Regular attendance and punctuality are essential to Sitel's ability to serve our clients and their customers. Associates who attain perfect attendance and punctuality are a valued asset to the organization and should be rewarded. Unnecessary absences place an unfair burden on co-workers and service to our clients. Sitel expects each Associate to be present at his/her job each and every workday as scheduled. Unscheduled absences resulting from illness or an unexpected emergency are different from time off that is scheduled in advance such as vacation or company-recognized holidays. It is very important to limit unscheduled absences when possible.

It is recognized that a reasonable amount of absence due to bona fide illness or emergency situations may be beyond the control of an Associate. On the other hand, Sitel is entitled to a reasonable degree of regularity in the attendance of our Associates; therefore, corrective action may be necessary for Associates who fail to adhere to a reasonable attendance standard. For that reason, we have established the following definitions and procedures to address absenteeism as well as the corrective action process that should be followed as warranted. Your efforts to ensure good attendance and punctuality are appreciated.

## Definitions

Absence - Unscheduled, unapproved absence or reporting for work more than two (2) hours after the scheduled shift start time.

Credit - Earned by achieving Perfect Attendance and used to offset future occurrences. Used when an Associate has received no occurrences. A maximum "bank" of five (5) credits may be maintained at any one point in time.

Evaporation - Earned by achieving Perfect Attendance and used to reduce total occurrences.
Leave Early \#1 - Leaving work between five (5) minutes and two (2) hours prior to the end of a scheduled work shift without manager approval.

Leave Early \#2 - Leaving work more than two (2) hours prior to the end of a scheduled work shift without manager approval.

No Call No Show (NCNS) - Not calling in to report an absence or tardy within two (2) hours of the start time of a scheduled shift start time.

Occurrence - A point system used to track unscheduled time off which includes, but may not be limited to, Absences, Leaving Early, NCNS and Tardies.

Perfect Attendance - No occurrences earned during four (4) consecutive work schedules constitutes Perfect Attendance. This means no instances of Tardies, Absences, NCNS or Leaving Early without approval occurred during that consecutive four (4) week period. Note: A week must be the full term of a schedule (either Monday through Sunday or Sunday through Saturday depending upon the site/department) and partial weeks do not count toward perfect attendance.

Tardy - Logging in later than five (5) minutes after the scheduled work shift start time and up to two (2) hours after the scheduled work shift start time. Note: Associates are expected to report for work, ready for their duties at the scheduled beginning of their shifts. The five minute time period in this policy allows for the synchronization of clocks and any difficulties that may be encountered. HOWEVER, if an Associate demonstrates a pattern of later arrivals within the five minute period, this leniency will most likely be removed and the Associate will be held strictly accountable for timely arrivals.

Work Shift or Workday - A singular work shift with one start time and one end time. A split shift, where there is an extended break period between two sections of the shift, is considered one work shift or workday.

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Work Week or Work Schedule - The work days in a week that an Associate is assigned to work. A work week is generally a Sunday through Saturday or Monday through Sunday schedule. Associates are scheduled work days with specific hours within that work week.

Attendance During a Training Period
For an Associate to be fully prepared to be effective and productive in a new job, it is especially important to attend all designated workdays during a training period. Absences during any training classes are strongly discouraged. In some cases the Learning Manager/Learning Specialist, along with the site/department management, will make a determination that absences have had a negative affect on the Associate's ability to successfully complete the necessary requirements of the training class. A decision may be made to separate the Associate. If the Associate's employment is separated, rehire will be at the sole discretion of site/department management.

## Reporting an Absence

If an Associate is unable to report to work when scheduled, it is necessary for that Associate to personally call his/her Coach/Supervisor as soon as it is known that he/she will be absent or late. This call should be made with as much advance notice as the Associate is able to give, but the call should be made NO LATER THAN TWO (2) HOURS AFTER THE SCHEDULED BEGINNING OF THE SHIFT. Associates who fail to call in and report an absence or tardy within two (2) hours of the scheduled beginning of their shift will be considered "no call no show" for that entire day and subject to corrective action. An Associate is required to call in and report unscheduled absences each and every day that he/she will not be reporting to work on a scheduled workday unless he/she is on a formally approved leave of absence. (See Leaves of Absence for details regarding what constitutes an approved leave.) Each business unit defines the specific procedure that an Associate must use to notify their Coach/Supervisor of an absence or tardy. Each Associate is responsible for knowing and following that specific procedure. Failure to follow this procedure may result in corrective action, up to and including separation of employment. If an Associate does not inform his/her Coach/Supervisor of an absence as described, for two (2) consecutive days, the "no call no show" absences will be considered job abandonment and Sitel will process the Associate's voluntary separation accordingly. Also, two (2) instances of "no call no show" within a rolling twelve month period will be considered job abandonment and Sitel will process the Associate's voluntary separation accordingly.

