

# 2019 GRI STANDARDS CONTENT INDEX



## The GRI Standards Content Index

The Global Reporting Initiative (GRI) is an international independent organization that helps businesses, governments and other organizations understand and communicate the impact of business on critical sustainability issues such as climate change, human rights, corruption and many others. GRI's Sustainability Reporting Standards are the world's most widely used standards on sustainability reporting and disclosure, enabling businesses, governments, civil society and citizens to make better decisions based on information that matters.

This report has been prepared in accordance with the GRI Standards: Core option.

This GRI Standards Content Index refers to our 2019 CR Report which can be downloaded [here](#).

### GRI 102: General Disclosures 2019

GRI Standard	Disclosure	Page reference or response	Omissions
102-1	Name of the organization	Liberty Global plc	
102-2	Activities, products, and services	Liberty Global is the world's largest international TV and broadband company, with operations in 6 European countries under the consumer brands Virgin Media, Telenet and UPC. We invest in the infrastructure and digital platforms that empower our customers to make the most of the video, internet and communications revolution. Liberty Global develops market-leading products delivered through next generation networks that connect 11 million customers subscribing to 25 million TV, broadband internet and telephony services. We also serve over 6 million mobile subscribers and offer WiFi service through 9 million access points across our footprint.	
102-3	Location of headquarters	London, United Kingdom; Denver, Colorado (USA) and Amsterdam, the Netherlands.	
102-4	Location of operations	Liberty Global operates in 6 European countries: Belgium, Ireland, Poland, Slovakia, Switzerland and the United Kingdom.	
102-5	Ownership and legal form	Liberty Global plc is a public listed company traded on the NASDAQ Global Select Market.	
102-6	Markets served	<a href="https://www.libertyglobal.com/operations/companies/">https://www.libertyglobal.com/operations/companies/</a>	
102-7	Scale of the organization	<ul style="list-style-type: none"> <li>Number of employees: Performance Summary, page 18</li> <li>Number of operations: About Liberty Global, page 1</li> <li>Revenues: <a href="#">2019 Annual Report</a>, page II-4</li> <li>Total capitalization: <a href="#">2019 Annual Report</a>, page II-64</li> <li>Quantity of products or services provided: About Liberty Global, page 1 + In brief, page 7 + Performance Summary, page 18</li> </ul>	

## GRI 102: General Disclosures 2019

GRI Standard	Disclosure	Page reference or response	Omissions
102-8	Information on employees	Performance Summary, pages 18-19	Employment contracts are not broken down by region or gender.
102-9	Supply chain	Our supply chain, page 12	
102-10	Significant changes	About this Report, page 1	
102-11	Precautionary Principle	We address the precautionary principle through our robust risk management processes. We apply the necessary precautions before developing new innovations with potential for causing harm and when extensive scientific knowledge on the matter is lacking. For more detail, see Risk Factors in our <a href="#">2019 Annual Report</a> , page I-33.	
102-12	External initiatives	Liberty Global endorses several initiatives designed to promote a digital society and improve the environmental impacts of the ICT sector. These include, among others, the EU's 'Shaping Europe's digital future' program, the Digital Skills and Jobs Coalition and the Global e-Sustainability Initiative (GeSI).	
102-13	Membership of associations	Liberty Global holds board positions in a number of social and environmental organizations, and supports others through memberships and ongoing involvement. A sample of such organizations includes: The Alliance to Better Protect Minors Online, the EIF (European Internet Foundation), the Digital Skills and Jobs Coalition, GIGAEurope, Street Child, SCTE (Society of Cable Telecommunications Engineers) and the World Economic Forum.	
102-14	Statement from senior decision-maker	CEO Welcome, page 2	
102-16	Values, principles, standards	Our values, principles and expected standards of behavior at Liberty Global are encompassed in our <a href="#">Code of Conduct</a> that applies to all of our employees, directors and officers.  We also maintain a specific <a href="#">Code of Ethics</a> for our CEO and senior financial officers.	

