

# LIBERTY GLOBAL'S HUMAN RIGHTS STATEMENT



JULY 2020

Liberty Global is committed to using our innovation to empower positive change. We innovate to create a positive impact across every element of our business and ultimately, society. We also recognize that our business has the responsibility to respect human rights and the ability to contribute to impacting human rights positively.

Our commitment to human rights is guided by the UN Guiding Principles on Business and Human Rights and the international human rights principles encompassed in the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

As Liberty Global continues to evolve, our shared commitment to our Company values means we treat our customers fairly, treat our colleagues with respect, and uphold the highest ethical and legal standards. As a result we have a strong reputation with our customers, our employees, our business partners and in the communities we serve.

## Our Policy

Our Code of Conduct is designed to provide the basic principles to support our people in working to the best of their abilities while maintaining the trust and solid reputation we have built. One of the ways we encourage this is by respecting and promoting human rights within our businesses; this is achieved in our core values:

We are **Straight Up!** We value authenticity, transparency and doing the right thing for our customers, for our organization and for the world.

We are **United!** We collaborate and embrace our differences to achieve our goals; building strong relationships, based on trust, respect and inclusivity to do more and do better.

We ensure that all of our employees have completed an online Code of Conduct training and exam certification which covers all our business values and those outlined in this human rights statement.

We also expect our suppliers and business partners to meet or exceed our ethical practices as outlined in our Key Principles section of our Responsible Procurement and Supply Chain Principles. 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 set out our 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 Board of Directors approve of this statement and our annual Modern Slavery Act Statement is approved by the Board of Directors each year in line with our legal obligation. The principles outlined in this statement are the key areas that we have identified as having the highest potential risk to human rights.

## Our Principles

### **Diversity and Nondiscrimination**

We value diversity in our workplace; we believe in providing equal employment opportunities to employees and prospective candidates without distinction of any kind. By aligning ourselves with the UN sustainable development goals we are committed to achieving gender equality throughout our business. We encourage female employees to strengthen their skills through training and mentoring as well as to create a talent profile to increase their growth potential into leadership roles. We adhere to and enforce applicable local legislation related to diversity and Discrimination such as the British Equality Act 2010, Dutch Equal Treatment Act and the laws enforced by the U.S. Equal Employment Opportunity Commission.

### **Harassment Prohibition**

A great working environment is dependent on the way we behave; we expect our employees to treat their colleagues, customers and suppliers with respect at all times. We are committed to providing a workplace free of any and all forms of harassment (sexual, physical, race, color, religion, sex, age, physical or mental disability, marital status, pregnancy, gender, gender identity or any other kind). We will not tolerate harassment of any kind from our employees, management, suppliers and business partners.

### **Prevention of Human Trafficking, Forced Labor, and Child Labor**

We will not tolerate the use of forced labor, child labor, slavery, or human trafficking in our business or in our supply chain. We are committed to the elimination of such practices and have outlined our policy and due diligence process in our [Modern Slavery Act Statement 2020](#).

### **Working Hours and Wage Standards**

We adhere to all applicable laws, relating to minimum wages, working hours, overtime and benefits. We are committed to the development of our employees skills and capabilities and to providing opportunities for career advancement.

### **Freedom of Association and Collective Bargaining**

We respect our employees right to form, join or not to join a labor union or any other organisation of their choice without fear of retaliation, intimidation, harassment or termination of employment. Where employees are represented by a legally recognized union and subject to local legal requirements, we are committed to establishing a constructive dialogue with their freely chosen representatives, and to bargaining in good faith with such representatives.

### **Workplace Safety**

The safety and health of our employees is of paramount importance. We provide a safe and healthy workplace and comply with all applicable health and safety laws and regulations. We also expect the same of our suppliers and business partners. We have certified Health and Safety Officers at each of our offices who act as main point of contact for any issues that may arise. They support the process of Risk Inventory & Evaluation which forms the basis for a safe and healthy working environment and acts as a repository for risks the business and its employees might encounter and measures taken to prevent harm to our employees.

### **Privacy, Data Protection and Security**

Liberty Global is committed to doing business in a way that respects the privacy of our customers and employees. Respecting privacy is about handling people's personal data appropriately, securely, and in line with applicable laws and regulations. Our Digital Confidence team oversees the manner in which Liberty Global deals with the governance of privacy, lawful intercept, security and related product lifecycle issues. We adhere to the General Data Protection Regulations (GDPR) which offer more transparency and better data protection for European Citizens. Understandably, when customers use our services they expect nothing but the best; not just in connectivity and content, but also in us handling their data responsibly and securely.

### **Due Diligence, Grievance and Remedy Process**

We encourage our employees, suppliers, business partners and any other external stakeholder to report any concerns regarding Human Rights or any conduct that they believe violates this policy or our Code of Conduct or any applicable law, rule, regulation through our third-party-operated [compliance portal](#). All allegations will be investigated and we will pursue action to mitigate any adverse human rights impacts. We will not permit retaliation against any employee who, in good faith, reports, complains of, or seeks advice concerning this policy, our Code of Conduct or any other illegal or unethical conduct.

Our supplier assessment process is outlined in our Responsible Procurement Approach in order to ensure the adherence to these Key Principles, Liberty Global has commissioned EcoVadis, a global supply chain assessment specialist. We work with our suppliers on the implementation of our Key Principles and 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 enable us to assess the sustainability performance of suppliers. 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.

## Summary

This statement expresses our commitment to respecting human rights. We will review these principles annually and continue to improve and update as needed. We are committed to the continuous improvement of our businesses performance and are working towards a process within which we can identify potential human rights and human rights violations throughout our operations.