

## The Global Reporting Initiative

The Global Reporting Initiative (GRI) is a non-profit organization that promotes economic, environmental and social sustainability. GRI's Sustainability Reporting Framework enables all companies and organizations to measure and report their sustainability performance.

GRI hereby states that Liberty Global has presented its report 'Corporate Responsibility Report 2012' to GRI's Report Services, which have concluded that the report fulfills the requirements of Application Level B.

The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines.



### Statement GRI Application Level Check

GRI hereby states that **Liberty Global** has presented its report "Corporate Responsibility Report 2012" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level B.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines. For methodology, see [www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf](http://www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf)

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 24 July 2013

A handwritten signature in blue ink, appearing to read "Nelmara Arbex", is written over a faint, large watermark of the GRI logo in the background.



























Nelmara Arbex  
Deputy Chief Executive  
Global Reporting Initiative



*The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. [www.globalreporting.org](http://www.globalreporting.org)*



















**Disclaimer:** Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 18 July 2013. GRI explicitly excludes the statement being applied to any later changes to such material.

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Profile Disclosures		Page	Status
<b>Strategy and Analysis</b>			
1.1	Statement from the most senior decision-maker of the organization.	Pages 02–03	
1.2	Description of key impacts, risks, and opportunities.	Pages 02–03	
<b>Organizational Profile</b>			
2.1	Name of the organization.	Page 04	
2.2	Primary brands, products, and/or services.	Pages 04–05	
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	Pages 04–05	
2.4	Location of organization's headquarters.	Page 05	
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Pages 04–05	
2.6	Nature of ownership and legal form.	Liberty Global plc is a public listed company traded on the NASDAQ Global Select Market	
2.7	Markets served.	Pages 04–05	
2.8	Scale of the reporting organization.	Pages 04–05, 56	
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	In 2012, we acquired One Link in Puerto Rico and Chellomedia added the MGM broadcast channels to its portfolio.	
2.10	Awards received in the reporting period.	Pages 15, 19, 21, 23, 29, 34, 35, 45, 49, 50, 52	
<b>Report Parameters</b>			
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	Inside front cover	
3.2	Date of most recent previous report (if any).	2011, <a href="http://www.lgi.com/cr/cr-news-and-reports-report-2011.html">http://www.lgi.com/cr/cr-news-and-reports-report-2011.html</a> 	
3.3	Reporting cycle (annual, biennial, etc.)	Inside front cover	
3.4	Contact point for questions regarding the report or its contents.	Inside front cover	
3.5	Process for defining report content.	Inside front cover, pages 06–07	
3.6	Boundary of the report.	Inside front cover	
3.7	State any specific limitations on the scope or boundary of the report.	Inside front cover	
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	Inside front cover	
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report.	Page 27, 37, 39, 55	
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement	Page 37	
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Inside front cover, page 37	
3.12	Table identifying the location of the Standard Disclosures in the report.	Page 57	
3.13	Policy and current practice with regard to seeking external assurance for the report.	The report has not been assured by an external company. All data is audited by the corporate office.	

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## Governance, Commitments and Engagement






4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	Page 54 Liberty Global does not collect data related to minority group membership, or other indicators of diversity, largely due to differing local anti-discrimination laws that prevent us from doing so. All Board members are over 50 years old.	
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	Page 54 2012 Proxy Statement – page 14 <a href="http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf">http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf</a> 	
4.3	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	Page 54 2012 Proxy Statement – page 19 <a href="http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf">http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf</a> 	
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	2012 Proxy Statement – pages 18 and 57 <a href="http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf">http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf</a>  We have works councils and/or similar employee representation bodies across our organization. These bodies represent the interests of the workforce and provide a consultative framework between the employees and management of the business.	
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	Page 54	
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Page 54 Liberty Global Annual Report 2012 – Part III pages 1–54 	
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	2012 Proxy Statement – page 18–19 <a href="http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf">http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf</a> 	
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	Page 54 We have a Business Code of Conduct and a Code of Ethics for our CEOs and senior financial officers	
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	Page 54 2012 Proxy Statement – page 15 <a href="http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf">http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf</a> 	
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Page 54 2012 Proxy Statement – page 15 <a href="http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf">http://www.libertyglobal.com/PDF/AR/2012-Liberty-Global-Proxy-Statement.pdf</a> 	
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Liberty Global recognizes the social and legal responsibility imposed on it to protect the public/environment from exposure to harm which may result from its actions/policies.	

