



CODE OF CONDUCT

Classification: C1
Date: December 2018
Status: Final
Version: 1.0
Author: HR and Legal & Regulatory
Version management: HR Reward

CONTENTS

SUMMARY	4
FOREWORD	6
1. INTRODUCTION	9
1.1 For whom?	9
1.2 What do we expect from you?	9
1.3 How we share this code of conduct	10
1.4 Reading guide	10
2. HOW WE WORK	11
2.1 Our values	11
2.2 Respectful working environment	12
3. HEALTH, SAFETY AND WELLBEING	17
4. COMMUNICATION	21
4.1 External communication	21
4.2 Information to the media	21
4.3 Internal communication	22
5. ASSETS AND INFORMATION	25
5.1 Protection of our assets	25
5.2 Privacy and personal data	27
5.3 Financial integrity, correct approvals and permissions	28
6. COMPLIANCE WITH THE LAW	31
6.1 Competition legislation	31
6.2 Anti-corruption legislation	32
6.3 Avoiding conflicts of interests	33
6.4 Insider trading	34
6.5 International trade, export laws and economic sanctions	34
6.6 Public announcement	35
7. SOCIAL COMMITMENT	37
7.1 Focus areas	37
8. MILIEU	41
9. ENVIRONMENT	43
9.1 Speak out	43
9.2 External report	43



CODE OF CONDUCT. **WE DO**

- Always use your common sense!
- Check the intranet for all rules applicable to you
- Any doubts? Contact your manager
- Always ask yourself first if you would feel comfortable to tell your manager and your colleagues about your actions



BEHAVIOUR

We work according to our core values **Open Up, Team Up and Step Up**

- We work with respect and equal opportunities for everyone and, therefore without:
 - ~ Discrimination
 - ~ Bullying
 - ~ Intimidation
 - ~ Alcohol and drugs



HEALTH, SAFETY AND WELLBEING

- We work in a safe and responsible manner
- We know the rules and regulations and respect them
- We keep ourselves and our colleagues safe
- We report bottlenecks



COMMUNICATION

- We do not share sensitive and confidential information with external people, not even informally
- We are professional in our internal, external and social media communication
- We do not communicate on behalf of VodafoneZiggo without permission
- Questions from the press? Always contact External Communication!
- Communication with financial stakeholders is done by management and External Communication only
- We express our views and participate in the Engagement surveys



COMPANY ASSETS AND INFORMATION

- We handle company assets, intellectual property and data with due care
- We observe all privacy and security measures and classify information
- We know the internal approval procedures for the signing of contracts
- We handle financial data with integrity
- We are always transparent



COMPLIANCE WITH THE LAW

- We apply 'zero tolerance' with regard to fraud and bribery
- We are prudent in accepting and giving business gifts and hospitalities and register them
- We guard against conflicts of business and personal interests
- We know the rules regarding insider trading



SOCIAL COMMITMENT AND THE ENVIRONMENT

- We use our technology for social problems in an ethical and responsible way
- We engage the sponsoring of social charities
- We separate our waste, save energy and paper and reduce our carbon footprint by making more use of public transport or the bicycle.



SPEAK OUT!

- We pay attention and speak out when we see something that does not seem right, or when we are not sure!
- We always take reports seriously and investigate with integrity
- We handle all reports – which can also be filed anonymously – confidentially

DEAR VODAFONEZIGGO COLLEAGUES,

'In our wonderful and relatively young company we collaborate with thousands of people, for a multitude of customers. To know from each other how we want to collaborate, it's important to agree upon some rules of conduct and write them down in a document which we call a 'code of conduct'.

Such a code of conduct guides us in our actions and describes the rules that apply to our company: formally, informally and ethically speaking. I'm proud that we are now ready to present you with the VodafoneZiggo code of conduct.

The code is fully in line with the values we uphold: Open Up, Team Up and Step Up. It's about being open and honest in your work, tackling things together, asking each other for help and having each other's back in a positive way. In addition, we are ambitious and welcome a challenge, but we also need to feel safe enough to speak out when we see or hear things that are not OK. The purpose of a code of conduct is not just to guide behaviour within the company. It's also a tool to earn the trust of our customers, shareholders and suppliers.

In this document we will show you the kind of work environment we are, the way we communicate with each other, how we deal with information and assets and which legislation and regulations are relevant to us. In addition, it describes the role we want to play in society. In each chapter we give examples of what we expect from you. Not all situations and possible

dilemmas are covered and the code doesn't replace your common sense or your own sense of responsibility either. It does provide guidance and meaning, though. Consider it a moral compass.

I expect everyone to read our code of conduct. Hopefully, reading it will bring a smile of recognition to your face and a feeling of understanding of how we want to work. Should you have any questions, please don't hesitate to ask them, to a colleague, your manager, HR or to Legal & Regulatory. If we have the courage to be open and honest, we can tackle and improve things together. Only then does this code of conduct have any meaning.

To me, this code of conduct serves as a benchmark in everything I do, every decision I take. And you all know that I like to set my standards high. Hopefully, the document can serve as an inspiration to you too, to bring out the best in yourself and your colleagues. Together we bring this way of working to life and give purpose to what we do: enjoyment and progress with every connection – millions of times a day!



JEROEN HOENCAMP
CEO VODAFONEZIGGO



I AM NOT FLIRTING
WHEN I SMILE.

RESPECT. WE DO 

1. INTRODUCTION

We seek to work in an honest and incorruptible way, according to the highest ethical and legal standards. Respecting each other and the people we do business with. The code of conduct describes the behaviour we expect from you as an employee. It explains our rules of conduct and standards. The code doesn't take the place of your common sense, but it does make it easier to make a decision.

