employees should make corrections to their time entries if necessary to make sure all work time is accurately reported and paid.

For employees who clock in and out using the computer, first thing after logging in to the computer, they are expected to clock in and start working; and last thing before logging out of the computer, they are expected to stop working and clock out.

Now that we've covered the basics, let's review some important Do's and Don'ts.



Do's and Don'ts

- Record all time accurately. Hourly employees must accurately record all hours worked and off-duty meal breaks taken of at least 30 minutes, including accurate start and end times.
- All work time must be paid. All time worked (including overtime) must be paid—period.
 Advanced approval for working overtime is expected, but time worked will be paid no matter what.³
- Do not work off the clock—ever! Off-the-clock work—working without recording time—is strictly prohibited. This means hourly employees may not do any work before clocking in, after clocking out, or during any off-duty time.
- Work as scheduled. Schedules are important for business planning and work-life balance. You may start working up to five (5) minutes before your scheduled start time and stop working up to five (5) minutes after your scheduled end time.
 Do not start any earlier or stop any later without management approval. And remember, if you're working, it's on-the-clock—regardless of the scheduled start and end times.

- Do not require, encourage or allow off-the-clock work. Even suggesting off-the-clock work or looking the other way is unacceptable.
- Never falsify time records. Time entries must be accurate, and may not be falsely adjusted up or down by anyone. Clocking in or out for another employee (other than a supervisor making a legitimate timecard entry or correction) is considered falsification, and is strictly prohibited.
- Use estimates and schedules for planning only.
 Always record actual work hours. Do not rely on estimates or schedules for timekeeping.
- Paid rest and unpaid meal breaks must be completely off-duty. Employees must be relieved of all duties during their meal and rest breaks. These breaks may not be discouraged, interfered with or interrupted. Breaks may not exceed the scheduled duration or frequency unless permitted or required by law. Unpaid meal breaks taken must be at least 30 minutes long and will be scheduled accordingly. Employees should not clock in/out for short rest breaks as they are paid.

^{3.} To allow for effective business planning, employees must get advanced approval from their supervisor for any schedule change requests (including requests to work overtime). Alorica will pay for all work time, including overtime. But repeated failure to get advanced approval of schedule changes (including overtime) may result in corrective action, up to and including employment termination.

- Off-duty and mobile devices. Hourly employees are not required or expected to carry or use mobile devices (such as cell phones or tablets) for work reasons during a meal or rest break, or while otherwise off duty. Notwithstanding, all hours worked must be recorded and paid—including mobile device usage, if any.
- Hourly employees and their supervisors must carefully and promptly review and approve time records. Hourly employees must complete their daily timekeeping certification to confirm the accuracy of their time records (including PAD Time) and correct any missing or inaccurate entries. Any necessary corrections must be documented manually if a system is not available to do so.
- Report any suspected non-compliance. If you believe anyone working for or acting on behalf of Alorica has done something which is contrary to our timekeeping or wage payment policies or applicable law, promptly notify Alorica using any channel of our Open Door Policy-including the company's reporting hotline (at www.theintegritycenter.com or 800-250-5189).

Remember, Alorica prohibits retaliation for reporting suspected violations of company policy or law.

Fair Labor Standards Act (FLSA) **Employee Classifications**

Once you're hired, you'll be assigned a specific classification based upon your job title, job description and the nature of your duties. Classifications are defined as follows under the Fair Labor Standards Act:

Exempt Employees:

Jobs that are classified as being executive, administrative, or professional in nature. These categories of employees are not eligible for overtime pay.

Non-Exempt Employees:

Jobs that are classified as staff. These categories of employees are eligible for overtime pay.

Awesome Employees:

This is not really an official classification within the Fair Labor Standards Act, we just made it up. But if it were, we have a feeling you'd be one of them.

Pay and Payroll Overview

Yay, it's Payday!!

It is Alorica's policy and practice to accurately compensate employees in compliance with all applicable federal, state and local laws. To ensure that you are paid correctly for all time worked and that no improper deductions are made, please correctly record all work time and promptly review your paystubs to identify and report any errors.

Overtime

Non-exempt employees are entitled to overtime pay for time worked over 40 hours in a workweek. Employees will receive pay for daily overtime worked if and as required by local law. Communication between employees and their supervisors helps employees understand the expectations of their job; it also helps supervisors understand what support and resources their employees might need. For this reason, and to allow for effective business planning, Alorica expects employees to seek approval in advance from their supervisor for schedule changes—including any request to work overtime. Of course, Alorica will pay for all work time—whenever it's worked—including

overtime. But repeated failure to obtain authorization in advance of working overtime (or any other schedule changes) may result in corrective action, up to and including employment termination.

Pay Distribution

You can select either Direct Deposit or Pay Card to receive your pay. Please enroll in Direct Deposit or update your bank information through Oracle Employee Self-Service or see a Employee Experience or Payroll representative to select a payment method.

Pay Period

Please refer to the Company's Payroll Calendar for Pay Period Start Date, Pay Period End Date, and Pay Date. A Payroll Calendar is available in Employee Experience.

Pay Statements

Pay statements are posted electronically on a secure website at my.adp.com. Your pay statements and W2s are available 24 hours a day, and pay statements are posted the Thursday before payday.

If you are newly hired and have not received a paycheck yet, you will need to wait until the Thursday before your first pay date to register with ADP.

To register:

- 1. Go to https://my.adp.com and enter registration code Alorica2-ALR and click 'go'
- 2. Begin registration by entering the requested information to verify your identity, and follow the prompts to complete the registration. Enter your email address to receive your activation code and registration confirmation. Please note, you'll need to retain your username and password, as these are needed to log in to the myADP website.

Payroll Deductions

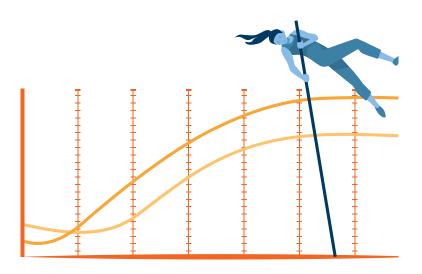
Alorica is required to deduct certain amounts for Income Tax, Medicare, and Social Security from the total amount you earn each week. The amount deducted depends upon your earnings and the information supplied on the W-4 form you filled out. Alorica can, with your prior written authorization, make other deductions for such things as health/ dental insurance, etc. If allowed by law, Alorica reserves the right to deduct money you owe to the Company from your paycheck after all appropriate taxes have been withheld and the minimum wage requirements have been met under applicable federal and state laws.

We make every effort to ensure our employees are paid correctly. As hard as we try, occasionally, mistakes happen. When mistakes are called to our attention, we will promptly make any necessary correction.

Please review your paystubs promptly and contact Employee Experience if you believe a mistake has occurred or if you have any questions regarding any deductions from your pay.

Payroll Garnishments

Alorica complies with mandatory agency and court Garnishment Orders to withhold wages, and charges administration fees as allowed by law. This may include reporting lump sum incentives, which may delay, reduce, or dissolve incentive payment to the employee. Employees are encouraged to directly contact those agencies issuing Garnishment Orders with any questions or concerns. If an employee has a question regarding a garnishment or child support order, please contact ADP Garnishment Hotline at 866-324-5191 for assistance.



Pay Transparency

As a Federal contractor, Alorica will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, if you have access to the compensation information of other employees or applicants as a part of your essential job functions, you cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by Alorica, or (c) consistent with your legal duty to furnish information. In other words, no gossiping, please.

Work Hours

The actual hours of your normal workday or work schedule will vary depending on your department's operational needs. Notification of changes to your work schedule due to operational demands will be provided with reasonable notice. That said, there may be circumstances where Alorica may not be able to provide advance notice of scheduled changes based on business need. Alorica reserves the right to assign employees to jobs other than their usual assignments when required. We consider ourselves one big happy team here, so we really appreciate your understanding if and when these things come up. Besides, don't you love mixing things up on occasion?

In addition, you may be required to work overtime or hours other than those normally scheduled when necessary (overtime must be approved in advance by a supervisor or manager). Exempt employees should expect to work past business hours and on weekends if necessary to complete their job duties.

Work Schedules

Office hours vary depending upon where you work, what you do and the needs of our clients. You're always free to discuss your schedule or request an adjustment to your schedule with your supervisor just please understand that while Alorica will try to accommodate these scheduling or rescheduling requests, our business needs may prevent our ability to approve them.

Day of Rest

Part of an insanely great employee experience is maintaining work-life balance. Our work at Alorica is important to our clients and their customers, and for our own sense of purpose. At the same time, we appreciate and respect the importance of your lives outside of work.

It's important to recognize that from time to time, business needs will require longer-than-usual workdays or workweeks. We strive to keep these instances to a minimum, but when they do occur, it's time to roll up your sleeves and get the job done! Of course, Alorica will always do right by our team,

such as paying required overtime, providing workplace accommodations and abiding by any other applicable requirements. These requirements include day of rest or consecutive work day rules in some locations.

California:

All California employees are entitled to one day's rest in a workweek. This does not mean employees cannot be required to work seven (7) consecutive days. Rather, for every workweek, California employees get one day of rest. For example, one can be asked to work 12 consecutive days in two workweeks, so long as Day 1 and Day 14 are days of rest. Of course, we don't anticipate working 12 consecutive days to be the norm. We think rest is important too.

California employees can choose to work seven (7) days in a workweek on a voluntary basis. However, no one can require, pressure or encourage a California employee to forego one day of rest in a workweek. There are limited exceptions to the California's day of rest rule. Contact local Employee Experience to find out when exceptions might apply.

Other Locations:

Other locations may have rules about working on a specific day or a specific number of consecutive days; Alorica will always abide by those laws. Managers should always partner with Employee Experience before requiring an employee to work seven or more consecutive days, a weekend day or when an employee has requested a day off as an accommodation. Being proactive in this way will help ensure we are complying with the law while supporting our employees and meeting business needs.

PERKS

EMPLOYMENT BENEFITS

The occasional free donut is great, but in the long-term these are the perks that really matter.

Les Col

401(k) Retirement Plan

Like it or not, retirement will one day be here.

Alorica provides a 401(k) Retirement Savings Plan (the Plan) to help you save money for retirement. To log into RetireSMART website, please visit www.retiresmart.com and enter your SSN and PIN provided to you.

If you have forgotten your PIN or are otherwise unable to login, please call 1.800.74 FLASH (743.5274).

