

VIRGIN MEDIA

MODERN SLAVERY & HUMAN TRAFFICKING

STATEMENT

2019 Edition

This Statement, published on 28 June 2019 is made by Virgin Media in accordance with the Modern Slavery Act (MSA) 2015 and is our third statement. It reflects improvement activity undertaken during 2018.



**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 21 million customers through operations in 10 countries across Europe subscribing to 45 million TV, broadband internet and telephony services. It also serves 6 million mobile subscribers.



4 MULTI AWARD-WINNING SERVICES ACROSS THE UK & IRELAND



FASTEST
WIDELY AVAILABLE
BROADBAND



EXPANDING OUR NETWORK UP TO
17 MILLION
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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 to thrive. In order to ensure our employees understand and comply with the policies that govern working at Virgin Media, all employees must 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.

2018 Update

Our Code of Business Conduct was relaunched in 2018 and includes guidance on what employees should do if they suspect any internal or external activity does not meet the expectations set out in the Code, including where a supplier may not be acting in accordance with our [Supplier Code of Conduct](#). All employees were required to complete online training to ensure that it is understood.



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.



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.

We have processes in place to verify our new hires have the right to work in the UK, including documentation checks. Additionally we have a process for identifying and investigating duplicate bank account information in personnel records as multiple employees with the same bank account 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. To address this, 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.

In 2018, with our parent company Liberty Global we carried out a further review of our supply chain categories to identify potential risk

suppliers. Following a risk-based assessment of 150 suppliers, 50 suppliers were invited to complete an EcoVadis assessment as a result of a Labour and Human Rights internal scoping exercise.

At the end of 2018, 152 current Virgin Media suppliers representing 49% of spend had 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.

2018 Update

In 2018 we continued to assess new and existing suppliers with 26 suppliers assessed for the first time and 44 suppliers being reassessed. We continued to 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, in addition to our ongoing assessment of strategic and critical suppliers.

1 ECOVADIS PLATFORM

ENVIRONMENTAL SOCIAL & ETHICAL CRITERIA 21

152 VIRGIN MEDIA SUPPLIERS

REPRESENTING

49%

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.

2018 Update

In 2018, we issued a total of 11 improvement actions to 7 suppliers which focussed on improving policies and processes related to monitoring of labour and human rights. By undertaking these actions the suppliers will strengthen their approach to minimising the risk of modern slavery in their operations and supply chain.

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.

2018 Update

All employees undertook training as part of the launch of our new Code of Business Conduct which includes information on what we expect from our suppliers with regards to human and labour rights as identified in our Supplier Code of Conduct.



**WE DELIVER
SUPPLIER
CODE OF CONDUCT
TRAINING**



This statement was approved by Virgin Media Ltd
Board Director Robert Dunn on 12 June 2019

A handwritten signature in white ink that reads "Robert Dunn".

Robert Dunn
Chief Financial Officer, Virgin Media