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





4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Liberty Global engages with many organizations, including: Boston College Center for Corporate Citizenship, Denver Metro Chamber of Commerce, The Cable Center, Women in Cable Television (WICT), Voluntary Agreement on STB power consumption, Cable Labs, National Investor Relations Institute and the American Institute of Certified Public Accountants.	
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations.	Pages 04, 10 Liberty Global has a position in the governance bodies at CEO Coalition to make the Internet a Better Place for Children. In addition we have strategic memberships with DIF (Digital Interoperability Forum), Cable Europe, the American Chamber of Commerce to the EU, the British Chamber of Commerce to the EU, the AAPA (anti audiovisual piracy alliance), EuroISPA, EIF - European Internet Foundation in the European Parliament, the American Academy in Berlin.	
4.14	List of stakeholder groups engaged by the organization.	Page 08 <a href="http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html">http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html</a> 	
4.15	Basis for identification and selection of stakeholders with whom to engage.	Page 08 <a href="http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html">http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html</a> 	
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Page 08 <a href="http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html">http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html</a> 	
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	Pages 06–07 <a href="http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html">http://www.libertyglobal.com/cr/cr-our-approach-stakeholder-engagement.html</a> 	

DMA Disclosure	Page	Status
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#### Disclosure on Management Approach Economic





Economic performance	Pages 02–04, 08, 45 Liberty Global Annual Report 2012 – pages 2–7 	
Market presence	Inside front cover Pages 02–04 Liberty Global Annual Report 2012 – pages 2–7 	
Indirect economic impacts	Inside front cover Pages 02–03, 11	

#### Disclosure on Management Approach Environmental

Materials	Pages 41–43	
Energy	Page 37	
Water	Page 37	
Emissions, effluents and waste	Page 37	
Products and services	Page 43	
Transport	Page 40	
Overall	Page 37	

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



### Disclosure on Management Approach Labor Practices and Decent Work

Employment	Page 45	
Labor/management relations	Pages 44–50	
Occupational health and safety	Page 46	
Training and education	Page 46	






### Disclosure on Management Approach Human Rights

Investment and procurement practices	Page 53 Code of Ethics ( <a href="http://www.lgi.com/governance-code-of-ethics.html">http://www.lgi.com/governance-code-of-ethics.html</a> )	 
Assessment	Page 50	

### Disclosure on Management Approach Society



Local communities	Pages 11, 50–52	
Corruption	Pages 44–45 Code of Ethics ( <a href="http://www.lgi.com/governance-code-of-ethics.html">http://www.lgi.com/governance-code-of-ethics.html</a> )	 
Public policy	Pages 44–45 Public Policy ( <a href="http://www.lgi.com/ir-public-policy.html">http://www.lgi.com/ir-public-policy.html</a> )	 
Anti-competitive behavior	Pages 12, 44–45, 54 Public Policy ( <a href="http://www.lgi.com/ir-public-policy.html">http://www.lgi.com/ir-public-policy.html</a> )	 
Compliance	Pages 44–45 Public Policy ( <a href="http://www.lgi.com/ir-public-policy.html">http://www.lgi.com/ir-public-policy.html</a> )	 

### Disclosure on Management Approach Product Responsibility



Product and service labelling	Pages 33–34	
Marketing communications	Code of Ethics for Advertising ( <a href="http://www.libertyglobal.com/cr/PDF/Code%20of%20Ethics%20for%20Advertising.pdf">http://www.libertyglobal.com/cr/PDF/Code%20of%20Ethics%20for%20Advertising.pdf</a> )	 
Customer privacy	Page 29	
Compliance	Pages 29–31	

