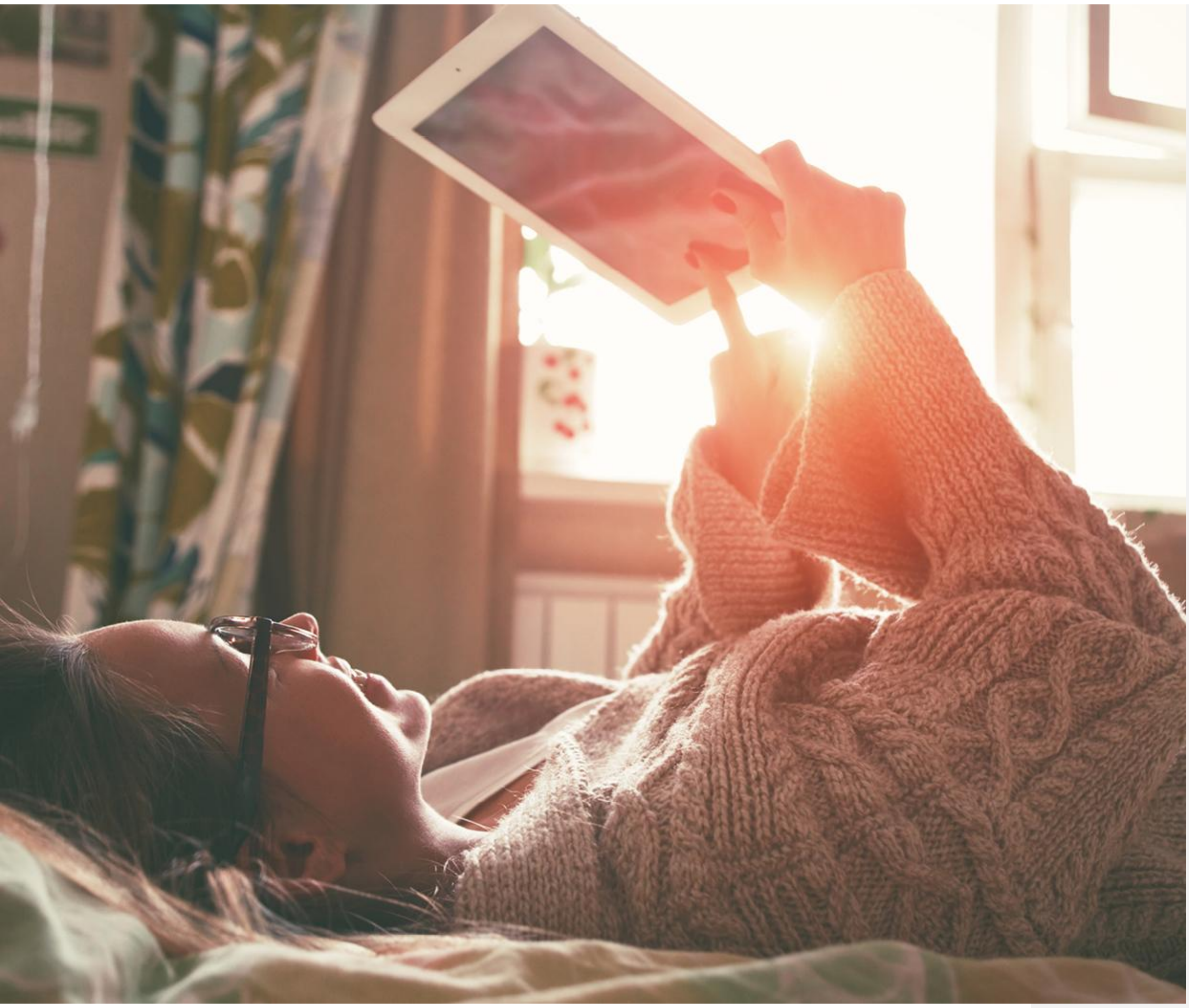

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) POLICY

April 2026

Commented [HE1]: to remove page 2

Commented [NR2R1]: Do you mean the contents? I do see other policies having one

Commented [HE3R1]: this is just a blank extra page

Contents

1. PURPOSE

At VodafoneZiggo, our purpose is to Connect Everyone and Everything to What Matters Most. We are committed to conducting business responsibly, ensuring that our operations do not cause significant harm to people and the environment, and have a positive contribution to the society. Guided by the United Nations Sustainable Development Goals (SDGs) and results from our Double Materiality Assessment (DMA), our ESG commitments align with VodafoneZiggo's mission, vision, and strategic priorities, ensuring ethical business practices, legal compliance, respect for human rights, and sustainable innovation. We strive to create long-term value for all stakeholders, including customers, employees, suppliers, investors, and the communities we serve.

This ESG Policy formalizes VodafoneZiggo's longstanding commitment to responsible business practices in the areas of:

- Governance: Ethical Business Principles and Strategy
- Social Responsibility
- Environmental Responsibility

This policy also outlines our commitment to practicing responsible procurement and investment by integrating ESG considerations into our investment decisions and management processes. It supports compliance with current and upcoming European and national ESG legislation and aligns with Double Materiality principles and ESG governance expectations. The scope of this policy reflects the outcomes from our Double Materiality Assessment (DMA), which identifies our most significant environmental, social, and governance matters.

2. SCOPE

- Own Operations

All business units, facilities, and functions directly managed by VodafoneZiggo, including employees, management, and internal processes.

- Upstream Value Chain

All suppliers, subcontractors, and service providers whose activities contribute to the production, delivery or support of our goods and services. This includes sourcing raw materials, transportation, logistics, and outsourced processes.

- Downstream Value Chain

All consumer and business customers, distributors, subcontractors, and end-users of our products and services.

