

# Modern slavery statement

Virgin Media O2 (VMED O2 UK Limited and its subsidiaries)

June 2026

# Introduction



**This Modern Slavery Statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Virgin Media O2 (VMED O2 UK Limited and its subsidiaries) during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking within our operations and supply chains. It is the fifth statement we have published as Virgin Media O2: all previous statements are available on our [website](#).**

We do not tolerate any form of human rights abuse within our operations or supply chains. However, we recognise that modern slavery exists in every country and across all sectors, including those operating entirely within the UK. We acknowledge that organisations that do not identify risks may not have adequate systems in place and so we remain committed to a proactive, worker-centred approach to due diligence, transparency, and continuous improvement, in line with the UK Government’s 2025 updated statutory guidance ‘Transparency in Supply Chains’ (TISC).

This statement has been approved by the Board of Directors and signed by our Chief Executive Officer.

## VMO2 entities addressed by this statement

- 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 8 Limited
- VMED O2 UK Financing I plc
- VMED O2 UK Holdings Limited

## Our business and organisational structure

46.7m

Mobile connections

5.8m

Fixed-line customer relationships

18.8m

Serviceable homes

8.3m

Full fibre

**Virgin Media O2 is one of the UK's leading telecommunications companies, connecting millions of people, businesses and communities to the services and experiences that matter most. We are owned by a 50:50 joint venture between Liberty Global and Telefónica, delivering mobile, broadband, television and fixed-line services across the UK through a portfolio of well known brands, including Virgin Media, O2 and giffgaff.**

Our business is built on the ownership and operation of national scale fixed and mobile networks. As the UK's largest mobile network and one of the country's largest fixed networks, we are well positioned to deliver connectivity at home, at work and on the move. Our strategy focuses on convergence, combining fixed and mobile services to create simpler, better value and more reliable customer experiences, while continuing to invest in the infrastructure that underpins the UK's digital economy.

### How we operate

We organise our activities around three customer segments:

- Consumer
- Business (B2B)
- Wholesale

This structure enables us to respond effectively to the differing needs of households, organisations and partners.

Our Consumer business provides mobile services through O2 and fixed broadband and TV services through Virgin Media, alongside digital first propositions such as giffgaff. We focus on delivering fast, reliable connectivity and outstanding customer experiences, supported by ongoing investment in 4G and 5G, full- fibre broadband, in-home connectivity and customer service transformation.

Our B2B business supports organisations of all sizes, from small enterprises to large corporates and the public sector. In August 2025, we established O2 Daisy as a scaled, standalone B2B organisation, bringing together national connectivity platforms with digital, cloud, security and managed service capabilities. It is owned 70% by Virgin Media O2 and 30% by Daisy Group. In April 2026, it was rebranded O2 Business and we are now working together to align our modern slavery risk management practices

Our Wholesale business supports competition and connectivity across the UK by providing wholesale access to our mobile and fixed networks. This includes long standing partnerships such as Tesco Mobile and Sky Mobile, together with fibre and high capacity wholesale services. We are also the anchor wholesale customer and network construction partner for Nexfibre, supporting the expansion of full fibre coverage across the UK.

### Governance and organisation

Virgin Media O2 is governed by a Joint Venture Board, which provides strategic oversight. Day-to-day operations are led by the Executive Management Team. Our operating model aligns with our three customer segments, ensuring clear accountability and a strong customer focus. O2 Business operates as a distinct B2B organisation within the Group, with its own leadership team and governance arrangements. Specialist committees support oversight of finance, risk, people and responsible business priorities.