The code of conduct contains a number of legal and policy requirements applicable to VodafoneZiggo. However, not all requirements or conceivable ethical dilemmas are covered, as that would make the document unreadable. So, the code doesn't replace other, more detailed policy rules that can be found on our intranet. You are and will be responsible for understanding and complying with regulations and legislation relevant to your position.

1.1 FOR WHOM?

The code of conduct applies to everyone within this company. It means that employees of VodafoneZiggo, whatever their role, need to observe the code of conduct. Also contractors, temporary workers and other people we work with are obliged to comply with our code of conduct during their business activities with or on behalf of our company.

In this code of conduct, with 'VodafoneZiggo' we mean every operating unit of VodafoneZiggo.

1.2 WHAT DO WE EXPECT FROM YOU?

It is important you observe the code of conduct and feel the freedom and responsibility to report any breaches of the code. Not complying with this code of conduct and/or applicable legislation and regulations can have serious implications for our company and the people involved. Disciplinary measures can be taken against anyone not complying with the code, in line with relevant rules. In serious cases this can lead to a termination of employment. In case of a criminal offence, we will notify the authorities and criminal proceedings can be instituted.

1.3 HOW WE SHARE THIS CODE OF CONDUCT

You will receive this code of conduct upon commencing employment. It's also available on our intranet, where you can find a Dutch version as well and an infographic summarizing the key points. It's good to know that our code of conduct is available on the internet too, informing everyone we do business with about the way we deal with one another. In order to take proper notice of the content of the code, everyone is obliged to take the e-learning modules.

1.4 READING GUIDE

The chapters of the code of conduct cover three themes:

1. Our way of working together and our way of communicating

Chapters 2, 3 and 4.

2. Our way of doing business and the legal requirements

Chapters 5 and 6.

3. Our commitment to society and the environment

Chapters 7 and 8.

In chapter 9 you find what you can do when you notice malpractices and how you can report any (suspected) malpractice.

At certain instances in the code of conduct you are pointed to registration and reporting requirements and options. More information about the topics and the various policies mentioned in our code of conduct can be found on intranet under 'How we work'. Here you will also find of list of people you can contact and their respective areas of expertise.

2. HOW WE WORK

2.1 OUR VALUES

Our values and preferred behaviour have been designed with the Culture Crew and, as a result, apply to us all. They are of paramount importance because they shape our culture and the way we deal with one another and with our customers, suppliers and the environment. They guide us in our decision-making and our actions internally and externally. The projects of our Culture Crew have shown that the following values are seen as the most important according to all employees:

OPEN UP

Think yes! Be open, honest and positive. Welcome new contacts, ideas and situations. Put yourself in someone else's shoes. Share your experience. Stay curious.

And the good thing is: *the more you open up, the more you learn.*

TEAM UP

Stand by each other. Boost each other. Trust each other. Value the differences. Join forces. Use the energy. Stick to your word. Keep each other alert. Celebrate success together.

And the good thing is: *the more we cooperate, the more we accomplish together.*

STEP UP

Get out of your comfort zone. Set the barrier high. And higher. Dare to renew. Take initiative and your responsibility. Put quality first. Each day. For every customer.

And the good thing is: *the more we accomplish, the more customers value us.*

If everyone observes and lives up to these values, we can bring out the best in ourselves and the best in each other. Values and conduct are important to realize our company strategy and goals: enjoyment and progress with every connection. That is why it's important to call each other to account when values are not being observed. To each and every one of us, the values will have a different meaning. Which is why the accompanying behaviour is just as important. Maybe even more important. So, be aware of your actions, your behaviour and how you approach things at all times.

FRIENDS OF LGBT+

WE DO 

There is an official Friends of LGBT+ network. This network advocates a 'colourful', pleasant and safe working environment for colleagues with a lesbian, gay/ bisexual, transgender or other sexual orientation. Its aim is to connect with and stimulate general acceptance in the workplace. Friends of LGBT+ are visibly present during national activities like the Gay Pride, but also at other moments like Purple Friday. They can be contacted through Yammer.

2.2 RESPECTFUL WORKING ENVIRONMENT

At VodafoneZiggo, we seek to offer equal opportunities to everyone and we aim for an environment where everyone feels respected and valued. This also applies to our customers and business partners. We acknowledge and value the importance of diversity within our organization.

Discrimination is not tolerated in any way whatsoever. Relations with and between employees are based on respect for the individual and for human rights. If we notice discriminating or sexist behaviour, we need to act upon it. We want everyone to feel free to express any concerns they may have.

Intimidation at work, of whatever nature, is unacceptable and not tolerated.

Intimidation can be described as actions, conduct or behavioural patterns that a person or a group of persons is most likely to experience as offensive, degrading, intimidating, hurtful or hostile. Intimidation can come in many forms, e.g. verbal (demeaning remarks, accusations, names, threats, insinuations), visual (cartoons, drawings, messages, emails) or physical (attacks, physical obstructions).

VodafoneZiggo does not tolerate bullying in any form. Bullying can have many forms and serious consequences. We are all responsible for ensuring this does not occur at VodafoneZiggo.

DRUGS AND ALCOHOL

Using, selling or distributing illegal substances is regarded as a serious offence.

Working under the influence of alcohol or drugs is not allowed. Neither does VodafoneZiggo tolerate possession of drugs, or selling or providing drugs to other employees.

In a respectful working environment, we support colleagues. Report any concerns you have about misconduct like bullying or alcohol or drug abuse to your manager or the HR Business Partner, to enable VodafoneZiggo to offer adequate support to these employees. You also have the option to contact one of VodafoneZiggo's confidential advisors, please refer to the list of contacts on intranet.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- never work under the influence of alcohol or drugs;
- report any concerns about alcohol or drug abuse by a colleague to the HR Business Partner;
- familiarize yourself during trips with local laws, cultures and customs;
- build trust in your team(s) by treating everyone with respect;
- never express yourself in a demeaning or offensive way to or about your colleagues;
- ensure all your communication is in accordance with this code of conduct, however informal the situation may be;
- inform your manager if you suspect a colleague is being harassed or bullied.