3. GOVERNANCE & OVERSIGHT

ESG is integrated into VodafoneZiggo's corporate governance framework to support regulatory compliance, risk management and strategic decision-making. The Senior Leadership Team (SLT) is accountable for the ESG strategy, including setting annual targets, reviewing progress quarterly, and integrating ESG into business operations.

In line with CSRD requirements, VodafoneZiggo conducts a Double Materiality Assessment (DMA) on an annual basis to identify and prioritize key sustainability topics. Oversight of these topics is assigned at senior leadership level, while the ESG team supports implementation, monitors progress, and provides regular updates to the SLT.

4. STAKEHOLDER ENGAGEMENT

We maintain regular engagement with key stakeholders, including employees, customers, industry peers, suppliers, civil society and investors, to understand their expectations, identify emerging risks and opportunities, and strengthen accountability. Stakeholder feedback is integrated into our Double Materiality Assessments, ESG strategy, and review processes.

Commented [HE4]: better to take out significant? I don't think we want to do harm to society ?

Commented [NR5R4]: I understand your point. At the same time, our focus is not on eliminating all possible harm, but on minimizing the most significant, impactful, or likely risks. This is based on our Double Materiality Assessment, from which our material topics are derived
If we remove "significant,' isn't the statement too broad, since we cannot eliminate all harm?

Commented [NR6]: @Govers, Wiebe (VodafoneZiggo) Besproken met Eveline. Zij ziet graag terug dat we het positief positioneren. Aangezien onze services waarde brengen willen we allereerst focussen op een positieve contributie (ipv harmful). Ok voor jou?

Commented [WG7R6]: Akkoord om beide te noemen. Moet je de scope van die significant harm niet verbreden tot aook mensen rechten?:

We are committed to conducting business responsibly, ensuring that our operations do not cause significant harm to people and the environment, and have a positive contribution to the society.

Commented [HE8]: Is there a specific reason why & is used, in stead of 'and' ?

Commented [HE9]: The DMA is done/reviewed on an annual basis, right?

