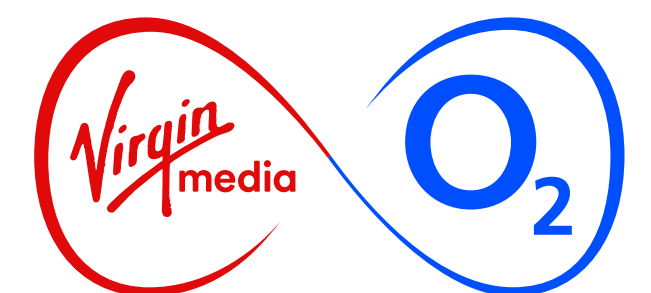


Virgin Media O<sub>2</sub>

# Modern Slavery Statement

In this statement, unless the context otherwise requires, the term "we," "our" and "Virgin Media O<sub>2</sub>" refer to VMED O2 UK Limited and its subsidiaries.

May 2025





# Introduction

This statement has been prepared in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by VMED O2 UK Limited and its subsidiaries (Virgin Media O<sub>2</sub>) for the financial year ending 31st December 2024 to manage modern slavery risks within our business and supply chains.

This is the fourth statement produced by Virgin Media O<sub>2</sub>, a business formed in June 2021 when the Virgin Media and O<sub>2</sub> (including giffgaff) businesses were brought together as a joint venture owned by Liberty Global and Telefonica SA.

Our previous statements can be found [here](#).

## 2024 summary

Virgin Media O<sub>2</sub> aims to be a leader in converging fixed and mobile networks in the UK, improving customer connectivity and services.

We will not tolerate any form of human rights abuse within our operations or supply chains. Our commitment to human rights and ethical behaviour is firmly embedded in both our [Code of Conduct](#) and [Supplier Code of Conduct](#) policies.

While our operations are solely in the UK, we procure from a global supply chain that we continue to view as our primary source of forced labour risk.

In 2024, we operated policies designed to minimise forced labour risk and conducted risk-based due diligence as part of our general supply chain sustainability management. We found no instances of forced labour.





# About our business

Based in the UK, we aim to champion convergence in the telecoms market, enhancing our customers' lives through next-generation fixed and mobile connectivity, and serving as a key enabler of the UK economy.

We tailor our products and services to meet the needs of our large and diverse customer base.

45.7 million  
mobile connections

5.8 million  
fixed-line customers

## Products & services

### Our consumer products and services include:

- Broadband
- TV
- Home phone
- Mobile connectivity
- Devices
- Converged bundles

### Our business and wholesale products and services include:

- Converged connectivity
- Mobility
- Security
- Cloud
- Data and analytics
- Fibre rollout for nexfibre

We deliver services via a portfolio of brands including:

- Virgin Media O<sub>2</sub>
- Virgin Media
- O2
- giffgaff

Our service channels have a physical and a growing digital focus and include:

- Over 300 stores
- Online and digital applications
- Telesales and customer care
- Face-to-face, indirect and other sales channels

Our networks underpin our commercial offerings. We are the fixed-line challenger in the UK, with a fully gigabit network, and the largest mobile operator in the UK, with extensive spectrum and infrastructure access:

- 18.3 million serviceable fixed homes
- 6.4 million premises within our fibre network
- 75% 5G outdoor population coverage
- over 99% 4G outdoor population coverage

Our team of 16,600 employees maintain our customer-first, can do service delivery philosophy.

We have a centralised procurement team that manages purchasing for all Virgin Media O2 brands, sourcing both directly and through procurement services managed by our shareholders, Liberty Global and Telefónica SA. These entities, like Virgin Media O2, strictly forbid forced labour and trafficking within their operations and supply chains, enforced through stringent policies and risk-based due diligence practices.

In 2024, Virgin Media O2's total invoiced spend was approximately £7.5 billion on goods and services from around 2,000 suppliers. Our main suppliers are primarily UK-based, but we leverage a global supply chain to deliver our consumer and business offerings. Our extended supplier network includes facilities in Asia, Europe, the USA and Africa.