EXAMPLES

TO ILLUSTRATE THE ABOVE, WE NOW GIVE YOU A (NON-EXHAUSTIVE) LIST OF EXAMPLES OF UNACCEPTABLE BEHAVIOUR:

- Carrying out illegal activities during your employment.
- Working under the influence of alcohol or drugs, or possessing, selling or supplying drugs to other employees.
- Stealing, destroying, damaging or abusing company property or things belonging to other employees.
- Rebellion or the use of insulting, threatening or obscene language.
- Making remarks about someone's race, skin colour, ethnical or national origin, religion, sexual orientation/identity, gender, disability or age, as a result of which an individual or individuals may feel unwanted, insulted or uncomfortable.
- Showing or sending objects, photographs, magazines, cartoons, screen-savers, emails, posters, videos or other content, as a result of which an individual or individuals may feel unwanted, insulted or uncomfortable.
- Making an inappropriate remark or expressing a public manifestation of a sexual nature, wanted or unwanted.
- Showing or sending objects, photographs, magazines, cartoons, screen-savers, emails, posters, videos or other content of a sexually explicit nature, unless this is essential to carry out your work.
- Sexual advances that are clearly undesirable, requests for sexual favours and other acts of a sexual nature that are (1) imposed under the employment contract, (2) used as a basis for hiring employees or promotion decisions, or (3) designed or intended to disrupt the work unreasonably or create an intimidating, hostile, degrading or offensive working environment.
- Threatening with or executing a retaliatory action after the rejection of an indecent proposal or inappropriate behaviour or as a reaction to a report of such behaviour.
- Showing inappropriate or threatening physical behaviour, like unwanted touching or obstructing or blocking another person's movements.

A black and white photograph of a man from the chest up, holding a USB drive in his right hand, pointing it directly at the camera. He is wearing a dark long-sleeved shirt. The background is a plain, light-colored wall.

**DON'T HAND OVER OUR
COMPANY STRATEGY LIKE THIS.**

WORKING SAFELY. WE DO 



SMOOTH, SOBER
& SHARP

RESPECT. WE DO 

3. HEALTH, SAFETY AND WELLBEING


We attach value to a healthy, safe and pleasant working environment for all employees and visitors of VodafoneZiggo locations. This applies, for example, to our office and technical premises and our shops.

Our approach is aimed at preventing accidents, injuries and absenteeism, at meeting legal obligations and at minimizing risks as much as possible by implementing effective prevention programmes. Examples are 'Work healthy at your computer', a policy 'Mental stress and undesirable behaviour', a policy 'Aggression and violence', a policy 'Working at heights', et cetera. Furthermore, our technical staff is in possession of various certifications to work safely and they participate in monthly toolbox meetings.

At VodafoneZiggo we have an absence policy and absence regulations. When ill, you receive counselling to return to work and in case of problems at work you can consult the company medical officer during walk-in hours. In addition and where necessary, VodafoneZiggo offers various interventions to ensure you can continue working, like staff welfare services, debt counselling, support in case of psychological problems, et cetera. If you experience health complaints, tools like an adapted chair, mouse or computer screen glasses can be provided.


Company emergency response has been implemented at all office locations. Each year, evacuation drills are organized to ensure everyone is well prepared for any emergencies. It is important that you are aware of the health and safety dangers and familiarize yourself with the instructions and procedures applicable to VodafoneZiggo.

If you are worried about health risks, safety issues within our organization or certain environmental issues, please raise them immediately with your manager, the HR Business Partner or with the Health Safety and Wellbeing team (HSW), enabling us to respond quickly and effectively to incidents occurring in spite of our precautions.



I NEVER SEND CONFIDENTIAL
INFORMATION VIA MY PRIVATE E-MAIL

WORKING SAFELY. **WE DO** ☒

vodafone  Ziggo



REGULARLY MISSING
PHONES FROM YOUR STOCK?

SPEAK OUT. **WE DO** ☒

vodafone  Ziggo

We expect everyone at VodafoneZiggo to behave in a safe and responsible way at all times. Our products and services can only be safe if there is a shared sense of responsibility, which will also benefit our customers. All information about healthy and safe working can be found on My HR/My Health and Safety.

HOW DOES THIS AFFECT ME?

WE DO ☒

WE EXPECT YOU TO:

- behave in a safe and responsible way at all times;
- report incidents and hazardous situations to the HSW team;
- comply with the sickness absence rules and take initiatives yourself to prevent sickness absence;
- use the personal protection equipment and work equipment (incl. safety controls) provided by VodafoneZiggo in the appropriate way;
- participate in instruction, toolbox, training and information sessions regarding health and safety, organized for employees;
- report bottlenecks in working conditions, dangerous situations and near-accidents;
- cooperate in evacuation drills and observe the instructions by the in-house emergency service staff (BHV) in case of an emergency.



DO YOU REALLY THINK MY
PASSWORD IS JEROEN123?

PRIVACY. WE DO 

4. COMMUNICATION

4.1 EXTERNAL COMMUNICATION

We communicate openly and transparently to all parties and stakeholders around us, within the boundaries of (commercial) confidentiality. All external communication should strengthen and/or protect the reputation and strategy of VodafoneZiggo. We protect confidential information against unwanted publication and only people who need confidential information to perform their work, have access to this information.

No-one is allowed to make statements on behalf of VodafoneZiggo, unless they have been approved in advance by the appropriate departments or persons. We need to realize that we are all representatives of VodafoneZiggo. In everything we do and say in public we represent the company.