Commented [NR10R9]: I included it now

5. RISK MANAGEMENT

VodafoneZiggo actively monitors and manages risks related to current and upcoming sustainability regulations, including the Corporate Sustainability Reporting Directive (CSRD), the Corporate Sustainability Due Diligence Directive (CSDDD), and the EU Taxonomy. Non-compliance with these regulations may result in legal, operational, and reputational risks, which are regularly assessed and managed as part of our broader ESG governance.

Commented [HE11]: Perhaps better to say, including but not limited to, ?

Commented [HE12]: This reads a little odd...? To check

Where applicable, additional relevant regulations and legal obligations are reflected in our policies and action plans for each material topic. These topic-specific policies outline how we address compliance and regulatory expectations across our business.

In line with applicable European sustainability regulations, we report annually on our environmental performance and the actions we take to manage our impact.

This includes disclosing our key environmental impacts, such as greenhouse gas emissions, resource use, water consumption, and waste, and providing transparency on their sources and development over time. We also track progress against our environmental targets.

Across our operations and value chain, we identify and address environmental impacts, working with suppliers and partners to promote responsible practices and compliance with relevant standards.

In addition, we assess how our activities contribute to environmental objectives such as climate change mitigation, pollution prevention, and the transition to a circular economy, and report on our progress in aligning with these objectives.

6. POLICY STATEMENT

I. Governance: Ethical Business Principles and Strategy

We uphold integrity, transparency, and accountability across our entire value chain. We strive to comply with national and international laws and regulations, maintain robust ethical and environmental procurement policies, and adhere to the highest standards of corporate governance. Our business practices are designed to ensure:

- Corporate Governance Excellence: SLT, the ESG Team and ESG Reporting Team oversee ESG commitments, ensuring compliance with the relevant ESG related regulations and legislation.
- Upholding Integrity and Ethical Business Practices: VodafoneZiggo maintains a zero-tolerance approach to bribery, corruption, money laundering and other financial or economic crimes, and requires strict compliance with applicable anti-bribery and fair competition laws and regulations. A mandatory Code of Conduct training is delivered annually to all employees. Robust policies are in place to support this framework and ensure consistent application across the organization.

II. Social Responsibility

We recognize the importance of fostering an inclusive, diverse organization, and a digitally inclusive society. We are committed to driving positive social impact and mitigating negative impacts from our workplace and supply chain to the communities we serve, ensuring that inclusion, equity, and digital access are embedded in everything we do, which includes:

- Human Rights Compliance: We are committed to respecting and promoting human rights across our business and value chain including commitment to internationally recognized human rights standards to uphold fair labour practices, prevent exploitation, and support workers' rights, including collective bargaining.

- Responsible Supply Chain Management: We conduct risk-based due diligence in our supply chain to identify and address risks related to child labour, forced labor, and unfair wages, ensuring ethical procurement.
- Employee Well-being and Safety: We invest in health, safety, and career development programs for our employees to foster a positive workplace environment.
- Human Rights Protection: We aim to ensure fair treatment of employees and workers in our supply chain, supporting non-discrimination, fair wages, and safe working conditions.
- Enhancing Digital Inclusion: We are committed to expanding and collaborating on initiatives that improve digital literacy, equip vulnerable groups with essential digital skills, and foster an inclusive digital society.
- Advancing Diversity, Equity, and Inclusion (DEI): We are committed to fostering an inclusive culture where all employees feel valued, respected, and empowered to contribute. This includes setting concrete representation targets, such as increasing the number of women in top management, and supporting employee-led initiatives like Employee Resource Groups (ERGs) that amplify diverse voices and promote equity across our organization.
- Community Engagement: We are partnering with societal organizations to address key social challenges, such as cybercrime prevention, online safety, and equitable access to digital tools, ensuring everyone is secure, equipped with the right skills and online awareness
- Data Protection and Privacy: We implement advanced measures to safeguard data, ensuring compliance with current security regulations and protecting the privacy of employees, customers, suppliers, and shareholders whose personal or sensitive data may be processed in the context of our ESG activities.