You are eligible to join the 401(k) Plan on the first of the month following 90 days of employment.

Subject to IRS limits, the Plan allows you to elect how much of your salary you want to contribute to the Plan and to direct the investment of your contribution into professionally managed investment funds. You are always fully vested in your own contributions and entitled to those contributions upon termination of employment regardless of how long you work at Alorica.

The Company may also make a matching contribution. At the end of five (5) years of employment, you are fully vested in the company's matching contributions. Employees may obtain specific plan information by contacting the Atlantic Group at Morgan Stanley at 1-877-988-6521.



Funeral/Bereavement Leave

We understand how difficult it is when one of our employees loses a family member, and we want to be as accommodating as possible during this time. Alorica offers up to two paid days if an immediate family member passes away. Your immediate supervisor will authorize the use of funeral/ bereavement leave. Alorica may exercise its discretion to deny funeral/bereavement leave under exceptional circumstances. For the purpose of this policy, a family member is defined as a spouse (including domestic partner), child (including step), parent (including in-law and step), sibling, aunt/uncle, grandparent, or niece/nephew. Employees may be required to provide documentation showing proof of relationship upon return to work to receive paid leave under this policy.

If additional time off is requested, or if an employee wishes to take time off when a friend or more distant family member passes, use of PTO may be approved by the manager.

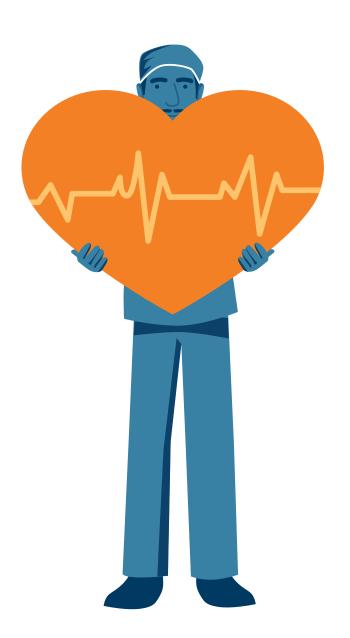


Health Insurance Coverage and Savings Options

Alorica provides multiple health insurance coverage and savings options. Eligibility and enrollment information is provided to you as part of your welcome packet. For additional information regarding the benefits listed below, contact a Employee Experience representative, or visit the Benefits site below.

engage.alorica.com/hr/benefits

Critical Illness Insurance **Dental Insurance Disability Insurance Medical Insurance** Flexible Spending Account (FSA) **Health Savings Account (HSA)** Life Insurance Pet Insurance **Vision Insurance**



Jury Duty

Some things we know for sure.

The sun rises in the east, every dog has his day, and eventually, you will be summoned (or nabbed, depending on how you feel) for Jury Duty-so here's Alorica's policy: Absences for Jury/Witness Duty will not be reflected on your attendance record. You must provide your immediate supervisor with a copy of your summons at least five (5) days in advance of the absence(s). Jurors and witnesses are frequently dismissed from duty for partial or whole days, and depending on state law, you may be required to report to work for the remainder of a scheduled shift.

Unless otherwise required by state law, pay for Jury Duty is limited to regular, full-time Employees. Your pay while on Jury Duty will be based upon your regularly scheduled shift, less any unpaid breaks up to a maximum of eight (8) hours a day and forty (40) hours a week while you are on active duty service. Hours paid for Jury Duty are not considered for the purpose of calculating overtime. You are allowed to keep any money received from the court to offset personal expenses while on Jury Duty.

Upon completion of Jury Duty, you'll be required to provide your manager with a statement from the court certifying the date(s) and times served. Employees appearing in their own case as a plaintiff or defendant or for a non-subpoenaed court appearance will not receive paid time off. Sorry, but PTO or unpaid time should be used for such instances.

Military Leave

The Company supports its team members who serve as members of the armed forces. Alorica offers paid military leave time for active full-time employees who have successfully completed the 90-day Introductory Period. Military leave will be paid at the employee's current regular base pay rate for a maximum of eight (8) hours per day for a maximum of ten (10) days per calendar year. Any military leave which extends beyond ten (10) working days in any calendar year will be unpaid unless the employee has available paid time off (PTO) that he or she would like to utilize.

Paid Time Off (PTO) and Holidays

If you are an eligible employee, you can enjoy PTO benefits and company observed paid Holidays. Please see Employee Experience to obtain a detailed description of the applicable PTO and Holiday information. Policy documents include scheduled Holidays, eligibility requirements, accrual rates, and processes for requesting time off.

Eligible employees must submit PTO requests through the appropriate tool (either WFM tool or timekeeping system) to ensure it is properly paid. Review your timesheet to ensure PTO time is properly designated. For more information, please visit

engage.alorica.com/hr/policies

Tuition Reimbursement

Feed your inner geek.

As a full-time Alorica employee, you may have the opportunity to enroll in college-level courses and receive reimbursement for eligible expenses. Full-time employees with three months of service prior to the course start date may apply for pre-approval for the Tuition Reimbursement Program. Upon the successful completion of the course with a grade of B or better, Alorica provides Alorica provides 100% tuition reimbursement only for the costs of undergraduate or graduate level courses with a maximum calendar benefit of \$1500. So you see, it really does pay to stay in school. Contact Human Resources for the details, or visit

engage.alorica.com/hr/forms

Workers' Compensation

If you're injured on the job, you may be eligible to receive Workers' Compensation insurance benefits. Alorica pays for this insurance for the employees' protection. The Workers' Compensation insurance plan may pay for all authorized medical expenses resulting from industrial injury or occupational illness to include income benefits for lost time from work.

You must report any work-related injury or illness, regardless of how serious the injury is, to your supervisor or to Employee Experience within twenty- four hours of it happening. This includes all work-related injuries or illnesses, whether or not you go to a doctor or medical facility for treatment.





TIME OFF FOR MORE IMPORTANT THINGS

LEAVE OF ABSENCE POLICIES

Because life happens.









Being an employer, it feels a little weird to say this—but some things are just more important than work—especially your health and the health of your loved ones, serving our country, and dealing with certain curveballs that life may one day smack you upside the head with.

Luckily, our government agrees, and so has enacted the following Leave of Absence Policies. Alorica complies with all these federal and state laws, which are detailed below. Please read through them so you can be sure you're familiar with the many instances in which we'd be happy to grant you an official Leave of Absence, and if you have any questions or concerns, just contact Employee Experience.

California Pregnancy Disability Leave (PDL)

Under the California Fair Employment and Housing Act (FEHA), all California employees who are disabled due to pregnancy, childbirth or related medical condition, are entitled to certain benefits for the period of disability. For details regarding the PDL, visit the State of California Employment **Development Department website** and/or contact Employee Experience.

California Family Rights Act (CFRA)

California employees who need to take time off work to care for the employee's own serious health condition; a seriously ill child, parent, or spouse; or to bond with a new child within the first year after birth or placement of the child with the employee, may be eligible for leave under the CFRA. For more information, visit the State of California Employment **Development Department's FAQ** and/or contact Employee Experience.

Family and Medical Leave Act (FMLA)

This policy addresses various leaves of absence covered under the federal Family & Medical Leave Act ("FMLA") such as family, medical, and military caregiver leave. This is a general overview (not an exhaustive review) of employer and employee rights and responsibilities under the FMLA. In the event of any unanticipated conflict between the law and our company policy, Alorica will comply with the FMLA (as well as any state and local leave laws). Additional information can be obtained from Employee Experience or the Company's Leave & Accommodations Department, which can be reached at leave.accommodations@alorica.com.

FMLA Eligibility:

To be eligible for family and medical leave under the FMLA, you must:

- Have worked for the company at least twelve (12) months
- Have worked at least 1.250 hours in the twelve (12) months prior to the need for leave1; and
- Work at an Alorica worksite with 50 or more employees either at the worksite or within 75 miles of the worksite

FMLA Leave Entitlement:

An eligible employee may take up to a total of twelve (12) work weeks of unpaid leave (except as noted below) during a twelve (12) month period (measured forward from the first date the employee takes FMLA leave) for one (1) or more of the following reasons:

- For the birth and care of a newborn child within one year of birth
- For placement of a child for adoption or foster care and to care for the newly placed child within one year of placement
- To care for an immediate family member (spouse, child, or parent) with a serious health condition²
- For the employee's own serious health condition
- Qualifying exigencies for covered military members (we'll explain what "exigencies" are later in the policy)

^{1.} Special "hours of service" requirements apply to airline flight crew employees. Nope, Alorica does not fly planes today, but you never know with such an innovative company!

^{2.} Immediate family member will be defined to include a domestic partner as required by applicable law.

An eligible employee may take up to 26 workweeks of leave during a "single 12-month" period for military caregiver leave (also discussed below).

For birth, adoption, or foster care placement of a child, leave may be taken on a consecutive basis; and for all other FMLA leaves, leave may be taken on a consecutive as well as an intermittent or reduced schedule basis

Military-Related Qualify Exigency Leave Under the FMLA:

An eligible employee may take up to a total of twelve (12) work weeks of unpaid leave during a twelve (12) month period (measured forward from the first date an employee takes FMLA leave) for any "qualifying exigency" arising out of the active duty or call to active duty status of a spouse, son, daughter or parent.

Qualifying exigencies are defined under the FMLA and may include, for example, issues arising from short notice deployment, attending certain military events, childcare, care of the military member's parent, rest and recuperation, addressing financial and legal arrangements, attending counseling sessions, and attending post-deployment activities. If you are requesting this type of FMLA leave, you must provide proof of the qualifying family member's call-up or active military service before leave is granted.

Military Caregiver Leave Under the FMLA:

An eligible employee who is a spouse, child, parent, or "next of kin" (as defined under the federal FMLA) of a covered veteran with a serious illness or injury may take up to a total of twenty-six (26) work-weeks of unpaid leave in a "single twelve (12) month period" to provide care for the veteran. If you are requesting this type of leave, you must provide certification of the family member or next-of-kin's injury, recovery or need for care.

The "single 12-month period" begins on the first day the employee takes leave for this reason, and ends 12 months later, regardless of the 12-month period established for other FMLA leave reasons. An eligible employee is limited to a combined total of 26 work-weeks of leave for any FMLA-qualifying reason during the "single 12-month period".

Requests:

If you are considering requesting a leave you should get in touch with the Leave & Accommodations Department to discuss the situation and request the necessary information. Your Employee Experience representative may be able to answer questions as well.

