



VIRGIN MEDIA

Modern Slavery & Human Trafficking Statement 2021 Edition

This Statement, published on 24 May 2021 is made by Virgin Media in accordance with the Modern Slavery Act 2015 (“MSA”) and is our fifth statement. It reflects improvement activity undertaken during 2020.

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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: 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 continued investment in our Project Lightning programme, which has seen our network footprint reach an additional 2.5 million premises so far to pass 15.3 million UK premises overall.



The Virgin Media Family

Virgin Media employs around 12,000 people and is part of Liberty Global, one of the world's leading converged video, broadband and communications companies.

Liberty Global connects customers through operations in seven countries across Europe subscribing to 49 million TV, broadband internet and telephony services. It also serves 6 million mobile subscribers.

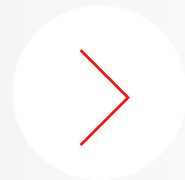


LIBERTY GLOBAL
CONNECTS CUSTOMERS
IN 7 COUNTRIES ACROSS EUROPE

SUBSCRIBERS

49 MILLION

6 MILLION





Governance & Policies

EMPLOYEES

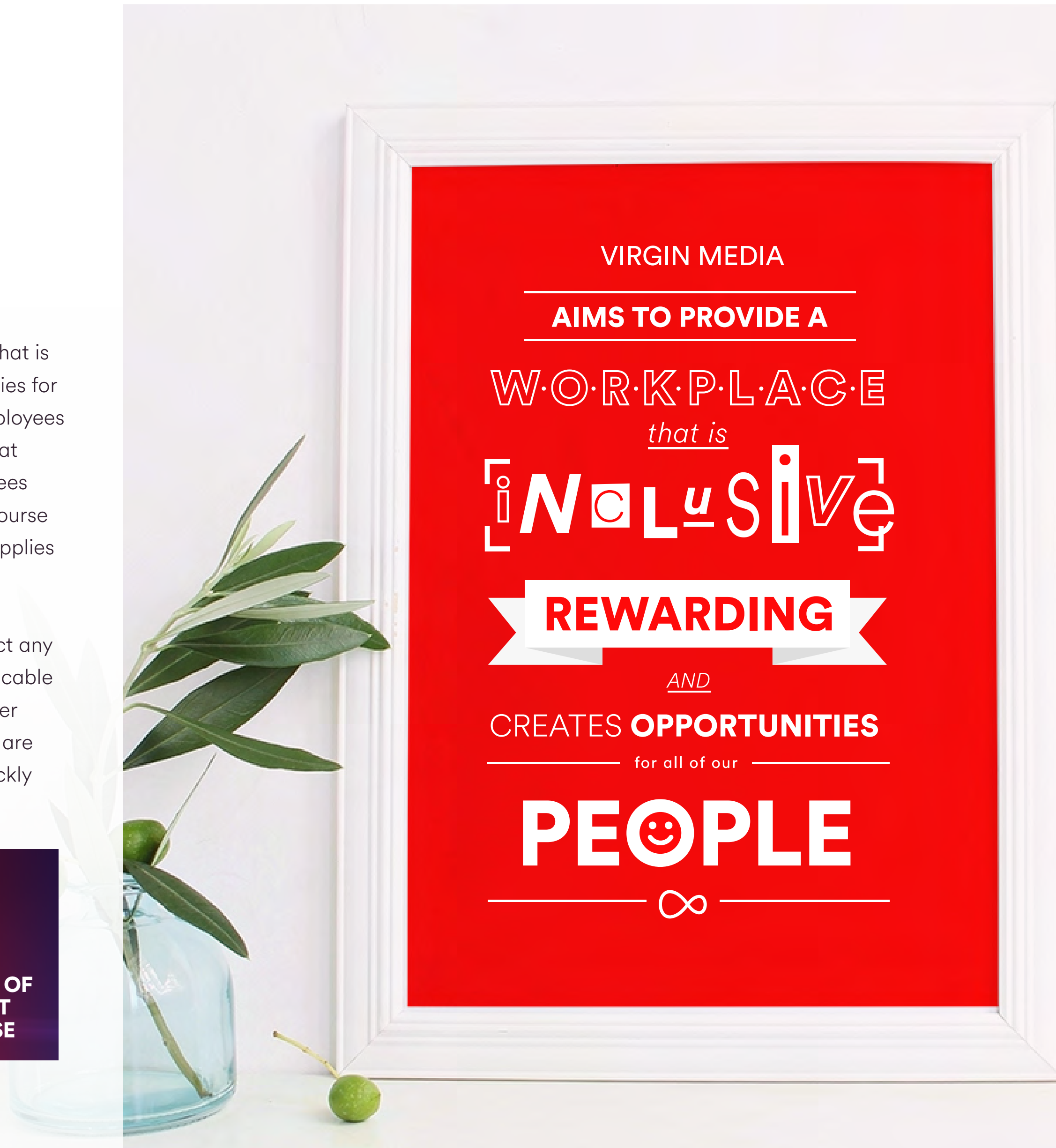
Virgin Media aims to provide a workplace that is inclusive, rewarding and creates opportunities for all of our people. In order to ensure our employees understand and comply with the policies that govern working at Virgin Media, all employees must complete our mandatory e-learning course about the Code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

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.