III. Environmental Responsibility

As a leading digital infrastructure provider, we recognize the urgency of addressing climate change and minimizing our environmental impact across our full value chain, from procurement and new business relationships to product use and end-of-life management. In parallel, we assess and manage climate-related risks to strengthen resilience across our operations, infrastructure, and stakeholders' communities. Our key commitments include:

- Climate Change Mitigation: We align with the Paris Agreement's goal of limiting global warming in line with the Science Based Targets initiative (SBTi) and a long-term ambition to achieve Net-Zero greenhouse gas emissions across our value chain by 2040.
- Climate Change Adaptation & Resilience: We assess and manage climate risks to build resilience across our operations and communities. By strengthening infrastructure, planning future scenarios, and supporting vulnerable stakeholders, we aim to ensure long-term sustainability in a changing climate.
- Circular Economy Initiatives: We aim to integrate circularity into product design and service offerings by promoting recycling, refurbishing returned equipment, and reducing e-waste.
- Renewable Energy Usage: We aim to Increase the share of renewable and low-carbon energy in our total energy mix.
- Energy & Network Sustainability: We strive to continuously optimize infrastructure to enhance energy efficiency and reduce emissions while maintaining high-performance connectivity across our operations.

Commented [HE13]: is there a specific reason why Continuously is written with a C instead of c?

We measure and manage our Scope 1, 2 and 3 greenhouse gas emissions across our own operations and value chain using methodologies aligned with the GHG Protocol Corporate Standard. The resulting data is externally assured with limited assurance by an independent third party and disclosed annually as part of our sustainability statement in accordance with the CSRD.

7. SUSTAINABLE PROCUREMENT

We implement a sustainable procurement framework which includes a Code of ethical and Sustainable purchasing, an ESG risk-based assessment, onboarding checks, and integration of ESG criteria in our strategic tender evaluations and in contracts clauses. All our suppliers must adhere to human rights, labour, environmental, and anti-corruption legal standards. Through our centralised due diligence platform, we conduct regular, risk-based ESG due diligence, including supplier assessments, country and industry risk evaluations, and corrective action plans where required.

Commented [HE14]: I would add here 'onboarding checks' as we also have for instance ESG specific questions in our new supplier onboarding questionnaires

Commented [HE15]: centralized is US spelling, whereas for instance for labour the British spelling is used. Decide whether you want to use US spelling or British spelling and adjust this throughout the document accordingly

Commented [NR16R15]: Made it UK

8. GOLDEN RULES

Everyone covered by the scope of this policy is responsible for acting ethically, avoiding harm to people and the environment, and contributing to positive social and environmental outcomes through their decisions and actions.

Commented [WG17]: Is dit nog een policy of een statement?

Commented [NR18R17]: Yes, ook als we dit naar buiten brengen blijft dit een policy

Commented [WG19R17]: Oke, akkoord

9. REVIEW MECHANISM

We continuously refine our ESG strategy based on stakeholder engagement and annual Double Materiality Assessments. This ensures our approach remains aligned with evolving regulations, stakeholder expectations, and business priorities, and that sustainability principles are fully embedded in our operations and decision-making. This policy is reviewed annually, or earlier if required.

10. VIOLATIONS OF THIS POLICY

Commented [WG20]: Add link to whisply? Since it will be publisehd online?

We are committed to fostering a transparent, accountable, and inclusive culture. All employees - including interns, temporary and flex workers, and workers in our value chain - are encouraged to report any misconduct, including breaches of ethical standards, health, safety, or environmental requirements, or violations of our Code of Conduct.

Reports can be made confidentially through various secure channels. Whistleblowers are protected under our Speak Out Policy, which ensures impartiality, fairness, and no retaliation. All reported violations will be investigated thoroughly and may result in disciplinary measures in accordance with internal procedures and applicable legal obligations.

Our Whistleblower Program is available to employees and external stakeholders, providing a safe and confidential way to report concerns. More information can be found via this link.