Notice:

You must provide Alorica at least thirty (30) days advance notice before FMLA leave is to begin if the need for the leave is foreseeable. If thirty (30) days' notice is not practical, notice must be given as soon as practical. In the case of an unforeseeable need for FMLA, you must provide notice to Alorica as soon as possible and practical.

Failure to provide timely notice of leave without a reasonable excuse may result in leave being delayed or denied. So please, keep us in the loop!

Once Alorica becomes aware that an employee's need for leave is for a reason that may qualify under the FMLA, the Company will notify the employee if he or she is eligible for FMLA leave and, if eligible, will also provide a notice of rights and responsibilities under the FMLA. If the employee is not eligible, the Company will provide a reason for ineligibility. The Company will notify its employees if leave will be designated as FMLA leave, and if so, how much leave will be designated as FMLA leave.

Medical Certification:

If you are requesting leave due to your own serious health condition or to care for a family member with a serious health condition, you must provide medical certification from a health care provider generally within fifteen (15) calendar days of the Company's requesting the certification. Failure to provide a complete and sufficient medical certification within fifteen (15) calendar days of the Company's request for the certification may result in a delay or denial of the leave request. Employees do not have to share a medical diagnosis but must provide enough information to determine if the leave qualifies for FMLA protection. Sufficient information could include informing the Company that the employee is or will be unable to perform his or her job functions, that a family member cannot perform daily activities, or that hospitalization or continuing medical treatment is necessary. Employees must inform the Company if the need for leave is for a reason for which FMLA leave was previously taken or certified.

Intermittent or Reduced Schedule Leave:

Under some circumstances, employees may take FMLA Leave intermittently, which means taking leave in blocks of time, or by reducing the employee's normal weekly or daily work schedule. An employee may take leave intermittently whenever it is medically necessary to care for a seriously ill family member, or because the employee is seriously ill and unable to work. Leave taken intermittently may be taken in increments as low as fifteen (15) minutes. Employees who take leave intermittently or on a reduced work schedule basis for a planned medical treatment must make a reasonable effort to schedule the leave so as not to unduly disrupt the Company's operations. If FMLA Leave is taken intermittently or on a reduced schedule basis due to foreseeable planned medical treatment, we may require employees to transfer temporarily to an available alternative position with an equivalent pay rate and benefits-including a part-time position—to better accommodate recurring periods of leave. If an employee's request for intermittent leave is approved, the Company may later require employees to obtain recertification of their need for leave. For example, the Company may request recertification if it receives information

that casts doubt on an employee's report that an absence qualifies for FMLA Leave.

Paid vs. Unpaid Time:

An employee is required to use short-term disability (if applicable) and any available accrued but unused PTO concurrently with FMLA leave. FMLA runs concurrently with any other medical leave (e.g., workers' compensation and disability), subject to applicable law. If not covered by workers compensation, short-term disability, PTO, FMLA, or state-provided benefits, FMLA is unpaid.

Benefits:

If you are enrolled in any of the Alorica benefit plans at the time an authorized leave of absence begins, coverage may be continued—provided you continue payment of premiums due. If FMLA is unpaid, you will be required to pay the ordinary per-paycheck deductions. Prior to the start of your leave, you should discuss the benefit payment process with the Employee Benefit Resource Center at 877-801-7928.

Responsibilities of the Employee:

Employees are expected to comply with notice and certification requirements, including notice of absences covered by an approved intermittent leave. Providing management notification of one's absence in advance (or as soon as possible if advance notice is not possible) is required—even where a leave of absence has been approved by the Company's leave administration team. Failure to provide such notice may be considered a violation of a Company Policy. Likewise, failure to report to work as scheduled if one's absence is not authorized by the Company may also be considered a violation of Company policy.

Reinstatement:

Upon return from leave under the FMLA, you will be reinstated to your original position or an equivalent position, subject to applicable law.

Physician's Release:

If you've taken leave due to your own serious medical condition, prior to returning to work following such leave, you may be required to provide certification from your health care provider that you are able to resume your job functions—with or without a reasonable accommodation.

Nondiscrimination:

Alorica takes its FMLA obligations seriously and will not interfere or deny the exercise of any rights provided by the FMLA. We will not terminate or discriminate against any individual for opposing any practice, or because of involvement in any proceeding related to the FMLA. If an employee believes their FMLA rights have been violated in any way, they should immediately report the matter to Employee Experience or The Integrity Center hotline. Employees may file a complaint with the U.S. Department of Labor or may bring a private lawsuit. The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collectivebargaining agreement that provides greater family or medical leave rights.

Other Sources of Information:

Alorica has posted a notice approved by the U.S. Department of Labor explaining rights and responsibilities under FMLA. This is posted in the employee break room at each location. Please contact the Leave & Accommodations Department or Employee Experience if you have any additional questions about the potential need for FMLA.

Personal Leave

From time to time you may need time off work for an extended period. When this time off work cannot be covered through shift replacements, vacation, personal days or a medical leave covered under a state or federal regulation/guideline (e.g. FMLA, ADA), you may need to request a Personal Leave of Absence.

Personal Leaves of Absence are approved at the discretion of the Directors of Operations. Generally, unless the leave request is covered under a state or federal regulations such as ADA or FMLA, Directors of Operations may grant a Personal Leave of Absence with the following restrictions:

- Leaves are to be a minimum of two (2) weeks and a maximum of four (4) weeks.
- Leaves of over two (2) weeks must be coordinated with Employee Experience prior to the leave being approved.
- If available, Paid Time Off must be used in conjunction with Personal Leave.

Alorica will comply with all applicable federal and state laws regarding the length of leave. Two (2) types of leave may not run back to back. Leave of Absence under this policy cannot be extended by holidays that fall during the period of leave.

You must submit a completed Leave of Absence Request form to Employee Experience as soon as you become aware of the need for leave. An individual counseling session will be scheduled with you to discuss the request. You will be provided notification of leave status by Employee Experience.

When considering a Personal Leave of Absence, Directors will give consideration to the client needs (for example, call volume), as well as the reason why you are requesting the leave.

The designated department will review all Personal Leaves of Absence Requests. Approval or denial will be based on production needs. Therefore, we cannot guarantee a Personal Leave of Absence.

Reinstatement from Leave

It is Alorica's policy to reinstate you in your original position, if possible, or an equivalent position, when you return from a leave of absence, as long as you have complied with the terms of the leave. However, if your position could not be held open for the duration of the leave (in the case of any leave other than FMLA or for the military), and if no comparable job opening is available, you may choose either of the following options:

- Choose to terminate your position in good standing and work with Employee Experience to identify available opportunities for which you are qualified.
- Accept a different position, if available, in which case your salary will be based upon the job accepted, and promotion qualifications will relate to time-on-the-job requirements.

Return to Work from Leave

In order to return from a Leave of Absence, you must contact Employee Experience on or before the return date specified on the Leave of Absence Request form and give the date of availability for work.

In cases where you are returning from a medical leave, a physician's statement authorizing your return is required.



YOUR SIDE OF THE DEAL

EMPLOYEE RESPONSIBILITIES

Treat others how you want to be treated and you're halfway there.



Attendance

We know you know this, but we're going to say it anyway—we need you. Alorica relies on you and expects you to be here, when you're supposed to be here. We need you to be on time and ready to work when you're supposed to, and continue to work until your scheduled quitting time. If you don't show up on your scheduled workdays, or if you're always showing up late or leaving early, this may result in corrective action, up to and including termination of employment.

You must contact your immediate supervisor or designated site contact, and call the 'call-in' line, where applicable, whenever you are going to be absent from work for any reason. Employees are required to call in as soon as possible, but with an expected minimum of 30 minutes from your expected start time. If you do not call in your absence and you don't report to work at any time during your scheduled shift, it will be coded as a No Call No Show (NCNS).

A NCNS is a serious violation of our attendance policy. Two (2) NCNS within a ninety (90) day period is considered a termination of employment for violation of company policy. Three (3) consecutive NCNS will be considered a voluntary termination of employment for job abandonment. Termination for attendance violations will negatively impact your eligibility for re-hire.



Business Practices

Remember that stuff you learned in elementary school about being honest, using common sense, and always treating people the way you want to be treated? That is still true today. And while we don't mind if you don't want to share your fruit snacks, there are some things listed below which are really important for you to know.

Competition and Antitrust:

Alorica supports competition based on quality, service and price. We will conduct our affairs honestly, directly and fairly. To comply with the antitrust laws and our policy of fair competition, you must never discuss with competitors any matter directly involved in competition between a competitor and us (for example: sales price, marketing strategies, marketing shares and sales policies). Furthermore, you must be accurate and truthful in all dealings with customers and be careful to accurately represent the quality, features and availability of company products and services.

Compliance with Laws and Regulatory Orders:

Alorica holds itself and its employees to the highest standards of ethical conduct. All employees are required to comply with all federal, state, local, and international laws, rules and regulations that are applicable to our business. If you need help understanding your responsibility with respect to compliance with any applicable laws, please speak with your supervisor, manager or Employee Experience.



Foreign Corrupt Practices Act:

The Foreign Corrupt Practices Act requires that the Company's books and records accurately and fairly reflect all transactions and that we maintain a system of internal controls; transactions conform to management's authorization; and the accounting records are accurate. Under the Act, it is also a federal crime for any U.S. business enterprise to offer a gift, payment to bribe, or anything else of value for the purpose of influencing an official act or decision, or seeking influence with a foreign government in order to obtain, retain or direct business to the company or to any person. The Company also prohibits employees from accepting improper payments, gifts or items of value from anyone.

Insider Trading:

While working on behalf of the Company, employees may become aware of material, non-public information about the Company or other companies with whom we do business. Material non-public information (also known as inside information) is information about a company that is not known to the general public and that a reasonable investor

would consider important when deciding whether to buy, sell, or hold that company's securities.

Buying or selling the securities of a company on the basis of inside information (known as insider trading) is a criminal offense and a violation of company policy. If you reveal inside information to anyone, including members of your immediate family or household, and that person then buys or sells securities based on that information, you may be criminally liable for "tipping," which is a violation of securities laws and violation of policy.

Inside information includes but is not limited to material, non-public information, such as new business strategies, potential transactions, pending contracts, unannounced earnings, prospective new services, or any other information that might affect a decision to buy, sell, or hold a particular stock, or affect the market for that stock. Information is considered to be non-public until it has been publicly disclosed and adequate time has passed for the securities markets to digest the information.

