



## **Virgin Media Modern Slavery and Human Trafficking statement**

This Statement made by Virgin Media is in accordance with the Modern Slavery Act (MSA) 2015.

### **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 helps create a digital world that makes good things happen, for our customers and the communities in which we operate. Across the UK and Ireland we offer four multi award-winning services: broadband, TV, mobile and home phone. Virgin Media delivers the fastest widely available broadband speeds to homes and businesses, and are expanding our network to reach 17 million premises through our £3bn Project Lightning programme.

Virgin Media is part of Liberty Global, the world's largest international cable company, with operations in more than 30 countries.

### **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.

In 2016 our recruitment policy was updated and now includes our zero tolerance approach to modern slavery as part of our recruitment principles, with the expectation that our recruitment partners will reflect this commitment.

#### **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.

### **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 is assessed, the EcoVadis platform provides a scorecard against the 21 environmental, social and ethical 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 & forced labour, freedom of association, human rights issues and health & safety standards.

Since 2014, 132 Virgin Media suppliers representing 40% 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 forced labour, conflict minerals, data protection and customer privacy and environmental stewardship.

### **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.

This statement was approved by Virgin Media Ltd Board Director Robert Dunn on 15 June 2017.

A handwritten signature in dark ink, appearing to read "Robert Dunn", with a long horizontal flourish extending to the right.

Robert Dunn

Chief Financial Officer, Virgin Media