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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 the Compliance team, a People team representative, a member of the Virgin Media Legal department or Liberty Global'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. 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 our Supplier Code of Conduct.



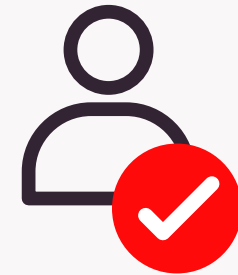


Due Diligence

OUR OPERATIONS

Virgin Media has taken 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.



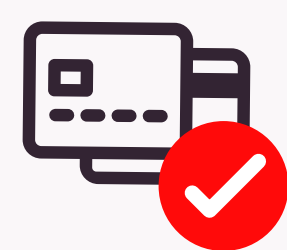
VERIFICATION PROCESS



THE RIGHT TO WORK IN THE UK



DOCUMENT CHECKS



INVESTIGATE DUPLICATE BANKING





Due Diligence

SUPPLIER ASSESSMENTS AND MONITORING

For Virgin Media, 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 benchmarks 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.

202 current Virgin Media suppliers representing 45% of our overall spend had completed the EcoVadis assessment by the end of 2020.

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.

1 ECOVADIS PLATFORM

ENVIRONMENTAL SOCIAL & ETHICAL CRITERIA 21

202 VIRGIN MEDIA SUPPLIERS

REPRESENTING

45%

OF SPEND COMPLETED THE ECOVADIS ASSESSMENT



KEY RISK FACTORS

- 
POTENTIAL FOR FORCED LABOUR
- 
CONFLICT MINERALS
- 
DATA PROTECTION
- 
CUSTOMER PRIVACY
- 
ENVIRONMENTAL STEWARDSHIP

2020 UPDATES

During 2020, we invited 2 strategic suppliers to complete a new Ecovadis assessment or share an existing assessment with us. One of the suppliers has shared an existing assessment with us, with no concerns relating to modern slavery raised. One supplier has to date declined to complete an assessment and we are assessing if any further action is required.



