

LIBERTY GLOBAL PROCUREMENT RESPONSIBLE SUPPLIER CODE OF CONDUCT

VERSION CONTROL:

Date	Owner	Version comments
13/11/2023	Liberty Global Procurement Services	V1
18/03/2024	Liberty Global Procurement Services	V1.1 (additional provision on biodiversity)
19/08/2024	Liberty Global Procurement Services	V1.2 (additional provision on artificial intelligence)

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PREFACE

WHAT IS LIBERTY GLOBAL?

Liberty Global (NASDAQ: LBTYA, LBTYB and LBTYK) 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* 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.

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. 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. **

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 ITV, Televisa Univision, Plume, AtlasEdge and the Formula E racing series.

Our scale enables us to transfer knowledge and expertise across our operations and investments, creating a dynamic family of brands united in the pursuit of innovation and excellence.

We're prioritising diversity, equity and inclusion in our workplace and communities, while reducing our impact on the environment. We are using technology as a force for good; for our people, our partners and the planet.

More on [Liberty Global](https://www.libertyglobal.com).

* 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.

** 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 www.libertyglobal.com

A MESSAGE FROM MARTIN SIMPER

MD, Chief Procurement Officer, Liberty Procurement Services

As representatives of Liberty Global, the manner in which we conduct business is of paramount importance to Liberty Procurement Services. Given this, we expect similar commitments from our partners to conduct themselves in the same way.

When it comes to day-to-day activity, it's important to us that everything we do is ethical, lawful, environmentally considerate, and socially responsible. That's why we've put together this Responsible Supplier Code of conduct, to give you clarity on what we expect from partners working with Liberty Procurement Services, and the Liberty Global Group (as defined below) more broadly.

Our Responsible Supplier Code of conduct is a set of principles that we expect you to work within. We'll be working with you to make sure you have the right policies and processes in place to comply with these principles, and that you also use them with your own suppliers. We'll also consider these principles when we're choosing suppliers, and we'll be working together to monitor compliance throughout our relationship.

Please join us in making sure that we are all committed to conducting business with honesty and integrity, in accordance with the highest ethical and legal standards, and with respect for each other and our planet.

INTRODUCTION

As Liberty Global continues to evolve, our shared commitment to one of our Company values, Straight Up, 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. We expect the same from our Suppliers.

Every year Liberty Global purchases significant quantities of equipment and services. With this comes a responsibility to ensure that we incorporate ethical, environmental and social considerations into our spending decisions. Liberty Global's Responsible Supplier Code of Conduct (referred to herein as the "Key Principles" or "this Responsible Supplier Code") set out Liberty Global's 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.

This Responsible Supplier Code is designed to give you guidance on the policies, regulations, rules, and legislation that support our areas of work and that we expect our suppliers to comply with. It sets out Supplier's obligations in relation to social, environmental and ethical compliance. This Responsible Supplier Code is designed to promote safe and fair working conditions and the responsible management of social, ethical and environmental issues in Liberty Global's supply chain.

We are committed to providing guidance and working with our suppliers to enable their compliance with our Responsible Supplier Code of Conduct. International management system standards are available to assist and guide businesses towards best practice and we expect suppliers to align to such standards. In particular, Suppliers with more than 250 employees are expected to seek certification to such standards where certification is possible (for example: ISO 9001, ISO45001, ISO 14001, ISO 27001, ISO22301, SA8000).

SCOPE

The Key Principles outlined below apply to all procurement and supply chain activities involving Liberty Global's suppliers. Adherence to these Key Principles forms an integral part of Liberty Global's contractual conditions with its business partners who will be responsible for their implementation in their supply chain processes as set out herein.

The phrase "Supplier" in this Responsible Supplier Code shall, where relevant, also include all officers, employees, contractors, subcontractors and agents of Supplier. All references to "Liberty Global Group" include the relevant contracting entity, each other direct or indirect

parent or subsidiary company, any joint venture or partner, or other affiliate of Liberty Global that benefits from the goods and services being provided.

Supplier shall comply with all relevant laws, regulations, rules, and standards in all of the countries in which it operates.

Supplier shall comply with this Responsible Supplier Code.

