



# LIBERTY GLOBAL'S MODERN SLAVERY ACT STATEMENT 2024

MAY 2024

# Modern Slavery Act Statement

Liberty Global maintains our commitment to respecting human rights, including the prohibition 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 2024 Modern Slavery Act Statement in compliance with our obligations under the requirements of Section 54 of the UK 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 85 million connections<sup>1</sup> across Europe and the United Kingdom.

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

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's consolidated businesses generate annual revenue of more than \$7 billion, while the VMO2 JV and VodafoneZiggo JV generate combined annual revenue of more than \$18 billion.<sup>2</sup>

Liberty Global Ventures, our global investment arm, has a portfolio of more than 75 companies across content, technology and infrastructure industries, including stakes in companies like 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 promote an open culture centered around Belonging, where everyone is valued and respected. 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 or any other company policy has been violated. We also have a number of policies and procedures in place to prevent and manage human rights-related violations in the workplace, including our Code of Conduct and our anti-discrimination, harassment and bullying policy.

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<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>2</sup> Revenue figures above are provided based on full year 2023 Liberty Global consolidated results and the combined as reported full year 2023 results for the VodafoneZiggo JV and full year 2023 U.S. GAAP results for the VMO2 JV. For more information, please visit [www.libertyglobal.com](http://www.libertyglobal.com).

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 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 and company policies are 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 and anti-discrimination, harassment and bullying policy.

## **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 Procurement Responsible Supplier Code of Conduct (RSCoC) outlines what we expect from our suppliers and our commitment to protect human rights. Our RSCoC ensures that we are being explicit in our expectations relating to labour. Each supplier going through our onboarding process must accept the terms of our RSCoC.

The key components of our RSCoC relating to the Modern Slavery Act include: child labour, human trafficking, forced labour, discrimination, working hours and wages, freedom of association and right to collective bargaining, 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 International Labour Organization's (ILO) Core Conventions on Labour Standards and the Universal Declaration of Human Rights.

## **Due Diligence**

### **Supplier assessments and monitoring**

Any risk of slavery and human trafficking in our business would sit predominantly in our supply chain. We use a variety of tools to ensure we have adequate means to assess, prevent and raise corrective actions on human rights issues that may occur in our supply chain. The most impactful actors of our supply chain (i.e., the top 80% by spend) are subject to heightened scrutiny.

One tool we use is the global supply chain assessment specialist EcoVadis, which benchmarks 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 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.

In addition to the EcoVadis platform, our suppliers are required to complete a multi-stage human rights due diligence process and assessment procedure, the results of which contribute to our analysis and decision with respect to the onboarding of each supplier.

Last year, we also joined the Joint Alliance for CSR (JAC) to promote sustainability in the international telecoms supply chain. As a member of JAC, we conduct CSR-related audit reports of our major information and communications technology suppliers and share such results with other JAC members.

### **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 RSCoC, Liberty Global will seek to work with them to address such non-adherence through a mutually agreed corrective action plan.

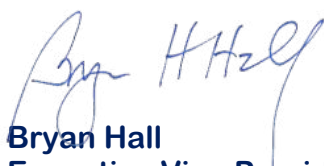
In 2023, a total of 730 corrective actions were issued to 25 suppliers, 266 actions out of the 730 were focused on improving policies and processes related to monitoring of labour and human rights. The most common corrective actions related to human rights from the EcoVadis evaluation were focused on the lack of targets or clear documentation and policies around human rights, insufficient reporting and lack of relevant certifications by our partners. No major breaches with regards to human rights were identified through this evaluation.

### **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.

Additionally, within the Code of Conduct and the RSCoC, 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 Ltd. approved this Statement and delegated authority to sign this Statement on its behalf to its General Counsel, Bryan Hall, at its board meeting in May 2024.



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