



STAYING AHEAD

TELENET
SUSTAINABILITY REPORT 2019



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STAYING AHEAD

FOREWORD BY THE CHAIRMAN AND THE CEO

Dear customer,
Dear partner,
Dear shareholder,

It is our purpose to help people and businesses **stay one step ahead in the digital age**, connecting people and creating experiences. For a better quality of life. That is what we stand for. That is what we keep front and center when making decisions.

Not least today, at a time when we are hit by a global economic and social crisis due to the coronavirus. More than ever, connectivity solutions have proven to be the lifeblood of the economy and society. As a company, it is our responsibility to ensure that families and businesses stay connected in these corona times. Over the past few months, we have gone the extra mile to help companies continue working, to keep consumers connected while minimizing their financial concerns, to break through the social isolation of hospitalized patients and elderly people in care homes, and to keep young people motivated and connected to their school. **#ThoughtItTogether**.

Our belief: Digital technology will improve our quality of life

We are living in a volatile, uncertain, complex and ambiguous world. We are working in a business environment that is changing at an unprecedented pace.



Powerful trends like climate change, globalization and digitization are redefining our needs, expectations and behaviors.

Every industry, every society is touched and changed by digitization. Sometimes we do not even notice these changes; sometimes they are truly disruptive. Our fundamental belief is that technology changes our lives for the better. Digital technologies power the engine of innovation, boost economic growth and strengthen social inclusion and cohesion. We are committed to push the boundaries of digital technology and to provide our society with **solutions for the future that address the issues of tomorrow**.

Our three-year strategic plan: Poised to win in the Belgian market

2019 marked the start of a new business cycle for Telenet with a new three-year strategic plan. We will continue to invest to provide our customers with leading connected entertainment, easy-to-use business solutions, innovative digital services and an amazing customer experience. We believe we are poised to win in the Belgian market by pursuing our **2019-2021 strategy**, which is built on five cornerstones:

1 | Extend our customer relationships, by enabling them to get greater value from living and working digitally. We want to be the leading connectivity provider in Flanders and Brussels, and aim to create true customer value by building on our unique positioning in converged connected entertainment. By gaining full ownership of De Vijver Media in May 2019, we solidified our position as a media player, and we are convinced this investment will help provide oxygen to the local media ecosystem.

2 | Accelerate growth in the business segment by differentiating through our human touch. In 2019, we completed the integration of Nextel, laying a strong foundation for future growth with value-adding ICT solutions and services that are fully personalized to the needs of our customers.

3 | Build a deep customer-centric experience, underpinned by a digital-first approach and radical simplification. We want to create highly personalized customer touchpoints by leveraging the power of data and digital. A radical simplification of our IT landscape and operating model will help us transform to digital first.

4 | Continue to thrive via perfect networks tailored to our customers' needs, and flexible platforms. In 2019, we completed the modernization of our fixed and mobile networks. We boosted the capacity of our fixed network to 1 GHz, enabling data download speeds of up to 1 Gbps and upload speeds of up to 40 Mbps for residential customers and 50 Mbps for business users. By expanding the fixed network to more than three million connectable houses and businesses in Belgium, Telenet is creating the largest GIGA Internet region in Europe. We will continue our network investments with a key focus on the acquisition of spectrum and the roll-out of 5G in our footprint.

5 | Empower employees to create value through team collaboration. In 2019, we embarked on a journey to transform our company into an agile organization with more empowered, autonomous and expert-driven teams. This transformation is underpinned by a culture of innovation, entrepreneurship, learning agility and resilience. We are heavily investing in providing training and coaching to our employees so they can adapt to the new agile way of working.

Our sustainability program ties in with our purpose

We remain committed to being a responsible company in the digital age, while continuing to strengthen our relationship with our stakeholders through consultation and dialogue. Our sustainability program reflects the interests of our stakeholders as defined by the material issues. In spring 2019 we announced our reviewed

materiality matrix, which reflects our stakeholders' interests and which is fully in line with our current corporate and business reality. Our sustainability program closely ties in with our company's purpose and is built on four pillars: (i) Digital society, (ii) Amazing Customer Experience, (iii) Great workplace, and (iv) Responsible business practices.

Telenet has supported the **ten Principles of the UN Global Compact** since 2011 and actively strives towards the United Nations Sustainable Development Goals.

Our sustainability efforts are rewarded

Our contribution to society is demonstrated by our ranking in the annual **Dow Jones Sustainability Index (S&P Global)**. This index ranks the companies that are best equipped to recognize and respond to emerging opportunities and risks resulting from global sustainability trends. In 2019, we reconfirmed our sustainability leadership and were rewarded for the seventh time as best performer in the global media sector, with a strong economic, environmental and social performance. Telenet also maintained its **Gold EcoVadis CSR Rating**, a rating used by large corporate clients wishing to assess a company's sustainability performance.

Acting in a socially responsible way

We commit to sustainable growth, with a good balance between operational excellence and social responsibility, and taking into account the social, economic and environmental aspects of our operations. Because, together with our employees and our stakeholders, we want to contribute to a digital society that propels us and that helps us stay one step ahead.



Bert De Graeve
Chairman

John Porter
Chief Executive Officer

COMPANY PROFILE

As a provider of entertainment and telecommunication services in Belgium, Telenet Group is always looking for the perfect experience for its customers. Under the brand name Telenet, we focus on offering digital television, high-speed Internet, and fixed and mobile telephony services to residential customers in Flanders, Brussels and parts of Wallonia. Under the brand name BASE, we provide mobile telephony solutions across Belgium. The Telenet Business department serves the business market in Belgium and Luxembourg with connectivity, hosting and security solutions.

To meet the expectations of all customer segments, Telenet also welcomes Mobile Virtual Network Operators (MVNOs) on its network. An overview of these strategic partnerships can be found on the [Telenet corporate website](#).



Telenet Group is part of Telenet Group Holding NV/SA and is listed on the Euronext Brussels. Liberty Global, the world's largest international TV and broadband company investing, innovating and empowering people in countries across Europe, Latin America and the Caribbean to make the most of the digital revolution, directly owns 56.36 percent of Telenet Group Holding NV/SA.

