

# LIBERTY GLOBAL'S MODERN SLAVERY ACT STATEMENT 2023

# 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.

Below you will find our updated 2023 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 communications services. We deliver next-generation products through advanced fiber and 5G networks, and currently provide over 86 million connections<sup>1</sup> across Europe and the United Kingdom.

Our businesses operate under some of the best-known consumer brands, including Virgin Media-O2 in the U.K., VodafoneZiggo in The Netherlands, Telenet in Belgium, Sunrise in Switzerland, Virgin Media in Ireland and UPC in Slovakia.

Our consolidated businesses generate annual revenue of more than \$7 billion, while the VMO2 JV and VodafoneZiggo JV generate combined annual revenue of more than \$17 billion.<sup>2</sup>

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.

Liberty Global Ventures, our global investment arm, has a portfolio of more than 75 companies across content, technology and infrastructure, including strategic stakes in companies like Vodafone, ITV, Televisa Univision, Plume, AtlasEdge and the Formula E racing series.

### **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

<sup>1</sup> Represents aggregate consolidated and 50% owned non-consolidated fixed and mobile subscribers. Includes wholesale mobile subscribers of the VMO2 JV and B2B fixed subscribers of the VodafoneZiggo JV.

<sup>&</sup>lt;sup>2</sup>\* Revenue figures above are provided based on full year 2022 Liberty Global consolidated results (excluding revenue from Poland) and the combined as reported full year 2022 results for the VodafoneZiggo JV and full year 2022 U.S. GAAP results for the VMO2 JV. For more information, please visit <a href="https://www.libertyglobal.com">www.libertyglobal.com</a>.

such improper conduct as promptly as possible. Employees can report the matter directly to the Compliance team, Human Resources representative, member of the Legal department or the Group's General Counsel. Additionally, a Compliance web-based reporting system is operated by a third-party vendor and is 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 labour, forced labour, 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 top suppliers against 21 environmental, social and ethical criteria. Such 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.

With regard to human rights issues, several human rights indicators are being monitored within the EcoVadis platform, including: working conditions, discrimination, labour relations, child & forced labour, 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 2022, a total of 651 improvement actions were issued to 36 suppliers, 199 actions out of the 651 were focused on improving policies and processes related to monitoring of labour 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 2023, we are launching a series of Sustainable Procurement trainings, which include specialized trainings on the EcoVadis Platform. The trainings are available to all procurement colleagues through a procurement sharing platform.

Additionally, within the 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 July 2023.

**Bryan Hall** 

**Executive Vice President, General Counsel and Secretary** 

**Liberty Global PLC**