



# **ANTI-DISCRIMINATION, HARASSMENT AND BULLYING POLICY**





## PURPOSE

Liberty Global is committed to providing a culture of conscious inclusion and respect for everyone. Our commitment to inclusion reaches across many dimensions, including gender, age, cultural background, race, color, ethnicity, disability, neurodiversity, religion, sexuality, gender identity, civil status and other forms of human diversity. We aim to provide a working environment that empowers our people to bring their true selves to work, every day and that actively promotes health, wellbeing and safety.

We do not condone or support any form of discrimination, harassment or bullying, each as defined below, towards any of our employees within the Liberty Global Group. Consultants, agents and representatives are also required to comply with this policy in their business activities with or on behalf of the Liberty Global Group. This policy emphasizes that discrimination, harassment (including sexual harassment) and bullying are unacceptable and will not be tolerated.

For the purpose of this policy, discrimination, harassment (including sexual harassment) and bullying will be collectively referred to as “improper conduct.”



## REPORTING AND SANCTIONS

Improper conduct must be reported to a Compliance officer, a member of the Legal or People team and/or, within your discretion, to your manager. Additionally, an anonymous Compliance Line and web-based reporting system are operated by a third-party vendor and are available 24 hours a day, 7 days a week. We are committed to ensuring that complaints will be addressed promptly, taken seriously and investigated without fear of retaliation. Retaliation is prohibited against an employee filing a complaint or assisting in the investigation of a complaint. If an employee perceives retaliation for making a report or participating in an investigation, the employee shall follow the reporting procedure outlined above. If, however, an employee makes a false report of a violation or of questionable behaviour for the purpose of harming another person, the reporting employee will be subject to disciplinary action.

Breaches of this policy may result in disciplinary action being taken up to and including termination of employment. In addition, persons who breach this policy may also face civil and criminal charges. Each case will be handled in accordance with local law.



## SCOPE

Liberty Global Group has a variety of policies in effect, including its Code of Conduct. Companies within the Liberty Global Group may have their own policies which we are seeking to align. If you are unclear on which policy applies, please contact a member of the People Team.



## DEFINITIONS

Exhibit A hereto sets forth illustrative examples of behavior that may fall within the definitions below. The examples are not an exhaustive list and context always matters.

### **Discrimination**

Treating a person unfairly or unequally because of who they are or because they possess certain characteristics. This may include treating a person unfairly or unequally based on their gender, age, cultural background, color, race, ethnicity religion, nationality, political preference, differing abilities or disabilities, civil status, sexuality, gender identity, or any other form of human diversity. Discrimination may be direct or indirect.

### **Harassment**

Actions, conduct or behaviour that any individual or group of individuals is reasonably likely to find offensive, humiliating, intimidating, unwelcome or hostile. Harassment can take many forms such as verbal (derogatory statements, slurs, epithets, threats, innuendo), visual (cartoons, drawings, postings, e-mail) or physical (assault, physical interference).

### **Sexual Harassment**

Unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual or otherwise offensive nature, especially where:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment
- Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment

### **Bullying**

Behavior that is repeated and malicious which interferes with a person's ability to do their job and is substantial enough to hurt someone either psychologically or physically. Bullying differs from harassment because it may involve reasons other than a person's perceived or actual characteristics. Bullying can happen in person or online, via various digital platforms and devices and it can be obvious (overt) or hidden (covert).

### **Management Persons**

Line Managers, Directors, Vice Presidents, Managing Directors and Executive Leaders within the Liberty Global Group.



## OUR JOINT RESPONSIBILITY

### Management Persons

Encouraging an inclusive workplace environment for all includes shared responsibility, and preventing improper conduct is a responsibility of every employee. Employees need to be comfortable reporting problems to a Compliance Officer, member of the Legal and/or People team, on the Compliance Line or, within your discretion, to your manager. Ideally, Management Persons will take proactive steps to prevent improper conduct.

These proactive steps could include:

- Being vigilant to all forms of improper conduct
- Listening to the concerns of employees and follow up on required support actions
- Role model inclusive behavior and treat everyone respectfully
- If you see something, say something. While you may not be the target of improper conduct, if you witness improper conduct, say something

### Legal or People Team

If a complaint has been raised, subject to confidentiality, Legal and/or People team representatives will seek to address the situation. This consultation will be carried out in a way that respects the privacy and confidentiality of the person raising the complaint. Liberty Global Group encourages a timely complaint to enable it to investigate and correct any improper conduct as soon as practicably possible.



## CONFIDENTIALITY

In instances of any alleged breach of this policy, discretion is important to protect all people concerned. If you are involved in an investigation, either as a witness or as an investigator, then you must keep it confidential and not discuss it with anyone. Disclosing information about the investigation could result in disciplinary action being taken against you.

Liberty Global Group will keep a complaint and the details of any investigation confidential, having regard to the rights of all involved in the investigation. However, there may be circumstances where full confidentiality cannot be maintained if the complaint is to be fully investigated in a procedurally fair manner or if disciplinary or corrective action is required. In such a case, the interest of the involved person will be taken into account.

The obligation of confidentiality does not prevent Liberty Global Group from disclosing any material if required to do so by law.



## DISCIPLINARY ACTION

The Liberty Global Group will treat all complaints seriously and impartially. As stated in the “Reporting and Sanctions” section of this policy, a breach of this policy may result in disciplinary action, which could include:

- Action to redress the improper conduct
- Requiring an apology to the affected person(s)
- Providing mediation between the parties, if both parties agree to mediation process and to the mediator
- Providing targeted training regarding prevention of unacceptable workplace behaviours
- Offering support to the person making the complaint
- Offering support to the person against whom the complaint is made
- Disciplinary action, up to and including dismissal against the person found responsible for the improper conduct; and
- Disciplinary action, up to and including dismissal against the person making a complaint of improper conduct if, after investigation, the complaint is found to have been malicious.

The Liberty Global Group may amend, terminate or otherwise modify this policy at any time and from time to time.

If you have any questions which are not covered in this policy or would like to share your thoughts, please send them to the **DE&I mailbox**.

## EXHIBIT A

The following are illustrative, non-exhaustive examples of behaviour that may fall within the following categories of improper conduct:

### Indirect Discrimination

- Insisting that all employees work on Saturday, disproportionately impacting people of certain religions who cannot work on Saturday

- Introducing a new dress code that prohibits hairstyles that are more likely to be worn by certain racial groups

### Direct Discrimination

- Not offering someone a job because of a perceived or actual characteristic
- Dismissing someone because of a perceived or actual characteristic
- Denying someone a promotion because of a perceived or actual characteristic

### Harassment

- Intrusion into someone’s personal life
- Excessive demands that are impossible to meet
- Demeaning demands that are below someone’s capabilities

### Sexual Harassment

- Physical gestures and other non-verbal behaviour, such as unwelcome touching, grabbing, fondling, kissing, massaging and brushing up against another’s body
- Sexually implicit or explicit communication in:
  - Written form, such as cartoons, posters, calendars, notes, letters, text messages, social media or e-mails
  - Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping or questions about another’s sex life, or repeated unwanted requests for dates

### Bullying

- Spreading malicious rumours, gossip or innuendo
- Microaggressions: Microaggression is a term used for brief and commonplace daily verbal, behavioural or environmental indignities, whether intentional or unintentional, that communicate hostile, derogatory, or negative attitudes
- Mobbing: sometimes known as “group bullying”, involves groups of people targeting a co-worker for isolation, humiliation, and aggression. Tactics include verbal aggression, stonewalling, exclusion, gossip and slander, physical aggression

