



**Section Title:** Ethics & Compliance  
**Policy Title:** Anti-Discrimination, Harassment, & Retaliation Policy (US)  
**Effective Date:** 9/13/2018  
**Revision Date(s):** 2/3/2020

## Anti-Discrimination, Harassment, & Retaliation Policy (US)

### SUMMARY OF THIS POLICY

QVC Group's operating brands (collectively, "QVCG" or the "Company") is committed to providing a work environment in which all individuals/team members are treated with respect and dignity based on appropriate behavior in the workplace. QVC Group prohibits all forms of discrimination, harassment, and retaliation based upon an individual's Protected Status, as defined below, without regard to whether the conduct may or may not also violate applicable laws. All team members have the duty to prevent discrimination, harassment, and retaliation in the workplace. Additionally, all team members are expected to conduct themselves in a way that fosters a comfortable, professional, and respectful working atmosphere for others and to avoid any conduct that could reasonably be interpreted as discrimination, harassment, or retaliation.

### THIS POLICY APPLIES TO

All QVC Group team members, applicants for employment, and non-team members such as customers, vendors/partners, independent contractors, visitors, volunteers, interns, and other third parties with whom QVC Group has business dealings, regardless of immigration status. This policy applies to conduct both in the actual workplace and in work-related settings outside the workplace, such as business trips, business-related social functions, and Company functions, and social interactions that impact the workplace or otherwise arise out of the workplace.

### THE POLICY

#### Definitions

**Protected Status:** Protected Status is defined under this policy to include the following characteristics, statuses, classes and/or categories: race (including traits historically associated with race, including but not limited to hair texture and protective hairstyles), creed, color, national origin, ancestry, citizenship, religion, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions, including, but not limited to, lactation), gender, gender identity and/or expression, sexual orientation, military or veteran status, marital status, age, the presence of any sensory, physical or mental disability, medical condition (as defined by applicable state law), genetic information, or any other characteristic protected by law.

**Discrimination:** Discrimination that violates this policy is defined as adverse treatment based on an actual or perceived Protected Status (or affiliation with someone of an actual or perceived Protected Status), rather than on the basis of an individual's merit, in regard to recruiting, hiring, job assignment, compensation, hours of work, benefits, promotions, demotions, transfers, training/education, social/recreational programs, separations/layoffs, discipline, termination, or any other term, condition, or privilege of employment.

**Harassment:** Harassment that violates this policy is a form of misconduct based on actual or perceived Protected Status. It is a form of discrimination. Harassment has the purpose or effect of creating or maintaining an intimidating, hostile, or offensive work environment or unreasonably interfering with an individual's work performance or adversely affecting an individual's employment opportunities. Harassment is prohibited not only by Company policy but also by many federal, state, and local laws. Not



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every behavior or action that might be offensive to a team member will necessarily be considered harassment in violation of this policy. The totality of the circumstances will be carefully reviewed/considered when determining if a violation of this policy has occurred.

Examples of harassment that is prohibited under this policy include, but are not limited to: using epithets, slurs, negative stereotypes, derogatory remarks, threats, intimidation or engagement in hostile acts, actions or gestures that demean, purported jokes or pranks, dissemination of explicit voicemail, email, graphics, or downloaded material/websites, and media (e.g., pictures, posters, cartoons, graffiti) placed on walls, bulletin boards, or elsewhere on Company premises or circulating in the workplace that shows hostility toward or are directed at a Protected Status.

Sexual Harassment: Sexual harassment that violates this policy includes unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal, written, or physical conduct or behavior either of a sexual nature (whether involving the same or opposite sex) or which is directed at an individual because of that individual's sex when:

- a. submission to such conduct is made either an explicit or implicit term or condition of employment or engagement with the Company, or
- b. submission or rejection of such conduct is used as the basis for employment or engagement with the Company decisions such as, but not limited to, hiring, termination, compensation, promotions, training, assignments, and schedules affecting the team member, or
- c. such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment, even if the reporting individual is not the intended target of the sexual harassment.

Examples of unwelcome behavior that could be considered sexual harassment under this policy include, but are not limited to: verbal comments or innuendos of a sexual nature or about a person's body, unwelcome physical contact, the display of sexually suggestive objects or pictures, sexual propositions, sexually suggestive comments, sexual innuendos, words of a sexual nature used to describe a person or situation, sexually oriented teasing, joking, or story-telling, jokes about gender specific traits, sexist remarks, sex stereotyping, using derogatory or demeaning terms (e.g., "honey," "sweetie") or cat calls, repeated comments about one's attire, appearance, or anatomy, persistent social invitations, leering, foul or obscene language or gestures, displays of foul or obscene material including those through the use of any computer or other telecommunications including, for example, email, text, and chat.