PUBLIC INFORMATION

It is not permitted to share company information, whether confidential or not, outside the appropriate work channels. Examples are sharing company information in online chatrooms, on websites and in blogs.

Unsolicited confidential information you receive, should be returned to sender or deleted. You are not allowed to use this information or disseminate it. If applicable, contact the sender to stop sending the information to you.

SOCIAL MEDIA

As to social media, we would like to encourage all employees to be good ambassadors of our brand, but refrain from mentioning things that could have unintended, especially negative, consequences.

4.2 INFORMATION TO THE MEDIA

Are you receiving (unsolicited) questions from a journalist? Please refer him to the department External Communication (part of External Affairs) or have him address his request to this department by sending an email to: pers@vodafoneziggo.com. Without prior approval from the department External Communication you may never answer questions from the media. Interviews with the press or other media can only take place in the presence of and supervised by the External Communication department. The coordination and approval of all press releases and statements in all media lies with External Communication. This department must be informed about all information before it is published.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- ensure your internal and external communication is professional, timely and – if necessary – approved;
- act professionally when representing VodafoneZiggo;
- refrain from statements that can negatively impact the reputation of VodafoneZiggo and the individual brands Vodafone, Ziggo and hollandsnieuwe. This is especially important when you are wearing a VodafoneZiggo outfit, using one of our vehicles or attending an event on behalf of us;
- refrain from (personal) statements that could be construed, even if mistakenly, as a statement or expression of support coming from VodafoneZiggo;
- publish no financial information or information about new products or services without permission. Leaked, incorrect or misleading messages can seriously impact the success of a product or service;
- protect confidential information against inappropriate publication and restrict confidential information to those people that need this information for the performance of their job.

4.3 INTERNAL COMMUNICATION

The general objective of internal communication is to disseminate relevant information –essential to be able to cooperate, fulfil our tasks and meet our targets- quickly and unambiguously. All employees of VodafoneZiggo communicate internally, formally and informally, in meetings, during presentations, through email, WhatsApp, Skype or phone.

We expect you to do this professionally, timely and to the best of your abilities.

This way of communicating ties in with our values: open up to each other, focus on collaboration and dare to speak up – positively and critically.

The Internal Communication & Engagement (IC&E) department supports all employees in communicating in a professional way. Whether it is by developing messages and sharing them with the company, or by providing advice, training or support on an individual basis.

INTERNAL COMMUNICATION TO ALL EMPLOYEES

Management also shares internal messages that are relevant to all employees or major subsets of employees.

Within the company information is shared about our strategy –and changes therein- and about the way we intend to realize that with each other, in our organization design, functions, roles and the accompanying processes. In addition we share information and knowledge about the products and services we offer, the technology that goes with it and the way in which we offer customer service. Each quarter we inform our employees about our financial results and we share our interpretation of those results, so that all colleagues understand the financial position of our company. We communicate this information on various levels and we expect managers to disseminate this information or explain it to their teams. We use intranet, Yammer, meetings and presentations to make this information as accessible as possible, offering all colleagues a chance to express their opinion at the same time, or share information themselves.

ENGAGEMENT WITHIN VODAFONEZIGGO

We regularly check how engaged employees feel about VodafoneZiggo. In these surveys you can indicate the level of your energy, the way you experience your role in the company and your views on your manager(s). The results are shared with all colleagues and any discrepancies between our preferred way of working and the results of this engagement survey are acted upon. In addition, we also monitor the use and the quality of our internal communication messages and tools.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- take responsibility for your role in internal communication and be professional and respectful in your communication with colleagues – formally and informally;
- actively read the messages published on intranet and newsletters, so you are aware of what is going on in the organization;
- know that you cannot automatically share internal messages and information with the outside world;
- realize that you represent the company and the brands – internally too;
- share information with your colleagues and team members and check whether messages are understood and if there are any questions;
- actively share your views in engagement surveys and internal communication in order to contribute to improvements.



WHEREVER I GO,
MY LAPTOP GOES!

CARELESS WITH COMPANY GEAR.
WE DON'T 

5. ASSETS AND INFORMATION

5.1 PROTECTION OF OUR ASSETS

Our properties, including business assets, intellectual property and confidential data must be secured and protected. We are all personally responsible for the proper protection and usage of these assets.

It goes without saying that malpractices like fraud and other punishable offences are unacceptable and will be investigated, possibly followed by a report to the law enforcement agency. Examples are theft and manipulating information systems or company stocks, seeking personal gain or third-party gain.

COMPANY ASSETS

Our business assets like laptops, office facilities and telephones should in principle be used for business purposes only. Limited personal use is allowed provided this is not conflicting with the activities of our company and provided it is accordance with our policy rules.

INTELLECTUAL PROPERTY

Intellectual property can be defined as the rights to, for example, patents, brands, domain names and work protected by copyright. We expect you to be aware of the policy with regard to intellectual property, relevant to your work. Acting in breach of intellectual property rights, like copying and distributing copyrighted work, illegally and without permission, is strictly forbidden.

CONFIDENTIAL DATA

Do you possess confidential data or have access to it? It is your responsibility to take reasonable measures to safeguard that confidentiality. 'Confidential data' can be described as all non-public information about our company and its operations, like information about (former) employees, financial status or results and information that is competition sensitive. Also all non-public information that other parties provide us with is classed as confidential. Confidential company information should not be shared freely and under no circumstances be made public. In the Information Classification Policy you find further instructions how to protect these data at all times.

SECURITY

We protect business assets and information with various security measures. We expect you to comply with the measures and to report any violations. Do not hesitate to also speak out when something went wrong accidentally. In the end, protecting our business assets and information is everyone's task and something we are all responsible for.

HOW DOES THIS AFFECT ME?