This statement addresses the following 23 Virgin Media O<sub>2</sub> businesses:

- giffgaff Limited
- NTL Glasgow
- NTL Kirklees
- Telefonica UK Limited
- Upp Corporation Limited
- Virgin Media Business Limited
- Virgin Media Limited
- Virgin Media Finance plc
- Virgin Media Mobile Finance Limited
- Virgin Media Intermediary Purchaser Limited
- Virgin Media Investment Holdings Limited
- Virgin Media Senior Investments Limited
- Virgin Media Secured Finance plc
- Virgin Media SFA Finance Limited
- Virgin Media Operations Limited
- Virgin Media Payments Limited
- Virgin Media Wholesale Limited
- Virgin Mobile Telecoms Limited
- VMED O2 UK Limited
- VMED O2 UK Holdco 4 Limited
- VMED O2 UK Holdco 5 Limited
- VMED O2 UK Financing I plc
- VMED O2 UK Holdings Limited

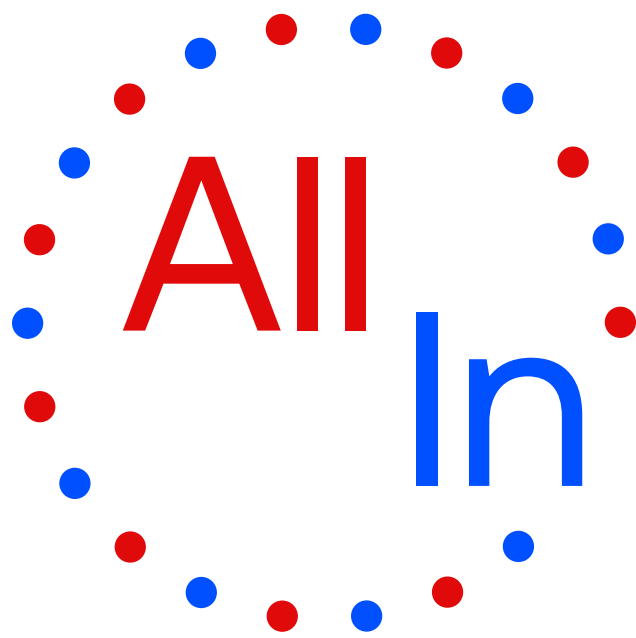


# Managing modern slavery risks

## Commitment and policies

Our commitment to human rights and ethical behaviour is embedded in our [Code of Conduct](#) policy, Human Rights statement and the [Supplier Code of Conduct](#) policy.

These are our main policies and statements that make it clear that we will not tolerate forced labour in any form in our operations or supply chains. Our Supplier Code of Conduct policy not only prohibits forced labour, but it also prohibits its enablers.



## Risk assessment

We believe the risk of forced labour within our operations is very low. As a leading employer, we implement supportive people policies that ensure Virgin Media O<sub>2</sub> is an attractive and inclusive workplace.

The highest potential for forced labour risk lies within our global supply chain, which is where we have focused our due diligence efforts. We target suppliers operating in sectors and geographies with elevated forced labour risks.

## Internal forced labour risk management

With over 16,000 employees working from 459 locations across the UK, our people are our greatest business asset. That’s why we implement a range of people-focused policies and diversity, equity and inclusion (DE&I) initiatives designed to make Virgin Media O<sub>2</sub> an equitable workplace.

Our Code of Conduct policy establishes a comprehensive framework that defines clear standards of behaviour for all employees and business stakeholders. The policy also underscores the importance of our Speak Up channel — a secure and confidential whistleblowing platform

that enables individuals to report concerns regarding potential misconduct, ensuring such matters are addressed with diligence and integrity.

We believe a diverse workforce that represents the communities in which we serve supports innovation, performance, and customer understanding. Our five-year DE&I strategy, ‘All In’, sets out our clear ambitions to move towards gender parity and increase employee representation from Global Majority group by 2027.

We act to build a safe, inclusive and respectful workplace, which is why ‘Belonging’ is a core pillar of our company-wide People Plan. This is supported by our DE&I programmes, which include a range of mandatory and optional training.

We provide feedback channels and opportunities for employees to share their views, concerns, and DE&I suggestions. More than half of our employees are members of our six employee-led groups, which represent women, race and ethnicity, LGBTQIA+, disability, neurodiversity, and unpaid carers. These networks play a crucial role in shaping our culture – increasing awareness of the challenges faced by traditionally marginalised groups, while providing support for employees to connect with others.





# Managing modern slavery risks

As a progressive employer, we also recognise the importance of work-life balance and provide a range of policies to support our employees to work flexibly and take time away from work when needed.