OUR VALUES

- ✓ WE SET THINGS IN MOTION
- ✓ OUR PASSION IS CONTAGIOUS
- ✓ WE ARE CLOSE
- ✓ WE SAY WHAT'S WHAT
- ✓ WE WORK BETTER TOGETHER

OUR KEY COMPETENCIES

- ✓ LEARNING AGILITY
- ✓ RESILIENCE
- ✓ SERVANT LEADERSHIP

SUPERIOR CONNECTIVITY



UPGRADE

UPGRADE AND MODERNIZATION OF THE FIXED AND MOBILE NETWORKS FULLY COMPLETED



FUTURE-PROOF

ACQUISITION OF A TEMPORARY 5G TEST LICENSE IN SPRING 2020 AND FIRST 5G NETWORK AND TECHNOLOGY LAB TESTS ONGOING

INSPIRING ENTERTAINMENT



100% OWNERSHIP

OF DE VIJVER MEDIA APPROVED BY THE BELGIAN COMPETITION AUTHORITIES IN MAY 2019



JOINT VENTURE WITH DPG MEDIA

ANNOUNCEMENT IN FEBRUARY 2020 OF THE INTENTION TO JOINTLY LAUNCH A FULLY-FLEDGED STREAMING SERVICE WITH LOCAL AND INTERNATIONAL CONTENT



€9.7 MILLION

INVESTMENTS IN LOCAL MEDIA PRODUCTIONS IN 2019

SUPERIOR BUSINESS SOLUTIONS



PRODUCTS

CONNECTIVITY, CLOUD, HOSTING, SECURITY AND VALUE-ADDED IT SERVICES



NEXTEL

INTEGRATION OF NEXTEL COMPLETED



More information about Telenet Group and its financial results can be found in the [Financial Annual Report 2019](#).

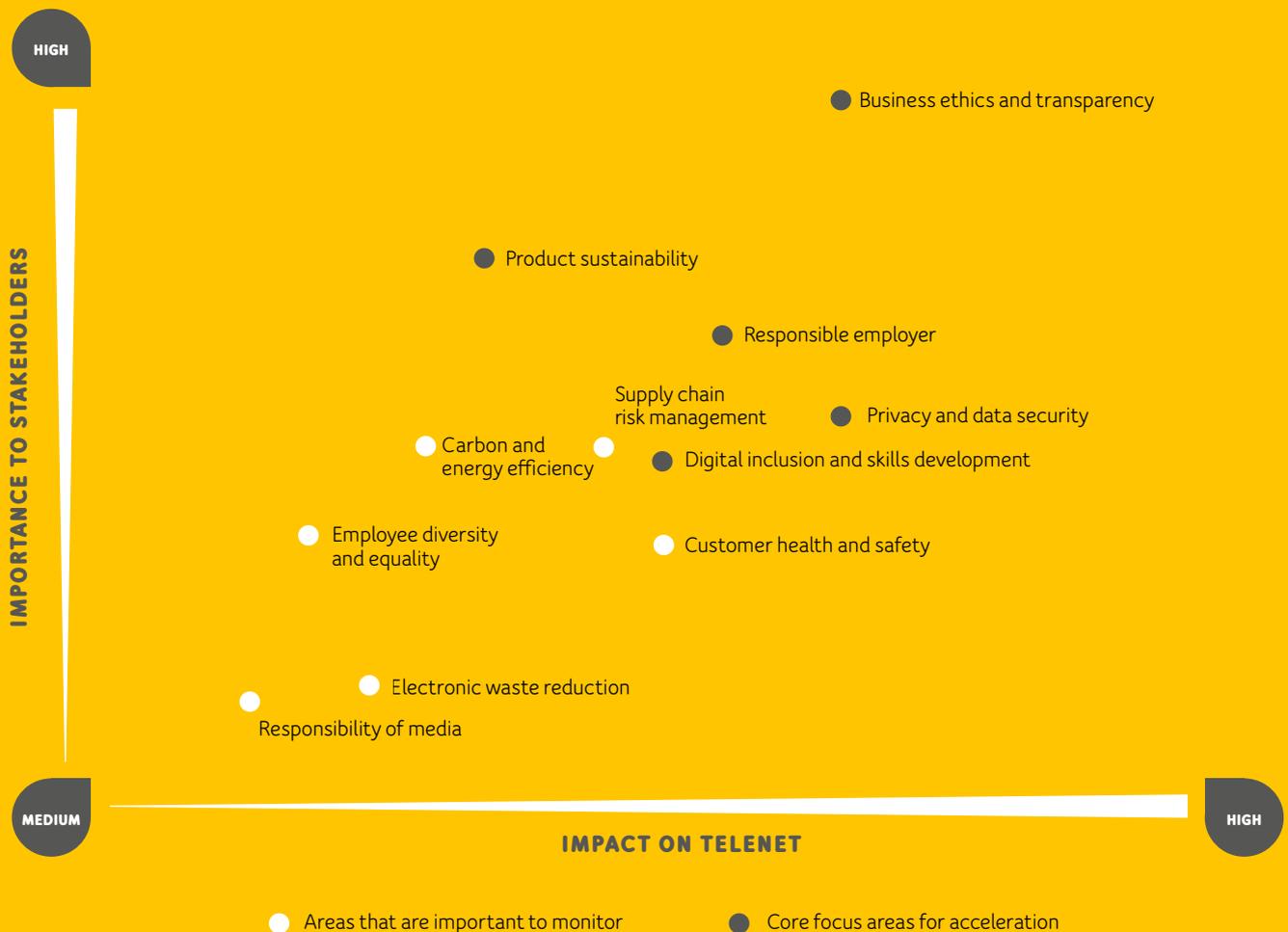
OUR SUSTAINABILITY POLICY

THE TELENET MATERIALITY MATRIX

Sustainability is a multifaceted concept – more than any company can tackle in one go. We have therefore made the conscious decision to focus our efforts on the most relevant issues: **the materialities**.

We determine the importance of the material matters in close consultation and dialogue with our stakeholders. The result is a schematic representation of the sustainability priorities and their relative importance to the stakeholders and the company: **the materiality matrix**.

Our materiality matrix was reviewed in spring 2019 to better reflect the extended footprint of Telenet across Belgium’s regions and the Grand Duchy of Luxembourg. The updated matrix includes eleven material topics, of which five have been identified as core focus areas: (i) Business ethics and transparency; (ii) Responsible employer; (iii) Product sustainability; (iv) Privacy and data security; (v) and Digital inclusion and skills development.



We apply a structured process to design the materiality matrix. Read more about our methodology on the sustainability section on the [Telenet corporate website](#).

THE TELENET SUSTAINABILITY STRATEGY

At Telenet, we strive for sustainable growth, with a careful balance between operational excellence and social responsibility that takes into account the social, economic and environmental aspects of our business operations. The **Telenet Sustainability Framework** outlines our commitments, objectives and priorities, and covers four years of business activities (2017-2020).

In fall 2020, we will review our sustainability strategy. Not to drastically change course, but to ensure that we maintain our leading position in the Belgian market when it comes to sustainability. This will result in the **new five-year Sustainability Framework 2021-2025**, which will be fully aligned with our key material issues and which will set new priorities and corresponding targets.

Our commitment: Always one step ahead!

At Telenet, we believe in the tremendous potential of digital and we are committed to help people and businesses to stay one step ahead in the digital age. We want to build a society in which people enjoy living and working together, embracing the endless possibilities of the digital world at the fullest. For a better quality of life.

We want to make a real difference in this digital era by engaging with our customers and employees in an inclusive and meaningful way. We are committed to building an open and transparent relationship with all our stakeholders, to looking them straight in the eye and responding to their expectations when it comes to our social, economic and environmental impact.

