

**LIBERTY GLOBAL'S
CORPORATE
RESPONSIBILITY
STAKEHOLDER ENGAGEMENT
FRAMEWORK**



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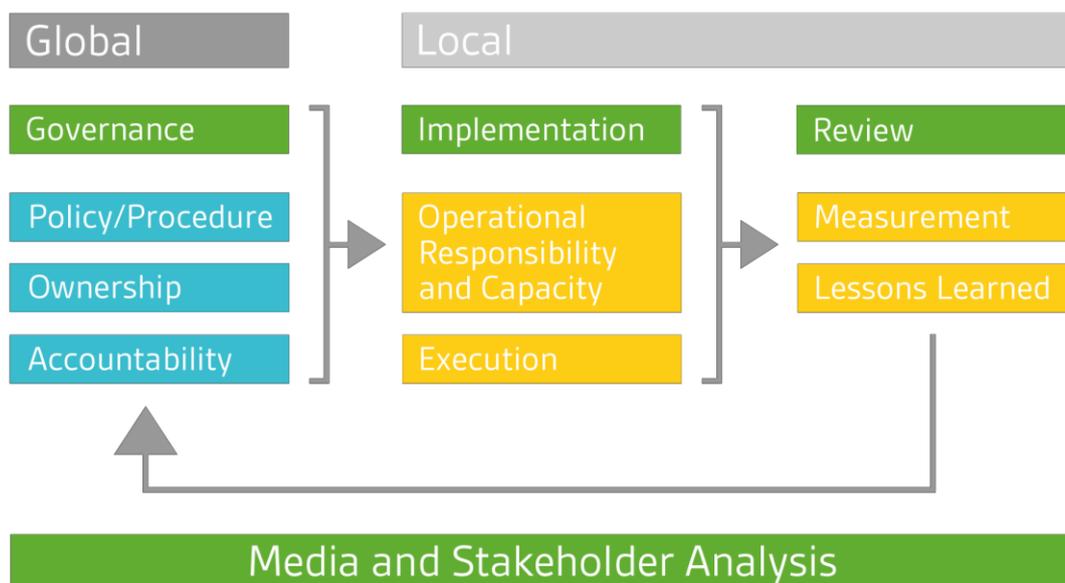
FRAMEWORK OVERVIEW

Liberty Global has systemized its corporate responsibility (CR) stakeholder engagement processes to create a consistent, comparable and replicable framework that can be used across the Group. This CR Stakeholder Engagement Framework is designed to bring a group-wide consistency in terms of process and indicators, but not in outcomes, which will vary locally.

Our CR Stakeholder Engagement Framework, based on RobecoSAM recommendations from [The Sustainability Yearbook 2014](#), which consists of three parts: governance, implementation and review (see below chart). The Framework provides a company-wide process, including guidelines and tools, while allowing for local implementation. The process also meets best practice sustainability and reporting standards, including Dow Jones Sustainability Index and the Global Reporting Initiative.

This Group-wide guidance has been developed as a common minimum standard. Both global and local operations are responsible for following the process and reporting accordingly. Liberty Global will support implementation of the Framework across its market operations where appropriate, consolidate results, and report on progress internally and externally. The Framework applies to our global operations that publically communicate on their CR and sustainability strategy and/or participate in formal reporting mechanisms. This includes Virgin Media, Telenet, UPC Poland, UPC Slovakia, Sunrise UPC and our joint venture VodafoneZiggo.

Liberty Global Stakeholder Engagement Framework



Source: RobecoSAM

Liberty Global will capture global stakeholder engagement data as part of its annual CR data collection process. Group-wide results will be shared annually with the relevant internal teams to help to leverage best practices and lessons learned. Annually, CR-related stakeholder engagement activities from across the Group will be reviewed by the [Liberty Global Corporate Responsibility Committee](#).

Liberty Global recommends that all market operations have local mechanisms in place for stakeholders to raise grievances. Globally, grievances can be raised by emailing cr@libertyglobal.com.

GOVERNANCE

To ensure that all operations are accountable for following these guidelines, Liberty Global recommends having designated individuals (e.g. within local CR teams, communications or procurement functions) responsible for stakeholder engagement delivery, with leadership provided by a relevant senior person at the local level. Annually, CR-related stakeholder engagement activities from across the Group will be reviewed by the [Liberty Global Corporate Responsibility Committee](#).

RESOURCES

Liberty Global recommends assessing the human resources needed to support the delivery of this approach. Capacity should be built to ensure that the best skills, resources and technical tools are available to capture, review and act on the outputs.

REPORTING

Measurement of CR-related stakeholder engagement, including performance indicators, will be captured as part of Liberty Global’s annual CR data collection process. This will allow actions, outcomes and performance to be tracked, risks to be flagged and urgent action to be taken.

