

VodafoneZiggo

Supplier Code of Conduct

Formerly known as VodafoneZiggo Code of Ethical and Sustainable Purchasing.

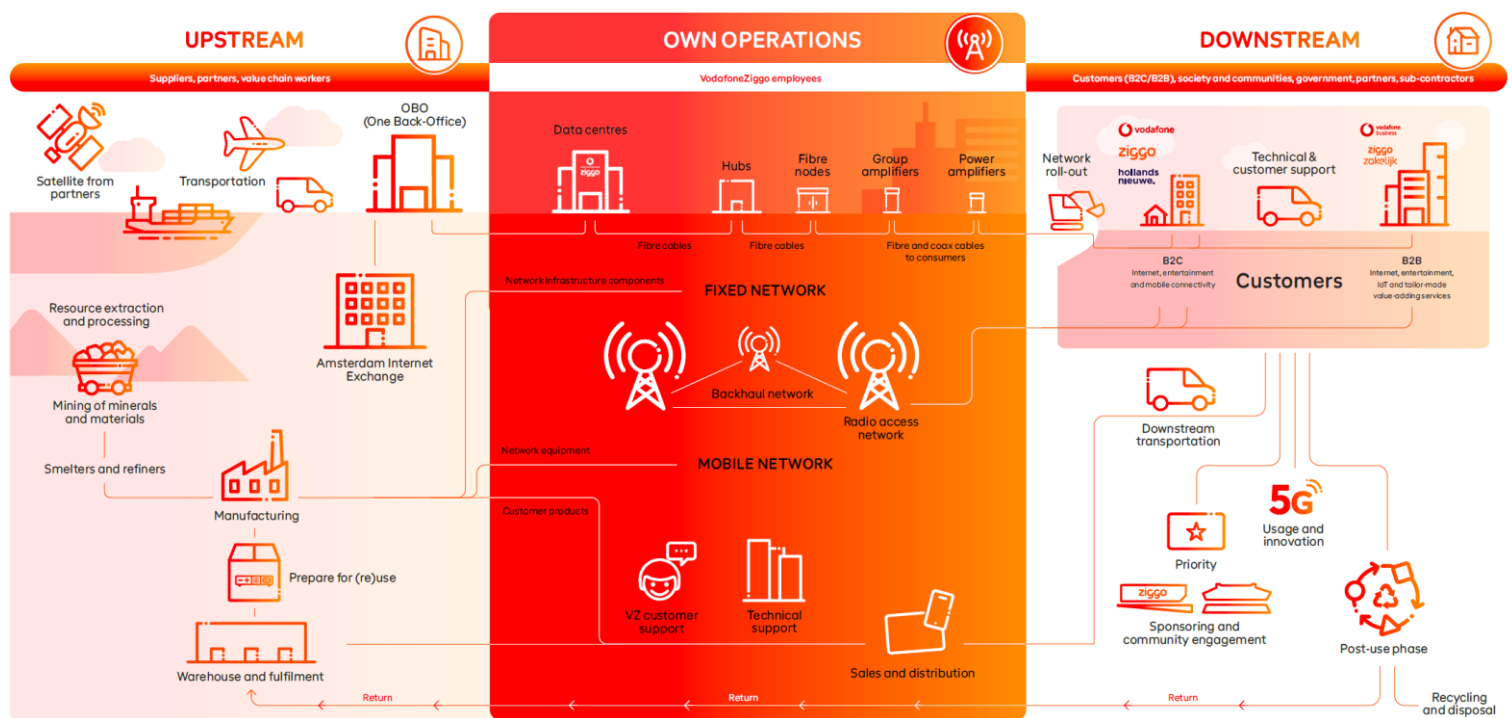


Figure 1 – Visualization of VodafoneZiggo's value chain key components and segments (upstream value chain, own operations and downstream value chain)

Version 3.0

July 2026

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PREFACE

Connecting everyone and everything to what matters most

At VodafoneZiggo, we are the connectors behind the connections. Our purpose is to connect everyone and everything to what matters most. We believe connectivity is about much more than infrastructure alone: by investing in technology, skills and culture, we bridge the gap between possibility and progress. The connections we shape help families to stay close, neighbours to support one another, students to learn, businesses to grow and communities to thrive.

