



Policy Statement QVC Human Rights Strategy

As part of the internationally active Qurate Retail Group, QVC Germany undertakes to always observe human rights and environmental Due Diligence obligations in an appropriate manner with the aim of preventing human rights and environmental risks, minimizing them and, if necessary, to end violation of human rights-related or environment-related obligations. This commitment applies to both our own business and our global supply and value chains. Our aim is that in the production and distribution of the products we sell, the environment is respected and protected in addition to human rights.

To this end, we direct our entrepreneurial activities, among other things, to the internationally recognised United Nations Guiding Principles on Business and Human Rights and are committed to the UN Charter of Human Rights and to the four fundamental principles and core labour standards of the International Labour Organization (ILO).

The responsible member of the Executive Board for this policy statement is the CEO of QVC Germany, Mathias Bork.

1. Risk management

QVC Germany has set up a risk management system to comply with the due diligence obligations described. Core elements of risk management are recurring and event-related risk analyses, the resulting definition of prevention and remedial measures, the QVC complaints procedure and the safeguarding of documentation and reporting obligations. Risk management has been anchored by QVC in all key business processes, in particular in the areas of Purchasing, Quality, HR, Compliance and Legal. QVC has also appointed a Human Rights Officer who, among other things, is responsible for monitoring risk management.

2. Risk analysis and priority risks

Risk analysis is at the heart of QVC risk management. Risk analyses in the area of human rights have been carried out by QVC for many years. The initial risk analysis in accordance with § 5 Abs 1 LkSG is about to be completed. QVC works together with an external, highly specialized service provider, in particular to carry out country- and ranch-specific risk mapping in its own business area and with suppliers and to ensure the fulfillment of documentation obligations. In a further step, the risk analysis is also partially substantiated down to the plant level and identified risks are prioritized on the basis of the criteria specified in § 3 para. 2 LkSG. In this way, QVC ensures that serious violations of human rights and environmental due diligence obligations can be countered without delay.

Initial results of the initial risk analysis have already been incorporated into this Policy Statement (as of 12/2022). After completion of the initial risk analysis and thereafter on a case-by-case basis, the policy statement is adapted and updated. To date, QVC has identified the following risks as material:

- Child labor, slavery and forced labor
- Risks to the health and safety of people at work
- Discrimination in any form (e.g. based on gender, age, ethnic and social origin, nationality, religion or belief, physical or mental disability, sexual orientation)
- Restriction of freedom of assembly and association
- Compliance with the applicable minimum wage regulations and working hours
- Environmental risks such as water, soil or air pollution

3. Prevention and remedial measures in one's own business area – guidelines for action for its own employees

We expect our employees to strictly observe all human rights and environmental due diligence. In order to sensitize our employees to respect for human rights, we carry out regular, mandatory training and further education measures. In addition, employees involved in procurement activities receive additional training and are therefore also responsible for monitoring respect for human rights and environmental standards in the supply chain. An overview of the standards and voluntary commitments of the Qurate Retail Group, which are also binding for the employees of QVC Germany, can be found [here](#).

Should further measures become necessary in the future as a result of the risk analyses to be carried out by us, these will be implemented immediately. The effectiveness of the measures shall be monitored on a recurring basis, at least annually.

4. Prevention and remedial actions of direct suppliers – expectations of our suppliers

We also expect our business partners to commit to respecting human rights and environmental due diligence obligations, to set up appropriate due diligence processes and to pass on these expectations to their employees, suppliers and service providers. We also support our suppliers in monitoring and ensuring the protection of human rights in their respective supply chains. Through our [Code of Conduct](#) and the contractual inclusion of the Code of Conduct in our supply relationships, suppliers of all brands of the Qurate Retail Group are obliged to adhere to the highest ethical standards, e.g. in relation to human rights and environmental due diligence. We only work with suppliers who comply with our Code of Conduct. This requires, among other things: that the products are manufactured in compliance with the following conditions:

- Human rights
- Fair working conditions
- Safety of employees
- Environmental compatibility of production and manufacturing processes

In addition, the products must meet all material requirements applicable in the respective sales countries.

Compliance with the Code of Conduct is continuously reviewed in order to uncover grievances at an early stage and to remedy them. Through tax audits, audits, surveys and continuous communication, we hold our suppliers accountable. Global audits of business partners aim to create transparency with regard to working and production conditions and to process and remedy possible violations.

5. Measures in the deeper supply chain

We are aware that risks to human rights and environmental due diligence obligations can exist not only for our suppliers, but especially in the deeper supply chain. We therefore oblige our suppliers to pass on the requirements we place on them to their respective contractual partners and to ensure compliance with human rights and environmental standards.

6. Complaints Procedure

QVC has established a grievance procedure that allows any person to confidentially report to QVC any information about risks or violations of human rights or environmental obligations in QVC's supply chain. It is a protected channel for transmitting observations, information and concerns. A report can be made at any time via the following website: <http://QVCGermany.ethicspoint.com>. Confidential information can also be transmitted anonymously via the telephone numbers given there.

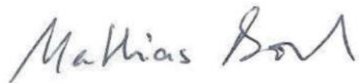
The appeal procedure is described in detail in written rules of [procedure for appeal procedures](#). QVC expressly calls on all persons, whether employees, suppliers, other data subjects and other third parties, to actively inform QVC of possible risks. This is the only way QVC can best ensure that human rights and environmental risks or violations are eliminated or minimized.

7. Documentation and reporting obligations

QVC documents in particular the performance of the risk analysis and its results. With the support of an external provider, it will also be documented in the future whether the derived prevention and remedial measures have been implemented. QVC Germany complies with all reporting obligations in accordance with the applicable legal requirements.

At least annually, but also on a case-by-case basis, we check how effective our measures are. The effectiveness can be seen in the aforementioned audits, surveys and the results of our continuous analysis of human rights risks and impacts. Based on this, our declaration of principles is constantly being adapted and expanded.

Düsseldorf, 2022-12-22

A handwritten signature in black ink that reads "Mathias Bork". The signature is written in a cursive, slightly slanted style.

Mathias Bork, CEO QVC Germany