Supplier shall take all reasonable endeavours to promote and apply this Responsible Supplier Code to its Suppliers and subcontractors (e.g., upstream tiers in the supply chain).

This Responsible Supplier Code is part of the [General Procurement Terms and Conditions](#) and embedded in Liberty Global contract templates.

Affiliates, partners or joint ventures that are part of the Liberty Global Group may have their own Supplier requirements, code of conduct, and responsible sourcing policies. By accepting this Responsible Supplier Code, Supplier shall also comply with those other Liberty Global Group policies before they can work with those Liberty Global Group companies. All purchasing will be against a Supplier facing code of conduct that sets out sustainability standards of Suppliers. Liberty Global will ensure compliance via risk based due diligence.

UPDATES

This Responsible Supplier Code will be periodically updated and revised to reflect changes in laws and regulations, as well as Liberty Global's policies and standards. The most current version is available online [here](#) and, unless stated otherwise, will be effective when posted. We expect Suppliers to keep themselves informed as to any changes to this Responsible Supplier Code and to visit the Liberty Global Website regularly to keep themselves up to date. Compliance with this Responsible Supplier Code shall be each Supplier's responsibility.

KEY PRINCIPLES

Liberty Global Group is reliant on its Suppliers and all parties within their supply chain to adhere to the Key Principles set out below and to implement, execute and duly manage the necessary processes to ensure such adherence:

1. International labour practice and standards

Liberty Global Group believes in **treating people fairly**. That means that Supplier shall comply with all applicable local and international laws and regulations regarding the environment, health and safety and employment, and adhere to the UK's Modern Slavery Act, SA 8000, the ILO Fundamental Conventions and the UN Declaration of Human Rights, including:

a. Contracted labour

- Supplier shall not seek to avoid their obligations to any employee regarding labour or social security and must not abuse service provision of contracts or the recurring use of subcontracts, to avoid their legal obligations.
- Supplier must prohibit all employee fees including 'agents' recruitment fees or other related fees. Any such fees found to have been paid by employees, must be repaid to the employee.
- To the extent consistent with local/regional/national market practice, all Supplier's employees shall have an employment contract signed by both parties that defines the

terms and conditions of employment. A copy of such a contract shall be issued to the employee.

- A Contract of Employment shall at least contain but not be limited to the following items:
 - a) Working hours showing at least a guaranteed wage
 - b) Overtime pay rates and compensation for working out of normal working hours
 - c) Payment and frequency of payment
 - d) Notice period

b. Child labour

- With regard to (but not limited to) the abolition of child labour (138 "on the minimum age for admission to employment", 182 "on the prohibition and immediate action for the elimination of the worst forms of child labour") as in the conventions of the International Labour Organisation (ILO), Supplier shall work against all forms of child work. Supplier shall contribute, support and/or develop policies and programmes that assist any child found to be performing child labour.
- In case there is child labour detected, the best interests of the child shall be the primary consideration and remediation actions shall be conducted in a manner consistent with ILO convention 138 and 182 and with the UN Convention on the Rights of the Child.
- Supplier must not employ any person below the applicable minimum legal age for employment. Where no local legislation exists to define the minimum legal age, the minimum age for employment shall be the age for completing compulsory education in the relevant country or not less than 15 years of age (or not less than 14 years, in countries where educational facilities are insufficiently developed, in accordance with international principles), whichever is higher.
- Employees under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts, hazardous activities, overtime or work that is inconsistent with the child's personal development. The definition of hazardous activities should be determined by applicable local law.

c. Forced labour

- Supplier must prohibit forced, bonded, compulsory, involuntary or exploitative prison labour, slavery and trafficking of persons in their operations and Supply Chain as per, but not limited to, the fundamental labour standards as laid down in the conventions of the International Labour Organisation (ILO) with regard to the abolition of forced labour and slavery (29, 105).
- To the extent consistent with local/regional/national market practice, Supplier shall grant employees the freedom to leave their employment or terminate their contract on reasonable notice. Employees shall be free to leave work after such reasonable notice period expires. All employment shall be conducted on a voluntary basis. Supplier shall provide each of its employees with an employment contract which contains such a reasonable notice period.
- Supplier shall not require employees to lodge deposits of money or withhold payment or place debt upon employees or require employees to surrender any government-issued identification, passports, or work permits as a condition of employment.
- Supplier shall provide employees with documented terms and conditions in their own language.