## GRI 102: General Disclosures 2019

GRI Standard	Disclosure	Page reference or response	Omissions
102-18	Governance structure	<ul style="list-style-type: none"> <li>• <a href="#">Proxy Statement</a>, pages 7-13</li> <li>• <a href="#">Corporate Governance guidelines</a></li> <li>• <a href="#">Overview members Board of Directors and Executive Leadership Team</a></li> </ul> <p>Liberty Global's Board of Directors consists of 11 persons: 9 are both independent and non-executive directors; one is a non-executive director and one is an executive director. The executive director is the only director who is an employee of Liberty Global. 10 directors are male and one is female. All 11 directors (100%) are over 50 years old.</p>	
102-40	List of stakeholder groups	GRI Content Index, page 5-7	
102-41	Collective bargaining agreements	24% of our FTE employees were covered by collective bargaining agreements in 2019.	
102-42	Identifying and selecting stakeholders	<a href="#">CR Stakeholder Engagement Framework</a> , page 5	
102-43	Stakeholder engagement	GRI Content Index, page 5-7	
102-44	Key topics and concerns raised	GRI Content Index, page 5-7	
102-45	Entities included	About this Report, page 1	
102-46	Report content and topic boundaries	Our Material Issues, page 4	
102-47	List of material topics	Our Material Issues, page 4	
102-48	Restatements of information	About this Report, page 1	
102-49	Changes in reporting	A new materiality assessment was performed in 2019, refer to Our Material Issues, page 4	
102-50	Reporting period	About this Report, page 1	
102-51	Date of most recent report	July 2019	
102-52	Reporting cycle	About this Report, page 1	
102-53	Contact point	<a href="mailto:cr@libertyglobal.com">cr@libertyglobal.com</a>	
102-54	Reporting in accordance with the GRI Standards	About this Report, page 1	
102-55	GRI content index	GRI Content Index, pages 2-9	

## GRI 102: General Disclosures 2019

GRI Standard	Disclosure	Page reference or response	Omissions
102-56	External assurance	<p>We engaged KPMG LLP to undertake an independent limited assurance engagement, reporting to Liberty Global plc, using the assurance standards ISAE 3000 and ISAE 3410 covering the greenhouse gas emissions and energy consumption as presented in Liberty Global plc's Annual Report and Accounts for year ending 31 December 2019.</p> <p>The KPMG Independent Limited Assurance Statement can be found at:  <a href="https://www.libertyglobal.com/wp-content/uploads/2020/05/KPMG-Independent-Limited-Assurance-Statement-2019.pdf">https://www.libertyglobal.com/wp-content/uploads/2020/05/KPMG-Independent-Limited-Assurance-Statement-2019.pdf</a></p>	

## 102-44 Stakeholder engagement topics by stakeholder group

### Communities and civil society organizations

How we engage:

- We work with organizations that support some of our most strategic issues, such as developing digital skills. We listen to what these organizations (e.g. CoderDojo, SOZIALHELDEN, Scope) needs, and collaboratively identify the best ways of supporting them to meet our shared objectives.
- We identify new ways to help keep children safe online through work with partners such as European Schoolnet.
- We enable discussions on some of the biggest issues facing society, through the creation of our flagship community investment program Digital Imagination.
- We work with NGOs such as SCTE, CableLabs and more for input on our product development.

What they told us and what we are doing:

- Our CoderDojo experience told us that there was an opportunity to combine the development of global citizenship with the needs to make coding engaging. We have further launched our Digital Imagination programs in three of our markets, The Netherlands, Poland and Ireland.
- European Schoolnet informed us of the need to raise awareness to teachers on the educational resources available for them to help them address the online issues young people are facing. While the teen handbooks have been in high demand for many years, the launch of the [educator handbook](#) in 2019 forged a close and unique collaboration with [the eTwinning network](#), facilitating hands-on involvement and engagement from teachers and pupils across Europe.

### Customers and consumers

How we engage:

- We use the Net Promoter Score (NPS) to gauge the strength of our relationship with customers.
- We respond to requests from our customers for environmental information relating to purchased goods and services.

