ENVIRONMENTAL POLICY

1. PURPOSE

At VodafoneZiggo, our purpose is to Connect Everyone and Everything to What Matters Most. We are committed to do so sustainably and without causing significant harm to the environment.

This Policy outlines VodafoneZiggo's commitment to reducing its environmental impact and integrating sustainable practices into its own operations and value chain. It aims to regulate activities related to carbon emissions, energy use, material use and waste management, customer health & safety and environmental services & advocacy to achieve our environmental targets and ensure compliance with national and international regulations.

Complying with this Environmental policy helps to mitigate the risks identified during our climate-related risk assessments.

2. SCOPE

This Policy applies to all internal and external employees of VodafoneZiggo and extends to contractors, suppliers, and business partners engaged in our operational and supply chain activities. It encompasses all our business segments and functions—covering fixed, mobile, and integrated communication and entertainment services—to ensure consistent environmental stewardship across our own operations and entire value chain.

3. RISK MANAGEMENT

Through compliance with our Environmental Policy/mitigation of negative environmental impact, we align with the following key regulatory requirements:

3.1 CORPORATE SUSTAINABILITY RESPONSIBILITY DIRECTIVE

Pursuant to the Corporate Sustainability Reporting Directive (CSRD), we conduct an annual Double Materiality assessment to identify which Impacts, Risks and Opportunities (IROs) are material to VodafoneZiggo's activities and stakeholders, and which material topic(s) these IROs relate to. We disclose below the material IROs identified in relation to the environment and which material sub-topics they relate to:

IRO	Description	Type	Material Topic
#29	*Risk of Investment in Energy Transition*	Risk	Climate Change
#40	*Climate Impact from Scope 1 and 2 Emissions*	Negative Impact	Climate Change
#42	*Climate Impact from Scope 3*	Negative Impact	Climate Change
#24	*Failing to adopt circular economy practices to prevent e-waste can lead to loss of resources and ecological damage*	Negative Impact	Circular Economy
#26	*Re-use of materials/products will avoid CAPEX*	Opportunity	Circular Economy

As "Climate Change" was identified as a material topic for VodafoneZiggo, we conducted a qualitative and quantitative Climate Risk Assessment (CRA) to better understand which assets and/or activities are at risk in the short, medium and long term. The results of this CRA form the base of our sustainability strategy and we engage with all relevant stakeholders to mitigate the identified risks.

Finally, to ensure the highest standard in our reporting, we go through an annual audit conducted by the external party KPMG on the KPIs below:

- Scope 1 , 2 and 3 CO_2 emissions
- % reduction in Scope 1 & 2 and Scope 3 Co2 emissions since baseline year 2018 (as part of our Scope 1, 2 and 3 CO_2 footprint audit)
- Waste report (as part of our Scope 3 CO_2 footprint audit)

3.2 ISO14001 :

We ensure the development and implementation of a robust environmental policy through our environmental management system certification, ISO14001. The external party DNV is auditing us annually and issues our (re)certification every 3 years.

4. POLICY STATEMENT

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 implementation to product use and end-of-life management. We commit to:

4.1 CLIMATE CHANGE MITIGATION:

Align with the Paris Agreement's goal of limiting global warming in line with the Science Based Targets initiative (SBTi) standards.

Targets:

1. Become Net Zero in Scope 1 & 2 by 2030 compared to baseline year 2018 (in accordance with GHG Protocol definition and SBTi standard)
2. Become Net Zero in Scope 3 by 2040 compared to baseline year 2018 (in accordance with GHG Protocol definition and SBTi standard)

➔ Mitigating IRO: #40 and 42

4.2 CLIMATE CHANGE ADAPTATION & RESILIENCE:

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.

Targets:

1. Conduct a Climate Risk Assessment and share the results with the relevant internal stakeholders to inform their investment strategies and work roadmaps.

➔ Mitigating IRO: N/A

4.3 CIRCULAR ECONOMY INITIATIVES:

Integrating circularity into product design and service offerings by promoting recycling, refurbishing returned equipment, and reducing e-waste.

Targets:

1. In 2026, 95% of the total active portfolio CPEs marked for collection should be collected as active B2C/B2B SoHo Customer Premises Equipment (CPE)
2. In 2026, 75% of mobile phones collected should be prepared to re-use

→ Mitigating IRO: #24 and #26

4.4 RENEWABLE ENERGY & EFFICIENCY

Prioritizing the sourcing of renewable electricity for our operations and continuously optimizing infrastructure to enhance energy efficiency and reduce emissions while maintaining high-performance connectivity.