WE DO

WE EXPECT YOU TO:

- use business assets available to you and intellectual property at your disposal in an appropriate way;
- visibly wear your security badge when in the office;
- shut down your computer at the end of the day and take your laptop home with you or store it in a locker;
- empty and clean your desk when you leave at the end of the day;
- take care of a confidentiality agreement before exchanging confidential data and if necessary seek advice from Legal;
- not leave information carriers like your laptop or phone unattended, for instance in your car or at other public places;
- lock your computer screen and make sure that (printed) confidential information is stored safely when leaving your desk;
- familiarize yourself with the Information Classification Policy to know how to deal with information and how to protect it in a correct way;
- only use authorized software and to set up and protect your password(s) properly;
- use secure printing, not leaving behind documents in printers or copiers;
- not use our systems to access sites or places that are obscene, indecent, insulting, libellous, illegal or otherwise unsuitable for the workplace;
- return the company assets that you were allowed to use, upon termination of your employment, with the confidential company data they contained still present. We also expect you to not take or store copies of documents for personal use and that you transfer and not delete information that is still important to VodafoneZiggo.

5.2 PRIVACY AND PERSONAL DATA

The protection of personal data is a crucial factor in the trust our customers and employees have in our company. That is why we are very serious about using these data and why we do not tolerate employees violating the correct and confidential treatment of personal data.

We expect you to handle and process personal data only for legally permitted purposes and with the knowledge, and where necessary permission, of the individuals they relate to. This requirement also applies if VodafoneZiggo is outsourcing (part of the) activities to another party, like a business partner or a supplier.

Do be aware that personal data is a broad concept and that it includes all personally identifiable information like names, addresses, birth dates, invoice details, traffic information and location data, IP addresses and other information about internet usage and set-top box data. If you are unsure if certain data are considered personal data, please seek advice from the Privacy team, you will find contact details on intranet or [click here](#).

It's also good to know that "processing" personal data consists of all activities you can think of, including merely saving data or (having the opportunity to) viewing them.

Apart from the proper use of personal data, you also need to protect them adequately against risks like loss, destruction and unauthorized access. As soon as you notice that others can have unauthorized access to the data, a data breach has occurred. A data breach should be reported immediately to the Privacy team, to ensure we can fulfil our obligation to report this to the relevant authority within the legally stipulated time (24 hours after discovering the data breach).

HOW DOES THIS AFFECT ME?

WE DO

WE EXPECT YOU TO:

- take organizational and technical security measures to protect information and information carriers;
- be familiar with the specific procedures and guidelines you need to observe and seek advice in case of any questions or doubts as to the processing of personal data;
- report a data breach immediately;
- participate in applicable training for which you are invited.

5.3 FINANCIAL INTEGRITY, CORRECT APPROVALS AND PERMISSIONS

Our company deals with complex legal accounting and (financial) reporting obligations. That is why we enforce very strict standards for our accounting, tax, reports, public announcements and other important obligations. Through internal audits we can prove that entries in our books are accurate and complete and that we have registered them according to the regulations in force.

Managers, directors, employees and other people acting on behalf of the company are not to influence the auditors of our company, nor the audit of our financial documents in any unduly manner.

Employees involved in the reporting process of our company need to be familiar with the audits and the applicable procedures for publication, including internal audits on financial reporting.

CORRECT APPROVALS AND PERMISSIONS

It's crucial for our company to duly document our agreements with third parties and the applicable internal approval of them. You always need to make sure you observe the correct approval procedures, signatories and implementation procedures for all transactions you are involved in. Our Contracting Policy on intranet gives an overview of authorizations (or proxies) for the formal signing of contracts. The policy also describes all the other relevant internal rules and authorizations with regard to entering into contracts and the accompanying internal approvals. The list of authorized signatories is part of the "VodafoneZiggo Proxy overview" on intranet under 'How we work'.

Entering into contracts without internal approval and proxy is not permitted and may result in disciplinary measures.


HOW DOES THIS AFFECT ME?

WE DO ☒

WE EXPECT YOU TO:


- report financial malpractices. Examples are:
 - » committing fraud during the preparation, evaluation, revision or audit of financial documents;
 - » a misrepresentation of the books, financial reporting or audit reports;
 - » premeditated noncompliance with local legal or tax obligations.

- only bind VodafoneZiggo by contract if you:
 - » are authorized to do so in accordance with the approval process of VodafoneZiggo;
 - » have thoroughly studied the contract, understood the conditions and come to the conclusion that entering is in the interest of VodafoneZiggo.
- be aware of the fact that not everyone is authorized to enter into agreements with third parties:
 - » you may only make an offer, commission someone or sign contracts if you are authorized and after internal approval;
 - » you may only give internal approval if and in so far as that is within the limits of your power.



**I CAN'T WELCOME YOUR GUESTS
IF YOU DON'T REGISTER THEM.**

**BEING CARELESS WITH VISITORS.
WE DON'T ☐**

vodafone  ziggo



JUST OFFERED SOME TICKETS
TO SWEETEN THE DEAL.

FRAUDE. WE DON'T 

6. COMPLIANCE WITH THE LAW

At VodafoneZiggo we work in accordance with applicable legislation in every situation. We will now briefly explain a few very specific laws that, depending on your role and position in the company, are relevant. It is your own responsibility to familiarize yourself with laws and regulations that apply to the job you do. The following list is by no means an exhaustive description, so make sure you know the rules and act accordingly.

6.1 COMPETITION LEGISLATION

Competition laws prohibits agreements with competitors that negatively influence competition in the market, and applies to VodafoneZiggo as well as to other companies. Therefore, each contact between a VodafoneZiggo employee and an existing or potential competitor must be carefully assessed. It's important that no commercially sensitive information is exchanged with competitors, directly or indirectly.