Examples of unwelcome physical contact include but are not limited to brushing up against another's body, standing too close, hugging, stroking, pinching, patting, massaging, kissing, fondling, or other touching.

Retaliation: Retaliation prohibited by this policy is any adverse employment action that is in response to an individual engaging in "protected activity." Protected activity occurs when a person has, in good faith: (i) made a complaint of discrimination, or harassment, either internally or with any anti-discrimination agency; (ii) testified or assisted in a proceeding involving federal, state, or local anti-discrimination law; (iii) opposed discrimination or harassment by making a verbal or informal complaint to management, or by informing a supervisor or manager of discrimination or harassment; (iv) reported that another individual has been discriminated against or harassed; or (v) encouraged an individual to report discrimination or



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harassment. Making intentionally false claims of discrimination, harassment or retaliation is not protected activity. Retaliation is prohibited under this policy and may also be unlawful.

## **Responsibilities**

Any officers and all levels of managers, supervisors, and members of the People team (Human Resources)/Team Member Relations/ Team Member Services who receive a complaint about, observe, or suspect that discrimination, harassment, or retaliation under this policy is occurring must promptly report the matter. Any officer, manager, supervisor, or member of the People team (Human Resources)/ Team Member Relations/ Team Member Services who has knowledge of discrimination, harassment, or retaliation and takes no action to end or report it or fails to do so in a timely manner, will be subject to disciplinary/corrective action up to and including termination of employment.

Everyone is expected to share in the responsibility of maintaining a work environment free from discrimination, harassment and retaliation, and everyone is responsible for reporting any instances they believe to be discrimination, harassment or retaliation. Everyone who is part of the investigation is expected to cooperate and provide truthful information. Anyone who conceals information, or knowingly provides false or misleading information will be subject to discipline up to and including termination of employment, or, in the case of non-team members, termination of the business relationship or other corrective action that is reasonable and appropriate under the circumstances.

## **Reporting and Investigating**

All incidents of suspected or known discrimination, harassment, retaliation or other violations of this policy, whether experienced or witnessed, must immediately be reported. There are a number of ways in which a report can be made, including to the team member's respective QVC Group Company's People and Org Partner(Human Resources)/Team Member Relations/Team Member Services group, immediate supervisor, or other member of management with whom you are comfortable communicating, or QVC Group's Ethics and Compliance Department (Ethics- Compliance@qvc.com), QVC Group's General Counsel: [General.Counsel@qvc.com](mailto:General.Counsel@qvc.com), or to the QVC Group (formerly Liberty Interactive) Compliance Line: 866.222.1232 or website: <https://liberty.tnwreports.com>.

**NOTE:** If a supervisor knows or suspects discrimination, harassment, or retaliation is occurring, he/she must report it to the HR Business Partner, People and Org Partner, or Team Member Relations Partner assigned to his/her business unit. If, however, a supervisor or manager believes that he or she has experienced harassment, he or she has multiple avenues of complaint, including all of the avenues listed above.

Team members are not obligated to file complaints with their immediate supervisor first before bringing the matter to those listed above. The Company urges team members to report all incidents of discrimination, harassment, and retaliation, regardless of the offender's position or relationship with the Company.

The People team (Human Resources)/Team Member Relations/ Team Member Services or another impartial, qualified person will conduct a fair, prompt, and thorough investigation that provides the complaining party(ies), target(s) of the behavior, and those accused of violating the policy with an opportunity to be interviewed or otherwise respond to the complaint, and that reaches reasonable conclusions based on the evidence collected. No one accused of harassment, discrimination, or



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retaliation will be an investigator of that complaint. QVC Group will treat all communication under this policy in a confidential manner to the fullest extent possible but cannot guarantee complete confidentiality consistent with the need to fully and fairly investigate. QVC Group's process protects the rights and interests of all persons involved in investigations, including complainants, witnesses and alleged wrongdoers.

The team member who made the complaint will be informed when the investigation has been concluded and informed of the resolution if appropriate.

QVC Group will take timely and appropriate action to resolve the situation based on the outcome of the investigation. If QVC Group determines, in its sole discretion, that a violation of this policy (or any QVC Group policy) or inappropriate conduct has occurred, it may take action that includes but is not limited to additional or remedial training, referral to counseling, reassignment, transfer, and/or appropriate discipline/corrective action up to and including termination of employment or, in the case of non-team members, termination of the business relationship or other corrective action that is reasonable and appropriate under the circumstances.

QVC Group will not retaliate and will not permit any retaliation against any team member who in good faith makes a complaint of harassment, discrimination, or retaliation, nor against any team member who assists in or is part of the investigation. This protection against retaliation extends to individuals who file a complaint with, or otherwise participate in an investigation, proceeding, or hearing conducted by a federal or state court agency.