### Our scale

16,800

Employees (Approx)

£7bn

Spend on goods and services (Approx)

2,000

Direct suppliers (Approx)

## Our supply chain



**Our networks and services are supported by a global, capital-intensive supply chain that reflects the scale and complexity of the telecommunications infrastructure we operate. This includes suppliers of network equipment, construction and maintenance services, customer devices and premises equipment, technology platforms, and content and programming.**

We expect our suppliers to operate to the highest standards. All suppliers are required to comply with our Supplier Code of Conduct, which sets clear expectations on ethical behaviour, labour standards, human rights and environmental responsibility. Environmental, social and governance (ESG) considerations are embedded into our sourcing decisions, supported by a risk-based approach to supplier due diligence, with enhanced oversight where risks are higher.

Through active engagement with key suppliers, we work to strengthen supply chain resilience, reduce environmental impact, and support responsible and sustainable operations.

### Labour supply chain

Workers enter our extended labour supply chain through:

- Direct recruitment
- Recruitment agencies
- Labour brokers for offshore customer service operations
- Specialist engineering and construction intermediaries

### Areas for improvement

In line with government expectations to disclose gaps, we acknowledge that:

- While we understand the operating geographies of our major suppliers and their primary sourcing locations, deeper mapping beyond Tier 1 suppliers remains incomplete. We will continue to strengthen this capability.
- Labour supply chains within offshore contact centres require increased transparency, particularly in relation to recruitment fee risk. This will be a focus area for investigation in 2026.

## Policies relevant to modern slavery

Our approach is underpinned by a suite of policies aligned with the UN Guiding Principles on Business and Human Rights, the ILO Core Labour Standards, and the OECD Due Diligence Guidance.



### Key policies

- Code of Conduct (mandatory for all employees)
- Anti Discrimination, Bullying and Harassment Policy
- Supplier Code of Conduct (mandatory for suppliers, including prohibitions on forced labour and enabling practices)
- Human Rights Statement
- Recruitment Policy (including a prohibition on worker paid fees)
- Grievance Policy

### Implementation and enforcement

- All suppliers are contractually required to comply with our Supplier Code of Conduct
- Non compliance triggers corrective action plans and escalation pathways, including independent audits where appropriate
- Workers are protected from retaliation through anonymous and confidential reporting channels
- Policies are reviewed annually to ensure alignment with emerging international standards



# Modern slavery risk assessment

## Internal assessment

Consistent with updated Transparency in Supply Chains guidance, which emphasises risk to workers rather than risk to the organisation, in 2025 we:

- Reviewed the effectiveness of our modern slavery control, specifically our people policies and practices.
- Assessed modern slavery risks relating to our own workforce, considering employment conditions and supporting policies.

This assessment concluded that the risk of modern slavery affecting our directly employed workforce is minimal.

We are committed to equitable, fair and inclusive employment policies and practices. Our working environment is one where people are treated with dignity and respect, ensuring everyone belongs.

We have enhanced policies including support for families, carers, neurodiversity diagnosis support, and a zero tolerance to non-inclusive behaviour and harassment.

## External risk assessment methodology

We reviewed our supply chains, operating geographies, and workforce profiles using UK Government guidance. We primarily assess risk based on:

- Sector / nature of activity (for example, construction, contact centres, transport)
- Geography (regulatory environment and enforcement effectiveness)

We also consider:

- Workforce profile (such as migrant versus local labour)
- Recruitment channels
- Severity and likelihood of exploitation based on supplier context
- Suppliers involved in higher risk activity and/or geography are prioritised for due diligence