Our focus domains

The Telenet sustainability program underscores our commitment to the key stakeholders and reflects their interests as defined by the materialities:



AMAZING CUSTOMER EXPERIENCE

our commitment to customers



GREAT WORKPLACE

our commitment to employees



DIGITAL SOCIETY

our commitment to society and local communities



RESPONSIBLE BUSINESS PRACTICES

our commitment to a fair, open and transparent dialogue with all stakeholders

For every commitment, we have defined a set of measurable targets, to be reached by 2020.



Visit the [sustainability section on the Telenet corporate website](#) to learn more about the Telenet sustainability strategy, the focus domains and the decision-making processes.

THE TELENET SUSTAINABILITY FRAMEWORK 2017-2020

<p>OUR 2020 VISION</p> <p>To be the leading converged connected entertainment and business solutions provider in Belgium.</p>	<p>GUIDING PRINCIPLES</p> <p>One step ahead – pioneering – close to you – good neighbor – sparkling – passion – enthusiasm – pleasure – sincere, honest and transparent – inclusive</p>	<p>OUR BUSINESS PRIORITIES</p> <ul style="list-style-type: none"> · Build a leading integrated network · Leader in inspiring entertainment · Unlock the potential in business solutions · Create memorable customer experiences
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Always one step ahead

At Telenet, we believe in the tremendous potential of digital and we are committed to help people and businesses to stay one step ahead in the digital age. We want to build a society in which people enjoy to live and work together, embracing the endless possibilities of the digital world at the fullest and with pleasure. For a better quality of life. In this digital era, we want to make a real difference by engaging with our customers and employees in an inclusive and empathic way. We are committed to build an open and transparent relationship with all our stakeholders, looking them straight in the eye and responding to their expectations as it comes to our social, economic and environmental impact.

			
AMAZING CUSTOMER EXPERIENCE	GREAT WORKPLACE	DIGITAL SOCIETY	RESPONSIBLE BUSINESS PRACTICES

Our commitment

<p>We do everything to give our customers the best experience possible and to build lasting trusted relationships with them</p>	<p>We want every Telenet employee to be proud to work for our company and to become real Telenet ambassadors. We want to empower, enable and inspire our employees to flourish</p>	<p>We want to build a society in which people enjoy to live and work together, embracing the possibilities of the digital world at the fullest, with pleasure. For a better quality of life</p>	<p>We do business in an open and transparent way, taking the expectations of all our stakeholders into account when it comes to our social, economic and environmental impact</p>
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2020 Objective

- | | | | |
|---|---|---|---|
| <ul style="list-style-type: none"> · Net Promoter Score (NPS) -5* · NPS rating of +15 on the reputation item 'Sufficient attention to product quality' · NPS rating of +10 on the reputation item 'Sufficient attention to product innovation' | <ul style="list-style-type: none"> · Zoom employee engagement score of 61% with a clear ambition to reach a score in the top quartile · Bi-annual E-NPS survey with a clear ambition to reach a +13 score | <ul style="list-style-type: none"> · Unlock the potential of digital for all through at least 3 digital skills programs · Accelerate 25,000 young people in the digital age | <ul style="list-style-type: none"> · NPS rating of -5* on the reputation item 'Enough efforts towards good causes' · NPS rating of -10 on the reputation item 'Honest and fair business practices' · Become 5 times more carbon efficient by 2025 (compared to 2016), and improve our energy efficiency by 15% every year through 2025 · Reduce carbon emissions from mobile combustion with 60% by 2030, using 2017 as the base year |
|---|---|---|---|

We'll do this by

- | | | | |
|--|---|---|--|
| <ul style="list-style-type: none"> · Bringing the best customer experience · Delivering top-quality products & services that are easy to use · Ensuring privacy & data security · Prioritizing transparent pricing & billing | <ul style="list-style-type: none"> · Attracting & retaining the best talent · Stimulating learning & development · Engaging our employees through internal communications and corporate culture · Cultivating employee well-being & diversity | <ul style="list-style-type: none"> · Investing in high-performant fixed & mobile connectivity solutions · Boosting the digital and creative economy · Nurturing 21st-century skills for children and empowering youth through entrepreneurship and digital literacy training · Ensuring basic digital literacy skills for all · Promoting a healthy digital balance | <ul style="list-style-type: none"> · Limiting our environmental footprint · Managing our supply chain in a responsible way · Demonstrating good governance & transparency in our business practices |
|--|---|---|--|

* NPS definition: see page 32

TELENET'S MANAGEMENT APPROACH TO ITS FIVE CORE MATERIAL ISSUES

In the present report, we provide deeper insight into our management approach to the five core material issues, which have the largest impact on our company and which are the most important to our main stakeholders. A description of our management approach to all eleven material issues can be found on the



[Telenet corporate website](#).

1 Business ethics and transparency

Material issue

Promoting responsible business practices through strict commitments to anti-corruption, good corporate governance, open stakeholder communications and transparent pricing and billing.

Business risks and opportunities

The material issue of business ethics and transparency is a key driver for Telenet's corporate reputation. It touches on all parts of our business operations, thus requiring a proper attention of all business units and teams.

Promoting responsible business practices allows us to maintain and strengthen our license to operate. When properly managed, the business ethics and transparency issue has the potential to become a key differentiator from industry peers and competitors.

Management approach

- Monitoring all aspects of our business with several internal Codes of Conduct.
- Applying a dedicated anti-corruption and bribery policy, which is in line with international regulations and Belgian legislation.
- Striving for transparent pricing communications on our commercial websites and in our press communications, commercial promotions and advertisements.
- Engage in open and constructive dialogue with all our stakeholders.

2 Responsible employer

Material issue

Continuously improving employee well-being and engagement, stimulating diversity and equal opportunities as well as attracting and developing talent.

Business risks and opportunities

Being a responsible employer is both an important risk given the talent scarcity on the Belgian market and a growth opportunity for Telenet.

If successfully managed, this material issue can be a key differentiator from other market players, especially in the current context of the war for talent.

Management approach

- Continuously investing in learning and development, diversity and equality*, health and well-being.
- Monitoring diversity and equality practices through a dedicated internal policy.
- Generating an open and transparent company culture through internal communications and social dialogue.
 - Due diligence is guaranteed through the continuous dialogue and consultation with platforms such as the Works Council.
- Attracting and retaining the best talent (1) by investing in employer branding initiatives and talent recruitment and retention programs, and (2) by establishing a structural cooperation with higher education schools and universities, and NGO that train untapped talent.
- Stimulating diversity and inclusion by building a working environment that nourishes talent and stimulates employee engagement.

*Employee diversity and equality is also a separate material issue, showing its importance for Telenet

3 Digital inclusion and skills development

Material issue

Offering training and educational programs to promote the development of STEM competencies and 21st century skills.

Business risks and opportunities

The material issue of digital inclusion and skills development is crucial to the successful execution of Telenet's corporate strategy. In a market with a growing digitalization, we need access to a digital-savvy workforce so it is in our best interest to contribute to

developing the talent pool and to invest in employment initiatives.