QVC Group's process for reporting and investigating does not prevent a team member from filing a complaint with a governmental agency that investigates claims of unlawful harassment, discrimination, and retaliation.

## BREACHES/VIOLATIONS 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.



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## ADDENDUM A – NEW YORK ADDENDUM

### NEW YORK ADDENDUM

#### POLICY AGAINST DISCRIMINATION, HARASSMENT, AND RETALIATION

The purpose of QVC Group's ("QVC Group" or the "Company") Policy is to educate covered individuals on prohibited conduct and establish prompt, thorough and effective procedures for responding to every complaint and incident so that problems can be identified and remedied internally. QVC Group's standard complaint form is attached to this addendum.

#### **Sexual Harassment**

Sexual harassment is a form of sex discrimination which is prohibited by federal, state, and (where applicable) local law. Sexual harassment may also be unlawful. In New York, the law explicitly provides that sexual harassment includes harassment on the basis of self-identified or perceived sex, sexual orientation, gender expression, gender identity and the status of being transgender.

Sexual harassment can occur between any individuals, regardless of their sex or gender. A superior, subordinate, coworker or anyone in the workplace including an independent contractor, temporary agency worker, vendor, client, customer or visitor can engage in sexual harassment.

Sexual harassment can occur anywhere. Sexual harassment is not limited to the physical workplace itself. It can occur while traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by covered individuals can constitute inappropriate workplace harassment, even if they occur away from the workplace premises, on personal devices, or during non-work hours.

#### **Retaliation**

In New York, retaliation is any adverse action that could discourage an individual from coming forward to report or support a discrimination or harassment complaint.

#### **External Legal Protections and Remedies**

Discrimination, harassment and retaliation are not only prohibited by QVC Group but also are prohibited by state, federal, and, where applicable, local law, and may also be unlawful. It is QVC Group's desire to resolve all complaints of discrimination, harassment and/or retaliation through the internal complaint resolution process described above. However, QVC Group also recognizes an individual's right to seek assistance from outside agencies. Aside from the internal process at QVC Group, individuals who believe they may have been discriminated, harassed and/or retaliated against may choose to contact the following governmental entities.

QVC Group is subject to the New York Executive Law, administered by the New York State Division of Human Rights ("SDHR"), Title VII of the Civil Rights Act, administered by the U.S. Equal Employment Opportunity Commission ("EEOC"), and the New York City Human Rights Law, administered by the New York City Commission on Human Rights ("CCHR").



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These agencies take complaints of discrimination, harassment, and retaliation and investigate to make determinations on the merits. Administrative and judicial review of agency determinations is provided for by the laws in question. You also have the right to file a complaint in a court of law. You can locate the nearest regional SDHR office by calling (718) 741-8400 or on the website at <https://dhr.ny.gov>. The EEOC is at 33 Whitehall Street, 5th Floor, New York, New York 10004 or you can call (800) 669-4000, (TTY: 1-800-669-6820). Information about the CCHR is located at: [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml) or by calling 311. Many localities enforce laws protecting individuals from discrimination, harassment, or retaliation. You may contact your county, city or town to see if such a law exists.

If there is a finding that the law was violated, remedies may include termination of unlawful acts, monetary damages, including back pay and benefits, attorney's fees and costs, civil fines, equitable relief and possible liquidated damages.

#### **POLICY AGAINST DISCRIMINATION OR HARASSMENT BASED ON REPRODUCTIVE HEALTH DECISION MAKING**

New York law also protects against discrimination and retaliation based on a team member's or a dependent's reproductive health decision making, which includes the decision to use or access a particular drug, device or medical service. The reporting procedures set forth in the Policy Against Discrimination, Harassment, and Retaliation (United States) apply to this provision and must be followed. You have the right to file a complaint in a court of law for any such violations, and a court may: award damages, including back pay, benefits, and attorney's fees and costs if you prevail, order civil penalties, provide injunctive relief, order reinstatement, or award liquidated damages if the Company does not have a good faith basis to believe it was in compliance with the law.



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**ADDENDUM B - COMPLAINT FORM NEW YORK**

**COMPLAINT FORM - NEW YORK**

**POLICY AGAINST DISCRIMINATION, HARASSMENT, AND RETALIATION**

If you believe that you have experienced or witnessed conduct that is prohibited by the Company's Policy Against Discrimination, Harassment, and Retaliation (the "Policy"), you are encouraged to use this form to report such conduct or report it verbally to your respective People and Org Partner ( Human Resources\_/Team Member Relations/Team Member Services group, or immediate supervisor, second-level leader, department leader, other member of management with whom you are comfortable communicating, an attorney within the legal department, or QVC Group's Ethics and Compliance Department ([Ethics-Compliance@qvc.com](mailto:Ethics-Compliance@qvc.com)) Questions and Concerns can also be raised to the QVC Group's General Counsel: [General.Counsel@qvc.com](mailto:General.Counsel@qvc.com), or to the QVC Group (formerly Liberty Interactive) Compliance Line: 866.222.1232 or website: <https://liberty.tnwreports.com>