Conflicts of Interest:

There are several situations that could give rise to a conflict of interest. The most common are accepting gifts from suppliers, employment by another company, ownership of a significant part of another company or business, close or family relationships with outside suppliers and communications with competitors. A potential conflict of interest exists for employees who make decisions in their jobs that would allow them to give preference or favor to a customer in exchange for anything of personal benefit to themselves or their friends and families.

All employees must conduct themselves in an honest and ethical manner and act in the Company's best interest. Employees must avoid situations that present a potential or actual conflict between their personal interest and Alorica's interests. If you discover any actual or potential conflict of interest, please contact your supervisor, manager or Employee Experience for guidance.

Bribery and Corruption:

Bribery and corruption not only harm the Company, but also the communities where we conduct business. The Company strictly prohibits bribes, kickbacks, or any other form of improper payment, direct or indirect, to any government representative, client, or supplier in order to obtain a contract, some other commercial benefit, or government action. The Company also strictly prohibits any employee from accepting such payments from anyone.

To clarify, a bribe is anything of value, including cash payments, gifts, entertainment, or other business courtesies, given in an attempt to affect a person's actions or decisions in order to obtain or retain business or to secure an unfair business advantage. A kickback is the return of a sum already paid or due to be paid as a reward for awarding or fostering business.

When dealing with public officials, you must adhere to the highest ethical standards of business conduct. You may not offer, provide or solicit, directly or indirectly, any special treatment or favor in return for anything of economic value or the promise or expectation of future value or gain.

In addition, there shall be no entertaining of employees of the U.S. Government.

Use of Company funds or assets for gifts, gratuities or other favors to employees or government officials is prohibited, except to the extent such gifts are in compliance with applicable law, are of insignificant value and not given in consideration or expectation of any action by the recipient.

Employees, officers and directors must not accept, or permit any member of his or her immediate family to accept any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with the Company, other than items of insignificant value. Any gifts that are not of insignificant value should be returned immediately and reported to your manager or other Alorica resource. If immediate return is not practical, they should be given to the Company for charitable disposition or such other disposition as the Company, in its sole discretion, believes appropriate.

Common sense and moderation should prevail in business entertainment engaged in, by or on behalf of the Company. Employees, officers and directors should provide, or accept, business entertainment to or from anyone doing business with the Company only if the entertainment is infrequent, modest and intended to serve legitimate business goals.

Outside Employment:

You must not be employed outside of Alorica in any business that competes with or provides services to Alorica or its subsidiaries.

Relationships with Suppliers and Customers:

Business transactions must be entered into solely for the best interests of Alorica. You cannot, directly or indirectly, personally benefit from your position as an employee or from any sale, purchase or other activity of the company. You should avoid situations involving a conflict or the appearance of conflict between duty to the company and self-interest. Our policy is that employees will not do business on behalf of the company with a close personal friend or relative; however, recognizing that these transactions do occur, they must be reported to compliance@alorica.com.

This policy is applicable equally to the members of the immediate family of each employee, which normally includes the employee's spouse (or domestic partner), children and their spouses, and the father, mother, sisters, and brothers of the employee and his/her household.

Confidential Information and Privacy of Communications:

Confidential information includes all information, whether technical, business, financial or otherwise, concerning the Company, which the Company treats as confidential or secret and/or which is not available or is not made available publicly. Company policy and various laws protect the integrity of Alorica's confidential information, which must not be divulged except in strict accordance with established Company policies and procedures. The obligation not to divulge confidential Company information is in effect even though material might not be specifically identified as confidential and the obligation exists during and continues after employment with the Company.

We must protect and enforce our Company's intellectual property rights. In addition, the Company respects the patents, trademarks, copyrights, and confidential and proprietary information of others, including those of our clients, competitors, and our employees' former employers. Any suspected infringement upon intellectual property rights should be reported as described in the Global Code of Conduct and Open Door Policy.

Protecting Information of Third Parties:

The Company respects the privacy of all of its employees, business partners, and consumers. We are committed to protecting the privacy and security of personally identifiable information in compliance with all applicable laws. Employees who handle the personal data of others must:

- Ensure that all customer and consumer records are maintained completely and accurately, with confidentiality;
- Act in accordance with applicable law;
- Act in accordance with client contractual obligations;
- Collect, use, and process personal data only for legitimate business purposes;
- · Avoid any unauthorized disclosure; and
- Promptly report any improper disclosure or use of personally identifiable information.

To further ensure that confidential consumer information is protected from fraud and misuse, while in working areas (such as the operations floor) the use of personal electronic devices that can record or transmit information is prohibited. Personal electronic

devices include, but are not limited to: smartphones/watches, tablets, MP3 players, DVD players, radios, cameras, or any device capable of storing data, images, or sound, etc. Such devices are not allowed while in working areas, with the exception of expressly designated members of management and Employee Experience. These devices are only permitted in designated non-working areas during non-working times, such as meal periods and breaks.



Collection Practices:

The Company assists clients in aspects of accounts receivable management, which may include collections activity.

In compliance with state and federal regulations, Alorica strictly prohibits improper collection activity. All employees engaged in collection activity are expected to use appropriate collection techniques and activities and to know which activities and/or behaviors are not permitted, based upon the training provided.

Improper collections activities include, but are not limited to, harassment, acts of misrepresentation, unprofessional behavior, or other actions or behavior prohibited by applicable consumer protection laws or Company policy. Violation of the Company's policies related to collection practices is grounds for appropriate disciplinary action, up to and including termination.

Company Assets:

Company property, including but not limited to electronic devices, data, software, buildings, equipment, supplies, and cash, must be used only for legitimate purposes and in accordance with all Company policies and procedures. Employees must comply with security programs that help prevent the unauthorized use or theft of Company property. Employees must abide by all applicable regulations or contractual agreements governing the use of Company property. Please note that Company property also includes proprietary and trade secret information, business processes and methodology, and client and prospect lists.

All cash and bank account transactions must be handled so as to avoid any question or suspicion of impropriety. All cash transactions must be recorded in the Company's books of accounts. All transactions shall be accurately and fairly recorded in reasonable detail in the Company's accounting records. Employees are personally accountable for Alorica funds over which they have control. Expenses actually incurred by an employee in performing

Alorica business must be documented on expense reports in accordance with Alorica procedures. In preparing expense reports, employees should review these procedures for the documentation in order to be reimbursed for business expenses.

Software and Computers:

Computerized information and computer software appear intangible, but they are valuable assets of the Company and must be protected from misuse, theft, fraud, loss and unauthorized use or disposal, just as any other Company property. You may not access Alorica records of any kind for your personal use.

Employee Conduct:

Dishonest or illegal activities on Company premises or while on Company business will not be condoned and can result in corrective action, including dismissal and criminal prosecution. Alorica reserves the right to inspect any property that might be used by you for the storage of your personal effects.

Zero Tolerance for Fraud:

The Company has zero tolerance for fraudulent or dishonest activities. The Company recognizes the responsibility to identify and promptly investigate any possibility of fraudulent activities. Employees must avoid fraud and work to maintain the highest business ethics standards.

Fraudulent or related dishonest activities include, but are not limited to:

- Theft of funds, securities, supplies, or any other Company or client systems, programs, or assets (including cash, furniture, fixtures, or equipment);
- Embezzlement;
- Bribery/kick-backs;
- False inflation of performance for financial gain;
- Information theft, e.g., client lists;
- Illegal or fraudulent accounting or reporting of money transactions;
- Forgery or improper alteration of business documents;
- Acceptance or solicitation of any improper gift, favor, or service that might reasonably tend to influence the employee in the discharge of his or her job duties;

- Dishonest acts aimed at taking unfair advantage of any Company or client program offered to consumers;
- Improperly utilizing social media to secure an improper or unfair benefit from the Company;
- Improperly profiting from any misrepresentation to or regarding the Company or its clients, suppliers, and vendors;
- Abuse of access to client products, services, and programs, including rewards programs;
- Falsification of expense reports or abuse of Company funds through expense reports;
- Authorizing or receiving payments for hours not worked; and
- Authorizing or receiving payments for services not performed.

Any act of fraud shall be dealt with seriously and will generally result in immediate termination and possible criminal prosecution. The Company has zero tolerance for fraudulent or dishonest activities. Any suspicion of fraudulent activity must be reported as described in below. Good faith whistleblowers will be protected from retaliation.

Accurate Business and Financial Records:

To carry out the Company's core value of integrity, employees are responsible for preparing and maintaining all Company business records fairly, completely, and accurately. Accurate record keeping and reporting reflects on the Company's reputation and credibility, and ensures that the Company meets its legal and regulatory obligations. To ensure accurate records, the Company maintains a system of internal controls. Employees are prohibited from taking any actions to circumvent the Company's system of internal controls. Preparing, maintaining, and reporting accurate business and financial records includes but is not limited to:

- Properly disclosing, recording, and accounting for all funds, assets, and liabilities;
- Ensuring that all financial records are supported by adequate documentation to provide a complete, accurate, and auditable record;
- Refraining from making any false or misleading entries in any books or records of the Company for any reason;
- Ensuring that all records are truthful, complete, and accurate;

- Properly executing quality reports, time records, expense reports, and all other submissions such as benefits claim forms;
- Disclosing all material and relevant information to those responsible for the preparation or review of the Company's accounting and financial records, including the Company's finance staff, and internal or independent auditors;
- Recording and classifying transactions in the proper accounting period and in the appropriate account and department;
- Accurately reflecting all material transactions of the Company;
- Ensuring there are no false or misleading statements or entries contained in any business records;
- Maintaining records in accordance with generally accepted accounting principles;
- Maintaining records in accordance with all applicable laws and regulations;
- Maintaining and protecting Company confidential information such as financial data, overhead data, bid/proposal information, profit rates, client lists, and dealer/discount information; and

 Ensuring that all reports to regulatory authorities are full, fair, accurate, timely, and understandable.

If any employee becomes aware of a possible omission, falsification, or inaccuracy in business records, reporting submissions, or accounting or financial documents, he or she is required to promptly report such information as described in the Global Code of Conduct and Open Door Policy. No employee who reports a violation or potential violation in good faith will suffer retaliation so long as he or she was not a knowing participant in the violation.