- Terms and conditions must be established in accordance with all applicable legislation, regulations, and rules.
- Supplier must provide training in identifying forced labour risks to their supplier-facing employees who may encounter instances of forced labour.
- Supplier must monitor reports of forced labour from NGOs and other credible sources relevant to their sector and regions of operations, to investigate such allegations if their supply chains or operations are involved and to act to close any instance or risk of forced labour found.
- Supplier must provide full disclosure to Liberty Global Group on request, of their activities relating to the management and investigation of forced labour risks, i.e., maintain and share a board approved *Modern Slavery Statement* that describes how forced labour risks are managed. The statement should detail:
 - a) the Supplier's organisation and supply chains (e.g. sectors and regions).
 - b) the policies it operates to combat forced labour.
 - c) its due diligence processes addressing forced labour both for its operations and supply chains.
 - d) where in its operations and supply chain forced labour risk may heightened, the measures it has taken to assess and manage that risk and the effectiveness of the measures taken.
 - e) the training and capacity building about forced labour available to its staff.
- Supplier shall undertake the necessary due diligence to ensure that there is no modern slavery or human trafficking in Supplier's operations and supply chain.

d. Working hours and wage

- Supplier shall respect national and local legislation and industry reference standards, adopting the criteria that offer the highest levels of protection for the employee.
- Unless otherwise customary in Supplier's relevant industry and geographical region, and provided that Supplier is in compliance with applicable national or local law, each employee's working week shall not exceed 60 hours per week (including overtime), and employees shall be entitled to sufficient breaks.
- Each employee shall be allowed at minimum one day off following every six consecutive working days and the right to paid vacation.
- In exceptional circumstances (which may include emergency situations but shall not include anticipated peaks in production requirements), when these hours might be exceeded by Supplier's employees, working hours shall in any event not be excessive. Supplier shall be considerate to the type of work performed and the acceptable working hours for the role concerned. Supplier must ensure all overtime required by the employer is voluntary, not requested on a regular basis, and is compensated at a special rate. According to ILO Convention 1, these provisions are aimed at functions other than supervision and/or management.
- Supplier shall respect the employees 'Right of Digital Disconnection' during daily and weekly rest periods, leave, holidays or other, as well as respect for personal and family privacy beyond the working time legally or conventionally determined.
- Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Suppliers shall pay a fair and reasonable wage to employees which is high enough to maintain a fair standard of living and which shall comply with at least legal and industry minimum standards.

- Supplier shall ensure its employees understand their employment conditions and give employees fair and reasonable pay as well as any legally entitled or agreed benefits.
- Supplier shall not use deductions from wages as a disciplinary measure other than stated in the local law. Employees must be paid in a timely manner, and Supplier must clearly convey to its employees, the basis on which they are paid.
- Supplier shall not compensate overtime unless this is required on the basis of local legislation or agreed in the contract.
- Supplier must not seek to pay salaries in kind.

e. Freedom of association

- In conformance with local law, Supplier shall respect the right of all employees to form and join trade unions (or other kinds of representation) of their own choosing and where appropriate to carry out representative functions at work, in accordance with relevant legislation; to allow employees to bargain collectively and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities.
- Employees should not be discriminated against or be treated unfavourably or differently because they carry out representative functions.
- Supplier shall allow open communication and direct engagement between its employees and management in building employee relations and for the resolution of any issues.
- In such cases when the applicable law or regulation is restricting the right to freedom and collective bargaining, Supplier shall allow alternative forms of representation of their employees.

f. Discrimination

Liberty Global expects its partners to offer equal opportunities for their employees and those seeking employment.

Supplier employment decisions must be based on individual merit and business needs, irrespective of gender, age, cultural background, color, race, ethnicity religion, nationality, political preference, differing abilities or disabilities, civil status, sexuality, gender identity, expression or any other form of human diversity.