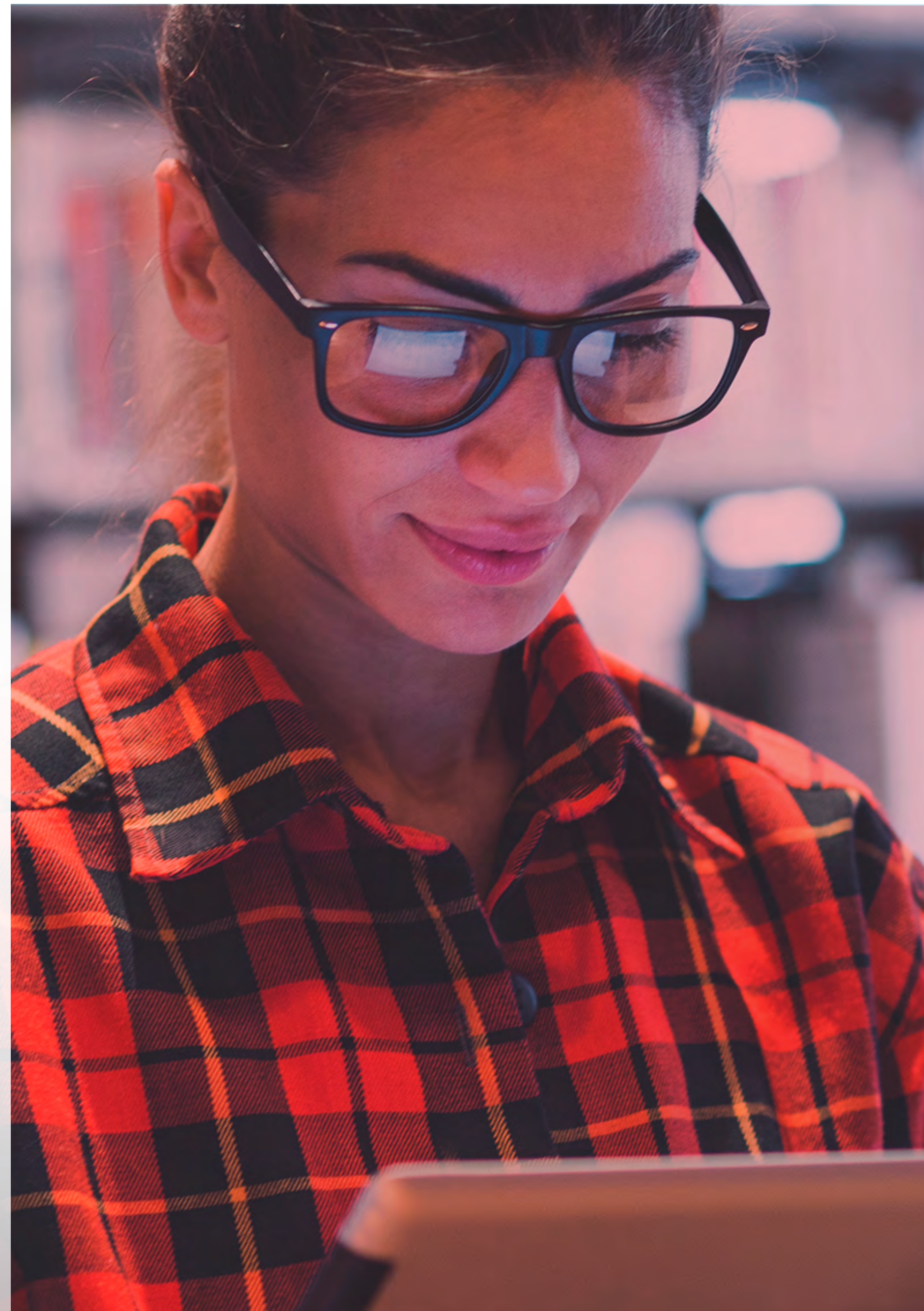
Supplier Corrective Actions

& 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.

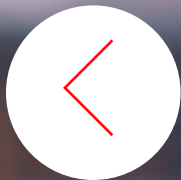
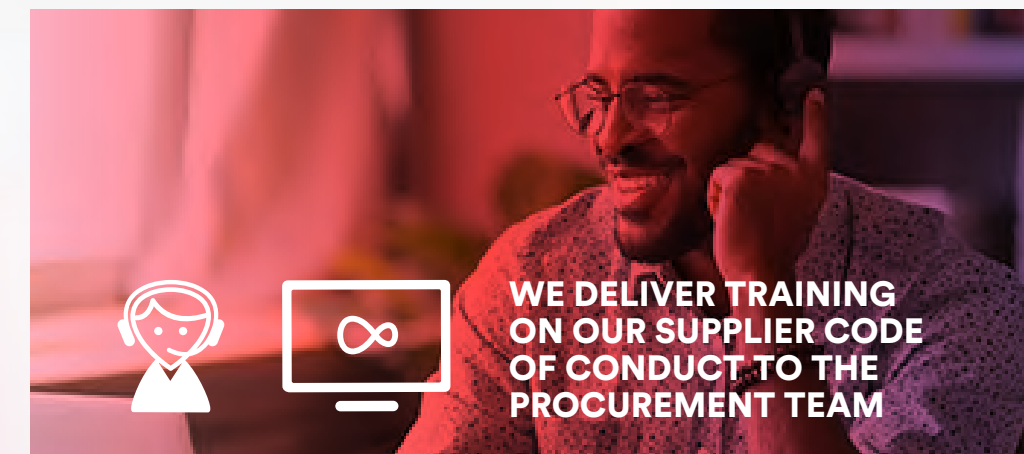
2020 UPDATE

In 2020 we issued one improvement action to a supplier which focussed on improving disclosure and reporting of issues relating to labour and human rights. This action is being addressed and is due for completion in 2021.



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 training on our Supplier Code of Conduct to the Procurement team to create internal understanding of our responsible procurement and supply chain approach, which includes information on modern slavery.



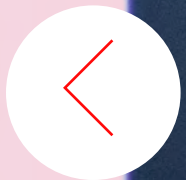
Continuous Improvement

2020 UPDATE

In September 2020 Virgin Media commissioned external human rights and modern slavery experts to independently review our approach to modern slavery. This included how we identify the risk of modern slavery within our operations and supply chain, our approach to due diligence, supply chain controls, reporting protocols and training.

The outcome of our review, includes:

- Targeted training for network expansion, outsourced contact centre and facilities management teams which have been identified as higher risk for modern slavery
- Building additional modern slavery checks into existing auditing arrangements
- Updating the questions we ask of new suppliers through the tendering process to better identify risk and ensuring in-life monitoring is conducted by operational teams





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This statement was approved by Virgin Media Ltd Board Director Gregor McNeil on 13 May 2021

Gregor McNeil

Chief Financial Officer (Acting), Virgin Media
May 2021

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