Discipline:

You should recognize that it is in your best interest, as well as Alorica's, to follow these Business Practices carefully. The Company never has and never will authorize any employee to commit an act that violates our Business Practices or to direct a subordinate to do so. With that understood, under no circumstances would it be possible to justify commission of such an act by saying someone from higher management directed you to do so.

Clean Workstation

Keep it clean, people, keep it clean...

Policy: All papers on the production floor must either be properly secured in their rightful place, or destroyed in the available shred bins. This includes client-specific paper such as logs, downtime forms and flash training notices; Alorica-specific paper such as Transfer Trackers, login/out reports and QA scan forms; pens, pencils and markers must also be secured on the production floor when not in use. No handwritten notes, other than those expressly required and permitted for business purposes, should be kept at your workstation. And sorry, but no personal belongings are allowed on your workstation desktop.

Responsibilities:

Team Members: No personal paper or writing utensils are permitted at your workstation. Members are responsible for your workstation and must not make personal handwritten notes or leave any paper at your workstation. Any Company information that needs to be left at your workstation, such as useful telephone numbers, helpful instructions or tips, will be laminated by Operations Management or kept in document protectors on the cubicle walls. Personal items such as backpacks, lunches, purses, etc., should be kept in the provided lockers where available, or as designated by Site management, and not on your workstation desktop. Members must never access personal belongings while on the production floor. Any client-specific paper or Alorica-specific paper will be turned in to the respective team manager before leaving at the end of your shift.

Team Managers: Team Managers are the first level responsible for enforcing this policy. If paper is found in wastebaskets in your area of responsibility, it is your responsibility to remove it and place it in the shred bin. As a Team Manager, you are responsible for enforcing adherence to this policy on the production floor.

Operations Management: Operations Management will laminate useful non-sensitive information identified by the floor that can be used during the course of business.

This policy is the Company benchmark for the physical security of production floor workstations. Sites may establish more stringent guidelines. However, this policy and its contents remain in effect and must be followed at all times by all employees, contractors, subcontractors and vendors.

Confidentiality

The protection of confidential information and trade secrets is really important—for both Alorica and your future with us—so be sure you understand this policy completely! In the course of work, you may have access to confidential information regarding the Company's marketing strategies, financial information, pricing strategies, equipment, its vendors, its affiliates, suppliers, clients as well as personal information regarding other employees. To protect this information, you may not disclose any trade secrets or confidential information at work, except as necessary to perform your job duties.

You must not, under any circumstances, reveal this information outside the Company without prior Management approval. Such information may be used only to perform Alorica job duties.

As a condition of your continued employment, all Alorica employees and our independent contractors are required to sign and maintain knowledge of the Company's most recent version of the Restrictive Covenants. These define the obligations in greater detail. Any questions about your responsibilities in this area should be directed to Employee Experience. Any violations of the policy can result in corrective action up to and including termination and prosecution. The policy should not be interpreted or applied so as to interfere with employee rights to selforganize, form, join, or assist labor organizations, to bargain collectively through representatives of their choosing, or to engage in other concerted activities, or to refrain from engaging in such activities.

Dress Code

We respect your right to show your individuality, but there are other ways to let everyone know you're a huge fan of SpongeBob, other than wearing your SpongeBob outfit to work.

You are expected to dress in a manner that reflects good taste and business professionalism with consideration to position and frequency of client contact. The purpose of business casual dress is to give you a more comfortable clothing option while still maintaining a professional image. The clothes you wear directly reflects Alorica's image to clients, vendors and visitors. Please use common sense regarding what you wear here, and present a well-groomed appearance. You must dress in a manner that is consistent with your responsibilities. Attention should be paid to safety, Company image, and client interaction. Clothing is inappropriate if it distracts or offends other employees, clients, visitors or vendors. Any clothing or accessory that has words or images that may be offensive to other employees is unacceptable.

If you come to work unsuitably groomed or dressed, you may be asked to return home, without pay, to change into more appropriate attire. Corrective action, including termination of employment, could result from a violation of this policy.

Company-wide standards of dress are as follows:

- All clothing must be neat, clean, well-fitted and appropriate for a business establishment
- · Haircut and style should be clean and neat
- All employees are required to maintain the highest standards of hygiene and grooming
- Professional attire may be required under certain circumstances and in the case of client visits and other business necessities

Unacceptable attire is as follows:

- Tank, cropped or half shirts
- Tight knit, spandex clothing or sheer clothing
- Torn, frayed, or ill-fitting clothing
- Shorts, skorts or skirts more than three (3) inches above the knee
- Backless, halter, or sun-type dresses
- Provocative or revealing clothing
- Fleece sweatpants or shorts
- Flip flops

Management reserves the right to change the dress guidelines, at any time, in full or part, to meet client standards, business situations, reduced productivity or in response to non-compliance with dress guidelines.

Food and Beverages

We love cupcakes as much as you do, but we've got to draw the line somewhere.

Food:

Eating and chewing gum is a no-no on the Production Floor, training room areas, or other common areas. We have our reasons for this policy, and as you might imagine, it's a real sticking point.

Beverages:

As far as we can tell, drinks were invented for two reasons: to satisfy our thirst, and to spill all over the place no matter how careful we are. Only beverages in spill-proof containers with a snap-on or screw-on lid are permitted at workstations. Cans and other liquid containers such as paper, plastic, and Styrofoam fast food cups with plastic lids are not allowed in production or training rooms. The filling of a spill-proof container must be done in the break room.

Identification Badges

It's your Badge of Honor. Wear it with pride!

For security purposes, all employees are issued an ID/security badge on their first day of employment. All employees, regardless of position, must present their ID upon entering any Company location.

The ID/security badge allows you to enter secured areas required by your job. Badges must be worn and clearly visible at all times while on Company premises. You are responsible for your badge and there is a replacement cost for losing your badge. Under no circumstances are you to use another employee's badge. Failure to adhere to the badge control procedures may be cause for corrective action up to and including termination.

Safety

Accident prevention is a priority throughout all phases of our operation. We're committed to creating, providing and maintaining a safe, secure and healthy working environment for all employees in accordance with Federal and State Occupational Safety and Health regulations. In order to meet these obligations, every employee must actively participate and be committed to maintaining a safe workplace. All supervisors have a responsibility to ensure employees and guests are not working in or creating unsafe conditions.

One of our top safety goals is to be accident-free. This can be achieved by identifying workplace hazards, correcting unsafe or unhealthful conditions as they arise, and avoiding unsafe acts. For specific safety questions and concerns, employees may review the Injury and Illness Prevention Program (IIPP) from Employee Experience.

Job Assignment:

Each employee needs to review and understand the following:

- Before starting a job or task you should be trained on the hazards associated with your duties.
- You are not expected to perform a job without proper safety training.
- You should not perform a job that appears to be unsafe.
- Mechanical safeguards must be engaged and should never be bypassed.
- Inspect your work area and equipment prior to beginning work each day and report any unsafe conditions immediately to a supervisor.

Employee Participation and Responsibility:

- Know the job and how to apply all safe work practices.
- Know hazards of the job and protect yourself from those hazards.
- Immediately report safety hazards to a supervisor.
- Actively participate and cooperate in safety meetings and training when requested.
- · Comply with safety instructions.

- Obey all health and safety warning signs.
- Immediately report injuries to a supervisor.
- Use First Aid supplies when practical.

Code of Safe Practices:

- Follow Company's IIPP.
- Report all unsafe conditions immediately to a supervisor.
- Clean worksite conditions must be maintained at all times.
- Report all accidents immediately.
- All electrical wiring shall be to Code and maintained in safe condition.
- Use proper lifting techniques.
- Only qualified personnel can perform maintenance services.
- Follow all manufacturers' guidelines for any equipment used.
- Work shall be well planned and supervised.

General Safety Rules:

The IIPP provides preventative measures to be taken and observed by all personnel to reduce the risk of accidents occurring in the workplace. Please familiarize yourself with these.

Alorica is sincere in our desire to conduct all operations in the safest possible manner. We are committed to providing a safe work environment for all our employees. In turn, it is your responsibility to make a commitment to the Company to work as safely as possible. Compliance with the IIPP will assist us in achieving this objective. These rules are a minimum guideline for working safely. Continued awareness and cooperation in safety is a vital part of everyone's job. You are expected to apply these generally accepted standards of safety.

- 1. Whenever involved in an accident or incident that results in an injury or property damage, no matter how small, the accident must be reported to a supervisor immediately.
- 2. Obey all of the Company's rules, government regulations, signs, markings, and instructions.

- 3. When lifting, use proper lifting technique: Warm-up, check the load for weight, bend knees, back straight, grasp load firmly, be square to what is being lifted and never twist. Lift with the legs, not the back. Ask for help with any item when its weight or shape is difficult for you to handle safely.
- 4. Do not participate in horseplay. Horseplay and practical jokes frequently cause a serious injury and are not permitted.
- 5. Do not distract or startle fellow workers while they are working.
- 6. Avoid unnecessary noises, music, talking, or shouting that may take the attention of other employees away from their work and can be a safety hazard to anyone.
- 7. No running. (With or without scissors).
- 8. Clean floor spills and trip hazards at the facility or job site immediately.

General Office Safety Rules:

- 1. Know the job and follow instructions. Ask a supervisor for assistance when needed.
- 2. Use good ergonomic principles that apply to the work area.
- 3. Know the emergency evacuation procedures.
- 4. If office equipment is malfunctioning, turn the equipment off and report the problem to a supervisor.
- 5. Worn wiring, overloading of outlets, and defective equipment should be fixed prior to use.
- 6. Keep desk drawers and file cabinets closed to prevent tripping or striking.
- 7. When using copy machines, printers, addressing machines and/or paper cutters, use machines in a safe work manner to avoid hand injuries.
- 8. When lifting items, use proper lifting technique and do not lift items beyond your physical capability (although feel free to grunt loudly for effect, just for fun).
- 9. Clear pathway of any trip hazards prior to lifting any material.
- 10. When going up or down any stairway or step, use handrails to give support and balance.

- Walk in the office and do not run. Keep to the right when going through intersections in corridors.
- 12. Open all doors slowly.
- 13. Do not go into any room that is not properly lit.
- 14. Do not place items in any hallway, aisle, passageway or stairway.
- 15. Look for things like debris, pens, carpet, etc., that may present a trip hazard.
- 16. Avoid any spills or water on floors. Place hazard sign, if available, and call maintenance immediately.
- 17. Report all unsafe equipment and broken furniture to a supervisor.
- 18. Report all electrical problems.
- 19. Do not perform work that is not authorized.
- 20. Use caution when entering or exiting the building if rain, ice or other slippery conditions are present.