- Liberty Global is committed to providing a culture of conscious inclusion and respect for everyone. Liberty Global aims to provide a working environment that empowers its people to bring their true selves to work, every day and that actively promotes health, wellbeing and safety. Liberty Global do not condone or support any form of discrimination, harassment or bullying, towards any of its employees within the Liberty Global Group. Consultants, Suppliers, agents and representatives are also required to comply with [Liberty Global Anti-Discrimination-Harassment-and-Bullying-Policy.pdf](#) in their business activities with or on behalf of the Liberty Global Group. This policy emphasizes that discrimination, harassment (including sexual harassment) and bullying are unacceptable and will not be tolerated.
- Supplier will not discriminate or support any form of discrimination against employees or prospective employees in any way on such as but not limited to: grounds of race,

colour, age, gender, sexuality , gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, Trade union membership, covered veteran status, protected genetic information, indigenous status, medical condition, HIV status, social origin, social or marital status and union membership in hiring and employment practices .

- Supplier shall ensure no form of discrimination is present at any stage of employment, from the selection of suitable applicants, their interview and assessment, to the terms of their employment (such as compensation, access to training, promotion, termination or retirement) and grounds for dismissal.
- Supplier must operate a policy that prohibits discrimination, harassment, bullying and a policy that promotes diversity, equity and inclusion.

g. Fair treatment

We expect Supplier to share our commitment to treating all (e.g., their employees as well as Liberty Global customers, employees and partners) with respect and dignity, to employ employees on the basis of their ability to do the job and treat them fairly in accordance with applicable laws and regulations regarding labour and employment.

- Supplier must treat employees fairly and with respect and dignity.
- Supplier must prohibit any verbal, sexual, physical and other forms of abuse or any harassment and / or any threats or other forms of intimidation or bullying.
- Supplier must prohibit harassment or illegal behavior: Suppliers, their employees, officers, representatives, etc. shall not engage in offensive, intimidating or unwelcome behavior.
- Supplier shall act in accordance with Liberty Global [Anti-Discrimination-Harassment-and-Bullying-Policy.pdf \(libertyglobal.com\)](#).

h. Health and safety

We all share the responsibility of ensuring that our places of work are safe, and our products and services are delivered in a safe way to protect our employees, partners, Suppliers, customers and the communities in which we operate.

- Supplier must provide, in accordance with relevant international standards and national laws, a safe and healthy working environment for employees, contractors, partners or others who may be affected by the Supplier's activities.
- Supplier shall put in place mechanisms to ensure that health and safety obligations are communicated and applied to parties under its control. Supplier shall ensure it meets general principles of health and safety risk prevention. General principles include identifying, minimising and preventing hazards, using competent, trained and informed people, providing and maintaining safe equipment and tools, including personal protective equipment as required.
- In the case of use of hazardous chemicals or specific substances, employee health is to be protected by the provision of appropriate personal protective equipment, ensuring its use is monitored or elimination of exposure to such substances.

- Equipment, production machines and other machinery shall be evaluated for safety hazards.
- Supplier shall ensure facilities and amenities, including employee accommodation where provided by Supplier, shall be hygienic, safe and meet the basic needs of employees such as, but not limited to, access to clean toilets, fresh drinking water, adequate heat and ventilation, reasonable personal space with appropriate emergency exits and sanitary facilities for the storage and consumption of food. Supplier shall ensure and monitor compliance and awareness with regards to safety measures applied when operating machinery, working at heights or carrying work on electrical equipment, circuits and gear. Appropriate qualifications, compliance to relevant safety regulations and use of protective gear must be ensured.
- Supplier shall have mechanisms and shall implement them to ensure that all its employees are competent to carry out the health and safety aspects of their responsibilities and duties. This shall include the nomination and training of persons at an appropriate level who are responsible for discharging Supplier's health and safety obligations.
- Supplier must operate Safety Management systems aligned to ISO 45001 and / or any relevant certification framework and where the Supplier has more than 250 employees, be certified to ISO 45001 covering all work areas and provided living accommodation.
- Supplier shall have systems and training to prepare for and respond to accidents, health problems and foreseeable emergency situations. Supplier shall have means and procedures in place for recording, investigating and implementing learning points from accidents and emergency situations.
- Supplier must establish and maintain 'Emergency preparedness plans' aimed at minimizing harm to life, the environment and property.
- Supplier shall identify and assess potential emergency situations and events, and minimize their impact by implementing emergency plans, evacuation procedures, employee training and drills, appropriate fire detection, sufficient extinguishers, adequate exit facilities and recovery plan.
- Upon request, Supplier must report any indicators requested relating to the safety, health, and well-being of its employees and/or subcontractors, through the channels and within any deadlines requested.
- Supplier shall immediately inform Liberty Global Group of any significant accident or any public health issues relating to their activities.