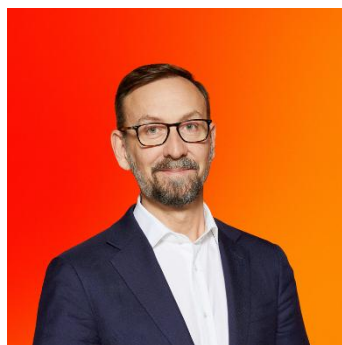
But we can't do this on our own. Our suppliers, both large and small, play a crucial role in enabling meaningful connections between people, organisations and society. We therefore need them to partner with us to achieve our ambitious goals across the social, environment and ethical domains

Every supplier is asked to ensure compliance with this Supplier Code of Conduct and to strive for continuous improvement. Through such partnership we intend to prevent human and labour rights violation while ensuring high business integrity in our supply chain. We also intend to be a driving force in making our supply chain more sustainable and resilient and to leverage this partnership to reach our Net Zero and circularity targets.

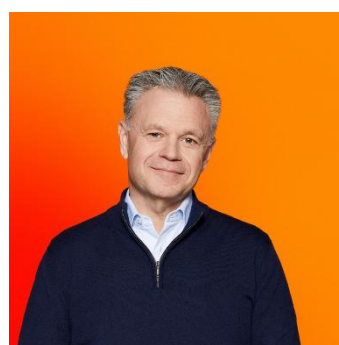
We know this is a journey. That's why we focus on collaboration, learning and ongoing improvement with our suppliers. This Supplier Code of Conduct sets out our ambitions and expectations in these areas. We ask our suppliers to follow this Code as part of our onboarding and supplier management processes, and we expect and appreciate their commitment and partnership in reaching these shared goals.

Our suppliers' choices help turn connectivity into a force for opportunity, inclusion and progress. Together, we can amplify our collective impact, building a sustainable and healthy future where everyone can connect to what matters most.

Regards,



Stephen van Rooyen,
CEO VodafoneZiggo



Ritchy Drost,
CFO VodafoneZiggo

1. INTRODUCTION

This Supplier Code of Conduct (the "Code") sets out the principles we commit to and expect our Suppliers (both in our upstream and downstream supply chain -see Figure 1) to promote and comply with. We expect our Suppliers to act in a socially, environmentally and ethically responsible manner and to ensure that their own suppliers do so as well.

The requirements in this Code reflect and are derived from internationally recognized standards and conventions as listed under the References of this Code . Suppliers must also ensure timely compliance with all applicable national and international laws and regulations. Where there are differences between national legislation and international standards, we expect suppliers to follow the most stringent guidelines. If there are conflicts between national legislation and international standards, we expect suppliers to adhere to national laws while seeking ways to safeguard human rights as much as possible.

This Code supports our ESG Policy and is part of the General Procurement Terms and Conditions which can be found under: [Conditions](#). The Code will be reviewed periodically to reflect learnings as well as changes in the relevant regulatory landscape and in VodafoneZiggo's internal policies.

2. SCOPE

This Code applies to all VodafoneZiggo's Suppliers and all products and services supplied to VodafoneZiggo, including their own operations, employees, affiliates, subcontractors, direct suppliers and those further upstream.

3. MANAGEMENT OF THE CODE

The Supplier is responsible for managing and ensuring compliance with this Code, in its own operations as well as its value chain, and ensures all relevant stakeholders are informed of and comply with the Code requirements.

If the Supplier encounters obstacles in meeting the Code requirements, or becomes aware of a breach, the Supplier shall immediately report to VodafoneZiggo. Together, we will agree on improvement or corrective action plans to resolve non-compliances and work towards compliance with the Code within the agreed timeframe.

If the Supplier consistently fails to comply with this Code, is unwilling to collaborate, declines to implement corrective actions, or is involved in severe breaches, VodafoneZiggo reserves the right to reconsider the business relationship.

VodafoneZiggo reserves the right to require information from suppliers to monitor, verify and evaluate compliance with this Code. This may, among others, include the request of a Supplier self-assessment (e.g. Ecovadis), data requests, surveys, and third-party audits. Suppliers shall upon request provide VodafoneZiggo access to all necessary information, personnel and premises, and take action to ensure such access to their suppliers, contractors or sub-contractors when relevant.