Failure to follow safety guidelines anytime while at work, or failure to stop any activity that may not be specified in the Company's safety policy but deemed an unsafe act by management, may be grounds for progressive discipline and/or termination.

Solicitation

We understand you want your kid to win that mountain bike from the school for selling all those magazines, but you can't ask co-workers to sign up for People Magazine on company time.

Alorica has strict rules which prohibit improper solicitation and distribution of literature by employees and non-employees. The primary purpose of these rules is to keep employees' working time free from non-work-related interference, to ensure that working areas are kept free from litter and to keep all non-employees who want to solicit our employees or distribute literature to them off of the Company property at all times.

In order to make the no solicitation/distribution rules more easily understandable to employees and to promote their continued uniform enforcement, the following written rules have been adopted:

- Solicitation and distribution of literature by nonemployees on Company property is prohibited.
- Solicitation by employees on Company property is prohibited when the person soliciting or the person being solicited is on working time. (Working time is the time employees are expected to be working and does not include rest, meal or other authorized breaks.)
- Distribution of literature by employees on Company property in nonworking areas during working time, as defined above, is prohibited.
- Distribution of literature by employees on Company property in working areas is prohibited.

For a number of business-related reasons. Alorica limits the number of charitable sponsorships it supports annually to no more than three sponsorships per site. This requirement is strictly followed. Information on selection criteria for a new sponsorship or a listing of current sponsorships may be obtained from your local Employee Experience representative.

Standards of Conduct

We're about to go over the long list in our "Standards of Conduct". As you read through it, we're hoping your first thought will be, "Of course!" Or at the very least, "Oh, okay." If you have any nagging thoughts or questions about anything you see here, please address these with your supervisor or Employee Experience. Here we go.

Alorica strives for an efficient, productive, fair and safe work environment that fosters dedication and mutual respect among employees. The Company's success depends on the quality of the relations between you, our clients, and the general public. Our clients' impression of Alorica and their interest and willingness to do business with us is greatly formed by the people who serve them (in other words, each employee of Alorica). Each of our employees shall conduct themselves with integrity and show respect for all those around them in the workplace, including fellow employees, our clients and our vendors.

As an employee of Alorica, you are expected to conduct yourself with integrity, which means but is not limited to:

- Communicating in a courteous, respectful and professional manner at all times whether in person, in writing or on the telephone;
- Taking pride in the quality of work;
- Maintaining a professional appearance and adhering to the business casual dress code;
- Protecting and preserving Company and client property;
- Being honest and truthful with the client's customers regarding client products, services, and capabilities about which they inquire, are advised, or purchase:
- Complying with safety procedures, requirements and guidelines;
- Adhering to schedule and attendance procedures:
- Refraining from abusive, harassing or profane language in the workplace (for example, fighting or name-calling is prohibited); and
- Maintaining Company, client and customer confidentiality.

It is within the sole discretion of Alorica to determine whether you have violated any policy regarding the

Standards of Conduct, regardless of whether or not that standard is included on the following list, and what corrective action is warranted when a standard has been violated.

Some examples of unacceptable actions while you are involved in Company business (whether on or off Company premises) which violate the Standards of Conduct include, but are not limited to. the following:

- Discourtesy to customers, clients, co-workers or vendors:
- Inappropriate phone handling of customer calls including but not limited to integrity, rudeness, tone of voice, not acknowledging calls or deliberately hanging up on a customer;
- Transporting personal customer information without approval;
- Unauthorized contact directly to clients or clients' customers:
- Unauthorized or inappropriate chat sessions with clients or internal customers;

- Dishonesty in providing information to the Company or clients. This includes falsification of any Company documents, employment records (e.g. applications), time records, or furnishing false information;
- Behaving in an unprofessional manner;
- Refusal to perform a reasonable request of supervisor.
- Refusal or failure to cooperate with any Company investigation:
- Unauthorized use or disclosure of Company or client proprietary or confidential information;
- Personal use of Company equipment, time, materials, facilities, without express Company approval, whether the use is for your direct benefit or not:
- Sleeping or appearing to be asleep on the job or anytime during a scheduled work period;
- Working unauthorized overtime, or failure to report overtime hours worked:
- Failure to correct inappropriate personal appearance, grooming, or personal hygiene;
- Reporting to work under the influence of any type of drug or alcohol;
- Conflict of interest such as working for another company engaged in the same or similar business to the Company; and

 Any criminal conduct, including gambling or possession or distribution of illegal substances.

Any conduct that compromises the values of the Company may be the basis for investigation or corrective action if Alorica reasonably believes such conduct may negatively affect or harm job performance or the well-being of others in the workplace. Alorica will investigate and/or refer to the appropriate authorities any conduct by you that may harm the safety of other individuals or the Company's reputation or property.



Substance Abuse Policy

Purpose and Goal: Alorica is committed to employees and other individuals in our workplace. to foster a business and work environment free of



Applicability:

Our Substance Abuse Policy applies to all employees, regardless of classification, during working hours, when representing or conducting business for Alorica, and while on or using company property (referred to here as "Alorica Time").

Prohibited Conduct:

Alorica's Substance Abuse Policy prohibits drug- and alcohol-related conduct inconsistent with our wellness and safety goals, including, but not limited to, the following:

- 1. During Alorica Time: (i) being under the influence of any drug or alcohol; (ii) possession, use, manufacture, distribution, trade, purchase, and sale of illegal drugs (as defined below) or drug paraphernalia; and (iii) manufacture, distribution, trade, and sale; and unauthorized or illegal purchase, possession, and use of legal drugs (e.g., prescription medications) and alcohol.
- 2. Storing in a locker, desk, automobile or other area on Company premises any illegal drug, alcohol, or drug paraphernalia;
- 3. Refusing to provide, switching, or adulterating any sample submitted for testing under this policy;

- 4. Refusing to consent to a request by the Company to submit to lawful drug and/or alcohol testing under this policy, or refusing to sign lawfully requested and required testing-related documents, including, but not limited to, authorization forms; and
- 5. Refusing to submit to the type of searches identified in the section entitled "Searches" below, when requested by management

For the purpose of this policy, "illegal drugs" include drugs which are illegal under state or federal law as well as prescription medication not prescribed for the employee's own medical condition by a licensed medical professional.

Prescription and over-the-counter medications are not prohibited when taken consistent with manufacturer instructions or a physician's prescription. If you are taking prescribed or overthe-counter medications, you will be responsible for consulting with the prescribing physician and/ or pharmacist to determine whether the medication may interfere with the safe performance of your job. If the use of a medication could compromise your safety, or the safety of fellow employees or the public, it is your responsibility to use appropriate personnel procedures (for example: call in sick, use leave, request a change of duty or other accommodation, or notify your supervisor or Employee Experience) to avoid unsafe workplace practices.

Alcohol:

Alcohol consumption is prohibited during working hours and on company premises. Any other consumption of alcohol at a Company-sponsored event must be expressly authorized by a Director or above and must not impair an employee's ability to exercise good judgment, comply with Company policy, act safely and responsibly, or perform his or her job duties. This policy does **not** give permission to operate a motor vehicle while under the influence of alcohol.

Notification of Convictions:

If you are arrested or convicted of a criminal drug offense or an offense pertaining to intoxication while driving (if your job requires use of a motor vehicle), you must notify the Company in writing within five (5) calendar days of the arrest or conviction, as applicable.

Alcohol and Controlled Substance Testing:

1. Your offer of employment with Alorica may be dependent upon the successful completion and passing of a lawful drug screening process. If you are seeking such a position and fail to pass the prescribed drug test, you may be ineligible for employment and shall be ineligible for hire or rehire for six months from the date of the test, or the maximum period allowed by law. If you are currently an employee of the Company seeking an alternative position, you may be rejected for the new position and may be subject to corrective action, up to and including immediate termination. Such pre-hire testing applies to applicants for new employment and transfer opportunities. Alorica's drug testing procedures and any related employment decision shall be subject to applicable law.

- 2. Unless otherwise prohibited by applicable law, employees may be required to submit to and satisfy lawful drug testing based on a change in job responsibilities or a change in client requirements.
- 3. Unless otherwise prohibited by applicable law. whenever Alorica has reasonable suspicion to believe that your work performance or on-the-job behavior may have been affected in any way by alcohol or drugs, or that this policy has otherwise been violated, Alorica may require you to submit to and satisfy lawful alcohol and/or drug testing.
- 4. Unless otherwise prohibited by applicable law, Alorica may, require you, if you are involved in a work-related accident, to undergo and satisfy lawful alcohol and/or drug testing.
- 5. Applicants and employees subject to testing will be given the opportunity, prior to testing, to notify a third-party Medical Review Officer (MRO) of all prescription and non-prescription drugs used during the relevant time period and to explain the circumstances surrounding the use of such drugs.
- 6. Prior to testing, you must sign an approval form consenting to the testing and consenting to the release of the test results to the Company's designated representative.

GENERAL EMPLOYEE RESPONSIBILITIES

7. Prior to taking any adverse employment action, the Company will give all employees who test positive the opportunity to explain the test results.

Testing Procedures:

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to DHHS/SAMHSA guidelines and any state laws where applicable and will include: a screening test; a confirmation test; the opportunity for a split sample; review by a MRO, including the opportunity for employees who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and a documented chain of custody. All testing will meet the certification requirements of applicable law.

All testing information obtained pursuant to this policy will be maintained in separate, confidential files.

Searches:

Subject to applicable law, Alorica may search your locker, desk or other Company property under your control, as well as your personal effects or automobile on Company property. You shall not maintain an expectation of privacy in any of these items located on the Company's premises at any time.

Consequences for Violations of This Policy:

Consequences for violation of this policy include, without limitation, the following, all of which are subject to applicable law:

- Violation of the Company's Substance Abuse Policy may result in corrective action, up to and including termination.
- Continued employment, if any, following a violation of this policy, may be conditioned on the employee signing a "Last Chance Agreement" prepared by the Company.
- Voluntary requests for assistance prior to violation of this policy will not prevent corrective action for violation of this policy.
- As explained above, applicants who fail a drug test or otherwise violate this policy may have their offer for employment withdrawn and be ineligible for employment.
- An employee will be subjected to the same consequences of a positive test if he/she refuses the screening or the test, adulterates or dilutes the specimen, substitutes the specimen with that from another person, refuses to sign the required forms or interferes with or obstructs the testing process in such a way that prevents completion of the test.

