



Virgin Media Supplier Code of Conduct 2019



● Introduction

Virgin Media is a part of Liberty Global plc, the world's largest international TV and broadband company. Together we serve 29 million customers across 30 countries, helping connect people to the digital world and enabling them to discover and experience its endless possibilities.

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 also launched the world's first virtual mobile network and we are one of the largest fixed home phone providers in the UK and Ireland.

We're dedicated to making sure everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way.

It's important to us that our suppliers feel the same way, and that's why we've put together this code of conduct: to give you a good idea of what it means to work with a Virgin company.

Our code is a set of principles that we expect all suppliers to work within. We'll be working with our suppliers to make sure they have the right policies and processes in place to comply with these principles, and that they also use them with their own suppliers. We'll also consider these principles when we're choosing suppliers, and we'll be working together to monitor compliance throughout our relationship.

A lot of the principles in this code are about complying with laws and regulations. By this, we mean laws and regulations that apply in the jurisdiction that suppliers operate in. At Virgin Media, this compliance is the minimum standard we're looking for, and we're always working with our suppliers to improve things further.

Wherever we're working regularly with suppliers, we'll do everything we can to make sure processes are in place to check that our principles are being followed and continually reviewed, and that there are solutions available for anything that needs to be put right. We'll do this through our contracts with suppliers, and we might also use independent third parties to check that our suppliers are complying with our principles.

Amar Treon

Amar Treon
Procurement Director

• Our principles

The principles in this code aren't meant to provide an exhaustive list of our expectations of suppliers, just the things that matter most. These are our priorities:

Human rights and labour conditions

Modern slavery and human trafficking

Virgin Media takes a zero tolerance approach to modern slavery and human trafficking and expects our suppliers to do the same. Employees should not be subjected to servitude, forced and compulsory labour or human trafficking. Employees should have the freedom to work for their employer and to leave the company after they've given reasonable notice. We expect all suppliers to meet the disclosure requirements under the Modern Slavery Act 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.

Employment relationships

Employees should have an easy to read contract of employment, which needs to comply with legislation and be particularly clear about wages. Employees who are unable to read the contract should be introduced to a suitable person, who can read out and explain the contract to them.

Freedom of association

Employees should be free to join trade unions (or other kinds of representation) and, where appropriate, to carry out representative functions at work, in accordance with relevant legislation. Employees should not be discriminated against, or be treated unfavourably or differently because they carry out representative functions.

Wages

Wages and benefits need to be in accordance with the relevant legislation. Employees should give their informed, freely given consent to any deductions (which should also be lawful).

Child labour

Virgin Media does not support the use of child labour in any circumstances.

Where children under the age of 18 are legally employed, they must not be employed at night or in hazardous conditions. All suppliers must work towards the elimination of all child labour and this should be in a manner consistent with the best interests of the children concerned.

Working hours

Suppliers should comply with legislation and/or industry standards on working hours, giving employees days off and resting times accordingly. Suppliers must not make workers do more than 48 hours per week and workers shall be provided with at least one day off in every seven.

Overtime should be voluntary and not demanded on a regular basis. Employees working overtime should be reimbursed at an appropriate rate.

Treating employees with respect and dignity

Employees should never be abused, harassed or intimidated, and any disciplinary measures taken should be recorded. Employees should have access to a written grievance or appeal procedure that's clear and easy to understand. Employees who are unable to read the procedure should be introduced to a suitable person, who can read it out and explain it to them.

Health and Safety

Suppliers will provide their employees with a safe and healthy workplace and should make sure a senior management representative is responsible for Health and Safety, and that appropriate policies and procedures are in place.

Discrimination

Suppliers will not discriminate in hiring and employing workers on the basis of race, caste, birth, social or ethnic origin, religion, nationality, age, gender, gender identity or expression, marital status, sexual orientation, disability, maternity, union membership or political affiliation.

HIV/AIDS

Suppliers should make sure that if HIV/AIDS is a significant issue where they're operating, workers are educated about the risk and that access to treatment and medication is provided as necessary. It's important not to tolerate discrimination against any worker who is (or is thought to be) HIV-positive or living with AIDS.

The environment

Suppliers should try and minimise any potential impact on the environment when supplying goods and services to us. As a minimum, we expect suppliers to comply with all local and national environmental legislation, regulations and directives to protect and improve the environment, and have developed, reviewed and recorded processes in place to make sure they comply.

We also expect suppliers to have action plans in place to manage their environmental impact, e.g. energy reduction and waste management programmes. Where appropriate, suppliers must also comply with additional environmental requirements specific to the products and services supplied to Virgin Media. Any specific requirements would be outlined in contract.

Business ethics

Suppliers should uphold the highest standards of integrity, transparency and governance and, as a

minimum, we expect our suppliers to comply with all relevant legislation and regulations. Suppliers must not take part in forms of bribery or corruption, and must not knowingly be associated with any group that supports acts of violence, terrorism or discrimination.

Conflict minerals

We expect suppliers to make us aware of 'conflict minerals' that are sourced from the Democratic Republic of Congo and surrounding countries (and any other countries that become applicable) which are used to finance armed conflict in that region, and that may exist in products or equipment provided by suppliers and all parties within their supply chain to Virgin Media.

Our supplier engagement process

We expect openness and transparency in our relationships with our suppliers. We want to work together improve our sustainability performance, and we'll endeavour to support continuous improvement with any supplier that needs help meeting the principles within this code. Transparency includes maintaining documentation necessary to demonstrate compliance with these principles. Virgin Media may exercise its relevant contractual rights to access this documentation and raise reasonable enquiries.

We ask all our suppliers to confirm that they have read and understand the expectations contained within this code.

Signed: **Date:**

Company: **Position:**