Management approach

- Investing in life-long learning and development initiatives that create a digital-savvy workforce.
- Supporting and sponsoring third-party driven digital skills training programs for children, youngsters and young adults alike by establishing structural partnerships with content partners and educational experts.

4 Privacy and data security

Material issue

Putting in place strict privacy and security measures to prevent unauthorized access to computers, databases and websites as well as to protect personal information and data from our customers.

Business risks and opportunities

The material issue of privacy and data security is core to Telenet's business activities. Major financial and reputational implications may arise for Telenet in the case we do not properly manage the issue or breach applicable legislation.

Management approach

- Establishing a clear customer data policy: the Telenet Customer Data Policy describes what information we process, why we do this and what our customers' rights are. The policy is fully compliant with the EU General Data Protection Regulation (GDPR).
- Discussing all privacy matters and priorities through the Privacy Council, which includes representatives from the different business departments.
- Ensuring data security: through the Security Council, Telenet formulates strategic recommendations around risks and threats arising from malicious or erroneous use of data.
- Properly informing and activating employees on privacy and security through training and regular information sharing.

5 Product sustainability

Material issue

Creating products that are innovative, have a low environmental, health and safety impact and have a long lifespan.

Business risks and opportunities

This material issue reflects our stakeholders' expectations to get access to products that are innovative, have a low environmental, health and safety impact and long lifespan. Product sustainability clearly offers opportunities to Telenet to stand out from its peers.

Management approach

- Developing innovative products, services and customer propositions by stimulating internal innovation and by promoting collaborations with external industry partners, academic institutions and startups.
- Participating in industry-led initiatives that market and develop new products and services.
- Investing in the upgrade and optimization of our customer equipment and networks, ultimately resulting in more energy efficiency and reduced greenhouse gas emissions.

OUR COMMITMENT TO OUR STAKEHOLDERS

At Telenet, each department is responsible for developing stakeholder relationships. At the corporate level, Telenet maintains dialogues with several stakeholder groups. Visit the [sustainability section on the Telenet corporate website](#) to learn more about the six stakeholder groups.

STAKEHOLDER GROUPS



IMPORTANT MEMBERSHIPS



 Discover the [full list of our corporate memberships](#) on the sustainability section on the Telenet corporate website.

OUR MOST IMPORTANT SUSTAINABILITY PROGRAMS

LOOKING BACK AT 2019

The Telenet Sustainability program underscores our commitment to help people and businesses stay one step ahead in the digital world, embracing the endless possibilities of digital at the fullest. For a better quality of life. The program reflects the key interests of our main stakeholders and is built on four pillars: **(I) Amazing Customer Experience, (II) Great workplace, (III) Digital society and (IV) Responsible business practices.**

The present chapter provides a high-level overview of the investments we made, the initiatives we took and the performance we achieved in each of these focus domains in the reporting year 2019.

More detailed information on the Telenet sustainability programs can be found on [our corporate website](#).



OUR COMMITMENT TO CUSTOMERS

AMAZING CUSTOMER EXPERIENCE

MOST IMPORTANT DEVELOPMENTS IN 2019

Future-proof networks, products and services

Our continuous investments in the upgrade and modernization of the mobile and fixed networks have positioned Telenet as the leading Belgian provider of future-proof converged networks. In 2019, Telenet completed its five-year investment program 'De Grote Netwerf', offering more than 3 million connectable houses and businesses in Flanders and Brussels access to a giga-speed connectivity of 1GHz, enabling data download speeds of up to 1 Gbps and upload speeds of up to 40 Mbps for residential users and 50 Mbps for business users. The upgrade of the BASE mobile network, which was completed in 2018, led to increased mobile network speeds and quality. We continue our network investments with a key focus on the **acquisition of spectrum and the roll-out of 5G across Belgium**. Telenet recently acquired a temporary 5G license and has started performing its first 5G network lab tests, which are showing promising results with speeds of more than 3 Gbit per second.

Our leading position in future-proof networks allows us to drive innovation across all business domains with technology solutions and customer propositions that respond to market expectations:

- In 2019, Telenet rolled out its **new Docsis 3.1 modem**, which offers broadband Internet through coaxial cable, and introduced its **new decoder with voice control**,

Netflix and YouTube integration, offering a new, enriched customer experience in the entertainment space.

- Introduced in fall 2019, the **Telenet Business KLIK bundles** offer corporate customers superior connectivity solutions and a personalized service.
- Early 2020, Telenet announced **SafeSpot**, the first all-in solution for cyber threats that protects residential customers against phishing and malware, and prevents potential security leaks through smart appliances.

Earning the trust of our customers

Positive customer experiences form the foundation of sustainable growth. Through our customer engagement channels and a seamless, high-quality and personalized service, we guide our customers to the best solution. To earn and maintain the trust of our customers, we have to continually improve the customer experience by making it easier for them to interact with Telenet. The year 2019 was marked by an agile transformation, leading to improved internal process efficiencies and reduced barriers between business functions and channels. We also invested in the development of digital customer engagement platforms, which complement the non-digital customer engagement channels where human exchanges make the difference.



Earning trust also implies that the vast amount of customer information that Telenet manages is handled with respect for privacy and protected with the highest standards for information security. We apply a privacy by design approach in the development of our products and customer services. The [Telenet Customer Data Policy](#) describes what information we process, why we do so and what our customers' rights are. It applies to all business activities of Telenet. Telenet is compliant with the General Data Protection Regulation (GDPR) when it comes to customer communications about the Telenet Customer Data Policy, and continues its investments to assure full compliance across the customer value chain. We engage with the Belgian Data Protection Authority for practical implementation and to sharpen clauses where necessary. The Security Center of Expertise defines our (cyber) security policy, manages security incidents and raises internal awareness through communications and training.

Driving transparent pricing and billing

In June 2019, Telenet informed all its customers of a price adjustment to a number of products and services. Prices were adjusted in line with inflation. As a company, we have the responsibility to reflect on how we can continually provide the best value for money and earn customers' long-term trust.

Ensuring regulatory compliance

Telenet has not identified incidents of non-compliance with regulations or voluntary codes related to the health and safety impacts of its products and services. We proactively assess and manage risks associated with health and safety, and inform our customers of these risks in a transparent manner.