Targets:

1. Increase the energy efficiency Index of our network by 2% year-on-year (kWh / terabytes)
2. Continue annually sourcing 100% renewable electricity until 2030 through market instruments

→ Mitigating IRO: #29 and #40

4.5 CUSTOMER HEALTH & SAFETY:

Ensuring adherence to all government regulations on electromagnetic fields and undergo frequent measurements carried out by the State Inspectorate for Digital Infrastructure (RDI).

Targets:

1. All mobile telephony infrastructure, mobile handsets and Customer Premises Equipment sent to customers operate within the exposure limits on electromagnetic fields set by the International Commission on Non-Ionising Radiation Protection (ICNIRP) at all time.

→ Mitigates IRO: N/A

4.6 ENVIRONMENTAL SERVICES & ADVOCACY:

Servicing our customers in the most environmentally friendly way, including by raising customer awareness on how to use our products and services sustainably.

Targets:

1. Increase the percentage of customer visits done by our own technicians with an electric vehicle to 100% by 2028
2. Ensuring availability of information on sustainable use of our products on our websites by the end of 2026

→ Mitigating IRO #40 and 42

5. GUIDING PRINCIPLES

1. Prioritize carbon reduction in all business decisions, investments and activities.
2. Optimize energy and resource efficiency across operations.
3. Reduce, reuse, and recycle materials to minimize waste.
4. Ensure compliance with all applicable environmental laws and company standards.

6. GOVERNANCE AND ALLOCATION OF RESPONSIBILITIES

The accountability for implementing and monitoring this Environmental Policy is shared across several roles within VodafoneZiggo:

1. **Senior Leadership Team (SLT):** Approves the policy as well as short and long-term environmental targets

2. **B2C Executive Director** is the Owner of the material topic "Climate Change" and therefore is accountable for the development of a Policy, Metrics, Targets and Actions.
3. **Customer Operations Executive Director** is the Owner of the material topic "Circular Economy" and therefore is accountable for the development of a Policy, Metrics, Targets and Actions.
4. **ESG department**: Leads the development and execution of the Climate Transition Plan and Circularity strategy. Contributes to annual reporting, including the calculation of Scope 1, 2, and 3 emissions. Also responsible for ensuring compliance with environmental regulations and external assessments such as Ecovadis and CDP. Reviews progress towards goals, resolves escalated issues, and approves updates to the Policy as needed.
5. **Technology & Finance**: Lead the development and execution of the energy strategy
6. **Department Heads**: Integrate environmental commitments into their teams' operations, ensuring adherence to the Policy and related standards and appropriate resource allocation.
7. **All Employees and Contractors**: Actively support and comply with the Environmental Policy by embedding sustainable practices in daily work activities.
8. **Procurement Team**: Ensures suppliers and partners follow VodafoneZiggo's environmental standards across the value chain.

Clear roles and continuous collaboration across all levels of the organization ensure the effective implementation and maintenance of this Policy.

7. REVIEW MECHANISM

This Environmental Policy will be reviewed annually by the ESG team to ensure its alignment with VodafoneZiggo's environmental targets, legal requirements, external commitments and industry best practices. Any policy update must be reviewed and validated by the relevant business experts and management body, whose field of expertise and responsibility is impacted.

Once all updates are validated by internal experts, the updated policy will be submitted to the director of Corporate Affairs for approval.

Significant changes to regulations or company strategy may trigger an ad-hoc review. Feedback from employees, contractors, and stakeholders is encouraged to continuously improve the Policy.

8. CONSEQUENCES OF VIOLATING THIS POLICY

Non-compliance with this Policy may result in disciplinary actions, up to and including termination of employment or contract, and possible legal and/or financial penalties.

Related policies

- ESG Policy
- Circular Electronics Policy
- Code of Ethical and Sustainable Purchasing
- CSR Procurement Policy
- Energy Policy

Related standards

- ESRS E1
- ESRS E5
- ESRS S2
- Science-Based Targets initiative (SBTi) Corporate Net-Zero standard
- GHG Protocol
- United Nations Sustainable Development Goals
- Energy Efficiency Directive
- Dutch Climate Agreement

Related documents

- 2024 Reporting Guideline Scope 1-2-3
- Environment Addendum

Consulted stakeholders

- B2C:
    - Executive Director
- Technology
    - Energy & Sustainability Manager
    - Senior Access Deploy Manager
    - RAN System Solution Architect
- COPS
    - Manager Business Planning & Forecasting
- Corporate Affairs
    - Legal Senior Employment Council
    - Compliance: Risk & Compliance expert
    - ESG Manager