



CODE OF SUSTAINABLE AND ETHICAL PURCHASING

February 2023

Version 1.0

Scope

All VodafoneZiggo procurement agreements with Suppliers.

Policy

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PREFACE

Have a positive impact on society together.

VodafoneZiggo plays a significant role in the lives of millions of people every day. Enjoyment and progress with every connection. That's what we stand for.

We are constantly innovating our technology and how we produce it - with respect for people's rights, for their health, and for the planet we share. The opportunity to have a positive impact is here and now, but we can only reach that goal by working together.

That's why VodafoneZiggo closely works together with partners that share our commitment to diversity, equity, inclusion and working more sustainably. Only then can we shift energy consumption and improve working conditions. Ensuring that VodafoneZiggo's supply chain contributes towards VodafoneZiggo's purpose to improve the lives of 2 million people, while halving our environmental impact by 2025.

Suppliers will be assessed on their commitment and performance to privacy, security, health & safety, terms and conditions of employment and the environment in categories where it is a risk. I am already proud of the amount of Suppliers we have already onboarded with EcoVadis, showing our collective responsibility toward sustainable supply chain.

This Code of Sustainable and Ethical Purchasing reflects how we as VodafoneZiggo want to collaborate with Suppliers to help everyone move forward in society. Together we can build a resilient, sustainable and inclusive digital society.



Jeroen Hoencamp, CEO VodafoneZiggo



Ritchy Drost, CFO VodafoneZiggo

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1. INTRODUCTION

This Code of Sustainable and Ethical Purchasing ("this Code") sets out Supplier's obligations in relation to social, environmental and ethical compliance. This Code is designed to promote safe and fair working conditions and the responsible management of social, ethical and environmental issues in VodafoneZiggo's supply chain.

2. SCOPE

1. The phrase "Supplier" in this Code shall, where relevant, also include all officers, employees, contractors, subcontractors and agents of Supplier. All references to "VodafoneZiggo" include the relevant contracting entity and all other VodafoneZiggo companies that benefit from the goods and services being provided.
2. Supplier shall comply with all relevant laws, regulations and standards in all of the countries in which it operates.
3. Supplier shall comply with this Code.
4. Supplier is encouraged to take all reasonable endeavors to promote this Code to its Suppliers and subcontractors
5. This Code is part of the General Procurement Terms and Conditions which can be found on: <https://vodafoneziggo.nl/voorwaarden>



3. MONITORING, CORRECTIVE ACTION AND REPORTING

3.1 COMPLIANCE TO THE CODE

Supplier is expected to identify, correct and monitor the continued compliance of any activities that fall below the standards of this Code.

3.2 BREACH OF THE CODE

Supplier shall immediately report to VodafoneZiggo any serious breach of this Code and together with VodafoneZiggo agree a schedule for corrective action. A breach of this Code may be considered to be a material breach of contract with VodafoneZiggo, and VodafoneZiggo accordingly reserves all its legal rights and remedies in respect of any such breach.

3.3 PROGRESS REPORTING

VodafoneZiggo (or another VodafoneZiggo company) may report progress (or extent thereof) in Supplier's compliance with this Code, in the annual report, and Supplier agrees to such disclosure.

3.4 ACCESS TO INFORMATION AND AUDIT

VodafoneZiggo Supplier shall provide VodafoneZiggo with reasonable access to all relevant information and premises for the purposes of assessing performance against this Code, and use reasonable endeavors to ensure that sub-tier Suppliers do the same. Audits may be conducted by an independent third party on behalf of VodafoneZiggo. Audits may also be conducted jointly between VodafoneZiggo and Supplier, and include the assistance of an industry representative, or relevant Non-Governmental Organisation.



4. HUMAN AND LABOUR RIGHTS PRINCIPLES

4.1 CHILD LABOUR

- 4.1.1 Supplier respects the fundamental labour standards as laid down in the conventions of the International Labour Organisation (ILO) with regard to the abolition of child labour (138, 182) and shall work against all forms of child work. In case there is child labour detected, the best interests of the child shall be the primary consideration and remediation actions shall be conducted. Supplier shall contribute, support and/or develop policies and programmes that assist any child found to be performing child labour.
- 4.1.2 Supplier shall not employ any person who is below the minimum legal age for employment.
- 4.1.3 The minimum age for employment shall be the age for completing compulsory education in the relevant country or not less than 15 years of age (or not less than 14 years, in countries where educational facilities are insufficiently developed, in accordance with international principles), whichever is higher.
- 4.1.4 Suppliers shall not employ children (persons under the age of 18) for any hazardous or night work, or work that is inconsistent with the child's personal development.