KEY DATA INSIGHTS

Residential customer complaints received by the Ombudsman for Telecommunications

1 file per 1,992 services
delivered in 2017

1 file per 1,577 services
delivered in 2018

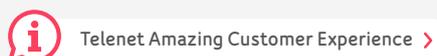
1 file per 1,861 services
delivered in 2019

GDPR Compliance (since May 2018)

	2018	2019
Number of GDPR requests received	1,737	1,133
Number of Requests for information with regard to the processing of (personal) customer data from the Data Protection Authority	3	4
Number of Incidents reported to the Data Protection Authority	8	23
Fines	None	None

Information security & cybersecurity

	2017	2018	2019
Number of information security breaches or other cybersecurity incidents	0	0	0
Number of information security breaches involving customers' personally identifiable information	0	0	0
Number of customers affected by the company's data breach	0	0	0
Fines	None	None	None





OUR COMMITMENT TO EMPLOYEES

GREAT WORKPLACE

MOST IMPORTANT DEVELOPMENTS IN 2019

Telenet is committed to being a responsible employer. This is reflected in the emphasis our employment policy places on investments in learning and development, diversity, health and well-being, and the open and transparent company culture achieved through internal communications and social dialogue.

In 2019, Telenet further extended its business portfolio with the acquisition of De Vijver Media. Following approval of this acquisition by the Belgian Competition Authorities in May 2019, we are working towards the integration of De Vijver Media into the Telenet business and organization.

In 2019, we also embarked on a journey to transform Telenet into a more agile organization, built on a 'digital first' attitude and driven by empowered expert-driven teams and individuals. This will enable us to continue to swiftly and precisely respond to the rapidly changing behavior of our customers and stakeholders. This transformation kicked off with two pilot projects involving the residential marketing and the IT and engineering teams, and was further extended to the entire organization during the spring of 2020.

This agile transformation is underpinned by a review of all key human resources processes such as role descriptions, function classifications and performance management procedures. This review is conducted in close alignment with our social partners. Telenet ensures continuous dialogue and consultation through a variety of platforms such as the Committee for Prevention and Protection at Work and the Works Council, which has an equal representation and comprises the same number of employer and employee representatives. The Works Council is involved in the drafting of the company's social, economic and financial policies. In addition, Telenet has two representatives in the European Works Council of its majority shareholder Liberty Global.

Telenet is also committed to open and transparent internal communications, and personal alignment between staff members and people leaders. In times of transformation, regular communications and increased investment in training and coaching are key in making sure that employees can quickly adapt to the new agile way of working.



Engaging our employees

Telenet has two main surveys in place to measure and monitor the active engagement of its employees. The Zoom employee engagement survey is conducted every two years. In addition, we annually measure the Employee Net Promoter Score (E-NPS). Held in September 2019, the Zoom survey had a response rate of 76 percent and showed strong scores for sustainable engagement (78 percent) and well-being (81 percent). Key attention points included the company's ability to change and quickly respond to market developments (47 percent), recruitment and retention of talent (50 percent), and pay and benefits (57 percent). In parallel to the Zoom survey, the E-NPS was measured in September 2019 and resulted in a score of +3, a company-wide decrease with 9 points compared to the E-NPS measurement of January 2019. This lower level of engagement can be explained by the general feeling of uncertainty among employees following the announcement of the company-wide agile transformation in summer 2019.

Cultivating employee well-being

Ensuring the well-being of employees in these times of change is essential for Telenet. Our health and well-being policy includes flexible working hours, home work arrangements, childcare facilities and contributions, and paid maternity/paternity leave.

In fall 2018, the company conducted its sixth employee well-being survey. In response to the outcomes, the Safety, Health and Environment (SHE) team took several actions to strengthen employees' resilience, engagement, and physical and mental health. In addition to the Employee Assistance Program, two well-being management tools – HiBrain and Happy Care – were developed and a series of well-being information sessions organized. The SHE team also created a centralized, digital information hub about well-being, health, safety, environment and risk handling, in the internal communications portal. A special toolkit was developed to address psycho-social risks at work, and employees from the Telenet Retail department completed trainings on how to cope with the emotional stress related to assertive customer interactions.

The SHE team ensures the day-to-day follow-up of all the well-being actions mentioned above. Finally, the company offered a free medical check-up to all employees over the age of 50, as part of the collective labor agreement and the Well-being at Work program. This medical check-up will be repeated every three years.

Attracting and retaining the best talent

A trend that does not only affect Telenet, but the economy at large, is the growing digitization and its consequences for the new way of working and the war for talent. Like many other companies and organizations, Telenet faces a growing challenge in finding technical experts like data scientists and information security specialists. In order to nurture tomorrow's workforce, Telenet stimulates Science, Technology, Engineering and Mathematics (STEM) education and skills development. In January 2020, we announced the creation of an Academy for Digital & Data Talent, in partnership with the universities of KU Leuven, VUB, ULB and the BeCode programming school. The partnership aims at strengthening the digital knowledge and technical skills of Telenet's current employees through initial training, reskilling and upskilling, while attracting new digital talent. The academy is founded on the shared vision held by all partners that lifelong learning is a prerequisite for remaining agile in a rapidly changing digital economy.

Embracing a culture of diversity and inclusion

Telenet embraces an inclusive talent management policy with strong attention to diversity at every stage of the employment cycle: from recruitment and learning and development, to career planning. Still, a key attention point for Telenet remains gender equality. Equileap, an independent organization that promotes gender equality in the workplace, assessed Telenet's gender equality performance: while we were in 34th position in 2018 with a score of 60 percent, Telenet's position dropped to 85th place in 2019, with a score of 58 percent. We recognize the importance of strengthening our approach to diversity and gender equality. It's why we will establish - in the course of 2020 - a Diversity and Gender Equality Charter based on the UN Women's Empowerment Principles, to be followed by a full diversity, inclusion and gender equality policy.



KEY DATA INSIGHTS

Employee Engagement: Bi-annual Zoom survey

	2017	2019
Response rate	91%	76%
Sustainable engagement	58%	78%
Well-being	--*	81%

*No comparison due to changed methodology

E-NPS*

	Jan. 2018	June 2018	Jan. 2019	Sept. 2019
	+13	10	+12	+3

* NPS methodology: see page 32

Employee Well-being

	2017	2018	2019
Number of occupational work accidents and accidents to/from work	84	74	69
Calendar days of temporary incapacity for work	688	303	331
Number of fatal occupational accidents or accidents with confirmed permanent disability	0	0	0

Attracting & Retaining Talent

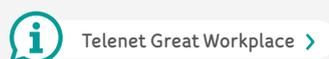
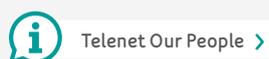
	2017	2018	2019
Number of new hires	354	409	510
Number of Young Graduates	20	27	36

Diversity

	2017	2018	2019
% of female employees, total workforce	35%	36%	36%
% of female leaders, Senior Leadership Team	50%	42%	36%

Gender-equal remuneration: Ratio average female/male salary

	2017	2018	2019
Non-management level	0.93	0.84	0.85
Management level*	0.91	0.86	0.88
Executive level*	0.91	0.84	0.83





OUR COMMITMENT TO SOCIETY AND LOCAL COMMUNITIES

DIGITAL SOCIETY

MOST IMPORTANT DEVELOPMENTS IN 2019

Investing in digital innovation

Digital innovation is an engine to create a richer quality of life, sustainable economic growth, and increased education and employment opportunities. In April 2020, Deloitte released a socio-economic impact study of Telenet for the period 2014–2019: the total impact measured by gross output was €26.7 billion, and the impact measured by gross value add was €16 billion. In 2019, our investments totaled €587 million, or 23 percent of our corporate revenue. The majority of these investments related to technology innovations and network improvements. According to Deloitte, Telenet’s business activities accounted for the creation of 11,086 full-time direct, indirect and induced jobs in Belgium in 2019.

