

**LIBERTY  
GLOBAL'S  
MODERN  
SLAVERY ACT  
STATEMENT  
2022**



JUNE 2022

## Modern Slavery Act Statement

Liberty Global maintains our commitment to respecting human rights, including the elimination of slavery and human trafficking in our supply chains and operations. We embolden any individual who has concerns about unethical behaviour across our business or operations to speak up and to do so without fear of retaliation.

We are always looking to improve our approach, during the previous year we have made a number of advancements. Below you will find our updated 2022 Modern Slavery Act Statement in compliance with our obligations under the UK's Modern Slavery Act 2015.

### About Liberty Global

Liberty Global is a world leader in converged broadband, video and mobile communication services. We deliver next-generation products through advanced fiber and 5G networks that connect over 85 million subscribers across Europe and the United Kingdom. Our businesses operate under some of the best-known consumer brands, including Virgin Media-O2 in the UK, VodafoneZiggo in the Netherlands, Telenet in Belgium, Sunrise UPC in Switzerland, Virgin Media in Ireland and UPC in Eastern Europe. Through our substantial scale and commitment to innovation, we are building Tomorrow's Connections Today, investing in the infrastructure and platforms that empower our customers to make the most of the digital revolution, while deploying the advanced technologies that nations and economies need to thrive.

### Policies

#### Employees

We provide a workplace that is positive, creative and rewarding, giving all employees the opportunity to reach their full potential and contribute to our Group's success. We will not tolerate harassment of any kind in our workplace. We promote an open culture, where people are encouraged to ask questions if they are unsure and to raise concerns if they believe our Code of Conduct has been violated.

Employees who become aware of or suspect any conduct that they believe violates any applicable law, rule, regulation, company policy or other provision of the Code of Conduct, are required to report such improper conduct as promptly as possible. Employees can report the matter directly to a Compliance Officer, Human Resources Representative, member of the Legal department or the Group's General Counsel. Additionally, a Compliance Line and web-based reporting system are operated by a third-party vendor and are available 24 hours a day, seven days a week.

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. All employees are required to complete mandatory online training on our code of conduct.

## Suppliers

We rely on all our suppliers to meet the disclosure requirements under the UK's Modern Slavery Act 2015 and to undertake the necessary due diligence to ensure that there is no modern slavery or human trafficking in their operations and supply chains. Liberty Global's Responsible Procurement and Supply Chain Principles (RPSCP) outline what we expect from our suppliers and our commitment to protect human rights. Our principles ensure that we are being explicit in our expectations relating to labour.

The key components of our RPSCP relating to the Modern Slavery Act include: child labor, forced labor, discrimination, working hours and wages, freedom of association and health and safety.

All suppliers are expected to comply with all applicable local and international laws and regulations regarding the environment, health and safety and employment, and including the ILO Core Conventions on Labour Standards and the Universal Declaration of Human Rights.

## Due Diligence

### Supplier assessments and monitoring

The risk of slavery and human trafficking in our business sits predominantly in our supply chain. We use global supply chain assessment specialist EcoVadis to benchmark suppliers against 21 environmental, social and ethical criteria. These criteria are based on a number of international standards including the UN Global Compact Principles, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI), the ISO 26000 standard and the Ceres principles. Suppliers are required to provide evidence of their environmental, social and ethical activities.

Once each supplier is assessed, the EcoVadis platform provides a scorecard against such criteria, enabling Liberty Global to evaluate the performance and risk associated with each supplier.

In 2021, we continued to strengthen our responsible procurement governance structure by integrating a weighting score from EcoVadis supplier assessments directly into our wider procurement risk assessment framework, which enables close monitoring of our key suppliers.

With regard to human rights issues, several human rights indicators are being monitored within the EcoVadis platform, including: working conditions, discrimination, labor relations, child & forced labor, freedom of association, human rights issues and health & safety standards.

### Supplier corrective actions and continuous improvement

We regularly monitor supply chain compliance risk and if a supplier assessment scorecard shows, or it subsequently transpires, that a new or existing supplier is not adhering to our RPSCP, Liberty Global will seek to work with them to address such non-adherence through a mutually agreed corrective action plan.

In 2021, a total of 481 improvement actions were issued to 41 suppliers, 140 actions out of the 481 were focused on improving policies and processes related to monitoring of labor and human rights.

## Training

Our procurement teams play an important role in ensuring that our suppliers participate in, and comply with, our on-going assessment program. We deliver annual Responsible Procurement training to create internal understanding of our responsible procurement and supply chain approach which includes information on Modern Slavery, and our approach. In 2022, we launched a refreshed Responsible Procurement training with an emphasis on modern slavery, human rights,

environmental and ethical key principles, and the way they are transposed in the Liberty Global's Responsible Procurement and Supply Chain Principles (RPSCP). The training included a reminder on our expectations from suppliers to comply with our key principles, and a walkthrough of the EcoVadis Platform. This training is available to all procurement colleagues through a procurement sharing platform.

Additionally, within the updated Code of Conduct, we highlight to our employees the expectations we have of our suppliers and that we work with our suppliers to assess their risk and performance on environmental, social and ethical activities, including human rights and labour.

The Board of Directors of Liberty Global plc approved this Statement and delegated authority to sign this Statement on its behalf to its General Counsel, Bryan Hall, at its board meeting in June 2022.

A handwritten signature in blue ink, appearing to read "Bryan Hall", with a long vertical flourish extending downwards from the end of the signature.

**Bryan Hall**  
**Executive Vice President, General Counsel and Secretary**  
**Liberty Global PLC**