

**LIBERTY
GLOBAL'S
MODERN
SLAVERY ACT
STATEMENT
2021**



JULY 2021

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 2021 Modern Slavery Act Statement in compliance with our obligations under the UK's 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 that connect 85 million subscribers across Europe and the United Kingdom. Our businesses operate under some of the best-known consumer brands, including Virgin Media-O2 in the UK, VodafoneZiggo in The Netherlands, Telenet in Belgium, Sunrise UPC in Switzerland, Virgin Media in Ireland and UPC in Eastern Europe. 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.

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.

Our Code of Conduct 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 are required to complete mandatory online training on our code of conduct.

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 2020, 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.

We 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 2020, a total of 267 improvement actions were issued to 24 suppliers, 71 actions out of the 267 were focused on improving policies and processes related to monitoring of labor 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 2020, 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.

[Our Approach to Responsible Procurement](#), a summary paper created for our procurement teams and suppliers, 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 July 2021.

A handwritten signature in blue ink, appearing to read 'Bryan Hall', with a long vertical stroke extending downwards from the end of the signature.

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