What they told us and what we are doing:

- We use NPS to monitor our customers' experiences from purchase through product use to paying their bill, and use the data in our process for testing new products. For example, we invited customers to test our Connect Box before launch.
- What customers told us influenced our decisions, from the look and feel to the packaging of the product. As a result, the Connect Box has the highest NPS of all of our WiFi modems.
- We have linked our global NPS targets to the remuneration of Liberty Global employees.

## **Employees**

How we engage:

- Spark is Liberty Global's innovation initiative designed to source ideas to tackle real business challenges, using the collective innovative spirit of our employees.

What they told us and what we are doing:

- The successful campaign, "Help our Street Cabinets beat the heat," led to the testing and implementation of Phase Changing Material being used in our street cabinets to help reduce the heat which can lead to outages during the hotter summer months.
- Another campaign in 2019 focused on the automation of reoccurring tasks throughout the business; Meet F.R.I.D.A.Y – Fast Reliable Intelligent Digital Assistant for You. The campaign received over 25 ideas; of which six have been implemented thus far. From these ideas we have already saved over 500 hours, equivalent to around 25K.
- Our Spark innovation training program (Matchbox) was implemented across our entire footprint in 2019; the program further supports and invests in our employees utilizing digital technology to solve social problems and inspire change.

## **Governments and policy makers**

How we engage:

- We help influence EU policy makers through our support of the alliance of industry and NGOs for a better internet for children.
- We participate in policy conversations and programs that help deliver the priorities of the EC's Digital Skills and Jobs Coalition to encourage digital skills development in Europe.

What they told us and what we are doing:

- The issue of child safety online is as pressing as ever. We are therefore continuing to invest in tools and information to keep children safe. We continue to support Safer Internet Day and promote the education and use of the safety features in our equipment.
- We continued to scale our Future Makers program in our markets encouraging young people to use their digital skills to solve social issues.

## **Industry peers**

How we engage:

- We address the key issue impacting our business through our membership and participation in several organizations.
- We are working towards a more sustainable cable industry as members of the Society of Cable Telecommunications Engineers' (SCTE)'s Energy 2020 program. In partnership with other key cable system operators and vendor companies, we aim to increase the efficiency and reduce the impact of our sector by developing energy management standards, technology innovation, organizational solutions and training.
- We are also influencing the establishment of standards for network improvement with the European Telecommunications Standards Institute (ETSI).

What they told us and what we are doing:

- We have learned a great deal as part of Energy2020, from best practice sharing to managing energy whilst increasing bandwidth. We're discussing the different approaches with our peers to explore how we can implement this both in the near future but also long term.
- We work closely with the SCTE and CableLabs to ensure we maintain a full view of the energy landscape of the cable network including Customer Premise Equipment (CPE). The partnership ensures the evolution of network and CPE features and operational efficiencies.
- We are sharing our own best practices, such as our use of Phase Changing Material (PCM). In the Netherlands, we are using PCM alongside Free Air to maintain optimal temperatures in our edge technical facilities and reduced our energy use at this site by 40%. Watch our [video](#) for the full story. We are also now trialing PCM in our street cabinets to help mitigate potential outages due to overheating on days when the outside temperature is abnormally high.
- As leading member of the SCTE Energy2020 program, we are helping develop standards for cable operators to measure and manage their energy and power consumption.

## **Investors**

How we engage:

- One of the main ways we engage with investors is by responding to their socially responsible investment questions through our submission to the Dow Jones Sustainability Index (DJSI), CDP Climate Change Program, FTSE4Good, and Newsweek Green Ranking. We also actively engage in MSCI ESG & Sustainability questionnaires.

What they told us and what we are doing:

- We continue to engage with DJSI and CDP on how to improve our performance. In 2019, we were ranked third in our industry for DJSI.
- We recognize that investors are able to make more informed investment decisions based on our submissions. In 2019, we continued to make our CDP submission public to improve transparency for SRI investors and analysts; we achieved a C score as part of CDP's Climate Change Program.

