

#### HUMAN RIGHTS STATEMENT

VodafoneZiggo September 2021



### CONTENTS

Introduction	3
Scope	4
Commitment	4
Employees	5
Suppliers	6
Rights to Privacy & Freedom of Expression	7
Children Rights	7
Communities	8
Due diligence and Roles & Responsibilities	9



#### INTRODUCTION

The purpose of this Human Rights Statement is to outline VodafoneZiggo commitment to uphold the highest possible standards of human rights, extending throughout business activities with our employees, customers, business partners, society, and the shareholders. This statement sets out the minimum requirements and commitment that every single person working for and with VodafoneZiggo must comply with. VodafoneZiggo recognizes and is committed to its significant role in a digital society. We believe that we contribute positively to the development of the economy, regions and local communities in a way that fosters and encourages fundamental human rights and freedoms.

VodafoneZiggo is committed to creating a diverse and inclusive culture internally, as well as equal opportunities and access to our services in the society. We aim to act in the most ethical and sustainable way possible in everything we do. Our ambition and commitment to respecting human rights is outlined in our Corporate Social Responsibility strategy (hereafter CSR), called the People, Planet Progress Plan.

Wherever we operate or where we have an impact, we strive to treat everyone equally and commit to the responsibility to protect and respect human rights in adherence with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.



### SCOPE

The VodafoneZiggo Human Rights statement sets out the minimum requirements and commitment that every single person working for and with VodafoneZiggo must comply with. The statement applies to employees of all VodafoneZiggo companies and joint ventures, with an interest of 50%, or more, or management control. The same standards are expected to be upheld by our suppliers and business partners and are outlined in our Code of Ethical Purchasing.

#### COMMITMENT

VodafoneZiggo is intrinsically motivated to seek ways to respect and protect all principles of internationally recognized human rights, which entails:

- Adherence to the international human rights guidelines.
- Where national law conflicts with human rights responsibility, complying with national law while respecting the minimum laid out requirements in the international rights principles.
- Applying adherence to human rights principles across all business activities and in relations with third parties.
- Commitment to engage continuously with our external stakeholders to improve in all activities associated with human rights.
- Commitment to execute human rights due-diligence for potential adverse human rights impacts with the aim of improvement.
- Commitment to monitor and report progress and performance of human rights adherence throughout the company.

VodafoneZiggo Human Rights framework is informed by the following international instruments:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights (the Ruggie Principles"/UNGPs), and Child's Rights and Business Principles;
- The Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises.



#### **EMPLOYEES**

VodafoneZiggo employee relations are governed within Human Resources department and in accordance with company's Code of Conduct. In the interaction with all applicants and employees, we are committed to:

- Creating equal opportunities for all, as well as fostering a culture of diversity and inclusion.
- Providing safe and healthy work environment free from harassment of any kind. •
- Guaranteeing the freedom of association and the right to collective bargaining of every • employee.
- Creating awareness amongst and encourage employees to adhere to human rights in every department.
- Having family-friendly policies, such as parental leave, part-time opportunities, access to • breastfeeding facilities.
- Offer opportunities for young people such as internships and work experience of various • educational levels.

Furthermore, VodafoneZiggo recognizes the right of its employees to join trade unions and engage in collective bargaining in accordance with local law. We also recognize the importance of employees having a robust channel to raising matters of importance. Each VodafoneZiggo employee who suspects violations of the Code of Conduct or this Human Rights Statement is strongly encouraged to raise the issue according to the Speak Out process. We encourage all internal and external employees to speak up about illegal or unethical behavior that they are aware of and want to report. VodafoneZiggo does not allow any form of retaliation for people who speak up.

#### SUPPLIERS

As outlined in the VodafoneZiggo Code of Sustainable and Ethical Purchasing, we expect our suppliers to adhere to the fundamental and internationally recognized principles of human rights, including:

- Acting responsibly and ethically towards every entity and person they interact with through VodafoneZiggo business activities.
- Respecting internationally proclaimed human rights principles and guidelines.
- Complying with national law and international human rights regulations in relation the rights of a child.
- Refraining from discrimination on the grounds of race, origin, religion, disability, gender, sexual orientation, union or political affiliation, and age; and respect the equality of all.
- Rejecting all forms of (modern) slavery.
- Complying to international labor standards to provide safe working conditions and to comply to the applicable laws regarding decent wages and working hours.