2. Our Ethical principles

In line with Liberty Global Group's way of working, we expect Suppliers to conduct business lawfully and with integrity. We defined the following main topics:

a. Ethical and legal standard

- Supplier must conduct business with honesty and integrity, in accordance with high ethical and legal standards and comply with all relevant legislation, regulations, and

rules. This includes, but is not limited to: fair competition, tax regulations, sanctions, embargoes and export controls.

- Supplier shall act in accordance with all applicable international standards and laws on fraud and money laundering; not do or omit to do anything likely to cause any party to be in breach of any of such international standards and laws; maintain an effective anti-fraud and (where appropriate) an anti-money laundering compliance program, designed to ensure compliance with the law including the monitoring of compliance and detection of violations.
- Suppliers and partners shall respect and comply with applicable competition laws and regulations, including an obligation not to exchange commercially sensitive and strategic information with competitors or to enter into anti-competitive agreements with any business partner.
- Supplier must respect Trade laws such as sanctions and export controls. In the case of export of any items or the transfer of technology internationally Supplier should ensure that the necessary licenses and approvals are in place before proceeding.

b. Anti-corruption and bribery policy

- We expect Suppliers to work in compliance with the [Liberty Global's Anti-corruption Policy](#).
- Supplier shall have an anti-bribery and corruption policy that sets out principles in accordance with this Responsible Supplier Code and the [Liberty Global's Anti-corruption Policy](#).

c. Conflict of interest

A conflict of interest situation can exist if your business judgment could be affected as a result of any relationship you have with another person or business entity. Even the appearance of a conflict of interest can create a perception that you may be acting improperly.

- The Supplier shall avoid any conflict of interest that may compromise the Supplier's or partner's credibility or third parties' confidence in the Supplier and in Liberty Global Group.
- Supplier shall report to Liberty Global Group any possible conflict of interest.

d. Insider trading, use of Liberty Global Group information

- Supplier shall not buy or sell securities if they have knowledge of material, non-public information, and shall not share such information with others for any improper purpose.
- Supplier shall not use Liberty Global Group information for a personal benefit or to promote a competing business or activity.

e. Gifts and hospitality policy

- All gifts and business entertainment involving Liberty Global must be offered / accepted as per Liberty Global's Policies and in accordance with the law.
- **What will never be acceptable:** gifts or hospitality offered or received when in a tender or negotiation process; cash or gift certificates; any gift or hospitality that creates an obligation or compromise or could have the appearance of affecting any

decisionmaker in Liberty Global Group' judgment; any offer of travel and/or accommodation in relation to hospitality.

f. Supply Chain diversity

Liberty Global Group believes in having an inclusive procurement process that promotes equity and fairness. Liberty Global Group aim is to have a diverse supply base providing equal opportunities to all potential suppliers. Supplier diversity is about adopting a fair and inclusive procurement process, ensuring all businesses, regardless of their size, location, and the background of their workforce, have the same opportunities to compete for the supply of goods and services.

- Suppliers are expected to operate an open procurement process that selects Suppliers based on their ability to meet our Product / service, quality, cost, innovation, risk and sustainability requirements, and regardless of their size, location, and the background of their workforce.

g. Whistleblowing procedures

- Supplier must operate confidential whistle blowing procedures open to anyone who wishes to report anonymously any alleged failure to comply with this Responsible Supplier Code. All reports must be investigated, and appropriate action taken to address any failures.

3. Environment

We expect Suppliers to participate actively in our journey to minimize any potential impact on the environment and share our values by following the below principles from this Responsible Supplier Code and, when relevant, by complying to specific Liberty Global Group targets that might be set in sourcing events and contracts.