Attendance Standard - Scheduled and Unscheduled Absences and Pay
The Sitel Paid Time Off Policy for hourly nonexempt Associates provides a method to accrue an established number of paid hours to use for approved and scheduled time away from work. Note: During high volume periods, including holiday or ramp times, it may be necessary to deny Associates requested time off so that we can continue to meet the needs of our clients. Associates are not permitted to schedule more paid time off than is earned through the accrual system (this does not apply to a formal leave of absence). Associates may schedule unpaid time off with management approval.

Unscheduled absences are unpaid; however, an Associate may choose to be paid for an unscheduled absence by using accrued PTO and submitting the proper paperwork to be paid for the unscheduled absence.

All unscheduled absences for any reason are subject to the attendance standard and earn occurrences whether they are paid or unpaid. Appropriately approved, scheduled absences will not earn occurrences.

Multiple tardies in a short period of time and/or patterns of abuse may also be indicators that corrective action is needed, regardless of the number of occurrences. Coaches/Supervisors will evaluate such instances for reasonable

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mitigating factors such as past work record and previous corrective actions when considering corrective action steps.

## Verification of Absence

The Company reserves the right to require written verification of unscheduled absences (i.e. physician's note, school note, etc.). The Company will most likely require written verification when an absence lasts for three or more days. If written verification is requested, an Associate must provide that verification within five (5) calendar days. If the written verification is not received within this timeframe, each day of absence will count as a separate Occurrence. All documents may be subject to verification by management. The use of fraudulent documentation will not be tolerated and may result in immediate termination of employment.

## Occurrence Process

Absences, Tardies, Leaving Early and NCNS are tracked through Occurrences. As the name implies, an Occurrence means that something related to the attendance policy has happened. All unscheduled Absences, whether paid or unpaid, are counted towards the attendance standard. Absences may be combined to count as one Occurrence if the unscheduled Absence was for the same reason and if supported by appropriate documentation and approved by management. Occurrences are received as follows (also see Definitions above):

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- Tardy - $1 / 2$ Occurrence
- Leave Early \#1-1⁄2 Occurrence
- Leave Early \#2 = 1 Occurrence
- NCNS (1st Instance) = 1 Occurrence and Final Counseling
- NCNS (2nd Instance within 12 months) = Termination
- Absence = 1 Occurrence
- Perfect Attendance = Either evaporates one Occurrence or earns one Credit
- Evaporation = When Perfect Attendance, as defined in this document, is achieved, the oldest Occurrence will be evaporated; in the case of $1 / 2$ occurrences, the oldest $1 / 2$ occurrence and the next oldest $1 / 2$ occurrence or $1 / 2$ of the next full occurrence will be evaporated
- $\quad$ Credit $=$ When Perfect Attendance, as defined in this document, is achieved, if there are no Occurrences to evaporate, an Associate will bank a Credit which may be used to offset future Occurrences. A maximum of five (5) banked Credits may be kept at one time.


## Corrective Counseling Process

The purpose of this corrective counseling process is to communicate Sitel's expectations for Associates and to identify behaviors that need to be corrected.

NOTE: Adherence to breaks and lunches are not included in this policy. Leaving early for and/or returning late from paid breaks or unpaid lunches are measured using the "break aux" and/or "lunch aux" and/or "log in/log out" metrics and guidelines. Associates are responsible for understanding these requirements. Any issues with adherence to scheduled break and lunch periods will be addressed through performance counseling.

Corrective Counseling Action Steps

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One (1) Occurrence - A status communication meeting between the Associate and Coach will occur in which the Coach will remind the Associate of the importance of good attendance and punctuality. The Coach will note the date and time of this communication in the Agent's file.

Two (2) Occurrences - A status communication meeting between the Associate and Coach will occur in which the Coach will remind the Associate of the importance of good attendance and punctuality. The Coach will note the date and time of this communication in the Agent's file.

Three (3) Occurrences - A status communication meeting between the Associate and Coach will occur in which the Coach will remind the Associate of the importance of good attendance and punctuality. On this occasion, the Coach will inform the Associate that the next full occurrence will result in the initiation of the Corrective Counseling process. The Coach will note the date and time of this communication in the Agent's file.