## Key 2024 activities

Launch of our ‘That’s #Not Okay’ zero tolerance campaign. We take a zero-tolerance stance against discrimination, bullying and harassment. In September 2024, we launched the campaign with four new people policies – Belonging; Grievance; Anti-Discrimination, Bullying and Harassment; and Disciplinary. Together, they establish high standards and clear procedures to protect everyone at Virgin Media O<sub>2</sub>. We also made it easier for our people to flag unacceptable behaviour with our Zero Tolerance Bot and a new reporting process.

## Sexual Harassment risk assessments

With the introduction of the Sexual Harassment Preventative Duty in October 2024, we conducted risk assessments across our business to identify risks of sexual harassment occurring in the course of employment. We are strengthening the measures we implement as an employer to mitigate these risks.

## ‘Ally Up’ workshops

All employees are given the opportunity to join workshops on topics such as anti-racism and neurodiversity. The workshops are facilitated by industry experts and focus on encouraging active allyship through awareness and education.

Our commitment to DE&I extends to all aspects of our employment including recruitment, hiring, evaluation, promotion, compensation, training, development and termination.





# Managing modern slavery risks (cont.)

## Supply chain due diligence

We have made no material modifications to our due diligence process since our last disclosure.

Our approach includes contributing to industry-wide initiatives, working closely with our parent organisations, and conducting our own risk-based due diligence. We integrate our forced labour risk management activities into the broader context of our supply chain sustainability efforts, including:

1. Embedding strict requirements in our procurement processes, which are enforced through our Supplier Code of Conduct policy. This policy prohibits any form of forced labour and requires suppliers to adopt strong risk management practices to effectively address this issue.
2. Evaluating the suitability of suppliers bidding for contracts based on our sustainability criteria in targeted tenders. We target tenders by considering the nature of the suppliers’ activities and their geographical footprint. As part of the tender evaluation, we examine their policies and procedures for mitigating modern slavery risks. Where concerns are identified, we engage proactively with suppliers to address them through active collaboration.
3. Identifying suppliers that present higher sustainability risks and requesting EcoVadis or IntegrityNext scorecards from them. This provides insights into their overall sustainability practices.
4. Conducting sustainability reviews during contracts with selected suppliers, particularly focusing on their management of modern slavery risks.
5. Performing audits of selected suppliers, either directly, through industry initiatives, or via independent third-party audits. Audits will address

all relevant sustainability considerations including human rights and forced labour. We will ensure effective policies and procedures are in place and seek improvements where necessary.

6. We conduct targeted Modern Slavery Risk Management reviews for a sample of suppliers operating in industry sectors identified by the UK government as having a higher risk of forced labour. These reviews assess the suppliers' policies and procedures for managing forced labour risks within their operations and supply chains, and support the implementation of improvements where needed. The reviews also verify that suppliers have published a Modern Slavery Statement in compliance with statutory requirements and maintain appropriate internal policies to address modern slavery and its underlying causes.



## Modern Slavery Risk Management reviews ensure that suppliers:

- Have a policy of compliance with the law
- Provide employees with established labour contracts
- Prohibit worker fees and fines and the withholding of ID documentation as a disciplinary measure
- Operate working hours aligned to legal norms and our code of conduct policy, supported by working hours controls and associated reporting
- Pay salaries aligned to legal norms and our code of conduct policy
- Ensure workers are free to leave following notice
- Have strict no child labour and no curfew policies
- Operate grievance processes
- Have a clear policy that prohibits forced labour and trafficking and that suppliers:
  - o Can identify their risk areas considering activity and location
  - o Plan and implement due diligence in high-risk areas and drive improvements as needed



# Managing modern slavery risks (cont.)



In 2024, we conducted a small number of direct audits of suppliers’ offshore facilities delivering contact centre services. We enhanced our oversight of this risk sector by mandating that these branded service providers engage independent third parties to conduct social audits of all offshore Virgin Media O<sub>2</sub>-facing facilities and share the results with us.

We additionally ran modern slavery reviews with a number of our UK-based construction suppliers. This continued our focus on the construction sector. The following performance indicators demonstrate the effectiveness of this approach:

- Over the past three years, our Modern Slavery Risk Management reviews have encompassed 96% of our construction-related expenditure, with 84% of construction partners engaging in the development of our fixed and cellular networks
- In 2024, the reviews addressed 20% of current construction partners and 20% of spend

No major issues were identified in the 2024 reviews; 12 minor action items and 14 opportunities for improvement were identified. Notably, no new construction partners were onboarded during 2024.

