

**LIBERTY GLOBAL'S  
RESPONSIBLE  
PROCUREMENT AND  
SUPPLY CHAIN PRINCIPLES**



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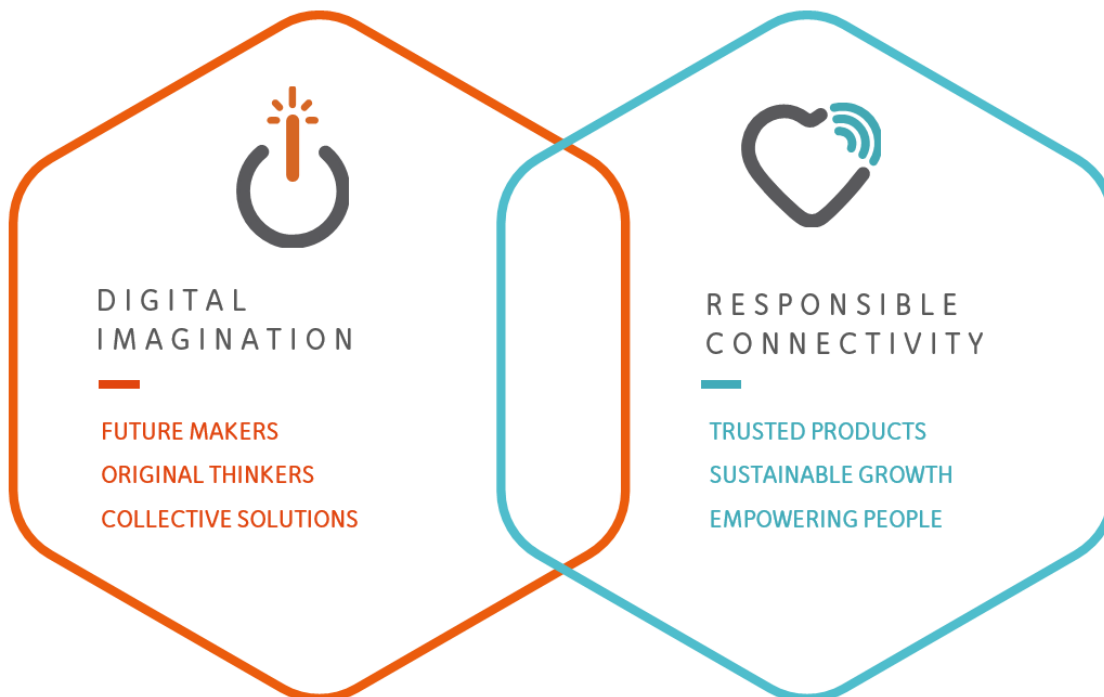
## Introduction

Liberty Global is the world's largest international TV and broadband company, with operations in 10 European countries under the consumer brands Virgin Media, Unitymedia, Telenet and UPC.

We invest in the infrastructure that empowers our customers to make the most of the digital revolution. Our scale and commitment to innovation enable us to develop market-leading products delivered through next-generation networks that connect our over 21 million customers who subscribe to over 44 million television, broadband internet and telephony services. We also serve over 6 million mobile subscribers and offer WiFi service across 12 million access points as of December 2018. Liberty Global also owns 50% of VodafoneZiggo, a Dutch joint venture, which has 4 million customers, 10 million fixed-line subscribers and 5 million mobile subscribers. For more information, please visit [www.libertyglobal.com](http://www.libertyglobal.com).

Every year Liberty Global purchases significant quantities of equipment and services from our vendors. With this comes a responsibility to ensure that we incorporate ethical, environmental and social considerations into our spending decisions. Liberty Global's Responsible Procurement and 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 strive to play our part in minimizing any harmful impact being caused by our supply chain.

Our responsible procurement approach falls under our Connected Purpose Corporate Responsibility framework illustrated below.



## Our approach

Our collaborative relationship with suppliers is based on a four-step approach, helping us both to mitigate risk and identify opportunities.

### 1. REQUIREMENTS

Setting requirements for suppliers through our Responsible Procurement and Supply Chain Principles

### 2. ALIGNMENT

Creating internal understanding through training our Supply Chain and Procurement teams

### 3. ASSESSMENTS

Assessing our suppliers using the EcoVadis platform

### 4. DIALOGUE

Opening up possibilities for supplier improvement

This document sets out the requirements for our Responsible Procurement and Supply Chain Principles (step 1 of our approach).