In a world of rapid technology developments, continuous investments in innovation are the lifeline of our company. We encourage an entrepreneurship culture across our organization, promoting an innovation mindset and stimulating the development of new products and services that can bring value to customers. In 2019, a group of Telenet engineers released TADAAM, a connectivity solution that “connects one’s home Internet and TV through mobile networks, without cables, ties or technicians”. Through the company-wide Apollo 8 program, we encourage our

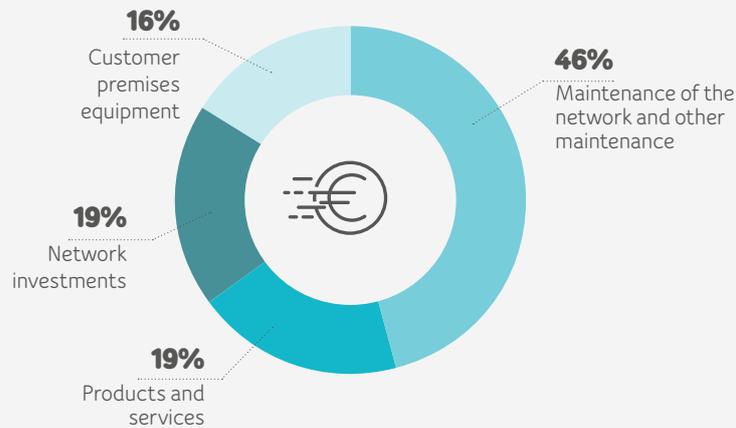
entire employee community to turn innovative ideas into minimum viable products and prototypes.

Telenet promotes a collaborative approach to innovation, in partnership with industry players, academic institutions and startups, to develop and test new products, services and applications. Examples include the launch of the Telenet Digital & Data Talent Academy in early 2020, and a five-year strategic partnership with Brussels South-Charleroi Airport to turn the airport into a digital hub using smart Internet-of-Things solutions.

Investing in the Belgian media sector

The Belgian media landscape is rapidly evolving. Consumer viewing behaviors are changing, and local media channels experience a growing competitive pressure from global content providers. It is our ambition to strengthen the local media ecosystem. By gaining full ownership of De Vijver Media in May 2019, we solidified our position as a media player. In February 2020, we announced our intention to create a fully-fledged streaming service with local and international content, in a joint venture with DPG Media. We are convinced these investments will provide oxygen to the media ecosystem in Flanders.

OVERVIEW INVESTMENTS 2019



TELENET 2019 ECONOMIC IMPACT



TELENET MEDIA & ENTERTAINMENT 2019 ECONOMIC IMPACT



 [Telenet Socio-Economic Impact Study by Deloitte >](#)



In 2019, Telenet invested €9.7 million in the production and co-production of local content and €210 million in content rights, distribution fees and copyrights. The media and entertainment investments accounted for 25 percent of the company’s total economic impact, measured in gross output. As far as employment is concerned, Telenet’s media and entertainment activities created 752 direct, indirect and induced full-time jobs in Belgium in 2019.

Committed to build a digital society accessible to all

As a committed member of the local community, we contribute to structural digital society initiatives and community investments. These investments aim at boosting innovation, creativity and entrepreneurship, nurturing digital skills, reducing the digital divide and promoting the right digital balance. In the period 2014-2019, we invested €89 million in digital society initiatives and community engagement. In 2019, Telenet’s financial contribution to charities and community initiatives totaled €2.02 million. Since 2015, every Telenet employee can take one paid leave day per calendar year to do volunteering work. In 2019, employees contributed 1,170 volunteer hours to the community.

Telenet monitors and manages its community investments on a yearly basis following the London Benchmark Group framework. In addition, we hold regular alignment meetings with the NGOs and community initiatives that receive structural support from us, in order to assess their impact, to review and – if necessary – adjust the investment and cooperation.

#ThoughtTogether

During the Covid-19 outbreak in 2020, connectivity solutions proved to be the lifeblood of the economy and society. We took our responsibility to ensure that families and businesses could stay connected. We went the extra mile to help companies continue working, to keep consumers connected while minimizing their financial concerns, to break through the social isolation of hospitalized patients and elderly people in care homes, and to keep young people motivated and connected with their schools. Find an [overview of our Covid-19 community initiatives here](#).





KEY DIGITAL SOCIETY PROGRAMS & INITIATIVES IN 2019

Unlocking the potential of digital for all



Social Tariffs

In an inclusive, digital society, technological innovations should be accessible to all. It's why Telenet goes beyond what is legally required and applies a social fee to all its telecom products and services.

52,000
customers (Sept. 2019)

SchoolNet+

Telenet Business offers – in cooperation with the Flemish government – a commercial solution with a social purpose to educational institutions and libraries, including a fast Internet connection and information security services.

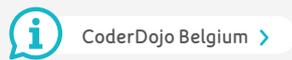
2,488
SchoolNet+ agreements
(2011-2019)

Empowering future generations

CoderDojo Belgium

Led by volunteers, CoderDojo Belgium inspires children and youngsters in the digital age and teaches them to code, build websites, and develop apps or games.

140+ Dojos across Belgium
1,200 coaches
Annual reach of **20,000** kids



YouthStart

YouthStart unlocks the potential of NEET (Not in Education, Employment or Training) youngsters by strengthening their entrepreneurial skills. YouthStart has a positive outflow of 77% to the job market or education.

806 youngsters coached in
academic year 2018-2019



BeCode

BeCode offers professional web developer training to youngsters and young adults from underserved communities. BeCode has a positive outflow of 83% to the job market or education.

Co-founded by Telenet in 2017, BeCode recently joined the Telenet Digital & Data Academy.

400 youngsters
graduated in 2019





Accelerating digital entrepreneurship

Digital Acceleration

Launched by Telenet Business in 2017, the Digital Acceleration program helps speed up the adoption of digital technologies by SME entrepreneurs in Flanders and Brussels by offering them free consultancy on email marketing, social media and online security.

672 SMEs reached by
20+ digital coaches in 2019

Launched in August 2019, the Digital Acceleration platform virtually connects SMEs with digital experts.

2,700+ entrepreneurs and **560**
digital experts registered on the
platform in April 2020



Telenet Business Digital Acceleration >

Finding the right digital balance

#TelenetGo

Launched in fall 2019, the #TelenetGo initiative educates consumers about the endless possibilities of the digital world through workshops given in Telenet shops and online expert talks on the website. The initiative also promotes a healthy digital balance, and online child safety and security. It raises public awareness on key digital risks like cyberbullying and sexting.