In the Netherlands, violations of the competition law can result in huge fines for the company of up to 40% of its global revenues. In addition, high personal fines can be imposed on the individuals involved. Make sure you familiarize yourself with the applicable competition law rules. You can find more information, including 'do's and don'ts' for specific topics, on intranet under 'How we work'. In case of any questions, please contact the Corporate Legal team.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- have a basic understanding of the competition rules and act according to the VodafoneZiggo guidelines. Attend the competition law training when your team is invited;
- be careful during business contacts with third parties at all times;
- notify the Corporate Legal team of any public events, interviews or other public statements, in order for you to receive the relevant preparation;
- handle sensitive information originating from Vodafone Group or Liberty Global with due care;
- contact the Corporate Legal team in case of any doubt.

6.2 ANTI-CORRUPTION LEGISLATION

Bribery is forbidden and not only morally reprehensible, it can also lead to criminal proceedings. We have a zero tolerance policy with regard to bribery. At the same time, you are allowed to offer and receive reasonable gestures to and from our customers and business partners.

You should not accept or offer a gift or invitation if, as a result thereof, it becomes hard(er) for you to make an impartial business decision or to carry out your job properly. In some cases you may have to register gifts and invitations, even appropriate ones, in the Gift & Hospitality Register. Make sure you familiarize yourself with the applicable regulations about what is appropriate and in which cases you need to register something.

In addition, you should never offer a business gift or form of entertainment with the intention to influence a business decision or in anticipation of getting something of value back in return, or to induce the recipient to carry out the work in an inappropriate way.

In some cases the lines of what is reasonable can be blurry. In case of doubt, always seek advice from the Compliance team.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- know the policy about Gifts and Hospitality (on intranet under 'How we work');
- realize that gifts and invitations you receive and offer always need to be appropriate. Ask yourself if you would inform the outside world, your team and management about the gift or invitation frankly and without hesitation;
- attend anti-bribery training sessions you are invited to.

6.3 AVOIDING CONFLICTS OF INTERESTS

It's important that you avoid any conflict of your personal interests and the business interests of our company. When you notice you find yourself in a position where this could become the case, for example because you are involved in side activities that are competitive with VodafoneZiggo or may harm the reputation of our company, it is important you follow the correct procedure. It is your duty to discuss any possible conflict of interest with your manager and your HR Business Partner, to observe the measures you may agree upon and to take care of a proper registration. Our (online) policy on conflicts of interests describes criteria and examples.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- be familiar with the policy concerning conflicts of interests (on intranet under 'How we work');
- not go into areas of business where you have a conflicting personal interest;
- act in the best interests of VodafoneZiggo and recognize potential conflicts of interest;
- ask yourself the question whether you can explain any side activities to friends, a colleague or your manager without feeling uncomfortable;
- discuss a (potential) conflict of interest with your manager and HR Business Partner and follow the correct procedure,
 - » if you have a close relationship with people in a recruitment process;
 - » if you have a close relationship with people working for competitors, large customers, suppliers or other business partners and/or that you have sensitive information about;
 - » if you are in an intimate relationship with someone that reports to you or in case of an intimate relationship that can influence decision-making in the interest of VodafoneZiggo;
 - » in case of any other situation that gives you the idea that there could be a conflict of interests.

6.4 INSIDER TRADING

We expect you to comply with all legislation and regulations that apply to the buying and selling of securities (like shares and bonds). When you work at VodafoneZiggo you may have access to important non-public information about our company, shareholders, suppliers or customers, that is useful for an investor in a decision-making process about buying or selling company shares or other securities. People who have access to such information are called insiders. This kind of information can to some extent be discussed with other employees but you are not allowed to share it with people outside our company. When you are handling this sort of confidential information in your work, make sure you are familiar with the rules and contact the Legal team in case of any questions or doubt.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- not buy, sell or trade in VodafoneZiggo, Liberty Global and/or Vodafone Group securities, if you have inside information;
- not buy, sell or trade in securities of any other company if you have inside information that you have gained because of your position at VodafoneZiggo;
- not share your inside information with others. This is not only a breach of confidentiality, but you also be committing a punishable offence.

6.5 INTERNATIONAL TRADE, EXPORT LAWS AND ECONOMIC SANCTIONS

Most countries have laws for international trading relationships. Some of these laws restrict the export of goods, technologies and software to specific users or locations. Export is not limited to traditional shipping methods. Export is a broad concept and can take place electronically, in meetings and through visual inspection. Other laws forbid business dealings with specific countries, organizations or people that are subject to a sanction. The combination of export control legislations and sanctions imposed by individual countries is complex. Some also apply outside the national borders and are therefore laid down in international treaties. These laws can influence your work, for example when you are involved in:

- the buying and selling of materials, software or technologies, including import, export, re-export and distribution of materials, software and technologies;
- the supply of communication or other high-tech equipment or software outside the national borders.

These examples do not exclude other cases. If the activities mentioned above apply to you or if you are not sure whether your activities are subject to export or sanction rules, please seek advice from the Compliance team as to the impact of these laws on your business activities.

6.6 PUBLIC ANNOUNCEMENT

Our company is subject to laws regarding securities transactions. As a result we are not allowed to share 'essential information' with investors, shareholders or bondholders before we publicly announce this information, as its impact on e.g. the market price of our securities can be substantial.

This is why only a limited group of people within VodafoneZiggo is authorized to communicate with investors, shareholders and bondholders on behalf of the company. If you are not one of these designated spokespeople, do not divulge any information when asked by a stock analyst or investor, even if the request for information is informal. In such cases you should put the person in question in touch with our Legal department.

