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SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct sets forth the expectations of Sirius XM Holdings Inc. (“SiriusXM”) for its suppliers and other third-party providers. SiriusXM chooses its suppliers carefully and expects that they will comply with this Supplier Code of Conduct, other applicable SiriusXM policies, and all applicable laws and regulations.

Protection of Employees and Contractors

Suppliers must not discriminate on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity. Harassment or discrimination of any kind will not be tolerated.

Suppliers must provide healthy and safe environments for their employees that meet or exceed applicable safety, occupational health, and fire safety laws and regulations. Suppliers must conduct regular risk assessments and monitoring, and put in place corrective and preventative measures to minimize workplace hazards. Employees of suppliers should have the right to refuse work and be encouraged to report any conditions that do not meet these criteria.

Suppliers must comply with applicable laws regulating work hours, wages and benefits.

Suppliers must comply with applicable laws to the extent that they provide employees the right to freely associate or engage in collective bargaining activities.

Suppliers must not use any form of forced or involuntary labor, nor will they engage, directly or indirectly, in human trafficking. Suppliers must not use child labor or employ any individuals whose age of employment is not in accordance with applicable laws.

Integrity & Ethics

Suppliers must do business free from corruption, bribery, or fraud in any form. This includes giving or receiving anything of value to improperly influence dealings with governments and government officials. Suppliers must accurately record business expenditures, never concealing the true nature of an expense.

Suppliers must operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to: anti-competitive business

practices, respect for and protection of intellectual property, company and personal data, export controls and economic sanctions.

Suppliers must provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation. Suppliers are expected to investigate reports and take corrective action, if needed. Suppliers must prohibit retaliation against anyone who, in good faith, reports or complains of violations of law or regulations, safety concerns, or misconduct.

Environmental Stewardship

Suppliers must comply with or exceed all applicable environmental laws and regulations. Suppliers are expected to increase efficiency throughout their companies and take measures to reduce their carbon footprint, energy use, water use, waste, and other emissions.

Suppliers should strive to conserve resources and protect the communities and environment that surround them. SiriusXM encourages its suppliers to develop and utilize environmentally friendly technologies and to increase the use of renewable energies.

Monitoring & Reporting

Suppliers should develop and implement appropriate internal business processes and policies to ensure compliance with applicable law and this Supplier Code of Conduct.

Subject to any restriction posed by law, suppliers should promptly inform SiriusXM of any concern related to issues governed by this Supplier Code of Conduct. SiriusXM policy prohibits retaliation against any person reporting such a concern. To report a concern, employees of suppliers can always speak directly to their SiriusXM representative.

SiriusXM expects to do business with suppliers that meet its standards and behave consistent with SiriusXM's principles, policies and commitments. SiriusXM also expects that its suppliers will encourage similar expectations through their own supply chains.