



VIRGIN MEDIA CODE OF CONDUCT FOR SUPPLIERS

In order that it operates responsibly and respects the value of the many people engaged in our supply chain, Virgin Media has created this code of conduct for suppliers to communicate clearly our minimum expectations in relation to:

- Human Rights
- Environmental impact

Human Rights & Labour Conditions

Employment is Chosen (No Forced Labour)

- Employees should be free to choose to work for the supplier, i.e. their employer.
- Employees should be free to leave the supplier after reasonable notice is served.
- Suppliers should not use forced, bonded or non-voluntary prison labour.

Employment Relationships

- Suppliers should establish recognised employment relationships with their employees that are in accordance with their national law and good practice.
- Suppliers' employees should be provided with an easy to read contract of employment with particular clarity in relation to wage levels.
- In the event that employees are unable to read, the contract of employment should be read and explained to them by a union representative or another appropriate third party.
- Suppliers should not seek to avoid providing employees with their legal or contractual rights.

Freedom of Association

- Suppliers should not prevent or discourage employees from joining trade unions.
- Suppliers' employees should be able to carry out reasonable representative functions in the workplace.
- Suppliers should not discriminate against employees carrying out representative functions.
- Where the law restricts freedom of association and collective bargaining, suppliers should facilitate alternative means of representation.

Living Wages Are Paid

- Wages and benefits should at least meet industry benchmarks or national legal standards.
- Suppliers should not make deductions from wages unless permitted by national law or with the permission (without duress) of the employee.
- Suppliers should always pay in cash and not in kind, e.g. goods, vouchers.

Child Labour

In principle, Virgin is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children. However, the elimination of child labour must always be undertaken in a manner consistent with the best interests of the children concerned. Procurement and supply management professionals should seek to ensure that their organisation's supplier comply with the following: in this context, 'child' refers to any persons less than 15 years of age, unless local legislation



on the minimum age stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

Young person refers to any worker over the age of a child, as defined above, under the age of 18.

Suppliers shall develop or participate in and contribute to policies and programmes which provide for the transition of any existing worker found to be a child performing child labour to enable her or him to attend and remain in quality education until no longer a child.

- Suppliers shall employ children and young persons at night in accordance with the ILO Conventions C79 Night Work of Young Persons ((Non-Industrial Occupations) Convention, 1946)) & C90 Night Work of Young Persons ((Industry) Convention (Revised), 1948)).
- Suppliers shall not employ children and young persons under 18 in hazardous conditions.
- In any event the course of action taken shall be in the best interest of the child, conform to the provisions of ILO C138 Minimum Age Convention (1973) and be consistent with the United Nation's Convention of the Rights of the Child.

Employees' Working Hours

- Working hours should comply with national laws or industry standards.
- Suppliers' employees should not be expected to work more than 48 hours per week on a regular basis.
- On average, suppliers' employees should be given one day off approximately every seven days.
- Suppliers should not pressurise employees into working overtime; overtime should be voluntary and not demanded on a regular basis; where overtime is requested by the employer it should be reimbursed at an appropriate rate and should not exceed 12 hours in any week.

Treatment of Employees

- Under no circumstances should suppliers abuse or intimidate, in any fashion, employees.
- Any disciplinary measures should be recorded.
- Suppliers should have a grievance/appeal procedure that is clear, easy to understand and should be given to the employee in writing.
- In the event that suppliers' employees are unable to read, the grievance/appeal procedure should be read and explained to them by a union representative or another appropriate third party.

Law

- Suppliers should always work within the laws of their country.

Health and Safety

- Suppliers should assign responsibility for health and safety to a senior management representative.
- Suppliers should have appropriate health and safety policies and procedures and these should be demonstrable in the workplace.
- Suppliers' employees should be trained in health and safety policy and procedures.

- Suppliers should monitor compliance with health and safety policy.
- Suppliers should provide employees (at the supplier's expense) with any necessary health and safety equipment, e.g. gloves, masks, helmets.
- Working conditions should be comfortable and hygienic.
- Suppliers should identify specific hazards, e.g. substances or equipment, and should implement processes to minimise risk.
- Supplier's employees should have access to clean toilets.
- Supplier's employees should have regular breaks and have access to water suitable for drinking and washing as a minimum.

Provision of Education, Testing, Treatment Services

Where HIV/AIDS is a significant issue in the supplier's location of operations, suppliers should educate workers about the risk of HIV/AIDS and assist in providing access to treatment and medication as necessary. Additionally, suppliers should not tolerate discrimination against any worker who is or is perceived to be HIV-positive or living with AIDS.

Discrimination

Suppliers should have a policy of equality for all in the workplace with no discrimination on the basis of race, caste, religion, nationality, age, gender, marital status, sexual orientation, disability, union membership or political affiliation.

Non-discrimination

The supplier does not require employees to disclose personal HIV/AIDS information.

Mandatory Testing

It must not be required that employees are subjected to mandatory HIV/AIDS tests.

The Environment

Suppliers are asked to give consideration to minimising their negative impact on the environment when supplying goods and services to Virgin. Suppliers should be able:

- To adhere to all environmental legislation, regulations and all local laws to facilitate the protection of the environment.
- To have a process that ensures conformity to local regulations, including those relating to the handling, recycling, and the elimination and disposal of dangerous materials.
- To have concern for the environment and an action plan to reduce the company's impact (e.g. energy reduction programme, waste stream management and recycling).
- To work actively to improve the environment and proactively to pursue any initiatives that bring about that improvement.
- To measure the impact on the environment and set targets to reduce that impact/improve performance.