In 2019, **100,000** visitors to the
website; **12,000** Comdom app
downloads; **13,000** Phubbed
app downloads



#TelenetGo >

B-BICO

In 2016, Telenet joined the Belgian Better Internet Consortium, which promotes media literacy and safer Internet use among children.



B-BICO >

Automodus Campaign

Launched by the Vlaamse Stichting Verkeerskunde in summer 2019 and supported by all mobile telecom operators in Flanders, the Automodus campaign raised the awareness of the general public on the use of smartphones while driving.



OUR COMMITMENT TO FAIR, OPEN AND TRANSPARENT BUSINESS PRACTICES

RESPONSIBLE BUSINESS PRACTICES

As an important player in telecommunications, media and entertainment, we want to maintain and strengthen the trust of our stakeholders. We pledge to conduct our business in a fair, responsible and transparent manner.

We do this by upholding the highest corporate standards and by actively engaging with our stakeholders so we can respond to their expectations with regard to our social, economic and environmental impact.

1 | Limiting our environmental impact

Most important developments in 2019

Evaluating and managing environmental risks, especially those associated with climate change, is a priority for Telenet. We recognize that we are exposed to different risks associated with climate change such as (1) policy and legal risks linked to enhanced emissions reporting obligations and potential regulation of existing products and services, (2) physical risks to facilities due to rising temperatures and increasing frequency of extreme temperature events, and (3) transition risks related to changing customer behaviors, in particular increases in electricity consumption, waste production and carbon emissions, caused by a higher demand for products. Efforts to mitigate and adapt to climate change do however also create opportunities such as resource efficiency, the development of low-carbon products and services, access to new markets, and building resilience throughout the supply chain.

Telenet has identified its most material environmental risks and opportunities in its materiality assessment. Based on these risks and opportunities, we have defined three environmental priorities:

- 1. Improving energy efficiency:** we invest in various initiatives to continue reducing the energy consumption of our own operations and that of our products in customers' homes and offices.
- 2. Reducing greenhouse gas emissions:** we perceive climate change as a threat and therefore manage it as a business risk. We switch to renewable energy sources as much as possible and offset emissions by investing in carbon compensation programs.
- 3. Reducing the use of resources and generation of waste:** our approach to waste focuses on reducing the use of resources, recycling and refurbishment of



customer premise equipment (CPE), and appropriate waste disposal and processing. We contribute to the circular economy by developing circular supply chains, recovering and recycling materials, extending the product lifecycle through refurbishment of CPE and by offering products as a service.

 **Telenet's Environmental Policy Statement** outlines our approach to environmental management. It underscores our commitment to environmentally friendly business operations, and is aligned with the Sustainable Development Goals of the United Nations and the principles set forward in the Paris Agreement.

In 2018, we redefined our targets and commitments for energy efficiency and carbon emission reduction in accordance with our extended mobile and fixed network infrastructure, our extended customer base and the

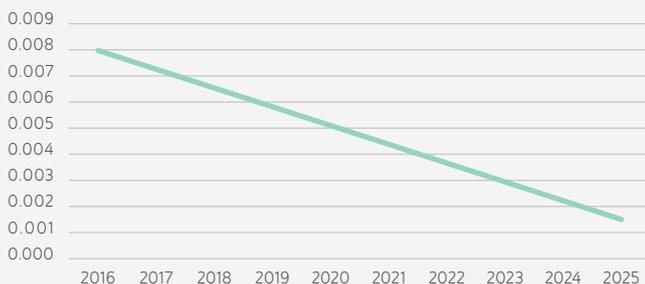
growing complexity of our operations systems and supply chain processes.

Our goal is to improve the efficiency of our electricity consumption by 15 percent every year through 2025. We also aim to be five times more carbon efficient by 2025, using 2016 as our base year for both targets.

In order to set meaningful targets, we measure our energy consumption and Scope 1 & 2 greenhouse gas emissions per terabyte (TB) of data transported through our networks.

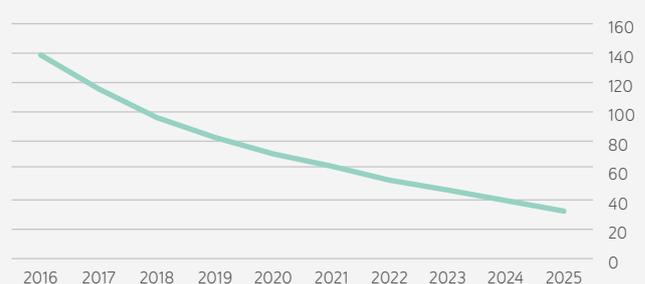
Carbon Efficiency Target: 5x more carbon efficient in 2025

Ratio scope 1+2 market-based emissions (tons CO₂e)/terabytes of data



Electricity Efficiency Target: 15% electricity efficiency improvement year on year through 2025

Ratio electricity consumption (kWh)/terabytes of data



Our goal is to improve the efficiency of our electricity consumption by 15% every year through 2025. We also aim to be five times more carbon efficient by 2025, using 2016 as our base year for both targets. In order to provide meaningful targets, we measure our energy consumption and GHG emissions per terabyte (TB) of data transported through our networks.



In 2019, we realized we needed to increase our ambition with respect to carbon efficiency by setting an additional, absolute target specifically aimed at reducing emissions arising from mobile combustion, which represented more than a third of Telenet’s total emissions over the last two years.

We commit to reducing carbon emissions from mobile combustion with 60 percent by 2030, using 2017 as the base year, which aligns with the Paris Agreement’s 1.5 degree-reduction scenario.

Through the Telenet ‘Move’ program, we aim to invest in a greener fleet (with passenger cars emitting a maximum of 95 gram CO₂ per kilometer) and to reduce the total number of kilometers driven annually with 5 percent from 2021 onwards. We commit to:

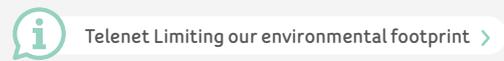
- **Move less** by stimulating home/remote work and by reviewing our Telenet offices strategy
- **Move differently** by promoting micro-mobility solutions, public transport and carpooling
- **Move better** by investing in the electrification of our fleet

As part of our commitment to environmental sustainability, we regularly review and optimize our environmental management processes. At this stage of our investments in environmental sustainability, we deliberately opt for a limited assurance, consolidated at the level of our parent company Liberty Global, focusing our efforts and available resources on refining our strategy and on implementing corrective actions that can help structurally improve our performance.

Telenet’s climate action plan is regularly benchmarked by independent sustainability review agencies for analysts and investors like S&P Global and ISS Corporate Solutions. Telenet is generally recognized for its coordinated action on climate change issues and its record in governance and emissions management. Key areas for improvement that were emphasized in 2019 included a more comprehensive circular economy strategy for used customer hardware like mobile phones, as well as third-party verification of our environmental data.

INITIATIVES TO OPTIMIZE OUR ENVIRONMENTAL PERFORMANCE

Improving energy efficiency



We purchase electricity from renewable resources.

