



## **Rules of Procedure QVC GERMANY**

### **for complaint handling in accordance with the Act on Corporate Due Diligence in Supply Chains (SCDDA) of QVC Handel S.à r.l. & Co. KG**

#### **Introduction**

QVC attaches great importance to human rights and the protection of the environment. With your reports and information, you support QVC Germany in the sustainable and effective protection of these priorities. QVC Germany expressly calls on all persons, whether employees or external parties, not to look away from violations or even risks of violations of human rights or the environment, but to actively report on them. This is the only way QVC can best ensure that human rights and environmental risks are eliminated or minimized.

In order to ensure a proper complaints procedure at all times, QVC Germany cooperates with the company NAVEX. NAVEX has developed the EthicsPoint reporting tool, which allows any reports to be kept confidential and secure. These Rules of Procedure describe the steps involved when QVC receives a complaint related to the SCDDA through EthicsPoint.

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## 1. Purpose and objective of the complaints procedure

- The complaints procedure enables any person to confidentially report to QVC Germany information about risks or violations of human rights or environmental obligations in QVC Germany's supply chain. It is a protected channel for conveying observations, information, and concerns.
- Any report made in good faith helps QVC to identify human rights and environmental risks in its supply chain at an early stage and to prevent their occurrence or to address any violations that have already occurred. Therefore, it is important to report such observations. We encourage such reporting and expressly ask for your cooperation.
- Below are the main elements of the complaints procedure. For questions in connection with your reports, please contact one of the reporting channels listed below (Section 4.) or the caseworker identified after you have filed your report (Section 6.).

## 2. Type of complaints within scope

- Information related to risks or violations with regard to human rights or environmental obligations along the entire supply chain of QVC Germany is in scope.
- This covers not only risks and violations within the companies / locations / production sites / branches of QVC Germany, but also within the companies / locations / production sites / branches of all suppliers of QVC Germany and the suppliers of the suppliers.
- Report your observations and perceptions regarding possible risks and violations of human rights and environmental concerns. Provide full details regarding your concerns, including relevant dates, locations, people involved, companies involved, and witnesses.
- Examples of potential risks that you can and should report on are:
  - violations of prohibitions on: child labor, forced labor, and all forms of slavery; unequal treatment in employment relationships or the deprivation of an adequate wage; and the assignment of inadequately trained or controlled private or public security forces
  - destruction of natural resources such as soil, water, air, etc. through environmental pollution
  - disregard for health and safety at work and work-related health hazards, disregard for freedom of association and the right to collective bargaining
  - unlawful violation of land rights
  - other obvious violations of other human rights

- Examples of specific environmental risks that you can and should report on are violations against:
  - a ban resulting from the Minamata Convention – the Minamata Convention regulates the handling of mercury
  - the prohibition of the production and/or use of persistent organic pollutants (POPs) and the unenvironmentally sound handling of waste containing POPs
  - the prohibition of the import and export of hazardous waste within the meaning of the Basel Convention

### 3. Individuals who can submit reports

- Any person can report, regardless of whether they are employed by QVC Germany (permanent employee, temporary worker, intern, etc.) or are an external contact with QVC Germany (e.g. employees of a supplier).
- A reporter does not have to be affected by the risk or injury. Third parties such as journalists or citizens who live near sites can also make reports. It is also possible to exchange information with interest groups regarding the report or to be represented by them during the report (e.g. representation/reporting by trade unions, NGOs or other third parties).

### 4. Ways of reporting complaints

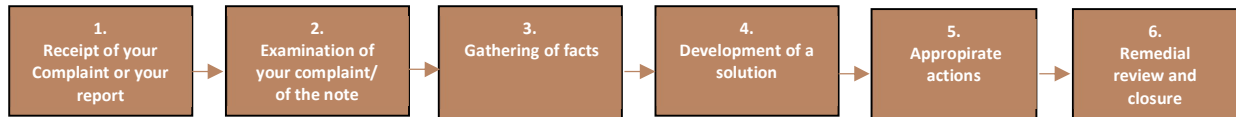
Information can be submitted via the following complaint channels:

- Webpage: <http://QVCGermany.ethicspoint.com>
- Hotline:

NAVEX Telephone Numbers	
United States	(866) 222-1232
China	4008801424
Dominican Republic	1-888-225-5288 (Spanish access code for United States number) 1-800-225-5288 (English access code for United States number)
Germany	08007241917
Italy	800925013
Japan	0120 984174
Poland	008001510230
UK	08009179782

## 5. Complaints Process

### Overview of the process steps:



#### **Step 1: Receipt of complaint/notice**

You make your report via one of the complaint channels mentioned in section 4. As a rule, you use the reporting form on the Internet. This allows you to make a confidential and, if desired, anonymous report. NAVEX does not create or maintain internal connection logs with IP addresses, so no information is available that associates your PC with EthicsPoint. If you are interested, please see [Ethics and Whistleblower Hotline Provider | NAVEX E&C | NAVEX](#). If, on the other hand, you do not want to submit the report anonymously, there is a section in the reporting form in which you can provide information about yourself.

