



# TELENET SUPPLIER CODE OF CONDUCT - JUNE 2019

## Our commitment to sustainability and responsible business practices

Telenet is committed to be the leading provider of converged connected entertainment and business solutions in Belgium, underpinned by high-quality fixed and mobile networks. Our fundamental belief is that technology changes our lives for the better. We are committed to push the boundaries of digital technology and provide our society with solutions for the future. We therefore continuously invest to provide our customers with leading connected entertainment, easy-to-use business solutions, innovative digital services and an amazing customer experience.

Telenet is part of the Liberty Global Group, the world's largest international TV and broadband company, investing, innovating and empowering people in countries across Europe, Latin America and the Caribbean to make the most of the digital revolution.

### Acting in a socially responsible way

As an important Belgian player in telecommunications, media and entertainment, we commit to sustainable growth, with a good balance between operational excellence and social responsibility. Sustainability forms an integral part of our business strategy. We pledge to conduct our business in a fair, responsible and transparent manner. We do this by upholding the highest corporate governance standards and by actively addressing the social, economic and environmental aspects of our business operations.

### Managing our supply chain in a responsible way

The products and services that we purchase from suppliers have as much of an ethical, environmental and social impact as our own products and services. We expect all our suppliers to adhere to the same standards as it comes to environmental and social responsibility and to conduct their business in a truly ethical way.

## Our approach

The present **Telenet Supplier Code of Conduct** sets out our ambition and expectation to be a responsible company and to work accordingly with our suppliers. It covers a series of fundamental principles we expect our suppliers to adhere to:

- fundamental human rights;
- working conditions;
- health and safety at work;
- environmental standards,
- business ethics.

These principles implement international labor standards such as the International Labor Organization Core Conventions, and the UN Treaty on Human Rights, Bribery and Corruption, Health, Safety and the Environment.

The Telenet Supplier Code of Conduct and the Liberty Global Responsible Procurement and Supply Chain Principles apply to all procurement and supply chain activities involving Telenet suppliers. Adherence to these principles forms an integral part of our supplier selection and contracting procedures.



## Our key principles

At Telenet, we subscribe to the following social, environmental and ethical standards and principles for responsible business practices. As they apply to all our business operations along the value chain, we also expect our suppliers to adopt these principles and to duly execute on them.

### I. INTERNATIONAL LABOR STANDARDS

We expect all Telenet suppliers to protect the human rights of their employees and to treat them with dignity and respect. Therefore, suppliers should comply with all applicable local and international laws and regulations regarding the environment, health and safety and employment and adhere to the UK Modern Slavery Act, the ILO Fundamental Conventions<sup>1</sup> and the UN Declaration of Human Rights, including:

#### a. Child Labor

- Not to employ any person below the applicable minimum legal age for employment.
- Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.
- Where people below the age of 18 are legally employed, not to involve them in hazardous activities. The definition of hazardous activities should be determined by applicable local law.

#### b. Forced Labor

- To prohibit forced, bonded, compulsory, involuntary or exploitative prison labor, slavery and trafficking of persons.
- To grant employees the freedom to leave their employment on reasonable notice or terminate their contract.
- To undertake the necessary due diligence to ensure that there is no modern slavery or human trafficking in your operations and supply chain.

#### c. Working hours and wage

- Working hours are not to exceed the maximum set by local law.
- Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

<sup>1</sup>Freedom of Association and Protection of the Right to Organize Convention, 1948 (No.87); Right to Organize and Collective Bargaining Convention, 1949 (No.98); Forced Labor Convention, 1930 (No.29); Abolition of Forced Labor Convention, 1957 (No. 105); Minimum Age Convention, 1973 (No. 138); Worst Forms of Child Labor Convention, 1999 (No. 182); Equal Remuneration Convention, 1951 (No.100); Discrimination (Employment and Occupation) Convention, 1958 (No. 111); and ILO Declaration on Fundamental Principles and Rights at Work (1998)

#### d. Freedom of association

- In conformance with local law, to respect the right of all employees to form and join trade unions (or other kinds of representation) of their own choosing and where appropriate to carry out representative functions at work, in accordance with relevant legislation. To allow employees to bargain collectively and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities.
- Employees should not be discriminated against, or be treated unfavorably or differently because they carry out representative functions.



**e. Discrimination**

- Not to discriminate against employees or prospective employees in any way on grounds of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

**f. Disciplinary procedures**

- To treat employees fairly and with respect.
- Not to tolerate verbal, sexual, physical and other forms of abuse.

## II. ETHICS

We expect all Telenet suppliers to conduct their business in an ethical manner and to act with integrity. Ethical requirements include the following:

- To be fully compliant with the [Telenet Code of Conduct](#)
- To conduct business with honesty and integrity, in accordance with high ethical and legal standards and to comply with all relevant legislation and regulations.
- To prohibit the use of bribery and corruption to advance business objectives and not to tolerate corruption in any form.
- To respect intellectual property rights and to safeguard customer and supplier information.

## III. HEALTH & SAFETY

We expect all Telenet suppliers to provide a safe and healthy working environment to their employees and to ensure the health and safety of the products and services they deliver.

