

LIBERTY GLOBAL'S MODERN SLAVERY ACT STATEMENT 2019



JUNE 2019

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 2019 Modern Slavery Act Statement in compliance with our obligations under the UK's Modern Slavery Act 2015.

About Liberty Global

Liberty Global is the world's largest international TV and broadband company, with operations in 10 European countries under the consumer brands Virgin Media, Unitymedia, Telenet and UPC. We invest in the infrastructure and digital platforms that empower our customers to make the most of the video, internet and communications revolution. Our substantial scale and commitment to innovation enable us to develop market-leading products delivered through next-generation networks that connect 21 million customers subscribing to 45 million TV, broadband internet and telephony services. We also serve over 6 million mobile subscribers and offer WiFi service through 12 million access points across our footprint.

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.

In 2018, we updated our Code of Conduct, it 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 were required to complete mandatory online training.

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 2018, we continued to implement a risk-based approach to the assessment of our suppliers, enabling us to select categories of suppliers based on key sustainability risk factors such as conflict minerals, forced labor, data protection and customer privacy and environmental stewardship.

With regard to human rights issues, we have created a bespoke alert system which flags specific human rights indicators within the EcoVadis platform when assessing suppliers, including: working conditions, discrimination, labor relations, child & forced labor, freedom of association, human rights issues and health & safety standards.

In 2018, we carried out a further review of our supply chain categories to identify potential risk suppliers. We assessed over 150 suppliers. From the 150 suppliers assessed 50 suppliers were invited for assessment as a result of a Labour and Human Rights internal scoping exercise. We continued to select and assess suppliers based on criteria focusing on suppliers in our contracted labour, contingent labour, contact centers, supply chain and CPE hardware categories and we continued to assess our most strategic and critical suppliers.

We also 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.

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 2018, we issued a total of 117 improvement actions to 33 suppliers, 37 actions out of the 117 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 quarterly 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 2018, we continued to update our training materials to include an emphasis on potential environmental, social and ethical risks, including modern slavery. This training is available to all procurement colleagues through a procurement sharing platform.

In 2018, we created a summary paper called '[Our Approach to Responsible Procurement](#)' this was created for our procurement teams and suppliers and establishes our approach and expectations to Responsible Procurement, highlighting our key areas of focus including human rights.

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 2019.

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