In addition, we had oversight of the [Joint Alliance for Corporate Social Responsibility](#) (JAC) 2024 Audit programme involving the telecoms supply chain. As a JAC affiliate member, we work with other telecoms companies to identify common suppliers of the industry to audit, sharing the findings.

We also liaised with our shareholders, Telefónica SA and Liberty Global, to ensure no forced labour issues were identified in any of our common suppliers or flagged via JAC audits, parent organisation audits or whistleblowing channels.



# Managing modern slavery risks (cont.)

## Training and awareness

While we don't provide formal training to suppliers, our due diligence does include modern slavery awareness. Our employees undertake mandatory training on our Code of Conduct.

## Engagement and collaboration

Where we can, we collaborate with our shareholders, Telefónica SA and Liberty Global, to share information on sustainability risks for common suppliers.

Through our shareholders, we are affiliate members of the Joint Alliance for Corporate Social Responsibility (JAC), a not-for-profit association of telecom operators dedicated to developing Corporate Social Responsibility (CSR) across the Information Communication Technology (ICT) supply chain. JAC assesses, verifies and implements CSR while sharing resources and best practice to develop long term supply chain sustainability.

## Outcome and conclusions

- Our 2024 due diligence activities did not identify any instances of forced labour
- Neither Virgin Media O<sub>2</sub>'s Speak Up channel, nor the equivalent reporting channels of our shareholders flagged any instances of forced labour with regards to common suppliers

We consider our current approach to managing forced labour risks to be appropriate and do not identify a significant need for reform at this time. However, we remain committed to continuous improvement and will enhance our engagement with sector initiatives such as JAC, as well as with our parent shareholders, to ensure alignment with emerging best practices.

## Outcome and conclusions

We will:

- Strengthen our due diligence by improving collaboration with our parent shareholders on supply chain forced labour risk management
- Explore the potential use of artificial intelligence tools to assist in assessing and reducing forced labour risks
- Trial enhanced risk management services to improve our monitoring of critical suppliers
- Review and adopt the latest UK Government transparency guidance as appropriate





# Conflict minerals

Resources known as 'conflict minerals', such as tin, tantalum, tungsten and gold are minerals sourced from conflict-prone regions like the Democratic Republic of Congo (DRC) and its neighbouring areas. They are identified as 'conflict minerals' if their extraction may have directly or indirectly benefited or funded armed groups, thereby contributing to human rights violations.

These minerals continue to pose a heightened risk of forced labour. While Virgin Media O<sub>2</sub> does not directly engage with smelters or refiners, they are integrated into our extended supply chain. Consequently, we stipulate in our Supplier Code of Conduct that our suppliers must:

- operate policies and processes to assess and minimise the risk of conflict minerals in their supply chains
- align with the Organisation of Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high-risk areas
- if requested, complete and share the Conflict Minerals Reporting Template

During sustainability reviews with suppliers, particular attention will be paid to their strategies for managing the risks associated with conflict minerals.



# Approvals

The boards of directors for the following companies have approved this statement:



They have all delegated authority to Lutz Schüler to sign this statement on their behalf.

*Lutz Schüler*

Lutz Schüler  
Chief Executive Officer Virgin Media O<sub>2</sub>  
May 2025

- giffgaff Limited
- NTL Glasgow
- NTL Kirklees
- Telefonica UK Limited
- Upp Corporation Limited
- Virgin Media Business Limited
- Virgin Media Limited
- Virgin Media Finance plc
- Virgin Media Mobile Finance Limited
- Virgin Media Intermediary Purchaser Limited
- Virgin Media Investment Holdings Limited
- Virgin Media Senior Investments Limited
- Virgin Media Secured Finance plc
- Virgin Media SFA Finance Limited
- Virgin Media Operations Limited
- Virgin Media Payments Limited
- Virgin Media Wholesale Limited
- Virgin Mobile Telecoms Limited
- VMED O2 UK Limited
- VMED O2 UK Holdco 4 Limited
- VMED O2 UK Holdco 5 Limited
- VMED O2 UK Financing I plc
- VMED O2 UK Holdings Limited