This includes the following requirements:

- To provide a safe, healthy working environment for employees, contractors, partners or others who may be affected by the company's activities, in accordance with relevant international standards and national laws.
- To obtain, maintain and keep up-to-date all required permits, licenses and registrations
- To mitigate health and safety risks when working for Telenet on Telenet premises, as well as other places.
- To ensure that products are compliant with applicable health, safety and environmental regulations about hazardous substances
- To provide, where necessary, relevant health and safety training.

## IV. ENVIRONMENT

It is Telenet's ambition to drive and grow its business while reducing its impact on the environment.

As a company, we have implemented a climate action plan built on three pillars:

- g. **Improving energy efficiency** by reducing the energy consumption in our operations
- h. **Reducing greenhouse gas emissions** by switching to renewable energy sources in our operations and by investing in a climate-friendly mobility solutions
- i. **Reducing the use of resources and generation of waste** by reducing the use of primary resources, by investing in the recycling and refurbishment of Customer Premise Equipment (CPE) and by properly disposing and processing waste



This commitment is outlined in the [Telenet Environmental Management Policy Statement](#) and is aligned with the UN Sustainable Development Goals and the principles of the Paris Agreement on Climate Action.

We expect our suppliers:

- To review the Telenet Environmental Management Policy Statement.
- To comply with all applicable local, regional and federal environmental legislation, regulations and directives.
- To have action plans in place to manage their environmental impact, including energy efficiency and carbon emission reduction measures and waste management programs.
- If and when applicable, to comply with additional environmental requirements specific to their products and services, as covered in underlying supplier contracts.

## V. CONFLICT MINERALS

In accordance with the [Responsible Procurement and Supply Chain Principles of our parent company Liberty Global](#), we expect suppliers to confirm that no conflict materials are incorporated in products or equipment provided by the suppliers or any third parties within their supply chain. These are materials sourced from the Democratic Republic of Congo and surrounding countries and which are used to finance armed conflict in the Equatorial Region.

## VI. PRIVACY & SECURITY

Earning the trust of all our stakeholders also implies that we handle the personal data and information we manage with respect for privacy and data security. Telenet complies with the European General Data Protection Regulation (GDPR) and we do expect the same from our suppliers.

Suppliers should protect and respect the personal data of everyone they do business with, including suppliers, business customers, consumers and employees. When personal data is collected, stored, processed, transmitted and shared, suppliers should follow the GDPR rules and any other applicable privacy and information security laws and regulatory requirements.

## Management systems

### I. LEGAL COMPLIANCE

Suppliers shall comply with all applicable laws, regulations, contractual agreements and standards.

### II. COMMITMENT AND ACCOUNTABILITY

Suppliers shall develop, review and record management processes to ensure full compliance with principles, standards and regulation. We encourage them to document how they comply with the Principles as set forth in this Telenet Supplier Code of Conduct.

### III. RISK MANAGEMENT

Suppliers shall implement measures to identify, determine and manage risks in all areas addressed in the Telenet Supplier Code of Conduct.

In case of disruptions, they should take appropriate actions in order to guarantee business continuity.

### IV. CONTINUOUS IMPROVEMENT

Suppliers should strive for a continuous improvement of their sustainability performance by implementing appropriate measures.



## V. SUSTAINABILITY PERFORMANCE ASSESSMENT

Together with its parent company Liberty Global, Telenet regularly assess the sustainability performance of its suppliers by using the **EcoVadis Dynamic Scorecard**, a global supply chain assessment platform. EcoVadis reviews the adherence of the Liberty Global and Telenet suppliers to the key Principles and assesses their performance on twenty-one indicators, environmental, social, and ethical and supplier risks. The assessment is annually performed on a selected number of Liberty Global and Telenet suppliers.

## VI. SUPPLY CHAIN PERFORMANCE MONITORING AND REVIEW

Telenet reserves the right to monitor and review the supplier's adherence to the key Principles. Key strategic suppliers will undergo a regular supply chain audit, first through written checklists and – in the event of suspected breaches – even through a physical inspection of the supplier's operations and facilities. Through proper KPI dashboarding, Telenet will ensure all supply chain requirements are met in terms of sustainability, ethical business practices, and planning, production and transportation methods.

## VII. CORRECTIVE ACTION PLANS

In the event suppliers fail to adhere to the key Principles as set forth in the Telenet Supplier Code of Conduct, Telenet will work with them to address the issues through a mutually agreed remediation plan. A failure to agree on a mutually acceptable corrective action plan may affect Telenet's ability and willingness to continue business relations with the given supplier.

Suppliers shall immediately report to Telenet any serious non-adherence to or breach of the key Principles and mutually agree on a schedule for corrective action.

Where serious breaches of the key Principles are identified and persist, Telenet may consider termination of the business relationship with the supplier concerned, subject to the terms and conditions of the underlying contract between Telenet and this supplier.

## VIII. ENGAGEMENT AND COMMUNICATIONS

Telenet will ensure awareness and adoption of the Telenet Supplier Code of Conduct through regular communications to and active engagement with its supplier community.

The Telenet Supplier Policy is publicly available on the [Telenet corporate website](#).

In addition, Telenet will work directly with suppliers to inform them on the policy and to share best practices on responsible supply chain management.

For more information and guidance regarding the Telenet Supplier Code of Conduct, please do contact the [Telenet Procurement team](#).