



Telenet Human Rights Statement (December 2020)

As a leading telecommunications, media and entertainment provider, we want to maintain and strengthen the trust of our stakeholders. Guaranteeing the integrity of our business practices is one of the key material issues for Telenet. We therefore pledge to conduct our business in a fair, responsible and transparent manner.

This Statement outlines our commitment to meet the highest standards of corporate governance. It applies to all our key stakeholders, including our customers, our employees, our suppliers, our partners and the local communities we are operating in.

We promote responsible business practices and ensure that human rights are respected across our value chain. We make sure that everyone who works for and on behalf of Telenet understands and implements this policy.

Our commitment to human rights is guided by the UN Guiding Principles on Business and Human Rights and the international human rights principles encompassed in the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

This statement has been reviewed and approved by the Telenet Board of Directors.

Our purpose and commitment

At Telenet, we believe in the tremendous potential of digital and we are committed to help people and businesses to stay one step ahead in the digital age, embracing the endless possibilities of digital at the fullest and with pleasure. For a better quality of life.

As a company, we want

- to be close to our customers, offering them an amazing experience in the digital age
- to engage in an open and transparent way with all our stakeholders earning their trust
- our employees to feel the passion, to grow themselves and to succeed in a continuously changing working environment.



Our Code of Conduct and internal policies

Our [Code of Conduct](#) defines how we act as individuals and how we interact with our colleagues, our customers, our business partners and with our broader stakeholder community. It lays the foundation for a strong company culture that responds to the highest standards of respect, business integrity and ethical conduct. The Code of Conduct covers key principles regarding

- Fundamental human rights
- Working conditions
- Health & Safety at Work
- Environmental standards
- Business Ethics

The [Telenet Anti-Corruption Policy](#) contains a prohibition on the giving and taking of bribes, a limitation on the giving and receiving of gifts, a reminder to observe laws and regulations, and an obligation of transparency around political donations.

The [Telenet Stakeholder Engagement Charter](#) provides a number of principles that ensure we develop lasting, trusted relationships with our key corporate stakeholders in an open and transparent manner.

These internal policies apply to the whole Telenet workforce and underscore our commitment to key ethical business practices, allowing our company to make a positive contribution to the Belgian society.

Our Supplier Code of Conduct

At Telenet, we purchase significant quantities of equipment, products and services from suppliers. This comes with a responsibility to ensure that ethical, environmental and social considerations are incorporated into our spending decisions. The [Telenet Supplier Code of Conduct](#) sets out our ambition and expectation to drive our business in a responsible way along our entire value chain. We expect our suppliers and business partners to meet the ethical practices as outlined in the code of conduct.

In addition, we ask our suppliers to comply with the [Telenet Anti-Corruption Policy](#) and the [Responsible Procurement and Supply Chain Principles](#) of our parent company Liberty Global. 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 most important human right principles we adhere to

(1) Diversity and Nondiscrimination

We value diversity and inclusion in our workplace. We are committed to equal opportunities for our employees and those seeking employment with our company. Company employment decisions must be based on individual merit and business needs, irrespective of race, color, ethnic, cultural, community or national origin, religion, political or syndical opinions, sexual orientation/ identity, family or marital status, gender, current or future health situation/disability, or age. This commitment extends to all aspects of employment including recruitment, hiring, evaluation, promotion, compensation, training, development and termination.

By aligning ourselves with the UN Sustainable Development Goals we are committed to achieving gender equality throughout our business. We encourage female employees to strengthen their skills through training and mentoring as well as to create a talent profile to increase their growth potential into leadership roles. We adhere to and enforce applicable local legislation related to diversity and anti-discrimination.

(2) Harassment Prohibition

A great working environment is dependent on the way we behave. We expect our employees to treat their colleagues, customers, business partners and suppliers with respect at all times. We are committed to providing a workplace free of any and all forms of harassment and we do not tolerate harassment of any kind from our employees, management, suppliers and business partners. There are behaviors which are unacceptable at work and contravene with our company policies like (sexual) harassment, bullying/mobbing including discrimination, and mental and physical violence. We condemn and address these practices according to national and local regulation.