4.2 FORCED LABOUR

- 4.2.1 Supplier respects the fundamental labour standards as laid down in the conventions of the International Labour Organisation (ILO) with regard to the abolition of forced labour and slavery (29, 105) and shall not use any form of forced, bonded, compulsory labour, slavery or human trafficking.
- 4.2.2 Supplier's employees shall be entitled to leave work or terminate their employment with reasonable notice. Employees shall be free to leave work after such reasonable notice period expires. All employment shall be conducted on a voluntary basis. Supplier shall provide each of its employees with an employment contract which contains such a reasonable notice period.



- 4.2.3 Supplier shall not require employees to lodge deposits of money or withhold payment or place debt upon employees or require employees to surrender any government-issued identification, passports, or work permits as a condition of employment.

4.3 WORKING HOURS

- 4.3.1 Supplier shall ensure working hours of Supplier's employees do not exceed the maximum set by local law and each employee's working week does not exceed 60 hours per week including overtime.
- 4.3.2 Supplier shall allow each of its employees at least one day off following every six consecutive working days.
- 4.3.3 Supplier shall grant its employees the right to paid vacation.
- 4.3.4 In exceptional circumstances (which may include emergency situations, but shall not include anticipated peaks in production requirements), when these hours might be exceeded by Supplier's employees, working hours shall in any event not be excessive. Supplier shall be considerate to the type of work performed and the acceptable working hours for the role concerned.

4.4 PAYMENT

- 4.4.1 Supplier shall ensure its employees understand their employment conditions and give employees fair and reasonable pay as well as any legally entitled or agreed benefits.
- 4.4.2 Supplier shall not use deductions from wages as a disciplinary measure. Employees must be paid in a timely manner, and Supplier must clearly convey to its employees, the basis on which they are paid.
- 4.4.3 Supplier shall compensate overtime at a premium to the relevant employee's standard hourly rate.

4.5 DISCIPLINARY PRACTICES

- 4.5.1 Supplier will treat all employees with respect and dignity. Supplier shall prohibit physical or verbal abuse or other harassment and any threats or other forms of intimidation.



4.6 DISCRIMINATION

- 4.6.1 Supplier respects the fundamental labour standards as laid down in the conventions of the International Labour Organisation (ILO) with regard to protection from discrimination at work or on the job (100, 111) and shall not engage in or support any form of discrimination in hiring, employment terms, remuneration, access to training, promotion, termination, retirement procedures or decisions including but not limited to: race, colour, age, veteran status, gender identification, sexual orientation, pregnancy, ethnicity, disability, religion, political affiliation, trade union membership, nationality, indigenous status, medical condition, HIV status, social origin, social or marital status and union membership.
- 4.6.2 Supplier shall ensure no form of discrimination is present at any stage of employment, from the selection of suitable applicants, their interview and assessment; to the terms of their employment, payment and grounds for dismissal.

4.7 FREEDOM OF ASSOCIATION & RIGHT TO COLLECTIVE BARGAINING

- 4.7.1 Supplier respects the fundamental labour standards as laid down in the conventions of the International Labour Organisation (ILO) with regard to the freedom to join or not to join trade unions and the right to collective bargaining (87, 98). Supplier shall allow open communication and direct engagement between its employees and management in building employee relations and for the resolution of any issues.
- 4.7.2 In such cases when the applicable law or regulation is restricting the right to freedom and collective bargaining, we expect Supplier to allow alternative forms of representation of their workers.

4.8 HEALTH & SAFETY

- 4.8.1 Supplier shall provide a healthy and safe working environment for employees, contractors, partners or others who may be affected by Supplier's activities, in accordance with international standards and national laws.
- 4.8.2 Supplier shall put in place mechanisms to ensure that health and safety obligations are communicated and applied to parties under its control.



- 4.8.3 Supplier shall ensure it meets general principles of health and safety risk prevention. General principles include identifying, minimising and preventing hazards, using competent, trained and informed people, providing and maintaining safe equipment and tools, including personal protective equipment as required.
- 4.8.4 Supplier shall have mechanisms and shall implement them to ensure that all its employees are competent to carry out the health and safety aspects of their responsibilities and duties. This shall include the nomination and training of persons at an appropriate level (and in particular executives), who are responsible for discharging Supplier's health and safety obligations.
- 4.8.5 Supplier shall ensure facilities and amenities, including employee accommodation where provided by Supplier, shall be hygienic, safe and meet the basic needs of employees.
- 4.8.6 Supplier shall have systems and training to prepare for and respond to accidents, health problems and foreseeable emergency situations. Supplier shall have means and procedures in place for recording, investigating and implementing learning points from accidents and emergency situations.

