

VIRGIN MEDIA

# Modern Slavery & Human Trafficking Statement 2020 Edition

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This Statement, published on 29<sup>th</sup> June 2020 is made by Virgin Media in accordance with the Modern Slavery Act (MSA) 2015 and is our fourth statement. It reflects improvement activity undertaken during 2019.

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# 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 MSA 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.

We’re expanding this through our Project Lightning programme, which could extend our network to up to 17 million premises, which has seen our network footprint reach an additional 2.2 million premises so far to pass 15 million UK premises overall.



# The Virgin Media Family

Virgin Media employs around 12,000 people and is part of Liberty Global, the world’s largest international TV and broadband company.

Liberty Global connects 11 million customers through operations in six countries across Europe subscribing to 25 million TV, broadband internet and telephony services. It also serves 6 million mobile subscribers.







# Governance & 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, 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.



## REPORTING MISCONDUCT

### TALK DIRECTLY

Compliance Officer  
People team representative  
Member of the Legal department  
Group's General Counsel



## LINE & WEB-BASED REPORTING SYSTEM

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.





# Governance & 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 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 (“Supplier Code of Conduct”). The key components of our Supplier Code of Conduct relating to the MSA 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 the Supplier Code of Conduct.



KEY COMPONENTS OF OUR SUPPLIER CODE OF CONDUCT



**SUPPLIERS  
ARE EXPECTED TO  
ENDORSE  
OUR CODE  
OF CONDUCT**

### 2019 UPDATES

Virgin Media went out to tender in 2019 for all civil engineering activity, including under our network expansion programme ‘Project Lightning’. Bidding suppliers were required to provide information on their compliance with the MSA and report their approach to managing labour and human rights risks in their operations and supply chains.

### ecovadis

Virgin Media confirmed compliance with the MSA, where applicable for the successful suppliers, and will be using the information shared to ensure best practice is adopted across our contract partners through collaboration and capacity building. In addition, all suppliers have completed an EcoVadis assessment.





# 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.

VERIFICATION  
PROCESS

THE RIGHT  
TO WORK  
IN THE UK

DOCUMENT  
CHECKS

INVESTIGATE  
DUPLICATE  
BANKING





# Due Diligence

## 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 Ten Principles of the UN Global Compact, 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.

At the end of 2019, 130 current Virgin Media suppliers representing 40% 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.



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1 ECOVADIS  
PLATFORM

ENVIRONMENTAL  
SOCIAL & ETHICAL  
CRITERIA 21

130 VIRGIN  
MEDIA  
SUPPLIERS

REPRESENTING

40%

OF SPEND  
COMPLETED THE  
ECOVADIS  
ASSESSMENT



### 2019 UPDATES

In November 2019, we invited 28 suppliers to complete a new assessment, 21 of which were identified as part of a scoping exercise with the suppliers operating in higher risk categories for labour and human rights issues. We will be working with these suppliers in 2020 to ensure the assessment is completed, and where necessary, corrective actions are issued.





# Supplier Corrective Actions

## & 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 Liberty Global will seek to work with them to address such non-adherence through a mutually agreed corrective action plan.

### 2019 UPDATES

In 2019, we issued a total of 11 improvement actions to 3 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. To date, 8 of the 11 actions have been completed.

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## 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.



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& Human Trafficking  
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Approved by Virgin Media Ltd Board Director  
Gregor McNeil on 29<sup>th</sup> May 2020.



Gregor McNeil

Deputy Chief Financial Officer, Virgin Media  
June 2020

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