### Performance Indicators










#### Economic

EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Pages 02–04, 27 Annual Report pp. 6, Part II pp. 4, 10, 22, 28–29, 36–37, 40, 70–71, 139–147, and Part III pp. 1-54	 
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<b>EC3</b>	<p>Coverage of the organization's defined benefit (DB) plan obligations.</p> <p>We have post employment benefit plans as defined under US GAAP in place in some of our operating countries. Of those we have defined benefits pension savings plans operating in Ireland and Belgium. This DB plan is closed to new members.</p> <p>We run Defined Contribution Pension Plans in countries such as the UK, Austria, Germany and Switzerland. In all other countries except the UK – these plans need to guarantee a minimum rate of return and, therefore, need to be declared as DB plans under US GAAP rules. These are insured plans and are shown as liabilities in the balance sheet.</p> <p>Austria DB Plan: The last reported pension liability for the DB plan(s) in Austria is \$9.2M according to 2012 US GAAP calculations. This is an Austrian severance payment provision, which is reported under BS25398 Net Pension liability. Severance Provision made each month based on actuarial calculation. Adjustment made on an annual basis for actuarial valuation - based on legal requirements: Employee entitled to 0 months if worked &lt; 3 years; 2mths &gt; 3yrs; 3mths &gt; 5yrs; 4mths &gt; 10yrs; 6mths &gt; 15 yrs; 9mths &gt; 20yrs and 12mths &gt; 25yrs based on final salary.</p> <p>Belgium DB Plan: The last reported pension liability for the DB plan(s) in Telenet is \$16.3M according to 2012 US GAAP calculations. There is a Defined benefit pension plan for ex-Electrable employees and a defined benefit plan for the Executive Team. Most of the Telenet employees participate in a DC scheme which is funded through a pension plan. By Belgian law, the employer has to guarantee a minimum rate of return on the contributions paid to DC plans and hence this plan qualifies as a DB plan from an accounting perspective. The main component of the outstanding pension liability consists of liabilities related to post-retirement Medical costs, which do not need to be funded. With respect to the pension plans themselves, there is a minimum financing requirement in Belgium which is applied. There is no requirement to finance the full IAS 19 liability.</p> <p>Germany DB Plan: The last reported pension liability for the DB plan(s) in UM is \$ 8933840 according to 2012 US GAAP calculations. The KBW plan is a basic Cash Balance Plan with a 2.25% of total gross salary plus 6% of gross salary above the Social Security Contribution Ceiling. The employer's obligation to provide contributions is limited to 10 to 15 years (with an annual automatic one year prolongation). Although the contribution is salary-related, it can be limited to last year's flat rate contribution amount by the employer.</p> <p>Ireland DB Plan: The last reported pension liability for the DB plan(s) in Ireland is \$17.03M according to 2012 US GAAP calculations (€13.052M in deficit as at 31-Dec-2012.). UPC IE operates a Defined Benefit (DB) Pension Plan – i.e. participants are entitled to 2/3rd of their final salary in combination with duration of service – at the time of the NTL acquisition this scheme was already in deficit. The scheme closed to new participants in 1999 and currently has 74 active members, 81 deferred pensioners and 22 pensioners in payment. The scheme has been in deficit for the last number of years and the company has been in communications with the trustees since July 2009 to control the liability by ceasing future accrual of benefits under the scheme. There are continuing discussions between the trustees and the company in respect of funding the deficit.</p> <p>Switzerland DB Plan: The last reported pension liability for the DB plan(s) in Switzerland is coming through as \$16.1M according to 2012 US GAAP calculations. Not a true defined benefit plan, but because there are certain guarantees (minimum interest rate, minimum conversion rate etc.) plan qualifies as a DB plan for USGAAP purposes. Minimum interest guarantee is determined by government on an annual basis. For 2011 this was 1.5%, for 2012 most probably stay at 1.5% (Swiss Government 10y Bond yield is 0.6%). If actual shortfall occurs, measures (benefit reduction and/or contribution increase) have "only" to be taken over time (5-7y, max 10y): no immediate lump sum necessary. Asset Fluctuation Reserve is built up if actual return is higher than interest credited to savings accounts and then used to subsidize accounts in years return is not sufficient. Fund is a stand-alone legal entity, any deficits need to be resolved by the fund itself. No legal obligation for LGI to make the additional contributions unless employees are ready to pay recovery contributions then employer must pay the same amount. Deficit in fund is a USGAAP accounting deficit; not a financial and cash relevant one.</p>	
<b>EC8</b>	<p>Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.</p>	<p>Pages 10-26</p> 

## Environmental


<b>EN3</b>	Direct energy consumption by primary energy source.	Page 55	
<b>EN4</b>	Indirect energy consumption by primary source.	Pages 38, 55	
<b>EN5</b>	Energy saved due to conservation and efficiency improvements.	Pages 39, 55	
<b>EN8</b>	Total water withdrawal by source.	Page 55	
<b>EN16</b>	Total direct and indirect greenhouse gas emissions by weight.	Pages 39, 55	
<b>EN17</b>	Other relevant indirect greenhouse gas emissions by weight.	Pages 39, 55	
<b>EN18</b>	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Pages 39–40, 55	
<b>EN22</b>	Total weight of waste by type and disposal method.	Page 55	
<b>EN28</b>	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	We are pleased to report that in 2012, Liberty Global did not receive any environmental prosecutions	

## Social: Labor Practices and Decent Work




<b>LA1</b>	Total workforce by employment type, employment contract, and region, broken down by gender.	Pages 46, 56	
<b>LA2</b>	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	Pages 46, 56	
<b>LA4</b>	Percentage of employees covered by collective bargaining agreements.	40% of full-time equivalent employees are represented by independent trade union or covered by a collective bargaining agreements.	
<b>LA10</b>	Average hours of training per year per employee by gender, and by employee category.	Pages 47, 56	
<b>LA12</b>	Percentage of employees receiving regular performance and career development reviews, by gender.	Pages 49, 56	

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## Social: Human Rights

<b>HR2</b>	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	Page 53 In 2012, Liberty Global did not screen its suppliers for human rights issues. However, in 2013, we will assess the ESG performance, including human rights issues, of our top 100 suppliers, by capital expenditure.	
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## Social: Society

<b>S03</b>	Percentage of employees trained in organization's anti-corruption policies and procedures.	100% of employees complete Code of Business Conduct training which has anti-corruption elements in it. In addition, Liberty Global provided focused in-depth training on anti-corruption for all employees in relevant departments including procurement and legal.	
<b>S04</b>	Actions taken in response to incidents of corruption.	No incidents of corruption were reported through employee reporting mechanisms during 2012	
<b>S05</b>	Public policy positions and participation in public policy development and lobbying.	Pages 11, 20, 34, 45	
<b>S06</b>	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	Liberty Global does not make any political contributions.	

## Social: Product Responsibility

<b>PR5</b>	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Page 34	
<b>PR6</b>	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	Code of Ethics for Advertising ( <a href="http://www.libertyglobal.com/cr/PDF/Code%20of%20Ethics%20for%20Advertising.pdf">http://www.libertyglobal.com/cr/PDF/Code%20of%20Ethics%20for%20Advertising.pdf</a> )  This Code is reviewed every two years. We do not sell any products that are banned in certain markets or are the subject of stakeholder questions or public debate.	