

VIRGIN MEDIA MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

2018 Edition

This Statement, published on 28 June 2018 is made by Virgin Media in accordance with the Modern Slavery Act (MSA) 2015 and is our second statement. It reflects improvement activity undertaken during 2017.



**ZERO
TOLERANCE**

Introduction

Modern slavery and human trafficking is completely unacceptable in modern society and business plays an important role in tackling it.

Virgin Media fully supports the principles of the Modern Slavery Act and takes a zero tolerance approach to modern slavery and human trafficking in our operations and supply chain.

About Virgin Media

Virgin Media offers four multi award-winning services across the UK and Ireland: broadband, TV, mobile phone and landline.

Our dedicated, ultrafast network delivers the fastest widely-available broadband speeds to homes and businesses and we're expanding this through our Project Lightning programme, which could extend our network to up to 17 million premises.

Virgin Media is part of Liberty Global, the world's largest international TV and broadband company.

Liberty Global connects 22 million customers through operations in 11 countries across Europe subscribing to 46 million TV, broadband internet and telephony services. It also serves 7 million mobile subscribers and offers WiFi service through 12 million access points across its footprint.



4 MULTI AWARD-WINNING SERVICES ACROSS THE UK & IRELAND



FASTEST
WIDELY AVAILABLE
BROADBAND



EXPANDING OUR NETWORK UP TO
17 MILLION
PREMISES
WITH PROJECT LIGHTNING



VIRGIN MEDIA IS PART OF
LIBERTY
GLOBAL
THE WORLD'S LARGEST
INTERNATIONAL
TV & BROADBAND COMPANY

Governance and Policies

EMPLOYEES: Virgin Media aims to provide a workplace that is inclusive, rewarding and creates opportunities for all of our people. In order to ensure our employees understand and comply with the policies that govern working at Virgin Media, we ask all employees to complete our mandatory Code of Business Conduct e-learning course.

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 Business Conduct, are required to report improper conduct as quickly as possible. Employees can report the matter directly to a Compliance Officer, People team representative, member of the Legal department or the Group's General Counsel. Additionally, an independently operated

Compliance Line and web-based reporting system are available 24 hours a day, seven days a week.

Our recruitment policy reflects our zero tolerance approach to modern slavery as part of our recruitment principles, with the expectation that our recruitment partners will reflect this commitment.

2017 Update

We used the publication of our first Modern Slavery statement to raise awareness of the issue and remind employees about our Code of Business Conduct, including the anonymous channels for reporting issues.



ALL EMPLOYEES
COMPLETE
CODE OF
BUSINESS
CONDUCT COURSE

Governance and Policies

SUPPLIERS: Virgin Media takes a zero tolerance approach to modern slavery and human trafficking and expects our suppliers to do the same. We expect all suppliers to meet the disclosure requirements under the MSA 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.

Our expectations of suppliers are clearly set out in Virgin Media's Supplier Code of Conduct. The key components of our Supplier Code of Conduct relating to the Modern Slavery Act are, but not limited to, child labour, freedom of employment, employment relationships, treating employees with respect and dignity, discrimination, wages, working hours, freedom of association and health and safety. All new and current suppliers are expected to endorse the latest version of Virgin Media's Supplier Code of Conduct.

2017 Update

We updated our Supplier Code of Conduct to communicate our commitment on preventing modern slavery occurring in our operations and supply chain. In addition, we reissued the Supplier Code of Conduct to our Business Services, Customer Services, IT, Core and Access Network suppliers.



**SUPPLIERS
ARE EXPECTED TO
ENDORSE
THE GUIDELINES**

Due Diligence

OUR OPERATIONS: Virgin Media has sought to take appropriate steps with regard to both our in-house resourcing team and preferred resourcing partners to ensure that slavery and human trafficking is not taking place within our operations.

2017 Update

We have implemented and conducted our first biannual audit of Virgin Media's Right to Work validation processes. These processes are carried out by our outsourced Offers & Onboarding Team.

In addition, we have reviewed our processes for identifying and investigating duplicate bank account information in personnel records, as multiple employees with the same bank account information may be an indicator of modern slavery. No evidence of modern slavery has been found to date.

SUPPLIER ASSESSMENTS AND MONITORING:

For our business, any risk of slavery or human trafficking would sit predominantly in our supply chain. In order to address this risk, we have engaged global supply chain assessment specialist, EcoVadis, to work with us.

EcoVadis has benchmarked suppliers against 21 environmental, social and ethical criteria based on a number of international standards including the UN Global Compact Principles, International Labour Organization (ILO) conventions, Global Reporting Initiative (GRI), ISO 26000 standard and Ceres principles. As part of this assessment, our suppliers are required to provide evidence of their environmental, social and ethical activities.

Once each supplier has been assessed, the EcoVadis platform provides a scorecard against the 21 criteria, enabling Virgin Media to evaluate the performance and risk associated with each supplier. In addition the EcoVadis platform provides an alert system, supplementing the Supplier Code of Conduct, which flags specific human rights indicators including; working conditions, discrimination, labour relations, child and forced labour, freedom of association, human rights issues and health and safety standards.

Since 2014, 177 Virgin Media suppliers representing 47% of spend have completed the EcoVadis assessment. In our evaluation of these suppliers, we have adopted a risk based approach, enabling us to select categories of suppliers based on key risk factors such as the potential for forced labour, conflict minerals, data protection and customer privacy issues and environmental stewardship.

2017 Update

We have increased the number of suppliers assessed by EcoVadis by 45, with a further 60 previously assessed suppliers providing updated scorecards. In addition we refined our assessments with particular focus on suppliers where there is higher risk of modern slavery occurring, such as contracted labour, contingent labour, contact centres and Customer Premise Equipment hardware categories.

1 ECOVADIS PLATFORM

ENVIRONMENTAL SOCIAL & ETHICAL CRITERIA 21

177 VIRGIN MEDIA SUPPLIERS

REPRESENTING

47%

OF SPEND COMPLETED THE ECOVADIS ASSESSMENT



Supplier corrective actions and continuous improvement

In addition to the EcoVadis benchmarking, Virgin Media regularly monitors supply chain risk and compliance. If a supplier assessment scorecard shows, or it subsequently transpires, that a new or existing supplier is not adhering

to our Supplier Code of Conduct, Virgin Media or its Parent Company will seek to work with them to address such non-adherence through a mutually agreed corrective action plan.

Training

Our procurement teams play an important role in ensuring that our suppliers participate in, and comply with, our on-going assessment programme. We deliver Supplier Code of Conduct training to create internal understanding of our responsible procurement and supply chain approach, which includes information on modern slavery.

2017 Update

In 2017, we updated our training materials to include highlighting potential environmental, social and ethical risks, including modern slavery. This training is available to all procurement colleagues through a new procurement sharing platform.

This statement was approved by Virgin Media Ltd
Board Director Robert Dunn on 27th June 2018



Robert Dunn
Chief Financial Officer, Virgin Media
