Liberty Global’s Responsible Procurement and Supply Chain Principles
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Introduction

Liberty Global plc ("Liberty Global", "Liberty") is the largest international cable company with operations in 14 countries. We connect people to the digital world and enable them to discover and experience its endless possibilities. Our market-leading television, broadband internet, and telephony services are provided through next-generation networks and innovative technology platforms that connect approximately 24 million customers who subscribe to nearly 48 million services at June 7, 2013.

Liberty Global’s consumer brands include Virgin Media, UPC, Unitymedia, Kabel BW, Telenet, and VTR. Our operations also include Chellomedia, our content division, Liberty Global Business Services, a commercial division, and Liberty Global Ventures, our investment fund. You can find more information at www.libertyglobal.com.

Every year Liberty Global purchases millions of euros of equipment and material from our vendors. With this comes a responsibility to ensure that we incorporate ethical, environmental and social considerations into our spending decisions. This approach falls under our Corporate Responsibility Framework which addresses or focus areas, which includes building a responsible supply chain. Liberty Global’s Responsible Procurement and our Supply Chain Principles (referred to herein as the “Key Principles”) set out Liberty Global’s ambition and expectation to be a responsible company and to work accordingly with responsible suppliers. In doing so we intend to play our part in minimizing harmful impact being caused by our supply chain.
Scope

These Key Principles apply to all procurement and supply chain activities involving Liberty Global’s suppliers. Adherence to these Key Principles forms an integral part of Liberty Global’s contractual conditions with its business partners who will be responsible for their implementation in their supply chain processes as set out herein.

Key Principles

Liberty Global is reliant on its suppliers and all parties within their supply chain to adhere to the Key Principles set out below and to implement, execute and duly manage the necessary processes to ensure such adherence:

1. International labor standards
To comply with all applicable local and international laws and regulations regarding the environment, health and safety and employment, and endorse the ILO Core Conventions\(^1\) and the UN Convention on Human Rights, including:

   a) Child Labor
      - Not to employ any person below the minimum legal age for employment.
      - Where people below the age of 18 are legally employed, not to involve them in hazardous activities. The definition of hazardous activities should be determined by local law.

   b) Forced labor
      - To prohibit forced, bonded or compulsory labor.
      - To grant employees the freedom to leave their employment on reasonable notice.

   c) Working hours and wage
      - Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

   d) Freedom of association
      - Employees should be free to join trade unions (or other kinds of representation) and, where appropriate, to carry out representative functions at work, in accordance with relevant legislation.
      - Employees should not be discriminated against, or be treated unfavourably or differently because they carry out representative functions.

   e) Discrimination
      - Suppliers will not discriminate against employees or during the process of the hiring employees in any way on grounds of age, gender, religion, ethnicity, sexual orientation, disability or otherwise.

   f) Disciplinary procedures
      - To treat employees fairly and with respect.
      - Not to tolerate verbal, physical and other forms of abuse.

2. Ethics

   a) Conduct business with honesty and integrity, in accordance with high ethical and legal standards and comply with all relevant legislation and regulations.\(^2\)

   b) Prohibit the use of bribery and corruption to advance business objectives; and not to tolerate corruption in any form.\(^2\)
3. Health and safety
   a) To provide a safe, healthy working environment for employees, contractors, partners or others who may be affected by company’s activities in accordance with relevant international standards and national laws.
   b) To provide, where necessary, relevant health and safety training.

4. Environment
   • As a minimum suppliers must comply with all local and national environmental legislation, regulations and directives to protect and improve the environment, and have developed, reviewed and recorded processes in place to make sure they comply.
   • Suppliers should have action plans in place, to manage their environmental impacts, e.g. energy reduction, carbon emissions and waste management programs. Where appropriate, suppliers must also comply with additional environmental requirements specific to the products and services. Any specific requirements would be outlined in contract.

5. Sourcing
Suppliers shall work with Liberty Global to make it aware of ‘conflict minerals’ that are sourced from the Democratic Republic of Congo and surrounding countries which are used to finance armed conflict in that region, and that may exist in products or equipment provided by suppliers and all parties within their supply chain to Liberty Global.

Foot Notes
1 ILO 29 Forced Labor (1930); ILO 105 Abolition of Forced Labor (1957); ILO 111 Discrimination (Employment and Occupation) (1958); ILO 138 Minimum Age Convention (1973); ILO 138 Article 2; ILO138 Article 3 and ILO Declaration on Fundamental Principles and Rights at Work (1998).

2 In line with both Liberty Global’s Code of Business Conduct and Anti-Corruption Policies accessible on Liberty Global’s web-site at www.libertyglobal.com
Implementation

Social and environmental responsibility is central to the way we do business and this approach is reflected in the management of our supply chain. In order to ensure the adherence to these Key Principles Liberty Global has commissioned EcoVadis, a global supply chain assessment specialist. Liberty Global will work with our suppliers on the implementation of our Key Principles and will require suppliers to duly complete an EcoVadis assessment of the social, environmental and ethical impact of their operation(s). The EcoVadis system provides simple supplier scorecards which enables Liberty Global to assess the improved sustainability performance of suppliers.

Monitoring and Review

- Liberty Global reserves the right to monitor and review suppliers’ adherence to these Key Principles on a regular basis as well as set targets to improve their performance.
- In the event that non-adherence is identified or reasonably suspected, Liberty Global shall be entitled to audit (the allocation of costs therefor to be agreed) such (non-)adherence whether itself or through a licensed third party.

Corrective Action

- If a completed EcoVadis assessment shows, or it subsequently transpires that a new or existing supplier is not adhering to these Key Principles, Liberty Global will seek to work with them to address such non-adherence through a mutually agreed remediation plan.
- Failure to agree on a mutually acceptable corrective action plan may affect Liberty Global’s ability and willingness to continue business relations with the relevant supplier.
- Suppliers are expected to identify, correct and monitor the continued compliance of any activities that fall below the standards set in these Key Principles.
- Suppliers shall immediately report to Liberty Global any serious non-adherence to these Key Principles and together agree a schedule for corrective action.
- Where serious breaches of these Key Principles are identified and persist, Liberty Global may consider termination of the business relationship with the supplier concerned subject to the terms and conditions of the relevant underlying contract between Liberty Global and such supplier.

Engagement and Communication

- These Key Principles will be communicated internally, to relevant employees and managers, and externally to all business partners and potential business partners.
- Where appropriate, relevant training and guidance will be given to employees regarding adherence to these Key Principles.
- Liberty Global will aim to work with suppliers, where appropriate, to share best practices on responsible supply chain management.

Responsibilities

Vice President Procurement, working within Liberty Global Procurement, is responsible for adherence to, and enforcement of, these Key Principles.

Raising Concerns and Seeking Guidance

Liberty Global’s employees are encouraged to raise any concerns regarding adherence to, and enforcement of, these Key Principles by Liberty Global’s suppliers by contacting CR@libertyglobal.com. All reports of ethical violations will be kept confidential to the extent possible.