IMPLEMENTATION

The Framework addresses how the stakeholder engagement strategy is implemented at the local market operations.

Liberty Global’s implementation process outlines three key stages:

- Stage 1: Prioritize and understand our key stakeholders;
- Stage 2: Define material corporate responsibility issues;
- Stage 3: Ongoing engagement with key stakeholders



STAGE 1: PRIORITIZE AND UNDERSTAND OUR STAKEHOLDERS

Locally, market operations will be responsible for identifying, selecting and prioritizing the appropriate stakeholders for engagement. This may include the use of stakeholder profiles and/or stakeholder mapping as prioritization tools.

Liberty Global recommends that all operations prioritize key stakeholders; and for those prioritized, determine the following:

- Characteristics of a high-priority stakeholder;
- Their demographics;
- Their concerns and interests;
- The key influencers and contacts within that stakeholder group; and
- The level at which engagement should be led.

Outcomes and documents on key stakeholders should be shared with relevant internal teams, and outline information relating to their concerns and interests.

STAGE 2: DEFINE MATERIAL CORPORATE RESPONSIBILITY ISSUES

Liberty Global recommends that formal stakeholder engagement be undertaken, at a minimum, every two to three years, combining a mix of both qualitative interviews and broader survey-led engagement. The objective of this process is to understand stakeholders' key CR and sustainability issues.

The outcomes of this process should be used to inform local business processes, including a materiality assessment.

Liberty Global recommends that stakeholder engagement be undertaken on any issues judged to be high priority to stakeholders. These issues will vary, depending on whether engagement is happening at Group or market operation level. Differences in what issues count as significant will also vary across cultures, product offerings, or demographics.

Making this practice part of how we do business and having a recurring review of performance will allow Liberty Global and its market operations to address key issues more quickly, advance best practice and share case studies across the Group.

STAGE 3: ONGOING ENGAGEMENT WITH KEY STAKEHOLDERS

Liberty Global expects all market operations to integrate sustainability-related questions into ongoing engagement activities, especially with high-priority stakeholder groups like consumers, employees and suppliers. In addition, it is recommended that market operations develop a stakeholder engagement narrative in local CR and sustainability reporting.

While it is recommended that a formal assessment of specialist stakeholder groups be undertaken every two to three years, this process would need to be supplemented with an annual program of ongoing engagement and reporting which will evidence responsiveness and take the Framework forward year on year. Where possible, Liberty Global recommends that sustainability-related questions be integrated into ongoing engagement with internal and external stakeholders. Stakeholder groups, mechanisms for engagement and typical questions asked need to be tailored locally to ensure all material issues are covered.

Ongoing engagement can be carried out in various methods, including employee engagement surveys, workshops, dialogues, consumer satisfaction surveys (e.g. RepTrak, NPS) and supplier questionnaires.

Media scanning should also take place as part of ongoing activities. While not necessarily considered part of a CR program, it is considered good practice to report on key media challenges.

GRIEVANCE MECHANISMS

Liberty Global recommends that all market operations have local mechanisms in place for stakeholders to raise a two-way dialogue. This information should be easily accessible on the website of the local market operations. Globally, grievances can be raised by emailing cr@libertyglobal.com.

BALANCED FEEDBACK

Liberty Global also encourages introducing the opportunity for balanced feedback in engagement tools, giving stakeholders the opportunity to openly share (and sometimes anonymously) what they dislike or would like to see improved.

REVIEW

Liberty Global will capture stakeholder engagement data from across the Group as part of our annual CR data collection process. This will include the following performance indicators:

- Date of last formal stakeholder engagement at the market operation level (i.e. materiality assessment);
- Key issues and responses identified during the engagement process;
- Number of grievances reported through local mechanisms;
- Lessons learned (both positive and negative) from stakeholder engagement activities, including example(s) where local stakeholder engagement has not been successful or has led to a negative outcome.

Group-wide results will be shared annually with the relevant internal teams to help to leverage best practices and lessons learned. This information will be fed back via internal reporting mechanisms, including an annual CR data collection summary report and corporate responsibility conferences.

LOCAL REPORTING

Locally, the outcome of this engagement process should be used to prioritize the issues that are most material to the business and to our stakeholders. Best practice reporting recommends communicating the material issues externally as part of the annual CR report. This 'materiality' focus ensures our reports are relevant and credible, by centering on matters that are critical in order to achieve the company's goals and manage its impact on society.

CONCLUSION

Stakeholder engagement is a key component of defining and maintaining focus within our strategic approach to CR. Listening and learning from stakeholders, both internal and external, helps us understand their expectations. This means we can respond to their needs where appropriate and focus our resources on improving what matters most.

For further information, please contact the Liberty Global CR Department at cr@libertyglobal.com.