- Supplier shall comply with relevant legislation and international standards, and in countries where environmental legislation is not evident or enforced, ensure reasonable practices for managing environmental impacts are in place. They shall have developed, reviewed and recorded processes to ensure they achieve such compliance.
- Supplier shall implement an internal environmental management system appropriate to the size and nature of Supplier's business. Suppliers of more than 250 employees must be ISO 14001 certified.
- Supplier shall obtain, maintain and keep current all necessary environmental permits (e.g., waste management, transportation), approvals and registrations.
- Supplier shall respect all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances. Hazardous chemicals and other materials included in products, especially those included in the substances of Very High Concern list of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation, must be identified and managed by Supplier to ensure

their safe use, recycling or re-use and disposal. The use of such chemicals and materials by Supplier must be avoided (and if not possible to avoid, minimised).

- Where required, the Supplier is required to deliver electrical or electronic equipment in line with all relevant European Union regulations such as but not limited to the Restriction of Hazardous Substances in the directive electrical and electronic equipment (RoHS) and REACH irrespective of the country of use, including any non-European countries.
- Supplier shall identify, minimise, monitor, control and treat all hazardous air pollutants and all emissions should be avoided or minimised in accordance with international standards and applicable laws.
- A dedicated risk analysis shall be conducted regarding air, water and soil pollution. In accordance with applicable laws and international standards, pollution levels should be monitored and supplier shall remedy any activity that adversely affects human life, wildlife, and environment. Where appropriate, Suppliers must also comply with additional environmental requirements specific to their products and services. Any specific requirements would be covered in underlying Supplier contracts.
- Supplier shall, within its best effort, identify, monitor and minimize Greenhouse Gas emissions (GHG) and energy consumption from its own operations including carbon dioxide emissions from production, transportation and travel and support providing relevant data to Liberty Global Group or recognised third parties appointed by Liberty Global Group to measure improvements.
- Supplier must ensure appropriate management, operational and technical controls are in place to minimise the release of harmful emissions to the environment.
- Supplier shall use its best efforts to actively contribute to the Liberty Global Group's Corporate Responsibility goals by:
 1. Understanding, measuring and publishing data regarding their carbon footprint, i.e., know how much of their emissions arise from their direct operations, energy usage and their extended value chain so that Suppliers and customers can focus their decarbonisation action.
 2. Having a carbon reduction plan with clear goals and interim targets.
 3. Taking actions to reduce GHG emissions.
 4. Aligning their carbon reduction planning to the SBTi standard (when relevant) so they have a valid science-based carbon reduction target and in line with the Paris Agreement.
 5. Maintaining Life Cycle Assessments (LCA) for the products and services offered so that they can identify and address the major opportunities to decarbonise the products offered. Note: Maintaining LCAs is important as Liberty Global will use product LCAs when assessing emissions arising from Liberty Global Group's purchasing of Suppliers products.
 6. Using renewable energy in line with its availability.
 7. Measuring and reporting annually their emissions following recognised standards like the GHG protocol (i.e. publishing annually GHG emissions).
 8. Ensuring appropriate measures are in place to improve the environmental performance of products and services when in use, such as considering energy efficiency and end-of-life of supplied products and/or services at the design stage.
 9. Understanding and supporting Liberty Global Group's decarbonization goals.
 10. Having a process to engage its tiers 2-suppliers to drive GHG emission reduction within Supplier's operations and that of their suppliers, incentivising

and helping them to reduce their carbon emissions by requiring them to address points 1 through to 9.

- Supplier must not supply equipment containing ozone-depleting gases (such as CFC or HCFC), nor refuel with these gases.
- Supplier must act to minimise their use of natural resources and raw materials, including water, fossil fuels, and rare minerals.
- Supplier should operate policies and processes to assess and minimise their impacts on nature and biodiversity.

4. Conflict Minerals

As part of its sustainable procurement approach, Liberty Global Group will not accept any 'conflict minerals', being materials sourced from the Democratic Republic of Congo and adjoining countries and which are used to finance armed conflict in that region, that are incorporated in products or equipment provided by the suppliers or any third parties within their supply chain to Liberty Global Group and in breach of any applicable laws (including the US Dodd-Frank Act).