\_\_\_\_\_  
 Your Name and Job Title

\_\_\_\_\_  
 Phone Number and Email Address

\_\_\_\_\_  
 Date Offending Conduct First Occurred

\_\_\_\_\_  
 Date Offending Conduct Last Occurred

Harassment/Discrimination: If you believe that you have been subjected to harassment or discrimination, witnessed harassment or discrimination, or have knowledge of harassment or discrimination, please describe the discriminatory or harassing conduct or actions (if you need more space, please continue on a separate piece of paper):

\_\_\_\_\_  
 \_\_\_\_\_

Retaliation: If you believe that you or another team member were treated differently after reporting or helping someone report discriminatory behavior or harassment, participating as a witness in an investigation or other judicial or administrative action, or opposing discriminatory behavior or harassment, state how you or another team member opposed the discrimination or harassment, and explain the retaliatory conduct (if you need more space, please continue on a separate piece of paper):

\_\_\_\_\_  
 \_\_\_\_\_





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Alleged Wrongdoer: Identify the person or people who you believe discriminated, harassed and/or retaliated against you and/or another team member (if you need more space, please list them on a separate piece of paper):

Name: \_\_\_\_\_ Title: \_\_\_\_\_  
Name: \_\_\_\_\_ Title: \_\_\_\_\_

Witnesses: List all the people you believe are witnesses to the discriminatory, harassing or retaliatory conduct (if you need more space, please list them on a separate piece of paper):

Name: \_\_\_\_\_ Title: \_\_\_\_\_  
Name: \_\_\_\_\_ Title: \_\_\_\_\_

Documents: If there are any documents that you believe are relevant to your complaint, please attach them.

Additional Information: If there is any additional information that you would like to provide or that you believe would assist us in our investigation, tell us more in the space below (if you need more space, please continue on a separate piece of paper)





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## ADDENDUM C - MASSACHUSETTS ADDENDUM

### MASSACHUSETTS ADDENDUM

#### POLICY AGAINST DISCRIMINATION, HARASSMENT, AND RETALIATION

#### Reporting

All incidents of suspected harassment, discrimination or retaliation or other violations of the Policy Against Discrimination, Harassment, and Retaliation must be immediately reported to any of the resources listed in the Reporting and Investigating section of the Company's policy. Concerns may also be reported to:

<p><b>Name:</b> Sherry Anderson  <b>Title:</b> Human Resources Business Partner  <b>Email:</b> <a href="mailto:shanderson@ballarddesigns.net">shanderson@ballarddesigns.net</a>  <b>Address:</b> 1670 Defoor Avenue, Atlanta, GA 30318  <b>Phone:</b> 404-603-7118</p>	<p><b>Name:</b> Kim LeVear  <b>Title:</b> Senior Director, Human Resources  <b>Email:</b> <a href="mailto:klevear@ballarddesigns.net">klevear@ballarddesigns.net</a>  <b>Address:</b> 1670 Defoor Avenue, Atlanta, GA 30318  <b>Phone:</b> 404-603-7023</p>
<p><b>Name:</b> Sonya Taylor  <b>Title:</b> Human Resources Manager  <b>Email:</b> <a href="mailto:Sonya.taylor@garnethill.com">Sonya.taylor@garnethill.com</a>  <b>Address:</b> 100 Domain Drive, Suite 110, Exeter, NH 03833  <b>Phone:</b> 603-823-3878</p>	<p><b>Name:</b> Heather Bushey  <b>Title:</b> VP People  <b>Email:</b> <a href="mailto:Heather.bushey@garnethill.com">Heather.bushey@garnethill.com</a>  <b>Address:</b> 231 Main Street, Franconia, NH 03580  <b>Phone:</b> 603-823-3844</p>

#### State and Federal Remedies

If a team member believes he or she has been subjected to discrimination, harassment, or retaliation, he or she may file a formal complaint with either or both of the government agencies set forth below. Using the Company's complaint process does not prohibit a team member from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC -300 days; MCAD -300 days).

1. The United States Equal Employment Opportunity Commission ("EEOC") One Congress Street, 10th Floor Boston, MA 02114, (617) 565-3200.
2. The Massachusetts Commission Against Discrimination ("MCAD") Boston Office: One Ashburton Place, Rm. 601, Boston, MA 02108, (617) 994-6000. Springfield Office: 424 Dwight Street, Rm. 220, Springfield, MA 01103, (413) 739-2145.