Professional Assistance and Treatment:

Alorica encourages its employees to seek professional assistance, counseling, or treatment related to alcohol or drug abuse or addiction, as the employee, his or her health care provider, or other personal advisor deems appropriate. Treatment for alcoholism and/or other drug addiction may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs to the employee. In addition, a leave of absence or workplace accommodation may be available to pursue treatment or other rehabilitation under Company policy or applicable law.

Confidentiality:

All information received by Alorica through this policy will be treated in a confidential manner, as required by law. Access to this information should be limited to those within Alorica who have a legitimate business need for the information or as otherwise required by law.

Applicable Law:

This policy shall be subject to applicable law.

Tobacco Use

Alorica is committed to providing a tobacco-free work environment. Smoking or the use of any tobacco products, including electronic cigarettes (e-cigarettes) is therefore not permitted inside any Company facility or work area. If you wish to use any of the prohibited products, you must limit your use to your specific break or meal periods and to the designated outside areas.

Visitors

It's fun to have your friends and family visit you at work, but due to the confidential nature of Alorica's business, the following guidelines must be followed for visitor access:

- All visitors to Alorica's facilities must sign in
- Visitor badges are issued upon signing in and must be worn at all times
- An authorized Company employee must accompany visitors to all Company facilities from the time they enter the building until they leave
- You are responsible for the conduct of your visitors while they are on the Company's premises. Even crazy, well-meaning uncles. So you know... choose wisely.

Weapons Possession

Unless required under state law. Alorica will not tolerate weapons of any kind on its premises including the parking lot and all surrounding land deemed as Company property. This applies to any article that can be construed as a weapon (including, but not limited to guns, ammunition, knives, etc.). Possession of such articles is grounds for dismissal.

Workplace Violence

Acts or threats of physical violence, including intimidation, harassment, and coercion, which involve or affect Alorica or occur on Company property, will not be tolerated. Acts or threats of violence include conduct which is severe, offensive, or intimidating enough to alter the employment conditions at the Company or to create a hostile, abusive, or intimidating work environment for one or more employees. Examples of workplace violence include, but are not limited to:

· Threats or acts of violence occurring on Company premises, regardless of the relationship between Alorica and the parties involved in the incident.

GENERAL EMPLOYEE RESPONSIBILITIES

- Threats or acts of violence occurring off Company premises involving someone who is acting as a representative of Alorica.
- Threats or acts of violence occurring off Company premises involving an employee of the company if the threats or acts affect Alorica's legitimate interests.
- Acts or threats resulting in the conviction of an employee or agent of Alorica, or of an individual performing services for Alorica on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence which adversely affect Alorica's legitimate interests and goals.

Acts of workplace violence by any people involved in Alorica's operations, including, but not limited to, Alorica personnel, contract and temporary workers, and anyone else on Company property may lead to corrective action up to and including termination, and/or legal action, as appropriate. Violence, threats or acts of violence by an individual acting as a representative of Alorica while off Company property, or by an individual acting off Company property when his/her actions affect

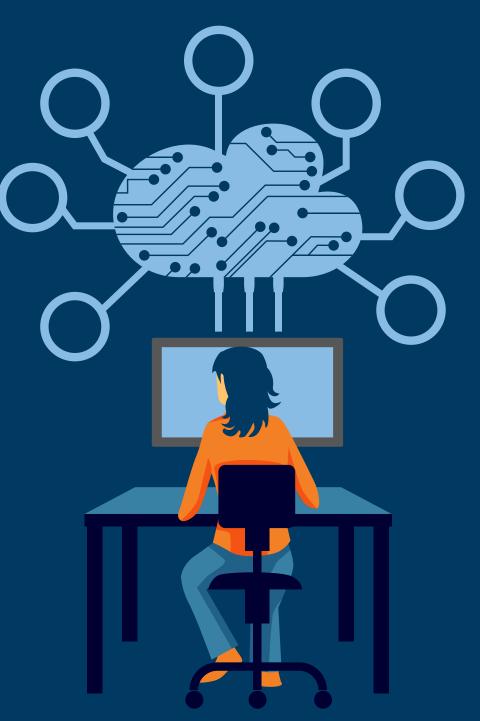
Company business interests, may lead to corrective action up to and including termination, and/or legal action, as appropriate. No provision of this policy shall alter the at-will nature of the employment relationship at Alorica.

You and every person on Company property should immediately report incidents of threats or acts of physical violence, which you know about. Reports should be made to the individual's supervisor, the Site Director and Employee Experience. Prompt investigation and resolution of any violation will be made with discretion and in the same manner as any other infraction of Company policy. Nothing in this course of action alters any other obligation established in Company policies or in state, federal, or other applicable law.

WHERE WE GET ALL TECHNICAL

WORKPLACE TECHNOLOGY

Hit 'send' with no regrets.



Ahhhhh, technology. What would we do without it? Actually, we at Alorica would have a mighty tough time doing what we do without it, so give it the props it deserves and read through the do's and don'ts below.

Communication Monitoring

Email, Voicemail, Instant Message and Chat:

Alorica's policy requires you to treat email, voicemail, instant message, and chat with the same respect and confidentiality as all other workplace-generated communications (such as memos, correspondence, reports, etc.). The guidelines below are provided to help you understand your rights and responsibilities:

 All email, voicemail, instant message, and chat communications are considered to be company records; Alorica reserves the right to access and disclose any and all messages for any purpose. This policy cannot be modified by a supervisor's conduct.

- Email, voicemail, instant message, and chat are to be used for legitimate business purposes only; they are not intended for use to send/receive messages of a personal nature.
- Unauthorized personnel are prohibited from accessing another employee's messages (an example of an "authorized" employee would be a secretary who has been given responsibility for sorting, filing, answering and/or printing email messages, or reviewing, responding to and/or sending voicemail messages).
- With Employee Experience' consent and approval, supervisory personnel may review email, voicemail, instant message, and chat communications for the employees they supervise at any time for any reason including, but not limited to, determining the status of work in progress, violations of Company policy and breaches of security.
- Unnecessary distribution of email, voicemail, instant message, and chat messages that require the time of others to review, sort and/or respond to are to be avoided.
- No chat or instant message programs should be installed without management approval.

Phone Calls:

In some areas of Alorica, there are service-oriented functions that require call monitoring to assist with training and to appraise individual performance. This is because our product is most often your voice on the phone, and the best way to evaluate our product is to listen to the quality of the call. Monitoring may occur at any time, and it is not possible to provide immediate notification without interrupting the phone call flow. Based on assigned position, separate unmonitored phones are provided for personal phone calls.

Computer Network Use Limitations— Prohibited Activities

Without prior written permission from Alorica, the Company's computer network may not be used to disseminate, view, store or download commercial or personal advertisements, solicitations, promotions, destructive code (e.g., viruses, Trojan horse programs, etc.) or any other unauthorized materials or software including personal software. Company technology systems may never be utilized to harass, intimidate or otherwise annoy another individual or

organization. Material that is fraudulent, harassing, sexually explicit, profane, obscene, intimidating, defamatory, or otherwise unlawful or inappropriate may not be sent internally or externally by email or other form of electronic transmission or displayed on or stored in any Company equipment. If you encounter or receive this kind of material, you should immediately report the incident to your supervisor or the local Employee Experience Manager.

Computer Software and Computer Crime

Alorica's policy regarding the use of computer software and computer-related crime is based primarily on legal statutes that have been enacted to address these areas. The points that follow are intended to communicate Company policy and also help you understand your rights and responsibilities:

1. Alorica routinely purchases or licenses computer software for single machines from a variety of outside entities: however, Alorica does not necessarily own the copyright to this software or any associated documentation. As a result, Company employees generally do not have the

right to reproduce the software or documentation for use on more than one computer without formal authorization from the software developer. When any additional copies are needed, you must contact the respective systems department for assistance.

- 2. Regarding use on networks or multiple machines, you must utilize the software and documentation in strict accordance with the Company's license agreement. All questions related to license agreements or network/multiple machine usage must also be directed to your respective systems department.
- 3. If you become aware of potential misuse of software or associated documentation within the Company, notify the department manager or Employee Experience.
- 4. According to U.S. copyright law, any individual involved in the illegal reproduction of software or related documentation can be subject to civil damages as high as \$100,000 per item copied, as well as criminal penalties including fines, imprisonment or both. Company employees who make, acquire, or use unauthorized copies

- of software or related documentation will be disciplined as deemed appropriate under the circumstances. Such discipline may include termination. Employees will also be disciplined as deemed appropriate for the use of "non-business" software while at the workplace.
- 5. Any Company employee who intentionally accesses any computer, network, program or data without the proper authorization to do so is in violation of the law. Further, any employee who has proper authorization to access a computer or network, but who knowingly and intentionally exceeds the limits of such authorization, is also in violation of the law. Any incidents of this nature are not condoned by the Company and will not be tolerated.

Intentional unauthorized access to a computer or network, or the intentional misuse of authorized access, can result in additional violations of the law when such actions result in:

- Another individual being unfairly deprived of property or services
- Another individual's property or services being improperly obtained
- The improper alteration, damage, deletion or destruction of any property or service
- The unplanned disruption of normal computer or network operations
- The improper access to information which is required to be kept confidential

Again, any incidents of this nature are not condoned by Alorica and will not be tolerated.

Passwords

Let's make sure they're not as easy as 1-2-3.

You are responsible for safeguarding your passwords. You are responsible for all transactions made using your passwords. You may not access the computer system with another person's password or account. A violation of this Policy may result in corrective action up to and including termination, as well as possible criminal and civil liability.

Permitted Use of Internet and Company Technology

The computer network is the property of Alorica and is to be used for legitimate business purposes. Users are provided access to the computer network and telephone access to assist them in the performance of their jobs. Additionally, certain employees ("Users") may also be provided with access to the Internet through the computer network. All Users have a responsibility to use the Company's computer and telephone resources as well as the Internet in a professional, lawful and ethical manner. Abuse of the computer network or the Internet may result in corrective action, including possible termination, and civil and/or criminal liability.

Computers, telephones, computer systems, and electronic media equipment (including computer accounts, laptop computers, cellular phones, printers, networks, software, electronic mail, Internet access connections, etc.) at Alorica are provided for the use of some employees for business-related use.