- Suppliers shall confirm that no conflict minerals are being sourced and used in the production of the products acquired or supplied by the Supplier.
- Supplier shall have a clear policy or procedure in place to avoid knowingly purchasing conflict minerals. In particular, Supplier shall have a policy or procedure to reasonably assure that minerals such as, exclusive but not limited to, tin, tantalum, tungsten and gold in the products it manufactures does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Supplier shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measure available upon Liberty Global Group's request.
- Supplier must align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- If requested, Supplier must complete and share the Conflict Minerals Reporting Template (from the Responsible Minerals Initiative) or similar questionnaire to enable transparency about the origin of minerals in our value chain.

5. Technology, Privacy, and Information Security

We expect Suppliers to safeguard and only make proper use of information or assets that we share with them and abide by all information protection and privacy laws that apply to their relationship with Liberty Global Group. Respecting and protecting the Privacy rights of Liberty Global Group customers and other consumers, Liberty Global Group employees, officers, directors and other parties with whom Liberty Global Group do business, is important to building and maintaining trust. Supplier shall comply with Liberty Global Group's key principles with respect to Privacy that are outlined in [Liberty Global Group's Privacy Policy](#).

- All intellectual property rights are to be respected, whether from Liberty Global Group, its subcontractors, its partners, its Suppliers, etc.
- Supplier shall implement and maintain security measures, to protect Liberty Global Group's Personal and Confidential data.

- Supplier shall inform Liberty Global Group immediately if at any time security is compromised and must act quickly, diligently, and responsibly to remedy the situation.
- Supplier shall protect Liberty Global Group's physical assets (e.g., office facilities, network and information technology equipment) and use them solely for business purposes and in compliance with all applicable Liberty Global Group policies.
- At the end of the contract term, Supplier shall remove all network connections used to access the Liberty Global Group network, return all personal and confidential data and assets (such as hardware, software, systems, documentation or other materials) provided by Liberty Global Group (or by its customers) during the course of the contract and the Supplier shall provide Liberty Global Group a written certification confirming that all assets and data have been returned and connections have been removed.

6. Artificial Intelligence

Without limiting the foregoing sections of these Key Principles, and to the extent Supplier is permitted (under its contract(s) with the Liberty Global Group) to design, develop, deploy or use artificial intelligence technologies ("AI") as part of its operations, products or services for the Liberty Global Group, we expect Supplier to adhere to the following guiding principles with respect to any such use:

a. Transparency

Supplier must be transparent about the use of AI in its products, services, and operations. This includes, where necessary:

- providing clear, up-to-date documentation and information to individuals impacted by Supplier's use of any AI, explaining how such AI is used, the data it processes, and the decision-making processes it influences; and
- providing effective mechanisms for feedback, review and redress for those impacted individuals.

b. Accountability and human oversight

Supplier must take responsibility and hold itself accountable for the performance and outcomes of any AI it uses, and the legal and ethical implications of Supplier's use or misuse of any AI. This includes:

- ensuring the AI systems are subject to appropriate human direction and control;
- where necessary, ensuring the outputs from any AI used by Supplier are subject to review by qualified personnel, including (but not limited to) where Supplier is using AI for high risk use cases (as defined in the EU AI Act);
- not using AI to replace or substitute the professional judgement, responsibility, or supervision of Supplier's employees or other personnel, or to perform tasks that are beyond such personnel's scope, capacity or expertise;
- assigning clear responsibilities to relevant Supplier personnel, and adopting a clear governance structure and process for, overseeing the use of AI;

- providing training to employees and other personnel of Supplier on the ethical use of, and the potential risks associated with using, AI; and
- implementing measures to regularly monitor and audit AI performance and mitigate any adverse impacts on individuals, society, and the environment.

c. Compliance and continuous improvement

Supplier must ensure that in the use of AI in its products, services, and operations, it:

- complies with all relevant laws and regulations applicable to the development and use of AI;
- keeps abreast of any changes to, and the introduction of, such laws, regulations and guidance;
- follows applicable standards of professional conduct; and
- adopts best practices for the ethical design, development, deployment and use of AI, including (but not limited to) the OECD AI Principles.