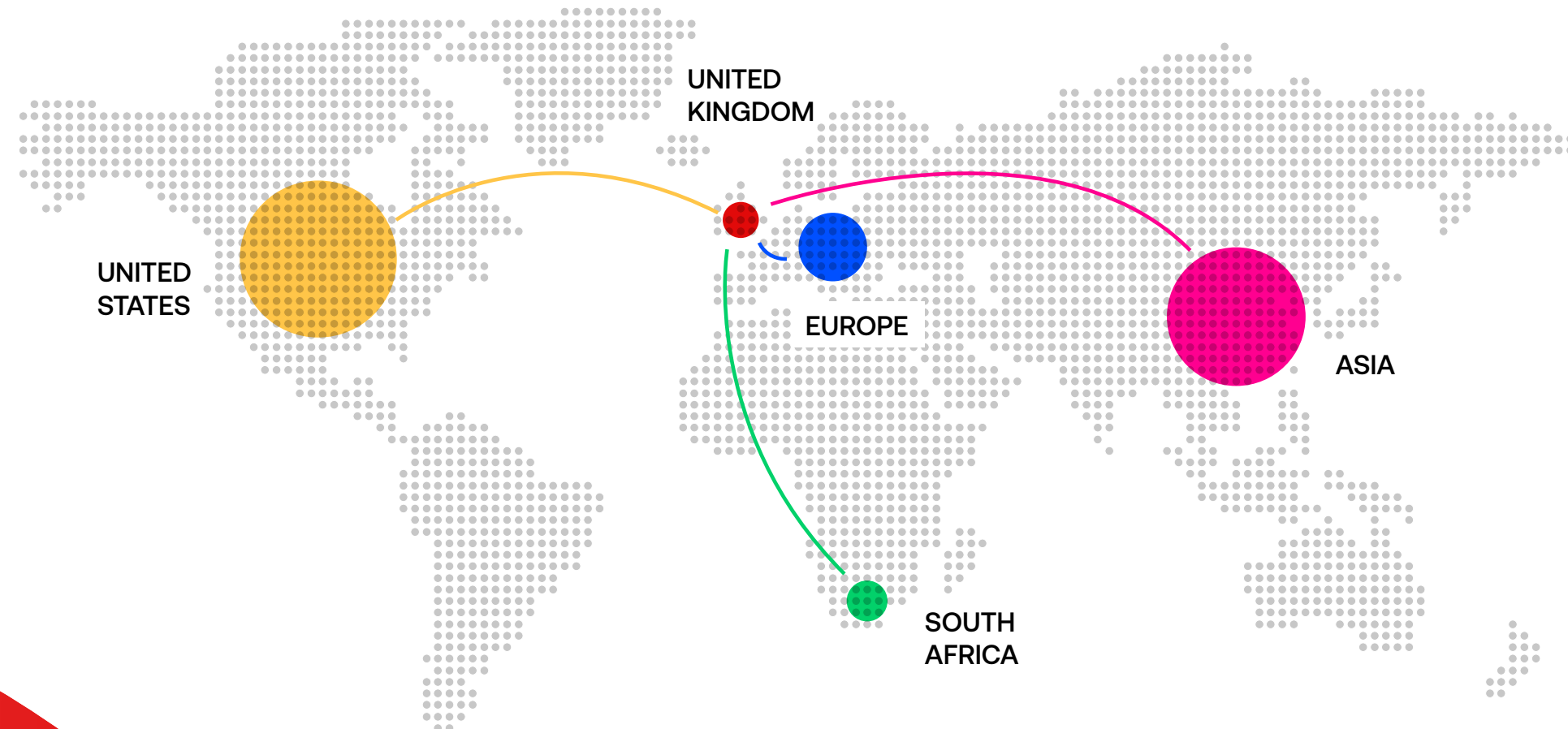
This assessment identified supply chains as the primary source of forced labour risk exposure.

## Priority risk areas identified

1. Offshore contact centre operations
2. UK construction services
3. UK logistics / transport suppliers
4. Hardware and electronics (including critical materials in solar panel supply chains)

# Due diligence and actions taken

**Our extended supply chain spans Asia, Europe, the United States, and South Africa. We focus our due diligence efforts where risks are highest. Our approach combines industry collaboration, alignment with our parent companies, and our own risk-based assessments. Managing forced labour is embedded within our supply chain sustainability programme, which reflects government guidance that meaningful due diligence extends beyond audits.**



**It includes:**

**Clear standards**

The Virgin Media O2 Supplier Code of Conduct prohibits forced labour and requires effective supplier risk management.