All information shared will be handled with care and in accordance with applicable privacy and information security laws. VodafoneZiggo may use aggregated data in its own external sustainability reporting.

4. ESG DUE DILIGENCE

Suppliers shall have ESG due diligence systems in place to identify, prevent, mitigate, and account for how they address actual and potential adverse impacts on people and the environment across their own operations, subsidiaries, and value chains, in line with the OECD Due Diligence Guidance on Responsible Business Conduct.

5. HUMAN AND LABOUR RIGHTS

Suppliers shall respect all international Labor and Human Rights, adhere to applicable Health & Safety Regulation, notably those listed under the References of this Code, and shall conduct their business in compliance with any internationally agreed principles on these matters, including ILO Conventions, UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises.

5.1 CHILD LABOUR

5.1.1 Suppliers shall not use or allow child labour in their own operations and value chain, and respect the rights of minors, in line with the ILO Conventions 138 and 182.

- 5.1.2 Minors from the age of 15 are employed only when respecting the stipulation of ILO Conventions 138 and 182, including not performing hazardous, night, or developmentally harmful work.

5.2 FORCED LABOUR

- 5.2.1 Suppliers shall not use or allow forced, bonded, compulsory, or prison labour, slavery, and human trafficking.
- 5.2.2 Employment must be voluntary, with freedom to leave after reasonable notice. Workers shall receive contracts in a language they understand.
- 5.2.3 Suppliers must not charge recruitment fees, demand deposits, withhold wages, impose debt, or retain identity documents, passports, or work permits. These fees shall also not be paid by workers to recruitment agencies, directly or indirectly employing workers on the supplier's behalf.
- 5.2.4 Special care must be taken to protect vulnerable groups, including migrant workers, from the risks of forced labour.

5.3 WORKING HOURS

- 5.3.1 Suppliers shall ensure that working hours, including over-time, comply with ILO conventions and related standards. A workweek shall be no more than 48 hours per week and no more than 60 hours per week including overtime in emergency or unusual situations. Overtime shall be adequately remunerated.
- 5.3.2 Paid vacation shall be granted in accordance with local legislation or ILO conventions where no legislation exists.

5.4 PAYMENT

- 5.4.1 Suppliers shall ensure equal remuneration for work of equal value.
- 5.4.2 Suppliers shall ensure reasonable and fair remuneration for all workers to ensure workers can meet basic needs and maintain a fair standard of living.
- 5.4.3 Suppliers shall not use deductions from wages as a disciplinary measure.
- 5.4.4 Workers must be paid in a timely manner, and the Supplier must clearly and transparently communicate the basis on which workers are paid, including through contracts.

5.5 NON-DISCRIMINATION & EQUAL OPPORTUNITY

- 5.5.1 Suppliers shall ensure there is no discrimination based on race, gender, age or any other aspect. Suppliers 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.

- 5.5.2 Suppliers will treat all workers with respect and dignity and prohibit physical or verbal abuse, sexual harassment, intimidation, or any other form of harassment.

5.6 FREEDOM OF ASSOCIATION & RIGHT TO COLLECTIVE BARGAINING

- 5.6.1 Suppliers shall comply with ILO Conventions and related standards, ensuring the freedom to form, join or not to join trade unions and the right to collective bargaining.
- 5.6.2 Suppliers shall allow open communication and direct engagement between their workers and management in building worker relations and for the resolution of any issues.
- 5.6.3 When the law limits the right to freedom and collective bargaining, we expect Suppliers to allow alternative forms of independent and freely chosen representation of their workers.