In addition to Code of Sustainable and Ethical Purchasing principles, VodafoneZiggo is in a longterm partnership with Ecovadis - an independent agency measuring the sustainability performance of our suppliers on 21 CSR-related topics, including adherence to Human Rights.

Furthermore, VodafoneZiggo is part of JAC, an international alliance of telecommunication companies with the aim of jointly conducting audits and monitoring the CSR performance of influential suppliers in the sector.

### **RIGHTS TO PRIVACY & FREEDOM OF EXPRESSION**

The right to privacy is a cornerstone for maintaining human dignity, protecting identity and security, and promotion of freedom of expression. VodafoneZiggo is committed to process personal data ethically, honestly and with integrity, and in line with applicable laws and our values. Our objective is to remain open and transparent about the way we process personal data, to offer fair choices to manage personal data responsibly, and to offer secure services to all our customers and employees.

As a major telecommunication service provider, VodafoneZiggo acknowledges the importance of freedom of speech and is committed to the promotion the right of its customers as well as its colleagues, partners, and any person connected to the company to not being restricted in the holding of opinions by any form of suffering prejudice, discrimination or repression.

### CHILDREN'S RIGHTS

Children are particularly venerable group in the digital society. In accordance with GSMA Mobile Alliance Against Child Sexual Abuse Content, VodafoneZiggo is committed to uphold to the human rights of a child in all our business operations, as well as provide support and guidance to children and their parents by:

- Adhering to responsible marketing and advertising by not targeting children younger than • 18 years. We have parental controls embedded in our TV and internet products and we do not collect data from children younger than 18 years old.
- Having various programs for children such as Online Masters and Experience Days where we address online safety. Through these programs we teach children digital skills and create awareness for online risks and how to protect themselves.
- Partnering with the Ministry of Justice and various telecom entities in the Public-Private Partnership, aiming to eliminate child pornography online. The initiatives of the partnership include Notice and Takedown Covenant, Hash Check Service, TU Delft tool development for monitoring of child pornography online; and supporting the Expertise Centre of Online Child Abuse (part of the INHOPE initiative).
- We will continue to provide tools, knowledge, controls, and resources to help our customers enjoy rapid advances in technology in a safe and responsible manner for adults and children especially.



#### COMMUNITIES

As major telecommunication provider, VodafoneZiggo recognizes and is committed to protect society by maximizing our social value through all our business activities. To achieve this goal, we address social issues and enter partnerships with charitable organizations and participate in covenants of non-governmental organizations.

#### **Digital Inclusion**

We believe that the opportunities of a digital future should be accessible to all. Our goal is to enable people to progress in a digital society through our technology and digital skills programs for children and adults.

#### Community Consultation and Land Rights

Communications networks are infrastructure intensive, and where relevant, we remain committed to transparent consultation and active engagement with landowners, community leaders and municipal authorities. This engagement is undertaken in compliance with our anti-bribery policy that makes it clear that we never offer any form of inducement to secure a permit, lease, or access to a site.

#### **Civil Society**

We recognize the important role of civil society advocacy. We value constructive dialogue with civil society, including with human rights defenders, to advance the respect for human rights and will seek to further engage in dialogue, where relevant and appropriate for both parties.

#### Charitable partnerships, volunteering, and donations

The Vodafone Netherlands Foundation is the custodian of VodafoneZiggo charitable giving and partnerships with non-profit organizations. Its main objective is to deliver public benefit by using the power of technology to enhance people's lives, especially people in a vulnerable position. To protect the beneficiaries of our Foundation programs from human rights related risks, VodafoneZiggo acts in accordance with the Foundations' Safeguarding guidelines.

# DUE DILLIGENCE AND ROLES & RESPONISBILITIES

VodafoneZiggo continuously monitors its commitment to adherence of internationally recognized human rights principles, aligned with United Nations Guiding Principles on Business & Human Rights. To create a complete and inclusive policy, employees from different departments, including Human Resources, CSR, Risk Management, Legal, Privacy, Risk & Compliance Offices are involved to increase level of awareness and knowledge about management and adherence to human rights principles at VodafoneZiggo.