



Section Title: Ethics & Compliance
Policy Title: Anti-Bribery and Anti-Corruption Policy (US)
Effective Date: 4/2/2018
Revision Date(s): 4/29/2021

Anti-Bribery and Anti-Corruption Policy (US)

SUMMARY OF THIS POLICY

QVC Group's operating brands (collectively "QVCG" or the "Company") hold themselves to high ethical standards and full compliance with the law. At the core of QVC Group's Principles is the expectation that QVC Group team members will do what's right. This means team members must always act with integrity, take the time to consider and reflect upon the impact of their choices, and take ownership of their actions. These are fundamental elements to QVC Group's overall success. A central part of that expectation is that all team members and Business Partners understand and comply with QVC Group's Ethics & Compliance Policies, and that no team members or Business Partners will offer, provide, request, or accept benefits or things of value in order to give or receive an improper advantage.

THIS POLICY APPLIES TO

This Policy applies to all U.S. QVC Group team members and Business Partners, but excludes employees of QVCG, Inc. ("QVCG"), QVC Group's parent company.

THE POLICY

Definitions

1. "Business Partner" means current or prospective agents, contractors, suppliers, Company-retained bloggers (including brand ambassadors or other influencers), Vendors, distributors, consultants, other third-party intermediaries, and joint venture partners. "Vendor" shall mean any company or party that sells something or provides a service.
2. "Government Official" means any officer, employee, or other person acting for or on behalf of:
 - a government or any department or agency of a government;
 - any entity or organization that is controlled or directed by a government;
 - a state-owned or state-controlled company;
 - a political party, political candidate, or political party official;
 - a public international organization (e.g., the United Nations, the World Bank, International Committee of the Red Cross, the Organization for Economic Cooperation and Development);
 - or
 - a member of a royal family.
3. Family members or close personal friends of those listed above can be considered Government Officials, even if they are not otherwise associated with a government or public office. Government Officials can also include consultants who hold government positions, employees of companies owned or controlled by governments, civil servants, administrative and judicial officers, political candidates, and members of the military.



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DETAILS ABOUT THE POLICY

THE POLICY

At QVC Group, we only seek business advantages through fair, legal, and ethical conduct. We do not offer, provide, request, or accept benefits or things of value in order to give or receive an improper advantage.

This Policy applies in all cases, whether the thing of value is given, promised, offered, requested, or accepted. It applies whether it is given directly or indirectly, such as through an external person or intermediary, or through a spouse, family member, close relative, friend, or associated company, and whether the request or offer comes from a Government Official or entity, or a private person or entity.

Benefits and Things of Value

Anti-corruption laws are very broad. A benefit or thing of value is anything of value to the recipient and can include:

- Cash or cash equivalents, such as gift cards or vouchers;
- Gifts, travel, hospitality, and reimbursement of expenses;
- Offers of employment;
- Charitable contributions;
- Political contributions;
- Forgiveness of debt; or
- Payments above market value.

Improper Advantages

An improper advantage means any advantage that would not be available without some improper behavior. For example, an improper advantage can mean receiving favorable tax treatment, a better deal or price, an import license, or a Business Partner agreement in return for providing a benefit or thing of value.

Business Partners

We work with Business Partners outside of QVC Group, and QVC Group can be held responsible for our Business Partners' actions. In order to protect our reputation and to ensure the integrity of our business and marketing relationships, we carry out appropriate due diligence on our Business Partners. We also require that our Business Partners sign appropriate agreements to protect our reputation and relationships. Consult the Due Diligence Policy & Procedures for more information.

Gifts, Hospitality, Promotional Expenses, and Travel

Gifts, hospitality, promotional expenses, and travel can, at times, be justified for our legitimate business objectives, but they must be reasonable, modest, and legal. At QVC Group, we do not offer or accept



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gifts, hospitality, promotional expenses, travel, or other benefits or expenses where they might improperly affect, or appear to improperly affect, the outcome of a business decision, or where they would violate applicable laws. Consult the Receiving Gifts, Meals, and Entertainment Policy; Global Travel and Entertainment Policy; Gifts, Meals, and Entertainment Offering Policy; and Sample Handling Policy for more information.

Charitable Contributions

At QVC Group, we are committed to giving back to the communities we serve, through such means as corporate philanthropy, product donation, and in-kind gifts. We must make sure that charitable contributions are made for the right reasons and are not misconstrued or used as a pretext for corruption. Accordingly, all charitable contributions proposed to be made on behalf of the Company or at the request of a QVC Group Business Partner must be reviewed, vetted, and approved in advance by Community Affairs (Giving@qvcgrp.com). Additional review by the Ethics & Compliance team may be required. For example, additional review by the Ethics & Compliance team is required for any proposed charitable contribution connected to a QVC Group Business Partner or Government Official.