5.7 HEALTH & SAFETY

- 5.7.1 Suppliers shall at all times ensure a healthy and safe working environment and implement a robust occupational health and safety management system, for example in line with ISO 45001 or equivalent, to systematically identify, assess and control health and safety risks, and ensure continuous improvement.
- 5.7.2 Suppliers shall take measures to identify, prevent, minimize, and control health and safety risks, including deploying competent and properly instructed personnel and providing, maintaining, and safely using equipment, tools, and necessary personal protective equipment (PPE) when relevant.
- 5.7.3 Suppliers shall ensure that employees and supervisors receive adequate information, instruction, and training, and that responsibilities are clearly assigned and consistently observed.
- 5.7.4 Suppliers shall provide safe, hygienic, and suitable workplaces and employee facilities, including drinkable water, in accordance with applicable law.
- 5.7.5 Suppliers shall have effective procedures for emergency response, first aid, and incident management. Accidents, near misses, and dangerous situations shall be recorded, investigated, and, where relevant, shared with VodafoneZiggo through the relevant buyer. Serious incidents shall be reported no later than 24 hours after occurrence to the relevant buyer.

6. RESPONSIBLE SOURCING OF MINERALS

The requirements for the responsible sourcing of metals and minerals apply to all products, components and services that contain metals and minerals (including, but not limited to, conflict minerals -tin, tantalum, tungsten, gold –, cobalt and raw materials deemed critical by the European Union).

6.1 MATERIAL COMPOSITION

- 6.1.1 Suppliers shall identify all materials present in the product supplied to VodafoneZiggo, including the associated volumes.
- 6.1.2 Suppliers shall, in line with the EU Critical Raw Materials Act, develop and implement strategies to promote secure and sustainable material composition, including diversification of sources, use of recycled or secondary materials where feasible, and efforts to reduce material intensity or substitute less critical materials without compromising safety or quality.

6.2 ORIGIN, DUE DILIGENCE AND CHAIN OF CUSTODY

- 6.2.1 Suppliers shall take appropriate measures to ensure that minerals in products supplied to VodafoneZiggo do not directly or indirectly finance armed conflict or contribute to serious human rights abuses. This should include identifying smelters and refiners in their supply chains, and ensuring these are conformant with recognized responsible sourcing programs, such as the Responsible Minerals Initiative.
- 6.2.2 Suppliers shall implement due diligence policies and procedures on the source and chain of custody of minerals, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- 6.2.3 Suppliers shall engage with upstream partners to promote healthy and environmentally sound extraction and processing practices, including responsible waste management, reduced greenhouse gas emissions, and minimized impact on biodiversity and local communities.

7. BUSINESS INTEGRITY

Suppliers shall adhere to all applicable laws and regulations as listed under the References of this Code. Furthermore, business should be conducted in compliance with internationally agreed standards on business ethics.

7.1 ANTI-BRIBERY, CORRUPTION, AND INDIVIDUAL CONDUCT

Suppliers shall not tolerate or engage in any form of bribery or corruption, including, but not limited to, improper offers or payments to or from employees, customers, suppliers, organizations or other individuals. Suppliers shall adhere to all relevant local, national and international laws, specifically the US Foreign Corrupt Practices Act and the UK Bribery Act. Suppliers shall not engage in facilitation payments; not offer, promise, receive or request any bribes (financial or non-financial), including but not limited to, in relation to any public official or commercial party; and should ensure their employees, contractors and subcontractors are aware of their zero tolerance policy on bribery and corruption. Suppliers must disclose any conflicts of interest that may involve bribery or corruption risks.

7.2 FRAUD AND MONEY LAUNDERING

Suppliers shall act in accordance with all applicable national and international standards, regulations 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, regulations 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.

7.3 PRIVACY AND INFORMATION SECURITY

Suppliers shall commit to protecting and respecting any personal data in the course of their business operations, including the data from suppliers, customers and workers. Suppliers shall comply with the European General Data Protection Regulation (GDPR), and 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's data. Suppliers shall treat customer and supplier information confidentially.

7.4 CONFLICT OF INTEREST

Suppliers and partners shall avoid conflicts of interest that may compromise Supplier's or partner's credibility or third parties' confidence in VodafoneZiggo. Suppliers shall promptly in advance disclose any actual or potential conflicts of interest to VodafoneZiggo. If applicable, Suppliers shall take any mitigation measures reasonably requested by VodafoneZiggo to address any conflict.

7.5 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.

