



**LIBERTY  
GLOBAL'S  
MODERN  
SLAVERY ACT  
STATEMENT 2026**

MARCH 2026

# 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 2026 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 Ltd. (Nasdaq: LBTYA, LBTYB, LBTYK) delivers long-term shareholder value through the strategic management of two complementary platforms: Liberty Telecom and Liberty Growth.

Liberty Telecom is a world leader in converged broadband, video and mobile communications, providing approximately 80 million fixed and mobile connections across Europe through advanced fiber and 5G networks that empower customers and strengthen national economies. The business generates aggregate revenue of \$22 billion, including approximately \$18 billion from nonconsolidated joint ventures and \$4 billion from consolidated operations.

Liberty Growth invests in scalable businesses across the technology, media, sports and infrastructure sectors, with a portfolio of roughly 70 companies and funds valued at \$3.4 billion. \*

Together, these platforms reflect Liberty Global's focus on operating, enabling and investing in businesses with strong strategic fit and the potential to deliver sustainable long-term returns.

\* As independently valued as of December 31, 2025

## Policies

### Employees

We foster a culture where every individual is valued and respected, while striving to create a sense of belonging for all. Our overarching goal is to attract, retain and engage the best talent, ensuring that we have access to the widest possible pool, select the best talent and create a culture where people can perform at their best. The importance of belonging extends beyond our employees' experience and performance; it influences talent acquisition and retention and strengthens our ties to the communities where we live and operate.

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.

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, a Human Resources representative, a member of the Legal department or the Group's General Counsel. Additionally, a Compliance web-based whistleblowing system is operated by a third-party supplier and is available 24 hours a day, seven days a week. In 2025, no human rights-related issues were reported or registered.

Our Code of Conduct and company policies are designed to provide foundational principles to support our people in working to the best of their abilities in a trusted, ethical and responsible working environment. 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 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 entering 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.

We recognise that conflict-affected regions can heighten the risk of forced labour and human trafficking within supply chains. Consistent with updated UK guidance, which emphasises transparent disclosure of identified risks, we monitor any sourcing or supplier activity that may be exposed to instability and respond accordingly as situations evolve.

## Due Diligence

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 are subject to heightened scrutiny.

### EcoVadis

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.

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.

Based on the supplier performance in EcoVadis in 2025, 542 corrective actions were issued to 51 suppliers. 119 of these actions were focused on improving policies, processes and reporting related to labour and human rights. The evaluation's most common corrective actions included tackling a lack of supporting documentation for compliance and policy representations. One notable instance was identified in monitoring process related to a supplier who was involved in a class action suit on workplace discrimination which was settled.

### **Joint Alliance for CSR**

We are also members of the Joint Alliance for CSR (JAC) to promote sustainability in the international telecoms supply chain. As a member of JAC, we engage in CSR-related on-site audits for some of our suppliers. These audits assess standards related to labour, health and safety, environment, ethics and management systems.

Additionally, JAC uses surveys to get confidential feedback directly from workers. This feedback improves the quality of the audits and provides further insight on matters such as human rights, health and safety, beyond the standard on-site audits.

In 2025, we conducted audits for 2 of our suppliers. We identified 8 corrective actions for our suppliers to improve. The most common areas of improvement were working hours and health and safety. Another 17 of our other Tier-1 suppliers and a total of 36 sites relevant to Liberty Global were audited by other JAC members. Any corresponding corrective actions needed were managed by the JAC members responsible for the respective audits.

### **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 internal Responsible Procurement training annually to create an understanding of our responsible procurement and supply chain approach which includes information on Modern Slavery.

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 June 2026.



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