5. BUSINESS INTEGRITY PRINCIPLES

5.1 GENERAL

Supplier shall adhere to all applicable anti-corruption laws and regulations. Also business should be conducted in compliance with internationally agreed standards on business ethics.

5.2 ANTI-BRIBERY, CORRUPTION, AND INDIVIDUAL CONDUCT

Supplier shall not tolerate or enter into any bribery, including improper offers or payments to or from employees, customers, suppliers, organizations or individuals. Supplier shall have an anti-bribery policy that sets out the principle of zero tolerance to any form of bribery or corruption within their organization, including facilitation payments; not give, promise, receive or request any bribes (financial or other advantage), including but not limited to



in relation to any public official; ensure its employees, contractors -sub-contractors are aware of its anti-bribery policy and how to comply with its requirements.

5.3 FRAUD AND MONEY LAUNDERING

Supplier shall act in accordance with all applicable international standards and laws on fraud and money laundering; not do or omit to do anything likely to cause any party to be in breach of any of such international standards and laws; maintain an effective anti-fraud and (where appropriate) an anti-money laundering compliance program, designed to ensure compliance with the law including the monitoring of compliance and detection of violations.

5.4 PRIVACY AND INFORMATION SECURITY

Suppliers shall commit to protecting and respecting any personal data in the course of their business operations, including suppliers, customers and employees. Suppliers shall comply with the European General Data Protection Regulation, other privacy and information security laws and regulatory requirements when using, storing or sharing any personal data as part of the services. Suppliers shall implement and maintain security measures, including against computer viruses, to protect VodafoneZiggo data. Suppliers shall treat customer and supplier information confidentially.

5.5 CONFLICT OF INTEREST

Suppliers and partners shall avoid conflicts of interest that may compromise the Supplier's or partner's credibility or third parties' confidence in VodafoneZiggo.

5.6 COMPETITION LAW

Suppliers and partners shall respect and comply with applicable competition laws and regulations, including an obligation not to exchange commercially



sensitive and strategic information with competitors or to enter into anti-competitive agreements with any business partner.

5.7 PROTECTION OF INTELLECTUAL PROPERTY RIGHTS AND CONFIDENTIAL INFORMATION

Suppliers and partners shall respect VodafoneZiggo's intellectual property rights and protect VodafoneZiggo's information by safeguarding it against misuse, theft, fraud or improper disclosure.

5.8 EXPORT CONTROL AND SANCTIONS

Suppliers and partners shall comply with applicable laws and regulations regarding export control and export restrictions, as well as relevant economic sanctions.

5.9 RESPONSIBLE SOURCING OF MINERALS (IF APPLICABLE)

- 5.9.1 Supplier shall have a clear policy or procedure in place to avoid knowingly purchasing conflict minerals.
- 5.9.2 In particular, Supplier shall have a policy or procedure to reasonably assure that minerals such as, exclusive but not limited to, tin, tantalum, tungsten and gold in the products it manufactures does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Supplier shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measure available upon VodafoneZiggo's request.



6. ENVIRONMENTAL PRINCIPLES

6.1 ENVIRONMENT

- 6.1.1 Supplier shall comply with relevant legislation and international standards, and in countries where environmental legislation is not evident or enforced, ensure reasonable practices for managing environmental impacts are in place.
- 6.1.2 Supplier shall implement an internal environmental management system appropriate to the size and nature of Supplier's business.
- 6.1.3 Supplier shall obtain, maintain and keep current all necessary environmental permits (e.g. waste management, transportation), approvals and registrations.
- 6.1.4 Supplier shall respect all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances. Hazardous chemicals and other materials included in products, especially those included in the substances of Very High Concern list of the REACH regulation, must be identified and managed by Supplier to ensure their safe use, recycling or re-use and disposal. The use of such chemicals and materials by Supplier must be avoided (and if not possible to avoid, minimised).
- 6.1.5 Where required, Supplier shall deliver electrical or electronic equipment in line with all relevant European Union regulations: Supplier shall comply with the EC Directive 2000/35 regarding waste electrical and electronic equipment (WEEE/in NL the AEEA). Supplier acknowledges and agrees to being the 'producer' of supplies (as described in the directive) and indemnify us against all damage and costs related to the application of the directive should we be seen as the 'producer' of the supplies, even when these supplies are exclusively branded with the Vodafone or Ziggo brands; Supplier shall also comply with RoHS: the restriction of hazardous substances in the directive electrical and electronic equipment. Supplier agrees to meet the RoHS requirements with regard to everything they supply to us, even if the directive is no longer valid after delivery of the supplies. Supplier acknowledges and agrees to being the 'producer' of the supplies (as described in the directive) and indemnify us against all damage and costs related to the application of the directive should we be seen as the 'producer' of the supplies, even when these supplies are exclusively branded with the Vodafone or Ziggo brands.