Four (4) Occurrences - Verbal Counseling - An Associate may receive a verbal counseling when a total of four (4) occurrences are received. While this is a verbal counseling for the Agent, the Coach should document this coaching for the Agent's file.

Five (5) Occurrences - Written Counseling - A written counseling may be issued when an Associate receives a total of five (5) occurrences. Written counselings are documented and signed by the Associate and Coach/Supervisor.

Six Occurrences - Following the sixth (6th) occurrence, a formal conversation will occur between the Associate and the Coach. During this session, the Coach will remind the Associate that attendance related incidents are now in a more serious status and could result in termination of employment if not corrected. The Coach will note the date and time of this communication in the Agent's file.

Seven Occurrences - Final Counseling - an Associate may be subject to a final counseling after a total of seven (7) occurrences are received or after a single incident of a "no call/no show" absence. Final counselings are documented and signed by the Associate and Coach/Supervisor. This language should be included for the Associate to initial:
"I understand that I have been issued a Final Counseling as a result of violations of Sitel's attendance and timeliness policy. I further understand that any additional violation of this policy until attendance corrections have reduced the number of active occurrences will most likely result in the termination of my employment."

NOTE: All Final Counseling should be approved by HR.
Eight Occurrences- Termination - may occur for an Associate who has received a total of eight (8) occurrences, two
(2) consecutive no call/no show absences, or two (2) non-consecutive no call/no show absences within a twelve
(12) month period. Terminations for no call, no show absences are considered voluntary terminations without notice.

## Perfect Attendance Awards

Associates have some control over the progressive counseling process via "Evaporation" and "Credits". When Perfect Attendance is achieved (see Definitions), an Associate may evaporate one Occurrence or earn one Credit toward future Occurrences.

Example: An employee has four (4) consecutive scheduled work weeks where no Occurrences have been received thereby achieving Perfect Attendance. That Associate earns one Credit. The Associate also achieves Perfect Attendance for the next four (4) consecutive scheduled work weeks and another Credit is earned. There are two Credits in the Associate's "bank". The Associate then calls in for an unscheduled Absence. The Occurrence earned

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for that Absence is applied toward the bank of Credits. One Credit is removed to offset the Occurrence. The Associate now has a bank of one Credit.

Example: On March 1st an Associate has a total of seven (7) Occurrences and receives a Final Counseling for excessive absenteeism. No further Occurrences are received during the next four (4) consecutive work schedules. One (1) Occurrence will be evaporated as a result of Perfect Attendance. The Associate now has a total of six (6) Occurrences and the Final Counseling corrective action is reduced to the equivalent of a Written Counseling. If as of May 24, no further Occurrences have been received (Perfect Attendance) since the original Final Counseling was issued on March 1st, one (1) Occurrence will be evaporated as a result of Perfect Attendance for three sets of four consecutive work week schedules. The Associate now has four (4) total Occurrences and is reduced to the Verbal Counseling level.

Whenever Evaporation is applied to a corrective action, the corrective action document in the Associate's file should have this language added: "As a result of Perfect Attendance, the $\qquad$ counseling (verbal, written, final - whichever applies) is reduced to a $\qquad$ counseling." Both the Associate and the Coach should sign or initial the notation.

However, if the Associate returns to an unacceptable pattern of attendance and/or punctuality, the corrective action process will again be applied, at the discretion of management, resulting in action up to and including termination.

## Implementing Corrective Actions

Corrective actions will normally follow a stepped approach; however, management reserves the right to use discretion in applying this policy under individual circumstances. Coaches/Supervisors should consult with their Managers and/or Human Resources when considering action outside a stepped approach. In all situations when an Associate has received multiple corrective actions for different circumstances such as performance, attendance, punctuality, or conduct, corrective actions may be combined and action escalated. Coaches/Supervisors will consult with management and their site HR Manager/Director in these situations to determine appropriate disciplinary actions.

## Transitioning from previous attendance policies

As this policy becomes effective, Associates will remain at whatever level of Corrective Counseling that is currently in effect. For instance, on December 31, 2007 an Associate is currently on a Written Counseling (or its equivalent), as this policy takes effect, the Associate would remain on a Written Counseling. At the next full occurrence, the formal conversation that occurs at the sixth (6th) Occurrence of the new policy would occur. Any questions regarding administration of this policy during the transition, or at any other time, should be directed to the HR Leader at the site. corrective action up to and including separation of employment. Policies are in compliance with Federal, State/Provincial and local regulations and laws, where applicable.