## Suppliers

How we engage:

- We follow a four-step process that includes the EcoVadis assessment to collaboratively work with our suppliers to identifying the biggest risks in our supply chain.
- We are also in dialogue with suppliers to identify opportunities to use new technology to improve our impacts.

What they told us and what we are doing:

- Through the EcoVadis assessment, we can assess the biggest risks we and our suppliers face. Based on this, we implement Collective Action Plans with suppliers that require extra support to address the biggest risk areas and help them improve their performance.
- We explored ways to implement the energy reduction solution from our 2018 Adaptive Power Challenge winner.

Materiality	GRI Standard	Management Approach: Page	Specific GRI Disclosure	Page	Omissions
Business ethics	GRI 415: Public Policy	101:1-3: Page 5	415-1 Political contributions	We did not make any political contributions during 2019. Our code of business conduct prohibits the use of company funds and assets for political contributions to political parties, political party officials and candidates for office, unless approved by our general counsel. Additionally, our charitable giving programs available to employees prohibit political contributions by our company.	
Privacy and data security	GRI 418: Customer Privacy	101:1-3: Page 11	418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	Customer privacy and data security, page 11	

Materiality	GRI Standard	Management Approach: Page	Specific GRI Disclosure	Page	Omissions
Talent attraction & development	GRI 404: Training and Education	101:1-3: Page 10	404-1 Average hours of training per year per employee	Performance summary, page 18	Breakdown by gender and employee category is unavailable.
	GRI 401: Employment	101:1-3: Page 10	401-1: New employee hires and turnover	Performance Summary, page 18-19	
Energy efficiency	GRI 302: Energy	101:1-3: Page 19-20	302-1: Energy use	Page 20	
			302-3: Energy intensity	Page 19	
			302-4: Reduction of energy consumption	Page 20	
Diversity & Inclusion	GRI 405: Diversity and Equal Opportunity	101:1-3: Page 10	405-1 Diversity of governance bodies and employees	Performance Summary, page 18-19 + GRI 102-18 in this document, page 4.	
Labor Practices & Human Rights	GRI 414: Supplier Social Assessment	101:1-3: Page 12 and our <a href="#">Modern Slavery Act Statement</a>	414-2 Negative social impacts in the supply chain and actions taken	Page 12	
	GRI 403: Occupational Health and Safety	101:1-3: Page 10, 17	403-9 Work-related injuries	Performance Summary, page 18-19	Data on the types of injury is unavailable. Aside from total employee figures, breakdown of data on outsourced employees is not available.
Environmental Product Sustainability	GRI 301: Materials	101:1-3: Page 10	301-3 Reclaimed products and their packaging materials	Page 10	
Electronic waste reduction	GRI 306: Effluents and Waste	101:1-3: Page 17	306-2: Waste by type and disposal	Page 19	

Additional Performance indicators*	Performance Indicators	Page / Link for DMA and Performance Indicators	Omissions
203-2: Significant indirect economic impacts	GRI 203: Indirect economic impacts	Pages 8-10, 14	
303-1: Water withdrawal by source	GRI 303: Water	Performance Summary, page 20	
305-1: Direct (Scope 1) GHG emissions	GRI 305: Emissions	Performance Summary, page 20	
305-2: Energy indirect (Scope 2) GHG emissions		Performance Summary, page 20	
305-3: Other indirect (Scope 3) GHG emissions		Performance Summary, page 20	
305-4: GHG emissions intensity		Performance Summary, page 20	
305-5: Reduction of GHG emissions		Performance Summary, page 20	
404-3: Employees receiving performance reviews		GRI 404: Training and Education	Performance Summary, page 19
Access to content: PA7 Policies and practices to manage human rights issues relating to access and use of tele-communications products and services including protecting children.	Telecom sector draft supplement	Trusted products, page 13	

\*These additional performance indicators are not considered as our most material issues for the purposes of this report and the GRI Standards requirement for “in accordance”, core option. However, we have included this data for the benefit of stakeholders who require additional information.