

Anti-Retaliation Statement

ESW promotes open and transparent communication free from any form of retaliation and an environment where everyone is encouraged to speak up and report concerns without fear of retaliation. Reporting concerns is everyone's responsibility, from employees to candidates, to any supplier, retailer, agent, consultant, or other business partner of ESW ("Third-Parties"). Remaining silent about possible misconduct is contrary to ESW's values of operating in an open and transparent manner.

If you have a concern that a legal or ethical violation has occurred, or is occurring, you are responsible for raising this concern. ESW's policies forbid any form of retaliation against you for fulfilling this obligation.

ESW upholds the principles of conducting business ethically and with integrity which includes complying with all applicable laws and regulations in any country or jurisdiction ESW operates in.

In the course of your employment (or potential employment) or as a third-party engaging in business with ESW in any way, if you believe that anyone (including yourself) has been subjected to retaliation for raising a concern or issue in good faith, you can contact HR, ESW's Chief Risk & Sustainability Officer, ESW's General Counsel or raise the issue through the Speak Up at ESW Hotline <http://eshopworld.ethicspoint.com>). This statement is applicable to U.S. Direct E-Commerce Limited trading as ESW and all other affiliated entities (collectively "ESW"), wherever located.

Tommy Kelly
Chief Executive Officer