7.6 PROTECTION OF INTELLECTUAL PROPERTY RIGHTS AND CONFIDENTIAL INFORMATION

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

7.7 TRADE CONTROL AND SANCTIONS

Suppliers and partners shall comply with all applicable trade control laws, export control laws and regulations, export restrictions, as well as all applicable relevant (economic and financial) sanctions laws, regulations, embargoes and restrictive measures, including but not limited to those administered, enacted or enforced by EU, UK, OFAC (US) and UN restrictions.

7.8 ARTIFICIAL INTELLIGENCE

If applicable, Suppliers must use AI in a responsible, transparent, and ethical manner. Suppliers should ensure AI use is fair, respects human rights, protects privacy, and does not cause harm or discrimination. Suppliers are expected to safeguard VodafoneZiggo's data and consider the impact of AI on society and the environment.

8. ENVIRONMENT

Suppliers shall work towards the reduction of their negative environmental impact, thus contributing to climate change mitigation.

8.1 MANAGING ENVIRONMENTAL PERFORMANCE

8.1.1 Suppliers 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.

8.1.2 Suppliers shall implement an internal environmental management system appropriate to the size and nature of the Supplier's business.

- 8.1.3 Suppliers shall obtain, maintain and keep current all necessary environmental permits (e.g. waste management, transportation, extraction licenses), approvals and registrations.

8.2 SUBSTANCES OF CONCERN

- 8.2.1 Suppliers 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).
- 8.2.2 When delivering electrical or electronic equipment, Suppliers shall meet the requirements set in the EC Directive 2012/19/EU (waste management from electrical and electronic equipment (WEEE)) and in the EC RoHS Directive (2011/65) (restriction of hazardous substances in electrical and electronic equipment).;
- 8.2.3 Suppliers shall identify, monitor, control, minimise and treat all hazardous air pollutants in accordance with international standards and applicable laws.

8.3 CIRCULAR ECONOMY

- 8.3.1 Suppliers shall implement processes to prevent and reduce waste, including through better design, production processes modification, optimized material use, reuse of components and return, take-back or refurbishment schemes where appropriate.
- 8.3.2 Ensure that any waste and end-of-life products arising from activities for VodafoneZiggo are handled in compliance with applicable environmental and waste management legislation, and only by authorized operators.
- 8.3.3 Provide transparent information on material composition, repairability, spare parts availability and end-of-life instructions to enable reuse, safe dismantling and high quality recycling of products.

8.4 CLIMATE CHANGE

VodafoneZiggo is committed to reducing the GHG emissions of its own operations by 90% and of its value chain by 50% by 2030. We are also committed to becoming Net Zero across our entire value chain by 2040.

To support these goals, Suppliers shall make efforts to identify, monitor and minimize the GHG emissions and energy consumption from their own operations, value chain and during the life cycle of the products and services delivered to VodafoneZiggo.

As such, Suppliers are expected to:

- Maintain a complete and transparent GHG emission inventory covering Scope 1, 2 and 3 (upstream and downstream), preferably verified by a third party.
- Define GHG emission reduction targets in line with VodafoneZiggo's goals
- Support GHG emission reduction targets with a time-bound action plan
- Increase the use of renewable energy according to availability
- Maintain Life Cycle Assessments (LCA) for the products and services offered so that they can identify and address the major opportunities to decarbonize the products offered. Note: Maintaining LCAs is important as VodafoneZiggo will use such LCAs when calculating their Scope 3 GHG emissions and identifying supply chain high risk areas.

9. RAISING CONCERNS (SPEAK OUT)

VodafoneZiggo has a 'Speak Out' mechanism that is available to all stakeholders, including suppliers and stakeholders in their respective supply chains. 'Speak Out' refers to the process of reporting acts or conduct that are suspected of violating VodafoneZiggo's [Code of Conduct](#) or that are illegal, unethical or punishable by law. For example, but not limited to, fraud, bribery, price fixing, security and data breaches, safety and environmental issues. Hence, violations of this Supplier Code fall within the scope of the Speak Out policy as well. All Speak Out reports are treated confidentially. VodafoneZiggo will not tolerate any retaliation against any worker, either employed by VodafoneZiggo or one of its Suppliers, who raises a genuine concern, regardless of whether the concern is substantiated or not.

Suppliers shall have their own whistleblower and grievance mechanisms available to employees and stakeholders in the value chain.