- 6.1.6 Supplier shall identify, minimise, monitor, control and treat all hazardous air pollutants and all emissions should be avoided in accordance with international standards and applicable laws.

6.2 CLIMATE CHANGE

- 6.2.1 Supplier shall within its best effort, identify, monitor and minimize Greenhouse Gas emissions (GHG) and energy consumption from its own operations including CO₂ emissions from production, transportation and travel and support providing relevant data to VodafoneZiggo or recognised third parties appointed by VodafoneZiggo to measure improvements.

6.3 CORPORATE SOCIAL RESPONSIBILITY (CSR)

- 6.3.1 Supplier acknowledges it is aware of and familiar with VodafoneZiggo's CSR goals (which can be found on <https://www.vodafoneziggo.nl/en/samenleving>). As such, Supplier shall use its best efforts to actively contribute to the VodafoneZiggo CSR goals by, amongst others, halving its waste and halving its CO₂ emissions by 2025.

7. RATING YOUR PERFORMANCE

Social and environmental responsibility is central to the way we do business and this approach is reflected in the management of our supply chain. In order to ensure the adherence to these key principles VodafoneZiggo currently uses EcoVadis, a global CSR supply chain assessment and rating specialist. VodafoneZiggo will work with our Suppliers on the implementation of our key principles and will require selected Suppliers to duly complete an EcoVadis assessment of the social, environmental and ethical impact of their operation(s). The EcoVadis system provides Suppliers scorecards which can be shared with their entire partner network and enables VZ to assess the improved sustainability performance of Suppliers and help them to improve by implementing suggested corrective actions. More information and the EcoVadis platform is available on: <https://ecovadis.com/>



8. RAISING CONCERNS (SPEAK OUT)

Supplier shall immediately report any instances of illegal or unethical behavior or breaches of this Code (in relation to the goods and services being provided to VodafoneZiggo) in confidence using the 'Speak Out' channel contact details below. Supplier shall also regularly promote these VodafoneZiggo 'Speak Out' channel contact details (as may be updated by VodafoneZiggo from time to time) and have them permanently available within Supplier's organization and to any contractors or subcontractors working on Supplier's behalf for VodafoneZiggo.

The report can be filed anonymously by using Whispli, an external contact point used for reporting concerns. The report can be made online or by phone, in Dutch and English.

Phone number: +31 97010253338

Online: vodafoneziggo.whispli.com/speakout

9. DEFINITIONS

Conflict minerals- (especially in Africa) a mineral mined in an area of armed conflict and traded illicitly to finance the fighting. The four most commonly mined conflict minerals (known as 3TGs, from their initials) are cassiterite (for tin), wolframite (for tungsten), coltan (for tantalum), and gold (source: <https://www.responsiblemineralsinitiative.org/about/faq/general-questions/what-are-conflict-minerals/>)

REACH -is the European regulation on chemicals. REACH stands for Registration, Evaluation, Authorisation, and Restriction of Chemicals. (source: https://business.gov.nl/regulation/chemicals-reach/?msclkid=0af41e4f41731689a1a07d4d35696ca3&utm_source=bing&utm_medium=cpc&utm_campaign=16.%20DSA&utm_term=business.gov.nl&utm_content=Catch%20all)



10. REFERENCES

The below links are subject to change:

ILO International labor standards (fundamental conventions) <https://www.ilo.org/>

UN Universal Declaration of Human Rights <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

OECD Due Diligence Guidance for Responsible Business Conduct
<http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
<https://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf>

UN Declaration on the Rights of Indigenous Peoples
https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf

UN Guiding Principles on Business and Human Rights
https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

UN Sustainable Development Goals
<http://www.un.org/sustainabledevelopment/20>

United Nations Convention against Corruption
<https://www.unodc.org/unodc/en/treaties/CAC/index.html>

The Science Based Targets initiative (SBTi)
<https://www.wri.org/initiatives/science-based-targets>