

# Anti-Corruption Policy



Owner	Published	Version
Legal	December 2019	4.0

## Purpose of Policy

Liberty Global plc (the “Company”) is committed to complying with all applicable anti-corruption laws (including, without limitation, the United States Foreign Corrupt Practices Act (the “FCPA”) and the United Kingdom Bribery Act 2010) and conducting our business in a manner that avoids impropriety and the appearance of impropriety.

Allegations of corruption can do serious damage to our business and reputation. Accordingly, the Company has adopted this Anti-Corruption Policy (this “Policy”), which prohibits anyone employed by or acting on behalf of the Company from paying or accepting bribes.

## Scope

This Policy applies to each director, officer and employee of the Company, of each of its direct or indirect subsidiaries, and to each agent, representative, consultant and independent contractor acting on behalf of the Company or any of its subsidiaries. Affiliated entities not covered by the Company’s Code of Conduct are expected to adopt their own policies equivalent to this Policy.

The Company may amend, terminate or otherwise modify this Policy at any time and from time to time.

## Statement of Policy

- The Company prohibits anyone acting on its behalf, directly or indirectly, from making or receiving payments, or taking any other action for an unlawful or improper purpose, unless such person is threatened with imminent bodily harm, imprisonment or worse.
- Actions that are unlawful or improper include receiving or paying bribes or giving, offering, promising, or receiving anything of value with the intention of improperly influencing the behavior or decision-making process of any person, including Public Officials and private commercial organizations, to obtain or retain a business advantage or improper benefit. “Anything of value” is not merely money, but may include, without limitation, business opportunities, concessions, payments for improper gifts, meals, travel and entertainment, civic, charitable and political contributions, sponsorships, stock options and favors (including offers of employment for a Public Official or Public Official’s family member).
- No Company funds, facilities or services of any kind may be paid or furnished to political parties or officials or candidates for office to obtain their support for executive, legislative, administrative or other action favorable to the Company.
- Gifts, hospitality, travel, and lodging involving Public Officials (among others) are governed by Liberty Global’s Gifts and Hospitality Policy, Code of Conduct and this Policy.
- The Company must make and keep books, records, and accounts that accurately and fairly reflect the Company’s transactions and dispositions of its assets. No undisclosed or unrecorded funds or assets are to be established for any purpose.
- The Company must devise and maintain a system of internal accounting controls sufficient to assure management’s control, authority, and responsibility over its assets.

# Anti-Corruption Policy



For the purposes of this Policy, Public Officials are all officials, employees, agents and representatives of any branch or level of government (executive, legislative or judicial and whether national, state or local) or of any governmental department or agency (including advisors to such agencies and branches), directors, officers and employees of State-owned or controlled companies (including their consultants, advisors, agents and other representatives), political parties, party officials and candidates for office, officials and employees of public international organizations such as the European Union or the United Nations, the World Bank (including their consultants, advisors, agents and other representatives), members of royal or ruling families, and leaders or elders of indigenous or aboriginal peoples and their families. Remember that state owned or controlled companies may even include organizations such as the BBC, other telecom operators such as Swisscom and certain banks.

To effectively implement this Policy, the Company shall maintain an effective risk-based anti-corruption program designed, implemented, and enforced to prevent and detect bribery and recordkeeping violations.

All employees are responsible for complying with applicable anti-corruption laws, this Policy and ensuring that third parties with whom they interact fully understand and follow anti-corruption laws, this Policy and associated guidelines in their activities related to Company business.

## *Sanctions*

The Company takes any violation of this Policy very seriously. Violators may be subject to disciplinary sanctions up to and including termination of employment. In addition, violators and the Company can face civil and criminal charges that could result in large fines, imprisonment and exclusion from government contract processes.

## *Reporting Violations*

Every employee or third party who has information that an improper payment has been made, promised or authorized or that any other violation of applicable anti-corruption laws or this Policy and related guidelines may have occurred, must immediately notify one of the following: Local Compliance Officer, Global Compliance & Ethics, Company's Central Legal Department or Compliance Line. Reports made through the Compliance Line are anonymous. If an allegation that applicable anti-corruption laws, this Policy and/or related procedures may have been violated is reported to any of the points of contact listed above, that person must immediately report the information to the General Counsel of the Company or his designee.

The Company will not permit retaliation against any person who, in good faith, reports a suspected violation of applicable anti-corruption laws or this Policy. The Company will not permit retaliation against any person who, in good faith, reports a suspected violation of applicable anti-corruption laws or this Policy. However, anyone who reports a suspected violation may be subject to disciplinary action to the extent he or she violated any anti-corruption law or this Policy.

## *Training*

The Company requires all employees Level 6 and above to complete periodic anti-corruption training (written, online, face-to-face, video conferencing, or a combination thereof). The Company may also require certain employees below Level 6, as determined by the Company's Central Legal Department, to complete periodic anti-corruption training.