Environment Policy Statement

Introduction

Virgin Media O2 is one of the UK's largest businesses with 47 million customer connections across broadband, mobile, TV and home phone services and is continuing to grow both fixed and mobile networks across the UK with gigabit broadband speeds already available across our entire network footprint and a commitment to upgrade our fixed network to full fibre by 2028. We employ around 18,000 people and have more than 430 retail stores.

The company is operating at a time of climate and ecological crisis, with the realities of climate change, biodiversity loss and unsustainable demand on the earth's resources becoming ever apparent.

In this context is vital that we take our environmental impact seriously and have the appropriate governance, management systems, controls, targets and resources in place to reduce these impacts across our operations and value chain. It is also important that we use our products, services and connections with customers, suppliers and partners to create positive environmental impact, through the enabling effect of connectivity, technology and data, supporting the UK to decarbonise by 2050

This Environment Policy sets out the principles which will help guide the environmental goals and targets we set, our decision making, how we operate and how we work with others. The Policy also sets out our commitments to minimising our environmental impact across material issues, using our products and services to enable environmental benefits.

Virgin Media O2 may amend, terminate, or otherwise modify this Policy at any time. We comply with all applicable laws and regulations while also adhering to our own internal policies.

Virgin Media O2 takes any violation of this Policy very seriously. Failure to observe the requirements set out in this Policy may constitute a disciplinary offence. In some circumstances this could include termination of employment.

Applicability

Unless otherwise stated in this Policy, this Policy applies to all of us, including every director and employee of VMED O2 UK Limited ("Virgin Media O2") and any trading subsidiaries of Virgin Media O2 (the "Virgin Media O2 Group"). Trading subsidiaries include, but are not limited to, Telefonica UK Limited, giffgaff Limited, Virgin Media Limited, Virgin Media Business Limited, Virgin Media Wholesale Limited, Virgin Media Mobile Finance Limited and Virgin Mobile Telecoms Limited. This policy also applies to each agent, representative, consultant, and independent contractor acting on behalf of Virgin Media O2 or any member of the Virgin Media O2 Group.

Our environmental principles

We aim to take care of our environment and maximise the environmental benefits of our products and services to tackle climate change. The following nine environmental principles are enablers for how we will achieve this.

1) Full scope of impact

We consider our full value chain impact, including direct operations and both downstream and upstream activity including our supply chain and customer use impacts.

2) Materiality

We assess our environmental impacts according to materiality (both at a corporate level and through our Environmental Management System) and develop targets and plans accordingly, ensuring we are addressing the most impactful environmental issues across our value chain.

3) Goal setting

In setting goals to reduce our environmental impact, we address material issues and take a science-based approach, including reflecting the latest science-based emissions reduction targets that are designed to achieve a 1.5 degrees warming scenario.

4) Measurement and reporting

We measure and report internally and externally on our material environmental impacts at least annually.

5) Empowerment and engagement

We authorise and empower employees to deliver environmental business objectives at all levels through clear communication, good management, relevant development, appropriate personal objectives and accurate role descriptions.

6) Communication

We communicate the Environment Policy, Objectives and Procedures to employees so that they understand how they can contribute and benefit, increasing their competence through a range of formal and informal training.

7) Collaboration

We collaborate with our partners, including customers and suppliers, to deliver mutual and beneficial objectives.

8) Continuous improvement

We listen, gather, assess and act upon feedback from employees, customers and partners on the relationships, products and services we provide through formal feedback processes, customer complaints, fault reports and similar mechanisms.

9)   Governance

We have senior accountability for our environmental approach with governance bodies in place, including the Environmental Steering Committee and the Sustainability & Responsible Business Committee, to oversee performance and plans and conduct the management review for our Environmental Management System.

Our environmental commitments

Virgin Media O2 will minimise its negative impact on the environment and enable the benefits of its products and services by achieving the following commitments;

We will

- Uphold and, where feasible, exceed all UK legal and regulatory requirements relevant to our business by setting challenging environmental objectives for the business. Through rigorous and independent oversight of activity we'll deliver an ethical, responsible and environmentally conscious approach to managing our business across the full value chain while also adhering to our own internal policies.

- Identify and proactively manage environmental risks via our corporate risk register, including the potential for business disruption caused by climate change.

- Review environment activity in the business at least annually by gathering, assessing and acting upon business strategy, audit results, feedback, business performance, complaints, risks and threats, legal and regulatory requirements.

- Maintain and grow our ISO14001 certified Environmental Management System across material operations

- Plan appropriate financial, human, and physical resources to enable the successful delivery of business activity through formal planning, resourcing and project management activity.

- Adopt nationally and internationally recognised codes and standards wherever possible and appropriate

- Reduce greenhouse gas emissions in line with Science Based Targets and with the aim of achieving Net Zero across full value chain emissions ahead of UK and international standards

- Increase the energy efficiency of our sites and fixed and mobile networks through measurement, reporting and analysis of energy performance, applying minimum performance standards and investing in new and more energy-efficient software and equipment

- Reduce the visual and noise impacts of our sites, operations and equipment and minimise local air pollution from back-up generators and our fleet

- Prevent pollution through effective pollution management controls

- Reduce waste across our operations, products and supply chain by following the waste hierarchy and adopting the principles of zero waste

- Champion a circular approach to our operations, products and services and proactively tackling the issue of e-waste

- Continuously improving the environmental performance of our products and services, and developing new products and services which enable environmental benefits for our customers, communities and the UK

- Create value for our shareholders through effective management of our environmental issues and in turn increase customer loyalty and trust, improve products and services, grow market share, attract new investment, safeguard and strengthen our reputation and developing innovative ways of working.

Control Page

Policy Details:	
Statement Author Name:	Robert McCann
Role:	Head of Environment, Climate & Nature
Statement Owner Name:	Nicola Green
Role:	Chief Corporate Affairs Officer
Effective date:	15 March 2022
Privacy Marking	Public

Policy review requirements:	
Review period:	Annual
Retention period:	Life of the Company (archive when superseded)
Next review date:	March 2023
Policy Keyword Search	Sustainability, environment, energy, waste, carbon, climate change, net zero, circularity, e-waste, WEEE, pollution, ISO14001
Related Policies/Procedures	Code of Conduct policy

Version Control inc Change History			
Version	**Date**	**Changed by**	**Changes**
vv0.1	18.02.22	Rob McCann, Head of Environment, Climate and Nature	First draft for distribution
v0.2	25.02.22	Rob McCann, Head of Environment, Climate and Nature	Updated with change following input from Environmental Steerco
v0.3	03.03.2022	Kirsty King, Internal Control Manager	Policy Management changes to bring into correct format.
V0.4	04.03.22	Rob McCann, Head of Environment, Climate and Nature	Updated with changes following input from Tracey Herald, Head of Responsibility & Sustainability
v1.0	15.03.22	Rob McCann, Head of Environment, Climate and Nature	Final Approved Version

[1] Where policy is in **'DRAFT'**, follow 0.1, 0.2, 0.3 etc. For '**FINAL APPROVED VERSIONS'** move to v1.0. Interim minor changes move version to 1.1, 1,2, 1,3 etc. For key material changes move to v2.0, v3.0, v4.0 etc.