Suppliers shall regularly promote the VodafoneZiggo 'Speak Out' channel contact details (as may be updated by VodafoneZiggo from time to time) to their workers and any contractors or subcontractors working on their behalf for VodafoneZiggo. VodafoneZiggo 'Speak Out' channel contact details should be permanently available within their organisation. They are encouraged to give workers a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

The report can be filled 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

10. REFERENCES

This list identifies key international conventions, declarations, standards and frameworks and legal instruments that inform this Supplier Code of Conduct. This list is non-exhaustive and does not limit suppliers' obligations to comply with all applicable laws, regulations and internationally recognized standards, whichever is most stringent.

Key international conventions, declarations, standards and frameworks

- Universal Declaration of Human Rights (UDHR)
- [United Nations Guiding Principles on Business and Human Rights](#)
- [International Labour Organization \(ILO\) Fundamental Conventions](#);
 - [C029 - Forced Labour Convention, 1930 \(No. 29\)](#)
 - [C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#)
 - [C098 - Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#)
 - [C100 - Equal Remuneration Convention, 1951 \(No. 100\)](#)
 - [C105 - Abolition of Forced Labour Convention, 1957 \(No. 105\)](#)
 - [C111 - Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)
 - [C138 - Minimum Age Convention, 1973 \(No. 138\)](#)
 - [C155 - Occupational Safety and Health Convention, 1981 \(No. 155\)](#)
 - [C182 - Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)
 - [C187 - Promotional Framework for Occupational Safety and Health Convention, 2006 \(No. 187\)](#)
- [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)
- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [OECD AI Principles](#)
- UN Convention against Corruption (UNCAC)
-

Other relevant frameworks:

- [The Science Based Targets Initiative](#)
- [The Responsible Minerals Initiative](#)
- ISO 45001 – Occupational Health and Safety Management Systems
- ISO14001 – Environmental Management Systems
- UN Global Compact Principles

Referenced regulations (non-exhaustive):

- EU Critical Raw Materials Act
- EU Artificial Intelligence Act

- EU General Data Protection Regulation (GDPR)
- EU Waste Electrical and Electronic Equipment (WEEE) Directive
- EU Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation
- EU Competition Law (Articles 101 and 102 TFEU)
- EU Export Control and Sanctions Regulations
- EU Anti-Money Laundering regulatory framework
- US Foreign Corrupt Practices Act (FCPA)
- UK Bribery Act
- Working Conditions Act (Arbowet in the Netherlands)
- Working Conditions Decree (Arbo-besluit in the Netherlands)
- Web Content Accessibility Guidelines (WCAG)
- Ecodesign for Sustainable Products Regulation (ESPR)

11. DOCUMENT HISTORY

Version 1.0 Original release = December 2022

Version 2.0 Last release = February 2023

Date (DD/MM/YY YY)	Section	Description of change	Entered by (Position & Title)	Authorised by (Position & Title)
26/05/2026	Preface	Alignment with VodafoneZiggo's ESG strategy released in 2025	ESG Supplier engagement manager	Director of Procurement
	Management of the Code	Inclusion of the notion of agreed "improvement or corrective action plans" to resolve non-compliance or breach of the Code		
	ESG Due Diligence	Addition of a chapter on ESG Due Diligence expected from suppliers to mitigate risks on people and planet in their operations and value chains		
	Human Rights	The chapter was shortened and simplified through references to applicable ILO Conventions		
	Responsible Sourcing of minerals	This section was promoted to a separate chapter applicable to a precise scope and		

		contained stricter and clearer supplier requirements.		
	AI (New)	Addition of a new chapter to tackle the challenges posed by AI (e.g. responsible, transparent and ethical use)		
	Environmental Principles	The chapter was shortened and sharpened to better align with VodafoneZiggo's strategy and environmental targets.		
	Rating your company	The chapter "rating your company" was removed. Instead, we mention the possible request from supplier self-assessment questionnaires in the chapter "Management of the Code".		
	Definition	The chapter "Definition" was removed as most key definitions were already given in the body of the Code.		
	References	The list of references was enhanced to reflect the new applicable regulatory landscape and align on best practices		