Political Contributions

QVC Group does not directly or indirectly make contributions to political parties, party officials, candidates or organizations or individuals engaged in politics as a pretext for corruption. All political contributions by or on behalf of QVC Group must be approved in advance by the Company's General Counsel to ensure that they are made transparently and legally. Consult the Conflict-of-Interest Policy for more information.

Facilitation or Informal Expediting Payments

Team members and QVC Group Business Partners must not offer, pay, promise, or give a benefit or anything of value to a Government Official in exchange for any improper business advantage, including a commitment to expedite or perform a routine government action.

Extortion

At QVC Group, we resist extortion, but the safety of our team members is most important. Extortion means a payment made in response to threats of physical harm. If a team member feels threatened with physical harm, they can make a payment if necessary to ensure their own safety in the situation. Team members must then contact their supervisor and the Company's General Counsel, Chief Ethics & Compliance Officer, or such person's designee as soon as possible. Payments must not be paid in response to business or financial threats.

Compliance with Laws and Regulations

We must comply with all applicable international, national, and local laws, regulations, rules, and ordinances, including, but not limited to, those relating to anti-corruption, fraud and bribery. Team members responsible for Business Partners must be aware of local market legal and regulatory requirements that apply to the business operations and contact the QVC Group Ethics & Compliance or



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Legal Teams for guidance if uncertain. If there is any difference between local law and any Ethics & Compliance Policy or Procedure, the strictest standard must be followed. The Company's Chief Ethics & Compliance Officer or such person's designee must be contacted in advance of any proposed deviation from this Policy, the Due Diligence Policy & Procedures, or any other Policy or Procedure.

Auditing and Internal Accounting Controls

At QVC Group, we keep accurate books and records that properly and fairly document all financial transactions. These books and records are available for inspection. We do not inaccurately record transactions, maintain off-the-books accounts, or enter into side agreements. Team members and Business Partners are prohibited from any such activity.

In order to maintain transparency, we have an effective system of internal controls, including financial and organizational checks and balances of the QVC Group accounting and record keeping practices and other business processes. Team members and Business Partners must adhere to those controls and cooperate with any audits that QVC Group conducts. The system of internal controls accounting and record keeping practices will be frequently reviewed and internally and externally audited. This is to make sure that they are effective and will be improved when required.

Monitoring and Testing

We are committed to the continuous improvement of our Anti-Bribery and Anti-Corruption compliance program. The Ethics & Compliance Team will periodically monitor and conduct testing and review of this Anti-Bribery and Anti-Corruption Policy and related business processes to assess their suitability, adequacy, and effectiveness. We will make improvements as appropriate.

Investigations

The Company may need to conduct internal fact-finding or investigations to evaluate matters covered by this Policy. Team members must cooperate with these internal investigations. Consult the Investigations and Reported Concerns Policy for more information.

QVC Group Business Partners are also expected to cooperate with these internal investigations and must provide proper and accurate information to QVC Group at all times. QVC Group reserves the right to suspend or terminate its relationship with a Business Partner which fails to provide reasonably requested information about their business operations, is found to have violated the QVC Group Anti-Bribery and Anti-Corruption Policy, or which refuses to cooperate in an investigation.

Cooperation in an investigation under this Policy does not restrict personal rights that exist under local legal provisions.

Internal Reporting and Non-Retaliation

QVC Group is committed to compliance with all applicable laws and regulations and to a policy that encourages team members to timely disclose concerns while ensuring that those concerns are addressed



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safely and confidentially. Complaints, concerns, and questions will be kept in confidence to the greatest extent possible.

QVC Group team members will not be retaliated against in any way for refusing to pay bribes or engage in other improper conduct, even if the refusal may result in loss of business for QVC Group. Nor will QVC Group tolerate retaliation against anyone who, in good faith, reports an actual or suspected violation of this Policy, who reports concerns about other illegal or unethical conduct, or who participates in an investigation, even if the report is ultimately not proved. Any allegations of retaliation should be reported and will be investigated.

Questions and Guidance and Reports

Team members can contact the QVC Group Ethics & Compliance team with questions relating to this Policy or to any other Ethics & Compliance concern by emailing [Ethics- Compliance@qvc.com](mailto:Ethics-Compliance@qvc.com). Questions and concerns can also be raised to the QVC Group General Counsel: General.Counsel@qvc.com, or to the QVCG, Inc. Compliance Line: 866.222.1232 or website: <https://liberty.tnwreports.com>.

BREACHES OF THIS POLICY

Breaches of this policy may result in disciplinary or corrective action up to and including termination or the most severe level of discipline allowed by applicable law or legal provisions.