(3) Prevention of Human Trafficking, Forced Labor, and Child Labor

We do not tolerate the use of forced labor, child labor, slavery, or human trafficking in our business operations and in business practices along our entire supply chain. We are committed to the elimination of such practices. We comply to the [Modern Slavery Act Statement 2020 of our parent company Liberty Global](#) which outlines the policies and due diligence processes we apply.

(4) Working Hours and Wage Standards

We adhere to all applicable laws, relating to minimum wages, working hours, overtime and benefits. We are committed to the development of our employees skills and capabilities and to providing opportunities for career advancement.

(5) Freedom of Association and Collective Bargaining

We respect our employees' right to form, join or not to join a labor union or any other organization of their choice without fear of retaliation, intimidation, harassment or termination of employment. Where employees are represented by a legally recognized union and subject to local legal requirements, we are committed to establishing a constructive dialogue with their freely chosen representatives, and to bargaining in good faith with such representatives.



(6) Workplace Safety

The safety and health of our employees is of paramount importance. We provide a safe and healthy workplace and comply with all applicable health and safety laws and regulations. We also expect the same of our suppliers and business partners. We have certified Health and Safety Officers at each of our offices who act as main point of contact for any issues that may arise. They support the process of Risk Inventory & Evaluation which forms the basis for a safe and healthy working environment and acts as a repository for risks the business and its employees might encounter and measures taken to prevent harm to our employees.

(7) Privacy, Data Protection and Security

When our customers provide personal data, they put their trust in us to protect that data. The same applies for all of our employees. We are committed to doing business in a way that respects the privacy of our customers and employees. Respecting privacy is about handling people's personal data appropriately, securely, and in line with applicable laws and regulations. We adhere to the General Data Protection Regulations (GDPR) which offer more transparency and better data protection for European citizens.

It is important that we use our company's information systems in a responsible way and protect the personal data on these systems. Whenever personal data is collected, we must ensure that it is kept private and safe, and treated in a way that is compliant with regulations. Personal data includes names, addresses, birthdates, social security numbers, and for our customers, location data, IP addresses and other internet usage data and set-top box data.

The [Telenet Customer Data Policy](#) stipulates how we collect, use, store and protect customer data. It also describes how customers can control the use of their personal data and how Telenet is authorized to contact customers. It also details the rules around the passing of personal data to third parties.

The Data Protection Officer oversees the manner in which Telenet deals with the governance of privacy, lawful intercept, security and related product lifecycle issues.

Due Diligence, Grievance and Remedy Process

We encourage our employees, suppliers, business partners and any other external stakeholders to report any concerns regarding Human Rights or any conduct that they believe violates our internal policies, our (Supplier) Code Conduct or any applicable law, rule, regulation through the Telenet Compliance team.

All allegations will be investigated, and we will pursue action to mitigate any adverse human rights impacts. We will not permit retaliation against any employee who, in good faith, reports, complains of, or seeks advice concerning our policies, our Code of Conduct or any other illegal or unethical conduct.



As far as supplier compliance is concerned, Telenet and its parent company Liberty Global have commissioned EcoVadis, a global supply chain assessment specialist, to review the social, environmental and ethical impact of their business operations and the adherence to our key Business Principles and Codes of Conduct. Selected suppliers are invited to complete an EcoVadis assessment questionnaire, resulting in a scorecard which enables us to evaluate their sustainability performance. If a completed EcoVadis assessment shows non-compliance with our key principles, Telenet and Liberty Global will work with the given supplier(s) on a mutually agreed remediation plan. On-going non-adherence to our policies and codes of conduct may result in a termination of the business relation with the given supplier.

Summary

The present statement expresses our commitment to adopting responsible business practices and respecting human rights. We will review these principles annually and continue to improve and update them as needed. We are committed to the continuous improvement of our businesses performance and are working towards a process within which we can identify potential human rights violations throughout our operations.

By guaranteeing the integrity of our business practices, we aim at maintaining our license to operate and strengthening the trust of all of our stakeholders.