d. Sustainability

Supplier must use AI with sustainability in mind, aiming to minimize their ecological footprint, including having consideration for energy efficiency and impact on ecosystems and biodiversity.

e. Data privacy and security

Supplier must ensure the AI used in its products, services and operations are secure, resilient and trustworthy in order to protect the privacy and confidentiality, integrity and availability of Liberty Global Group data (including the data of Liberty Global Group customers, employees, subcontractors and other third parties), inputted into, or generated as outputs by, such AI. This includes:

- ensuring that any data which is personal data is collected, stored, and processed in compliance with all applicable data protection laws and regulations;
- implementing robust security measures to prevent unauthorized access, data breaches, and misuse of data;
- continuously and rigorously monitoring and testing those security measures; and
- where appropriate, anonymizing or pseudonymizing personal data where possible to protect individuals' privacy.

f. Societal impact

Supplier must ensure that its use of AI is respectful of the values and interests of the Liberty Global Group's customers, employees and the societies in which the Liberty Global Group operates.

g. Diversity, non-discrimination and fairness

Supplier must ensure that its use of AI is fair and non-discriminatory, respects human rights and does not harm, exploit, create bias or inequality against, any individual or groups. This includes:

- avoiding or mitigating against the risks of unfair social or financial prejudices;

- regularly auditing Supplier's use of AI to identify and eliminate biases in data and algorithms; and
- ensuring that AI-driven decisions are fair, impartial, and do not disproportionately impact any group based on race, gender, age, disability, or other protected characteristics.

By adhering to the above guiding principles, Supplier will contribute to the responsible and ethical use of AI on behalf of the Liberty Global Group, ensuring that the benefits of AI are realized in a manner that is fair, transparent, and respectful of human rights.

COMPLIANCE

Liberty Global Group requests Suppliers to implement the Key Principles to ensure compliance and alignment with Liberty Global's social and environmental responsibility principles laid out in this Responsible Supplier Code.

Compliance with the Responsible Supplier Code will be evaluated by Liberty Global Group in accordance with the Liberty Global's Supplier Assessment procedure. This process also enables Liberty Global Group to assess the improved sustainability performance of Suppliers and to help them to improve by implementing suggested corrective actions.

If Supplier declines Liberty Global Group's assessment requests, or if Supplier fails to comply with this Responsible Supplier Code, this may affect Liberty Global Group's ability and willingness to continue business relations with the relevant Supplier.

ENGAGEMENT AND COMMUNICATION

Liberty Global Group will communicate these Key Principles externally to all business partners, Suppliers, and potential business partners.

Liberty Global Group will aim to work with Suppliers, where appropriate, to share best practices on responsible supply chain management.

RESPONSIBILITIES

Suppliers should appoint a relevant point of contact to ensure adherence to the Key Principle outlined in this document.

RAISING CONCERNS AND SEEKING GUIDANCE

Liberty Global Group's Suppliers and third party partners are encouraged to raise any concerns regarding adherence to, and enforcement of, these Key Principles by Liberty Global Group's Suppliers using the [Liberty Global Compliance Portal](#).

Reports can be made anonymously through the Portal and will be kept confidential to the extent possible.

REFERENCES

Please find below a list of useful references, this is not to be seen as an exhaustive list and is there to support:

- [UK's Modern Slavery Act](#)
- [ISO 9001, ISO45001, ISO 14001, ISO 27001, ISO22301](#)
- [SA 8000](#)
- The [ILO Fundamental Conventions](#)
 - a. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
 - b. Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
 - c. Forced Labour Convention, 1930 (No. 29);
 - d. Abolition of Forced Labour Convention, 1957 (No. 105);
 - e. Minimum Age Convention, 1973 (No. 138);
 - f. Worst Forms of Child Labour Convention, 1999 (No. 182);
 - g. Equal Remuneration Convention, 1951 (No. 100);
 - h. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
 - i. ILO Declaration on Fundamental Principles and Rights at Work (1998)
- [UN Declaration of Human Rights](#)
- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [UN Declaration on the Rights of Indigenous Peoples](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [UN Sustainable Development Goals](#)
- [United Nations Convention against Corruption](#)
- [The Science Based Targets initiative \(SBTi\)](#)