



LIBERTY GLOBAL'S MODERN SLAVERY ACT STATEMENT 2025

Modern Slavery Act Statement

Liberty Global maintains our commitment to respecting human rights, including the prohibition of slavery and human trafficking in our supply chains and operations. We embolden any individual who has concerns about unethical behaviour across our business or operations to speak up and to do so without fear of retaliation.

Below you will find our updated 2025 Modern Slavery Act Statement in compliance with our obligations under the requirements of Section 54 of the UK Modern Slavery Act 2015.

About Liberty Global

Liberty Global (NASDAQ: LBTYA, LBTYB and LBTYK) is a dynamic team of operators and investors generating and delivering shareholder value through the strategic management of three platforms — Liberty Telecom, Liberty Growth and Liberty Services.

Liberty Telecom is a world leader in converged broadband, video and mobile communications services, delivering next-generation products through advanced fiber and 5G networks. Liberty Telecom currently provides approximately 80 million¹ connections through some of Europe's best-known consumer brands, including Virgin Media O2 (VMO2) in the U.K., VodafoneZiggo in the Netherlands, Telenet in Belgium and Virgin Media in Ireland. With our substantial scale and commitment to innovation, we are building Tomorrow's Connections Today, investing in the infrastructure and platforms that empower our customers to make the most of the digital revolution, while deploying the advanced technologies that nations and economies need to thrive.

Liberty Telecom's consolidated businesses generate annual revenue of approximately \$3.6 billion, while the VMO2 JV and the VodafoneZiggo JV generate combined annual revenue of more than \$18 billion.²

Liberty Growth invests, grows and rotates capital into scalable businesses across the technology, media/content, sports and infrastructure industries with a portfolio of approximately 70 companies and various funds, including stakes in companies like ITV, Televisa Univision, Plume, EdgeConneX and AtlasEdge, as well as our controlling interest in the Formula E racing series. Liberty Services delivers innovative technology and finance services, generating approximately \$600 million in revenue.³

Policies

Employees

We provide a workplace that is positive, creative and rewarding, giving all employees the opportunity to reach their full potential and contribute to our Group's success. We promote an open culture centered

¹ Represents aggregate consolidated and 50% owned nonconsolidated fixed and mobile subscribers, including those of UPC Slovakia. Includes wholesale mobile connections of the VMO2 JV and B2B fixed subscribers of the VodafoneZiggo JV.

² Revenue figures above are provided based on full year 2024 Liberty Global consolidated results and the combined as reported full year 2024 results for the VodafoneZiggo JV and full year 2024 U.S. GAAP results for the VMO2 JV.

³ Represents full year 2024 revenue of Liberty Services, substantially all of which is derived from our consolidated businesses and nonconsolidated JVs.

around Belonging, where everyone is valued and respected. We will not tolerate harassment of any kind in our workplace. We promote an open culture, where people are encouraged to ask questions if they are unsure and to raise concerns if they believe our Code of Conduct or any other company policy has been violated. We also have a number of policies and procedures in place to prevent and manage human rights-related violations in the workplace, including our Code of Conduct and our anti-discrimination, harassment and bullying policy.

Employees who become aware of or suspect any conduct that they believe violates any applicable law, rule, regulation, company policy or other provision of the Code of Conduct, are required to report such improper conduct as promptly as possible. Employees can report the matter directly to the Compliance team, a Human Resources representative, a member of the Legal department or the Group's General Counsel. Additionally, a Compliance web-based reporting system is operated by a third-party supplier and is available 24 hours a day, seven days a week. In 2024, no human rights-related issues were reported or registered.

Our Code of Conduct and company policies are designed to provide foundational principles to support our people in working to the best of their abilities in a trusted, ethical and responsible working environment. All employees are required to complete mandatory online training on our Code of Conduct and Anti-Discrimination, Harassment and Bullying policy.