Regarding computer information, voicemail, email, or letters addressed to a Company address, you have no privacy rights to this information. Unless otherwise prohibited by law, Alorica may open and view or listen to this information as it sees fit. It is the responsibility of Alorica employees to see that these information systems are used in an efficient, ethical, and lawful manner. The use of information systems is a privilege extended by Alorica, which may be withdrawn at any time. Your use of the computer systems may be suspended immediately upon the discovery of a possible violation of these policies. A violation of the provisions of this policy may result in corrective action up to and including termination.

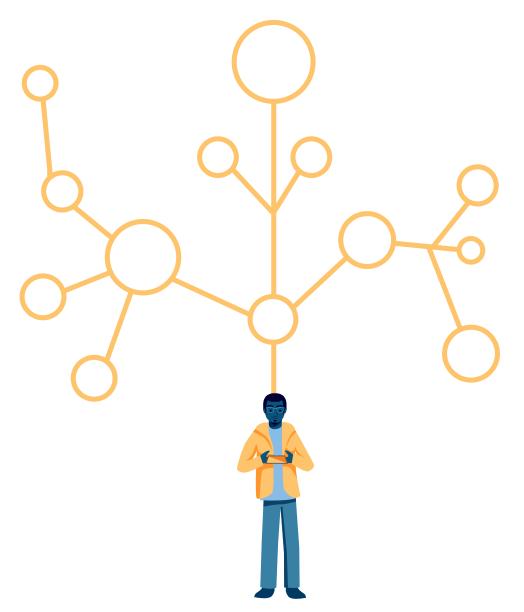
Computer resources include, but are not limited to: host computers, file servers, application servers, communication servers, mail servers, fax servers, web servers, workstations, standalone computers, laptops, software, data files, and all internal and external computer and communications networks that may be accessed directly or indirectly from our computer network.

You should not have any expectation of privacy in anything you create, store, send or receive on the computer system. The computer system belongs to Alorica and may be used only for business purposes. Alorica may access and review any material of the user at any time.

You expressly waive any right of privacy in anything you create, store, send, or receive on the computer or through the Internet or any other computer network.

Personal Cell Phones and Other Equipment

In an effort to protect sensitive information, the use of non-Company-issued cell phone equipment or any "Personal Electronic Device" (smartphones/watches, tablets, MP3 players, DVD players, radios, any device capable of storing data, images, or sound, etc.) in the production areas is prohibited. PEDS may not be used or stored in any Alorica production area (such as: QA booths, production floors, bathrooms, training rooms, hallways, etc.). The use of PEDs will be permitted ONLY in the break rooms or outside of the Company's facilities.



Social Media

Look at you, so close to the end of this awesome (albeit lengthy) handbook! Perhaps you're looking forward to finishing up so you can hop on social media for some lighter viewing and posting. If so, what a coincidence—we're just getting to our Social Media Policies section.

So before you tweet, or post, or blog, or create a new meme that takes the world by storm—or even if you don't know what any of that means—check out our Social Media do's and don'ts!

Purpose: The purpose of this Social Networking guidelines and procedures for employees to

Application:

This Policy applies to Alorica employees and other parties representing Alorica who use the following:

- Multimedia and social networking sites (Facebook, LinkedIn, etc.)
- Micro-blogging sites (Twitter, SnapChat, etc.)
- Blogs (both internal and external)
- Wikis such as Wikipedia and any other site where text can be posted
- Web forums, email discussion lists, etc.
- Video and photo sharing websites (YouTube, Flickr, Instagram, etc.)

Use of any of these sites or activities is, in each case, referred to as a "posting" in this Policy. Unless representing Alorica in the social media (pursuant to Section II of this Policy), you should always use your personal email address, not a company email address, for any posting or social network profile that you establish.

Think before you post! You are personally responsible for all content you post on social media under this policy. You must comply with applicable law and Company policies, including, but not limited to, the Company's Code of Ethical Business Conduct, System Use agreement(s), Internet Usage Policy, Harassment and Discrimination Policy, Information Security Policy and Standards Manual, Insider Trading Policy, Global HR Data Privacy Policy, Intellectual Property Use Policy, and any Acknowledgment of Conditions of Employment or Employment Agreement.

Employees should remember that any conduct, online or otherwise, that negatively or adversely impacts the employee's job performance or conduct, the job performance or conduct of other coworkers or adversely affects clients, customers, colleagues or associates of Alorica or Alorica's legitimate business interests may result in disciplinary action, up to and including termination of your employment.

A special note about using Social Media at work. Please remember that unless you are specifically authorized to represent Alorica on social media and/ or your job responsibilities specifically authorize you to do so, use of social media during your scheduled work time and/or accessing social media sites using the Company network is prohibited.

Yes, your accounts are your own, and yes, we deeply respect that. But if you're an Alorica employee, you do have a responsibility to protect, defend, and uphold the Alorica name—just like you do IRL especially if you talk about Alorica or identify yourself as an Alorica employee.

When making any posting, including personal postings not referring to Alorica or its business, vou must:

1. Be authentic. Your personal posting reflects your personal point of view, not the point of view of Alorica. Take personal responsibility for what you publish online. Ultimately, your content is yours and that means you are:

- a. Legally responsible for your personal postings b. Subject to liability if your posts are found vulgar, obscene, threatening, intimidating, harassing, or a violation of Company policies against discrimination, harassment, or hostility on account of age, race, religion or other protected class.
- 2. Be accurate and honest. We realize that everyone has complaints or criticisms from time to time and that social media posts are frequently used as outlets to express these feelings. Alorica strongly encourages employees to report complaints directly to us first so that we may have the opportunity to investigate and find solutions to your concerns. Complaints may be made in person with Employee Experience or anonymously by calling 800-250-5189. However, if you must post, keep it respectful and honest. Never publish information which is known to be false about Alorica or any co-workers, clients, customers, colleagues or other individuals that work on behalf of or are associated with Alorica.

WORKPLACE TECHNOLOGY

- 3. Are you going to talk about Alorica? #iwork4alorica or #alorica is a quick and easy way to disclose your affiliation with us. If you're specifically talking about Alorica online, you use this hashtag—the Federal Trade Commission says you have to—and if you're on a long-form platform, you can use this statement: "This post reflects my personal thoughts and opinions which do not necessarily reflect the views of Alorica."
- 4. Protect client confidentiality. Do not reference clients, use client logos, or discuss client programs in any way.
- 5. Protect Alorica's confidential and proprietary information. You may only disclose public information and must not disclose Alorica's confidential information. If you are unsure if information is public or private, please ask your manager. Disclosing competitive information or trade secrets is cause for termination of employment.

- 6. Respect fair use and copyrights. Watch out for and don't share confidential (such as: competitive information, trade secrets, details of a client engagement, etc.) or copyrighted (such as: music, photos, videos, text, logos, etc.) information. Your postings may not include Alorica's logos or trademarks or those of Company clients, partners or suppliers.
- 7. Be respectful. You should be fair, courteous and respectful to co-workers, clients, customers, colleagues and other individuals who work on behalf of Alorica and demonstrate respect for their privacy. "Cyber bullying" will not be tolerated. Please avoid posting any statements, photographs, video or audio that may be viewed as malicious, obscene, threatening, harassing or abusive of co-workers, clients, customers, colleagues or other individuals that work on behalf of or are associated with Alorica. Employees are required to refrain from engaging in offensive postings that may create a hostile and abusive work environment based on race, sex, religion or any other protected class.

Be a Scout:

If you see confidential Company information posted in a public forum, you should notify the Director of Digital Strategy at socialmedia@alorica.com.

Breach of Policy:

Violations of this Policy may result in corrective action up to and including termination, prosecution or civil litigation. Many of the responsibilities detailed in this Policy extend beyond employment with Alorica including, but not limited to, respecting the Company, its clients', its business partners', and its suppliers' copyrights, trade names and trademarks, and confidential information.

Retaliation Prohibited:

Alorica prohibits taking adverse action against any employee for reporting a possible violation of this policy or cooperating in any investigation with respect to a complaint under this policy. Any employee who retaliates against an individual for engaging in activity protected by this policy shall be subject to disciplinary action, up to and including termination of employment.

What this Really Means:

Alorica reserves the right to ask you to delete, report inappropriate content, or delete content at any time based on needs as determined by the Marketing and Legal departments. Most commonly this will be as a result of a violation of client obligations, so please be extra-vigilant about protecting proprietary information.

Protected Activity:

Nothing in this policy shall prohibit employees from engaging in concerted activity to complain about the terms and/or conditions of their employment and/or advocate for change.

Virus Detection

Files obtained from sources outside the company, including disks brought from home, files downloaded from the Internet, newsgroups, bulletin boards, or other online services; files attached to email, and files provided by clients or vendors, may contain dangerous computer viruses that may damage the company's computer network.

You should never download files from the Internet or outsiders, accept email attachments, or use disks from non-Company sources, without first scanning the material with Company-approved virus-checking software. If you suspect that a virus has been introduced into the Company's network, notify your supervisor immediately.



HANDY LINKS, NUMBERS & RESOURCES



Engage - Alorica's Social Intranet

In addition to scintillating company announcements, events, and activities, Engage also provides a way to comment, submit an idea, ask a question or post a personal update.

Oracle

Under Employee Self-Service, you can update your address, revise your tax selection, enroll in direct deposit and more. If you have any questions or need assistance, please contact your local Employee Experience representative, or go to the Oracle Self-service website. Please visit ebsprodapp.alorica.com and click Login Assistance.

Integrity Center Complaint Hotline

Employees may report any concerns or complaints under the policies in this Handbook or otherwise related to their employment, anonymously by contacting the complaint hotline at 800-250-5189.

SmartBen

Medical, Dental, Vision, Disability benefits, etc.

- 1. Your login is the first letter of your first name, your last name and the last 4 digits of your Social Security number. Your password is the last 6 digits of your Social Security number. Example Username: jsmith6789 Example Password: 456789
- 2. Click Begin Enrollment button.
- 3. Make benefit selections. Once all of your lections are complete, each benefit will have a green light. To proceed to the next step, click the green button labeled "Elect & Continue".
- 4. Review your Confirmation. Examine your elections thoroughly and enter your initials to acknowledge your agreement before clicking "Continue".
- 5. You have successfully completed the enrollment process. Print a copy of your Confirmation Statement for your records.

You came. You saw. You read... a lot. You committed to doing your best. That's all we can ask.

Welcome to the Team!