## 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 adhere to the UK's Modern Slavery Act, the ILO Fundamental Conventions<sup>1</sup> and the UN Declaration of Human Rights, including:

#### a. Child labor

- Not to employ any person below the applicable minimum legal age for employment.
- Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.
- 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 applicable local law.

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<sup>1</sup> Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87); Right to Organise and Collective Bargaining Convention, 1949 (No. 98); Forced Labour Convention, 1930 (No. 29); Abolition of Forced Labour Convention, 1957 (No. 105); Minimum Age Convention, 1973 (No. 138); Worst Forms of Child Labour Convention, 1999 (No. 182); Equal Remuneration Convention, 1951 (No. 100); Discrimination (Employment and Occupation) Convention, 1958 (No. 111) and ILO Declaration on Fundamental Principles and Rights at Work (1998)

#### **b. Forced labor**

- To prohibit forced, bonded, compulsory, involuntary or exploitative prison labor, slavery and trafficking of persons.
- To grant employees the freedom to leave their employment on reasonable notice or terminate their contract.
- To undertake the necessary due diligence to ensure that there is no modern slavery or human trafficking in your operations and supply chain.

#### **c. Working hours and wage**

- Working hours are not to exceed the maximum set by local law.
- 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**

- In conformance with local law, respect the right of all employees to form and join trade unions (or other kinds of representation) of their own choosing and where appropriate to carry out representative functions at work, in accordance with relevant legislation. To allow employees to bargain collectively and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities.
- Employees should not be discriminated against, or be treated unfavorably or differently because they carry out representative functions.

#### **e. Discrimination**

- Suppliers will not discriminate against employees or prospective employees in any way on grounds of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

#### **f. Disciplinary procedures**

- To treat employees fairly and with respect.
- Not to tolerate verbal, sexual, physical and other forms of abuse.

### **2. Ethics<sup>2</sup>**

- To conduct business with honesty and integrity, in accordance with high ethical and legal standards and comply with all relevant legislation and regulations.
- To prohibit the use of bribery and corruption to advance business objectives and not to tolerate corruption in any form.
- Intellectual property rights are to be respected and customer and supplier information is to be safeguarded.

### **3. Health and safety**

- To provide in accordance with relevant international standards and national laws, a safe, healthy working environment for employees, contractors, partners or others who may be affected by the company's activities.
- To provide, where necessary, relevant health and safety training.

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<sup>2</sup> In line with both Liberty Global's Code of Business Conduct and Anti-Corruption Policies accessible on Liberty Global's website at [www.libertyglobal.com](http://www.libertyglobal.com)

#### **4. Environment**

- As a minimum, suppliers must comply with all applicable local and national environmental legislation, regulations and directives and have developed, reviewed and recorded processes to ensure they achieve such compliance.
- 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 their products and services. Any specific requirements would be covered in underlying supplier contracts.

#### **5. Conflict Minerals**

- Suppliers shall confirm that no conflict minerals (being materials sourced from the Democratic Republic of Congo and surrounding countries and which are used to finance armed conflict in that region) are incorporated in products or equipment provided by the suppliers or any third parties within their supply chain to Liberty Global.

#### **6. Privacy and Security**

- Suppliers shall commit to protecting and respecting the personal data of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall comply with the European General Data Protection Regulation, other privacy and information security laws and regulatory requirements when personal data is collected, stored, processed, transmitted, and shared.

### **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 selected suppliers to duly complete an EcoVadis assessment of the social, environmental and ethical impact of their operation(s). The EcoVadis system provides 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 for and the scope of such audit to be agreed) such (non-) adherence whether itself or through a 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 out 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

- Liberty Global will communicate these Key Principles 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 supplier 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

Liberty Global procurement category and commodity leads are responsible for the communication of these Key Principles via procurement platforms and systems. Suppliers should appoint a relevant point of contact to ensure adherence to the Key Principle outlined in this document.

## 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](mailto:CR@libertyglobal.com).

**All reports of ethical violations will be kept as confidential as reasonably possible.**