When you suspect that essential, non-public information has been divulged to an investor, shareholder or bondholder of our company, please contact our Legal department immediately.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- not divulge essential, non-public information to investors, shareholders or bondholders;
- report any (possibly) unauthorized giving of essential, non-public information to investors, shareholders or bondholders.



I SAY IT TO YOUR FACE,
NOT BEHIND YOUR BACK.

RESPECT. WE DO 

7. SOCIAL COMMITMENT

As a large technology company we fulfil an important role in Dutch society with our infrastructure. We aim to maximize our positive impact and minimize our negative impact. In order to achieve that we strive to create social value.

Our social value

At VodafoneZiggo everything is about technology. However, we do realize that technology in the lives of our customers has no more than a supporting role. An important role, but still... Technology makes things possible, it adds significance to people's lives, to their work and to society. VodafoneZiggo enables people to connect with each other, with whom they want, whenever, wherever they want. Borders become faint, the world is accessible to all. The possibilities are endless and we are part of that. We believe it is important for everyone to participate in this digital society. In an accessible and responsible way. With our technology we aim to bring progress to the lives of all our stakeholders.

7.1 FOCUS AREAS

Within our approach there are three programmes we distinguish:

1. DIGITAL LIFE

VodafoneZiggo wants the online environment to seamlessly merge into the real world. Enabling everyone to experience a positive work-life rhythm. We grant everyone the pleasure of a life filled with rich experiences, valuable contacts and meetings. We also want to encourage people to keep improving themselves, so they can keep up with the digital society.

2. DIGITAL SOLUTIONS TO PROBLEMS IN SOCIETY

Our products and services for the corporate sector have been designed in a way that they have a positive effect on society and the economy. They contribute towards less pollution and to increased productivity, safety and efficiency. We aim to inspire our customers to use ICT to reduce the carbon footprint. In healthcare we enable virtual care, a way for doctors and caretakers to monitor, and sometimes even treat, patients remotely.



SELLING YOUR TEST PHONES ONLINE...

FRAUDE. WE DON'T

In offices and homes we provide Internet of Things solutions that connect devices with the internet, making life a bit easier. We also enable online working at nearly every conceivable location. As a result, companies and employees are less dependent on fixed workplaces, commuting and a high energy consumption. To gain more insight into the social impact of our business products and services we will commission more research.

3. RESPONSIBLE BUSINESS OPERATIONS

An ethical and responsible business operation is important to us. The focus is on doing business in an honest way. Do you treat others like you want to be treated? Fair propositions and fair customer treatment is a precondition. We also take into account the possible negative impact we have in local communities. VodafoneZiggo has six focus areas when it comes to responsible business operations:

- Environment:** we minimize our negative impact while optimizing our positive impact.
- Sustainable purchasing:** we encourage our chain to do business in a responsible way.
- Privacy:** we protect our customer data and the confidentiality of communications on the subject, on top of complying with legislation and regulations.
- Diversity:** when it comes to diversity, we focus on creating an international work force and an open culture with regard to, for example, LGBT+, people distanced from the labour market and women in technology.
- Health:** we want our customers to be able to use their mobile phone without worries. Which is why we cooperate on a(n) (inter)national level with several organizations in research and informing the public.
- Social sponsoring:** we sponsor a very limited number of charities.

The execution of the three programmes mentioned before is embedded in our operations. A number of these programmes lie with the Vodafone Netherlands Foundation. All financial donations by VodafoneZiggo to charities are always made through the Vodafone Netherlands Foundation.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- take responsibility when you think the world around you needs us;
- listen and respond to worries people may have about activities of VodafoneZiggo.



MY WORK GOES THROUGH
THE SHREDDER EVERY DAY.

PRIVACY. **WE DO** 

8. ENVIRONMENT

At VodafoneZiggo we act responsibly towards the environment. We expect you to use all materials, tools and substances in a responsible, appropriate and safe way and to exercise due care to prevent environmental incidents. Our organization, including its individual employees, managers and senior managers can be held liable for the clean-up costs of pollution. In addition, we can face civil or criminal proceedings for violating environmental regulations.

We comply with the relevant environmental legislation and international standards. We continuously strive for innovative, trendsetting solutions to improve the environmental performance of our products and services. We will develop new services to enable our customers to make more sustainable choices. Any developments in this area will be shared with you through the intranet.