**Supplier pre-qualification assessments**

We assess sustainability and modern slavery controls during selected tenders and work with suppliers to address gaps.

**Enhanced scrutiny**

Higher risk suppliers provide EcoVadis or IntegrityNext sustainability scorecards (sustainable supply chain platforms).

**Sustainability reviews**

We conduct general sustainability reviews with selected suppliers that also address modern slavery risk management.

**Audits**

We use industry initiatives and independent third-party audits, aligned to JAC (Joint Alliance for Corporate Social Responsibility), SMETA (Sedex Members Ethical Trade Audit) or VAP (Validated Assessment Program) protocols. Where applicable, these include social audits and worker interviews.

**Targeted modern slavery risk assessments**

Suppliers in higher risk sectors undergo detailed modern slavery risk assessments to ensure robust controls.

**Media monitoring**

We track media coverage for stories that may signal potential modern slavery risks, reviewing them both individually and at a sector level where relevant.

We operate a zero-tolerance approach to forced labour and human trafficking, supported by strong policies and risk-based due diligence across our extended global supply chain. Where due diligence identifies concerns that suppliers have not addressed in a timely manner or to our satisfaction, we reserve the right to terminate engagement.

**Key actions in 2025**

- ✔ Conducted targeted reviews of high-risk construction partners, covering a significant proportion of spend and active suppliers.
- ✔ Required selected offshore service providers to undergo independent third-party social audits.
- ✔ Identified minor non-conformities and monitored supplier corrective actions.
- ✔ Examined internal and external intelligence sources, including sector collaboration initiatives and Speak Up (whistleblowing) channels.

## Responsible recruitment

We are committed to the Employer Pays Principle, prohibiting worker paid recruitment fees.

The Employer Pays Principle reduces modern slavery risk by eliminating recruitment debt and ensuring workers are not charged fees to access work, addressing a key cause of coercion and forced labour.

## Conflict minerals

Conflict minerals - such as tin, tantalum, tungsten and gold - are an essential part of ICT production but are frequently linked to the financing of armed conflict and human rights violations in regions such as the Democratic Republic of Congo and neighbouring countries.

While Virgin Media O2 does not work directly with smelters or refiners, these minerals are present in our extended supply chain, and so we take steps to identify, prevent and mitigate any adverse human rights impacts. Through our Supplier Code of Conduct, we require our suppliers to:

- Have policies and processes to identify and reduce risks association with conflict minerals in their supply chains.
- Align with the OECD Due Diligence Guidance for responsible mineral supply chains.

Where appropriate, we focus on how suppliers manage conflict mineral risks during sustainability reviews.