Suppliers

We rely on all our suppliers to meet the disclosure requirements under the UK's Modern Slavery Act 2015 and to undertake the necessary due diligence to ensure that there is no modern slavery or human trafficking in their operations and supply chains. Liberty Global's Responsible Supplier Code of Conduct (RSCoC) outlines what we expect from our suppliers and our commitment to protect human rights. Our RSCoC ensures that we are being explicit in our expectations relating to labour. Each supplier entering our onboarding process must accept the terms of our RSCoC.

The key components of our RSCoC relating to the Modern Slavery Act include child labour, human trafficking, forced labour, discrimination, working hours and wages, freedom of association and right to collective bargaining, and health and safety.

All suppliers are expected to comply with all applicable local and international laws and regulations regarding the environment, health and safety and employment, and including the International Labour Organization's (ILO) Core Conventions on Labour Standards and the Universal Declaration of Human Rights.

Due Diligence

Any risk of slavery and human trafficking in our business would sit predominantly in our supply chain. We use a variety of tools to ensure we have adequate means to assess, prevent and raise corrective actions on human rights issues that may occur in our supply chain. The most impactful actors of our supply chain are subject to heightened scrutiny.

EcoVadis

One tool we use is the global supply chain assessment specialist EcoVadis, which benchmarks top suppliers against 21 environmental, social and ethical criteria. Such criteria are based on a number of international standards including the UN Global Compact Principles, the ILO conventions, the Global Reporting Initiative (GRI), the ISO 26000 standard and the Ceres principles. Suppliers are required to provide evidence of their environmental, social and ethical activities. Once each supplier is assessed, the EcoVadis platform provides a scorecard against such criteria, enabling Liberty Global to evaluate the performance and risk associated with each supplier.

Several human rights indicators are being monitored within the EcoVadis platform, including working conditions, discrimination, labour relations, child & forced labour, freedom of association, human rights issues and health & safety standards.

Based on the supplier performance in EcoVadis in 2024, 256 corrective actions were issued to 21 suppliers. 75 of these actions were focused on improving policies and processes related to labour and human rights. The evaluation's most common corrective actions included tackling a lack of supporting documentation for compliance and policy representations. No major breaches regarding human rights were identified through the EcoVadis due diligence process.

Joint Alliance for CSR

We are also members of the Joint Alliance for CSR (JAC) to promote sustainability in the international telecoms supply chain. As a member of JAC, we engage in CSR-related on-site audits for some of our suppliers. These audits assess standards related to labour, health and safety, environment, ethics and management systems.

Additionally, JAC uses surveys to get confidential feedback directly from workers. This feedback improves the quality of the audits and provides further insight on matters such as human rights, health and safety, beyond the standard on-site audits.

In 2024, we conducted audits for 6 of our Tier-1 suppliers. We identified 19 corrective actions for our suppliers to improve. The most common areas of improvement were working hours and health and safety. Another 26 of our other Tier-1 suppliers and a total of 45 sites relevant to Liberty Global were audited by other JAC members. Any corresponding corrective actions needed were managed by the JAC members responsible for the respective audits.

Training

Our Procurement teams play an important role in ensuring that our suppliers participate in and comply with our on-going assessment program. We deliver internal Responsible Procurement training annually to create an understanding of our responsible procurement and supply chain approach which includes information on Modern Slavery.

Additionally, within the Code of Conduct and the RSCoC, we highlight to our employees the expectations we have of our suppliers and that we work with our suppliers to assess their risk and performance on environmental, social and ethical activities, including human rights and labour.

In 2024, we participated in the Business & Human Rights Accelerator, a six-month programme under the UN Global Compact, to advance our commitment to human rights.

The Board of Directors of Liberty Global Ltd. approved this Statement and delegated authority to sign this Statement on its behalf to its General Counsel, Bryan Hall, at its board meeting in May 2025.



Bryan Hall
Executive Vice President, General Counsel and Secretary
Liberty Global Ltd.