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HUMAN RIGHTS POLICY

Our Commitment to Human Rights

Sirius XM Holdings Inc. (“SiriusXM”) acknowledges its responsibility to respect human rights. SiriusXM is committed to ensuring that our employees, contractors, and customers are treated with dignity and respect.

This Policy reinforces our values, principles, and practices, and attempts to take into account internationally recognized human rights principles, including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

What We Do

SiriusXM directors, officers and employees are responsible for managing our business activities in full compliance with SiriusXM’s Code of Ethics and applicable law. We comply, and expect our suppliers and other third parties we do business with to comply, with laws of the United States and the states, counties, cities, countries and other jurisdictions in which SiriusXM conducts its business or which are otherwise applicable to SiriusXM.

We strive to operate in a responsible manner and provide a safe and healthy workplace for our employees. Through our Code of Ethics, internal policies, and practices, SiriusXM also seeks to maintain a workplace that is respectful and inclusive of all individuals and that is free from harassment, intimidation, and offensive conduct. We recognize and respect the diversity, cultures, customs and values of the people in the communities where we operate.

SiriusXM values and promotes workforce diversity and does not tolerate unlawful discrimination or harassment. We are an equal opportunity employer and are committed to treating all employees in a nondiscriminatory manner. Equal opportunity is extended to employees and applicants in all aspects of the employment relationship, including recruiting, hiring, compensation, training, promotion, transfer, discipline and termination.

SiriusXM does not tolerate any form of forced labor, human trafficking, or child labor. SiriusXM also provides opportunities for employee and external stakeholder concerns to be heard.

We are committed to respecting the privacy of individuals, including employees and customers. We follow recognized privacy principles and strive to implement reasonable and appropriate practices in our collection, use, and sharing of personal information about individuals.

Monitoring & Enforcement

We have put in place several reporting mechanisms to address violations of applicable law, our Code of Ethics, and our policies, including this Policy. Concerns regarding this Policy, or suspected violations of this Policy, can be reported to the non-management directors of SiriusXM. Further information as to these procedures, can be accessed via the “Contact the SiriusXM Board of Directors” link on the Company's public website at <https://investor.siriusxm.com/investor-overview/default.aspx#gov-tab5>, or employees of the Company may access this information via the Company's internal website in the "Whistleblower Hotline Info" folder.

In the event that our business activities are suspected of causing or contributing to human rights compliance issues, we will investigate, address and respond to the concerns raised and take appropriate corrective action in response to any substantiated allegation.

SiriusXM will not permit retaliation against anyone who, in good faith, reports or complains of violations of this Policy.

SiriusXM reserves the right to interpret, modify, terminate, or revise this Policy, in whole or in part, without notice.