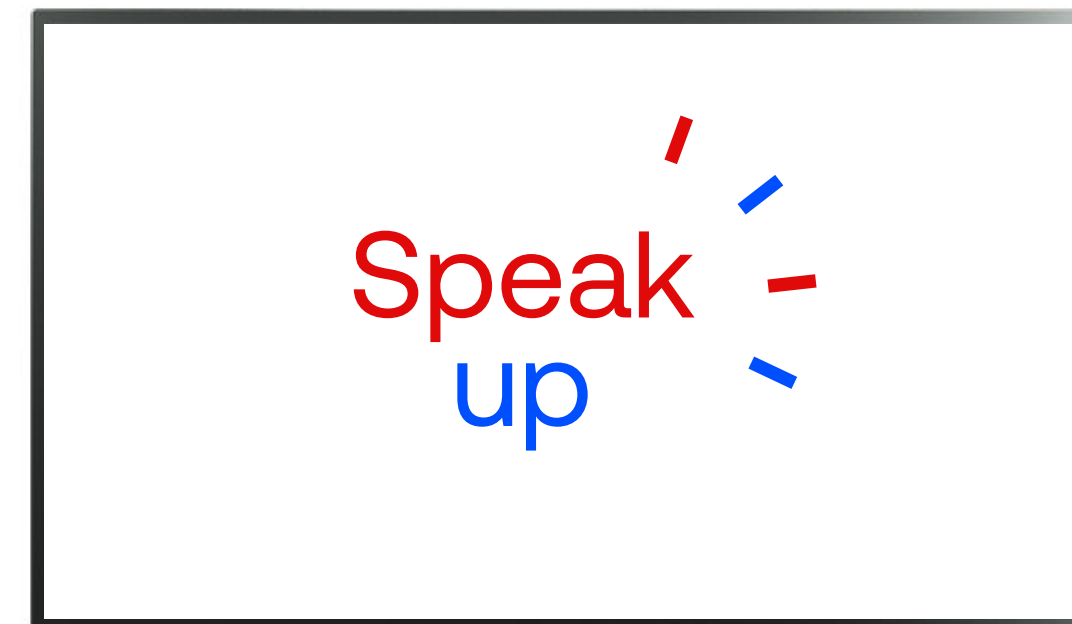
## Reporting mechanisms and remediation

We maintain accessible, confidential reporting channels, including:

- Speak Up channel (whistleblowing) — available to employees and suppliers
- Trade union and worker representative engagement

Our remediation approach aligns with the UN Guiding Principles and includes investigation, safeguarding, corrective action, compensation where appropriate, and ongoing monitoring.

No confirmed incidents of modern slavery were identified in 2025. However, recognising that a lack of findings can indicate insufficient due diligence, we will work to strengthen our approach in 2026.



## Training, monitoring and continuous improvement

### Training Delivered in 2025

- Mandatory Code of Conduct training for all employees
- Specialist training available for procurement, HR and supplier management teams

### 2026 commitments

- Map 100% of significant Tier 1 suppliers and at least 25% of Tier 2 suppliers in high risk categories. Tier 1 organisations supply directly to Virgin Media O2, and we categorise them as significant based on spend.
- Introduce worker voice engagement mechanisms.
- Train 100% of procurement managers on modern slavery risks.
- Extend modern slavery risk reviews across logistics suppliers.



### Effectiveness measures: 2025

#### Internal

- ✔ Percentage of employees completing Code of Conduct training at year end 2025 - 99.8%

#### External

- ✔ Number of supplier facility audits - 11 driven at Virgin Media O2 request
- ✔ Percentage of required Social Audits including worker interviews - 100%
- ✔ Percentage of construction supplier spends addressed by modern slavery risk management reviews - 27%, and 70% in the last 36 months
- ✔ Modern slavery statement evaluated for fixed network construction tenders - 100%
- ✔ Percentage of logistics / transport spend addressed by modern slavery risk management reviews - 88%
- ✔ Modern slavery related concerns raised by Speak Up Channels - 0

### Supplier-facing policies & our Speak Up channel

Supplier facing policies and our Speak Up channel are available on our website [here](#). We encourage anyone with concerns regarding behaviours or practices that may breach our Code of Conduct, policies, or applicable laws to report them through our Speak Up channel.

### Collaboration

We continue to collaborate within The Joint Alliance for Corporate Social Responsibility (JAC), via our parent companies. JAC is a not-for-profit association of telecom operators dedicated to developing Corporate Social Responsibility (CSR) across the Information Communication Technology (ICT) supply chain. JAC shares resources and best practice to develop long-term supply chain sustainability across the sector as a whole and strengthen approaches to human rights risk management.

In 2025, JAC conducted up to 150 on-site supplier audits of common sector suppliers. JAC provides a significant opportunity to strengthen our approaches to human rights risk management through shared due diligence.



### Approval and publication

This statement has been:

- Approved by the Board of Directors of VMED O2 UK Limited
- Signed by the Chief Executive Officer
- Published on our corporate websites
- Submitted to the UK Government's Modern Slavery Statement Registry



**Lutz Schüler**  
Chief Executive Officer Virgin Media O2  
June 2026