Alternatively, you can also report the same information confidentially and anonymously via a toll-free telephone hotline (see Section 4). You would provide the same information in the phone call, and a communication specialist at the call center will enter your answers into the EthicsPoint website. These reports shall be subject to the same security and confidentiality measures as for online submissions.

The receipt of your report will be confirmed and documented to you.

#### **Step 2: Examination of the complaint/notice**

The reports are entered directly on the secure server of EthicsPoint. NAVEX makes these reports available only to certain individuals within the organization who are responsible for evaluating the report, depending on the nature of the concerns and the location of the incident.

When you submit a report on the EthicsPoint website or through the EthicsPoint Call Center, you will receive a unique, randomly assigned number, called the "Report Key," and will be asked to choose a password. If you later want to add to your report, you can return to the EthicsPoint system either over the Internet or by phone and access the original report to add more details.

#### **Step 3: Gathering of facts**

In addition, QVC may follow up and post questions or requests for additional information. You should access your report via your report key and password regularly, to check for any new postings. You may be asked whether you would be willing to speak with someone about your concerns. If you are willing to do so, QVC will coordinate a date and time.

**Step 4: Develop a solution**

On the basis of the substantiated facts, a proposed solution is developed. Upon resolution of the matter you will be contacted regarding the outcome.

**Step 5: Appropriate Actions**

If based on the substantiated facts remedies are needed those measures will be implemented as soon as possible. The implementation is carried out either by QVC or an organization commissioned by QVC.

**Step 6: Review of the actions taken and completion of the process**

The implementation of the remedial action is reviewed and evaluated internally. The reporter will get a message about the result of the evaluation. If the risk or injury is sufficiently eliminated the process is completed.

**Timeline**

QVC works as efficiently as possible to review and resolve issues. Every investigation and every remedial action are different. The time required may therefore vary. QVC strives to deal with all concerns in case processing as quickly as possible, but prioritizes reports that raise more serious concerns from a risk/injury perspective. In any case, the reporters will be given feedback on their complaint no later than within three months of the day that complaint was received. If the review takes more than three months, the reporters will be given feedback at regular intervals, at least every three months.

The effectiveness of the complaints procedure is reviewed at least annually and on a case-by-case basis.

**6. Contact person for the reporters**

The information is initially received by a case-handling team via the above-mentioned complaint channels. The information is reviewed and a decision is then made as to whether further clarification is needed from the reporter or whether the matter can be assigned to an internal department based on the nature of the concern raised. Examples of internal departments to which a matter may be assigned include the Legal Department, the Ethics & Compliance Department, the Quality Assurance Department and the HR Department. Once a matter is assigned to a particular caseworker within the assigned department, that person's name and contact information will be posted on the EthicsPoint site.

## **7. Objective, impartial and independent handling of complaints and/or information**

- The case is handled objectively and impartially. Access to information is restricted to those persons who absolutely need this information to handle a case.
- The persons involved in the case act independently. This means that the individuals assigned the cases are impartial, independent, objective and neutral in their review of the case.

## **8. Maintaining confidentiality in the complaints procedure**

- Your identity as a whistleblower will be treated confidentially in accordance with German law. This also applies if the suspicion ultimately proves to be unfounded. At your own request, you can also remain anonymous during the procedure.
- All complaint channels are confidential channels through which you can ask questions and/or report concerns about actual or potential risks and violations of human rights and environmental obligations or misconduct in this regard.

## **9. Protection from retaliation**

- QVC will not tolerate any retaliation (including, without limitation, discrimination, punishment, labor measures, etc.) against persons who report concerns/observations in good faith or are involved in a subsequent investigation. This also applies if the concerns are ultimately unfounded.
- Such retaliation is strictly prohibited at QVC and is considered serious misconduct that would be investigated and addressed accordingly. This is also enshrined in the QVC Code of Conduct.