



Human Rights statement

At Virgin Media O2, we respect and uphold internationally recognised human rights in our own operations and through our wider business relationships. We know that the nature of our operations carries potential human rights risks and we take steps to identify, prevent and mitigate any impacts.

We comply with all applicable laws and regulations and are guided by best practice frameworks, including the United Nations (UN) Guiding Principles on Business and Human Rights; the Universal Declaration of Human Rights (UDHR); and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

This human rights statement reaffirms our undertaking to protect and promote human rights, focusing on the areas where our greatest risks lie. It is aligned with our shareholders' commitments: Telefónica, S.A.'s global corporate human rights [policy](#) and Liberty Global's human rights [statement](#).

Company policies and processes help guide our approach to managing human rights, promoting dignity and wellbeing in our workforce, supply chain and the communities where we operate. All employees undergo training on our [Code of Conduct](#), which sets out the ethical standards we expect and the pledges we make to our customers, employees and suppliers. Additional policies relating to specific human rights impacts are referenced throughout this statement.

Recognising that human rights impacts may change over time as our operations and business evolve, we will continue to regularly assess our most salient issues, periodically reviewing and updating this statement.

OUR COMMITMENTS

To our employees:

Diversity, equity and inclusion (DE&I)

We value diversity. We believe in providing equal opportunities to all employees and preventing the discriminatory treatment of people, without exception. Ensuring that all aspects of diversity are respected and protected - including, but not limited to, legally protected characteristics - means that Virgin Media O2 employment decisions are based on business need and individual merit.

'All In' is our company strategy for building a fully inclusive workplace and a culture of respect and understanding. Six employee networks provide an opportunity for our employees to build communities and contribute directly to our plans. Our DE&I commitments are outlined in our [Code of Conduct](#), and our ESG strategy, the [Better Connections plan](#), sets out our targets to improve gender parity and the proportion of our workforce from underrepresented backgrounds.

Fair workplace

We are unambiguous about the rights of our employees to fair treatment in the workplace. We do not tolerate harassment of any kind. Any actions that are illegal or contravene our policies are strictly prohibited. Our [Code of Conduct](#) prohibits forced labour, threats, coercion, abuse, discrimination,



violence or intimidation in our working environment. If any employment-related issues or concerns are raised, we have grievance policies and processes in place.

We adhere to all applicable UK employment laws relating to minimum wages, working hours, overtime and benefits. Our [Fair Pay Statement](#) details how we ensure Virgin Media O2 employees are paid fairly and appropriately for their contribution.

Freedom of association and collective bargaining

We guarantee the right of all Virgin Media O2 employees to belong to the trade union of their choice, without fear of retaliation or hostile action. Employee Voice, composed of 200 elected representatives, is an employee forum aimed at facilitating and improving two-way dialogue.

Forced labour, child labour and human trafficking

We prohibit any form of forced labour, child labour, slavery or human trafficking within our operations, and conduct risk-based due diligence to minimise any risk in our supply chains. More information is available in our annual [Modern Slavery Statement](#).

Health, safety and wellbeing

At Virgin Media O2, we take a shared responsibility to making sure our workplaces are safe and that our products and services are delivered in a way that protects our employees, contractors, partners, customers and members of the public. We comply with all applicable health and safety laws and regulations, and have established externally-certified policies and processes to prevent accidents in the workplace, injuries, and illnesses associated with our professional activity.

To our customers:

Privacy and data protection

Our Data Protection Policy ensures that we use personal data responsibly, maintaining the trust that our customers put in us and respecting the fundamental rights to privacy and the protection of personal data. Mandatory training is provided when employees start their employment at Virgin Media O2, and every year thereafter, so that everyone understands how to handle people's personal data responsibly, in line with laws and regulations.

Vulnerable customers and accessibility

We believe that everyone should have equal access to the products and services that will help them thrive in a digital world, and experience consistently fair treatment. Our Vulnerable Customers and Accessibility Policy is designed to specifically provide for the needs of customers with disabilities and those whose circumstances may make them vulnerable.

Child protection

We seek to protect children, young people and vulnerable customers from online harms, as detailed in our Children, Young People and Vulnerable Customers Online Safety Policy. We promote the responsible use of technology by children and young people and offer expert guidance about online child safety to parents, guardians or carers. Age verification processes restrict access, where possible, to 18-rated content.



Artificial intelligence (AI)

As the use of AI continues to rapidly evolve, we are mindful of our responsibilities to identify, measure and mitigate AI ethics risks across our business, ensuring we adopt a safe, considered and transparent approach to the use of AI technological advances.

To our suppliers:

We treat our suppliers fairly, and expect the highest standards of conduct in return. All suppliers must accept our Supplier Code of Conduct and our Quality and Sustainability requirements as a condition of business. The code establishes the minimum standards we expect in ethics; health and safety; human rights and labour conflicts; environmental standards; privacy; supply chain diversity; and social value.

Suppliers must undergo risk-based due diligence to assess their management of human rights risks, including the risk of modern slavery - which is a criminal offence, as well as breaching our Code of Conduct and Supplier Code of Conduct. Annual statements must be provided showing the measures suppliers are taking to ensure requirements on child and young person labour, forced labour and human trafficking are being met. We publish an annual [Modern Slavery Statement](#).

To society and the environment:

Digital inclusion

By investing in digital infrastructure and providing products and services that improve people's access to technology, we aim to help tackle the inequalities of the digital divide and bring about positive social change. We provide digital connectivity to underserved rural areas; offer affordable internet access through our social tariffs and refurbished devices; and contribute to initiatives related to digital inclusion and digital skills training.

Environment

We comply with all environmental legislation. Our [Environment Policy](#) sets out the governance, targets and resources required to manage our environmental commitments. We manage our primary environmental impacts through our ISO14001 certified Environmental Management System. We endeavour to minimise the impact of our operations (conserving the planet's natural resources; improving the circularity of our products; and managing our energy use and carbon emissions), as well as maximising the benefits of digital connectivity.

Supporting charities

We enable our employees to make a positive difference to registered charities and good causes which they are passionate about. This includes volunteering and the ability to donate to charities through their salaries. We undertake due diligence prior to making donations on behalf of Virgin Media O2 to ensure a consistent and ethical approach to charity giving.

WHISTLEBLOWING AND REMEDIATION

Our employees, suppliers, business partners and other external stakeholders can report concerns regarding human rights or conduct that might violate our policies or any applicable law, rule or regulation through our whistleblowing channel, [Speak Up](#).



Reports of violations can be raised anonymously, and all allegations will be treated in confidence and investigated, with appropriate action taken to mitigate any adverse human rights impacts. We don't permit retaliation against any employee who - in good faith - reports, complains of, or seeks advice concerning this policy, our Code of Conduct or any other illegal or unethical conduct.

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