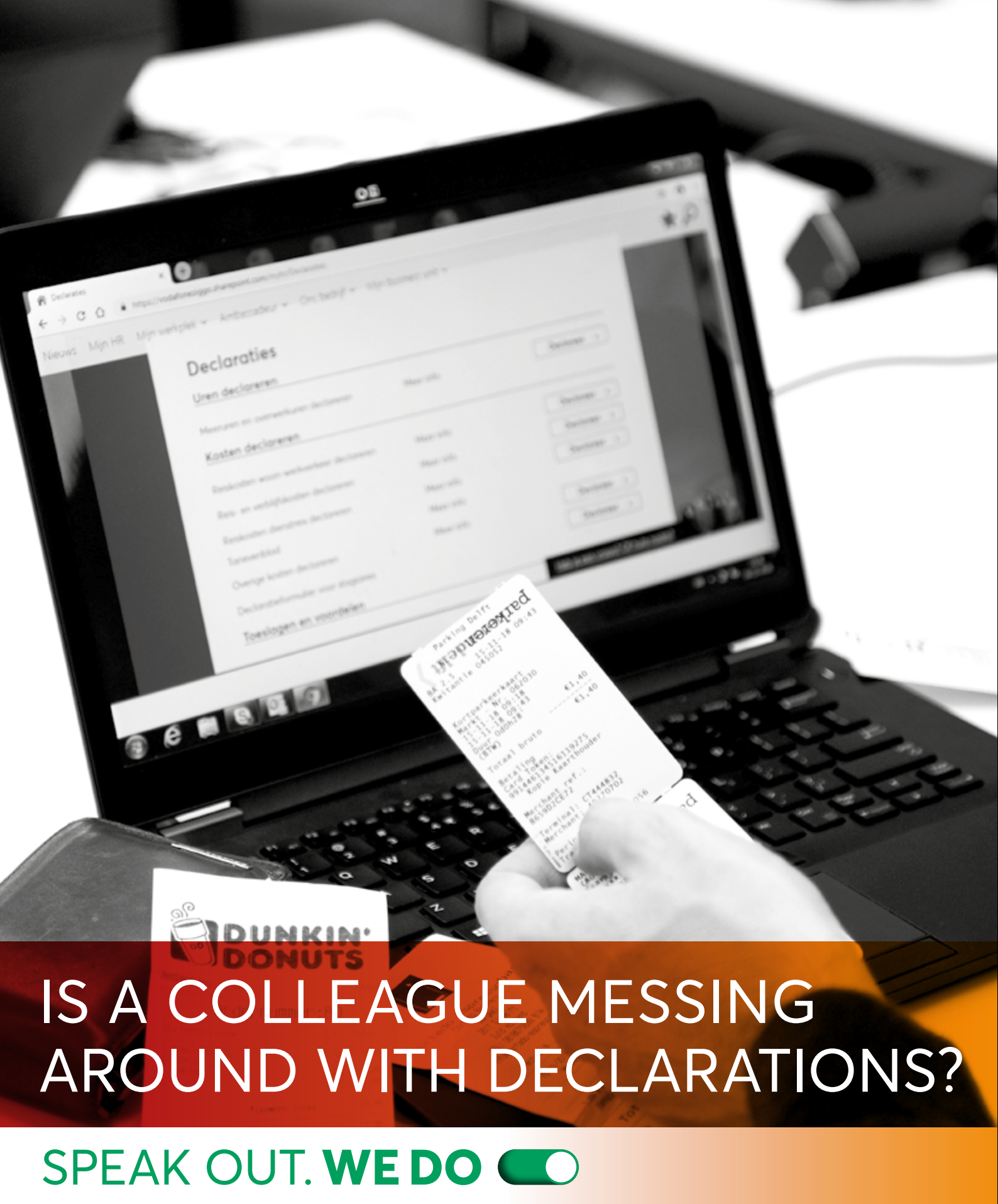
Where possible, we will reduce the usage of resources and harmful emissions we are responsible for. We will reuse and recycle telecommunication equipment and other waste materials. Batteries, toners and ink cartridges are disposed of separately, and should therefore not be thrown in the 'normal' rubbish bins. This chemical waste is very harmful to the environment and dangerous to living creatures of any nature. Familiarize yourself with the applicable procedure at your location. At (technical) locations, waste is deposited by the employees in charge in separate containers designated for that purpose.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- separate waste as much as possible;
- print as little as possible, always duplex and black and white;
- when possible, turn off the light when you leave a room;
- dispose of harmful substances using the existing procedures;
- immediately notify your manager or use the notification system on the intranet if you are worried about certain environmental issues or an environmental incident (HSW).



9. REPORTING: SPEAK OUT

Speak up when you see something at work that feels like a breach of our code of conduct and you suspect unacceptable behaviour. Inappropriate or illegal behaviour or activities can be detrimental to our people, our company and our reputation. VodafoneZiggo wants to take action against and investigate behaviour and activities violating our code of conduct. That is why we encourage all employees, but also suppliers and other business partners to speak up when they notice inappropriate or illegal conduct or activities.

9.1 SPEAK OUT

'Speak Out' is the name of the process designed for reporting every activity or behaviour at work you suspect is a violation of our code of conduct or which looks illegal, unethical or criminal. Reports can be made by all employees, suppliers and other business partners of VodafoneZiggo and are always handled confidentially. Every disclosure leads to an investigation. VodafoneZiggo guarantees that someone who raises a genuine concern will not experience any reprisals, even if the concern turns out to be unfounded upon investigating. Please feel free to bring up suspected malpractices at all times.

Your manager or the HR Business Partner is normally the first person for you as an employee to raise such issues with. However, a Speak Out report can also be filed with Compliance or Security using any means of communication you like. Click here to access the list of contacts on intranet. Should you, for whatever reason, not feel free to talk to the people or departments mentioned above, you can also file an external report.



IT ONLY TAKES A MINUTE
TO EMPTY OUT YOUR VAN.

CARELESS WITH COMPANY GEAR.
WE DON'T 

9.2 EXTERNAL REPORT

Should you prefer to file an external report, anonymously if you wish, you can do so by using Whispli. Your report to Whispli can be made online or by phone, in Dutch or in English:

- Phone number: +31 97010253338
- Online: vodafoneziggo.whispli.com/speakout

It doesn't matter which approach you choose to discuss your concern – the key thing is that you report it! All information about Speak Out can be found on intranet. Click here for 'Speak Out'.

HOW DOES THIS AFFECT ME?

WE DO 

WE EXPECT YOU TO:

- feel safe to discuss possible breaches of the code of conduct and integrity questions. We achieve this by:
 - » stimulating an 'Open Up' culture, where topics can be discussed among each other;
 - » monitoring trends and developments in integrity matters, identifying and discussing them and adopting a stance;
 - » offering protection against possible retaliation;
 - » having confidential advisors in the company and enabling anonymous reports;
- report suspected violations of the code of conduct. Which of the channels mentioned below you want to use, is irrelevant. You choose the way and the contact point you like best:
 - » your manager or HR Business Partner
 - » Compliance team: askcompliance@vodafoneziggo.com
 - » Security team: <https://keyconcept.internal.vodafone.nl/Item>
 - » Whispily (anonymously if you wish).