100% green energy use in our own and leased buildings

We invest in the upgrade and modernization of our mobile and fixed network operations. We constantly measure the Power Usage Efficiency (PUE) of the 94 technical stations and the Telenet/BASE data centers. Telenet supports the European Code of Conduct on Data Center Energy Efficiency.

Adoption of LED technology, alternating pulsing for climate cabinets and turbo compressors for cooling units

Use of a free cooling solution in the technical locations since 2018

We invest in innovative, more eco-friendly products and solutions.

Release of a new generation of set-top boxes with reduced energy demand in May 2019



Reducing greenhouse gas emissions

We encourage the use of responsible mobility solutions.	<p>39% of all emissions in 2019 due to mobility</p> <p>Average CO₂ emissions of all passenger vehicles: 117 g/km</p> <p>Average CO₂ emissions for newly deployed passenger vehicles: 128 g/km.</p> <p>Corrective actions:</p> <p>(1) the shift to compressed natural gas and electric vehicles.</p> <p>(2) the promotion of mobility alternatives for company cars with a focus on public transport and bicycles.</p> <p>(3) the introduction of an employee flex mobility plan in 2018.</p> <p>(4) the launch of the Telenet Move program in spring 2020 to reduce mobile combustion emissions in a more structural manner by 2030.</p>
We reduce emissions arising from third-party transport in general and the last-mile delivery of goods in city environments in particular.	<p>Signing of the Green Deal on Sustainable City Logistics in spring 2019, an initiative of the Flemish government in partnership with academic institutions, local governments and industry partners. Set-up and implementation of a proof of concept for the delivery of goods to the Telenet and BASE shops in the city of Mechelen, using electric vehicles and bikes.</p> <p> Green Deal on Sustainable City Logistics ></p>
We invest in a carbon offsetting program to reduce our environmental footprint.	<p>Investment in a sustainable reforestation program in Ecuador, in partnership with the nature organization Bos+: 424,419 native trees planted since the project launch in 2011, representing a reforestation of 375 hectares and an estimated accumulated carbon sequestration storage of 8,627 tons in 2019.</p>

Reducing the use of resources and the generation of waste

We recycle and reuse set-top boxes and modems.	<p>Annual recycling of more than 200,000 set-top boxes and modems through a reverse logistics solution in partnership with the social profit organization Vlotter (IMSIR cvba): 378 tons of waste avoided in 2019.</p>
We invest in the recycling and reuse of computers, mobile phones and IT equipment.	<p>Structural partnership with Pro Used Computers for the recycling and reuse of Telenet IT equipment</p> <p>Reprocessing of old mobile phones collected from customers in points of sales when buying a new mobile device: 0.20% of Telenet customers and 0.50% of BASE customers reached</p>
We invest in smart and environmentally friendly packaging.	<p>Reduction of waste generated by packaging of more than 20% in 2019</p>
When inevitable, we ensure proper disposal of generated waste.	<p>46% refurbishment of collected customer premise equipment</p> <p>100% recycling of hazardous waste.</p> <p>One environmental incident in 2019 involving significant spills, related to the replacement of an underground storage tank in a network headend. Mineral oil pollution was detected in the soil, upon which the polluted soil was excavated. Residual contamination was identified, but it did not present a risk to human health or the environment.</p>



2 | Managing our supply chain in a responsible way

Most important developments in 2019

Telenet rewards suppliers who strive for sustainable operations and encourages the others to improve their performance. We require suppliers to comply with the  **Anti-Corruption Policy** and the **Telenet Supplier Code of Conduct**, which covers:

- environmental standards for the suppliers' activities, products and services
- fundamental human rights
- working conditions
- health and safety at work
- business ethics

Suppliers must also agree to comply with the **Responsible Purchasing and Supply Chain Principles** of our parent company Liberty Global. These principles implement international labor standards such as the International Labor Organization Core Conventions and the UN Treaty on Human Rights, Bribery and Corruption, Health, Safety and the Environment.

An assessment of the implications of the UN Framework and Guiding Principles on Business and Human Rights on Telenet's business found that there is a significantly elevated risk of disrespect and abuse of human rights in our supply chain. Key human rights risks in the supply chain include child labor, forced labor, working hours and wages, discrimination, freedom of association and health and safety.

Together with Liberty Global, we use the EcoVadis Dynamic Scorecard to assess the Environmental, Social and Governance performance of companies on 21 indicators covering environmental, social, ethical and supplier risks. We regularly monitor our suppliers and launch a formal audit in the event of suspected breaches. In case of non-compliance with Corporate Social Responsibility principles, we help suppliers take corrective actions. If no agreement is reached on an acceptable recovery plan however, the business relationship may be terminated.

KEY DATA INSIGHTS

EcoVadis Dynamic Scorecard 2019 – Suppliers

Number of suppliers that comply with the Telenet Supplier Code of Conduct	Performance 2019: 13% Target: 100% of new suppliers have signed the Code of Conduct
Number of suppliers assessed through EcoVadis in 2019	Performance 2019: 143 (57 of which supply directly to Telenet) Target: 100
Number of high-risk suppliers asked to take corrective actions in 2019	Performance 2019: 4 Target: 100% of high risk suppliers has a corrective action plan
Number of suppliers Liberty Global/Telenet have the ambition to assess in 2020	100

 [Telenet approach to Procurement & Supply Chain Management >](#)



Telenet is also a major supplier to large corporations. EcoVadis assessed Telenet’s sustainability performance in the summer of 2019.

EcoVadis Assessment 2019 – Telenet

EcoVadis CSR Rating	Gold EcoVadis Rating (69/100 points)
Strongest performance	Labor practices (80/100 points) Ethics (70/100 points)
Improvement areas	Environment (60/100 points) Sustainable procurement (60/100 points)
Identified risks	Lack of certification (ISO 14001 & OHSAS 18001) Low coverage of policies and measures across the organization

3 | Demonstrating good governance & transparency in our business practices

Most important developments in 2019

At Telenet, we are committed to conduct our business in a fair, honest and respectful manner. We uphold the highest corporate governance standards. We actively engage with our stakeholders so we can respond to their expectations with regard to our social, economic and environmental impact, and we subscribe to a series of internal codes of conduct and external charters, principles and initiatives. We ensure that human rights are respected across our value chain by setting the highest standards for our employees, customers and suppliers. We apply the necessary precautions before developing new innovations with potential for causing harm and when extensive scientific knowledge on the matter is lacking.

Adoption of internal codes of conduct

Meeting the highest standards of corporate governance is essential to guaranteeing the integrity of our business practices. We therefore monitor all aspects of our business with several internal codes of conduct.

The Telenet Code of Conduct is signed by the management board, senior leadership and all employees with confidential roles. It integrates principles of the OECD Guidelines for Multinationals, setting out the rules and behaviors to conduct business with honesty and integrity, in accordance with high ethical and legal standards. The code is the leading policy for employees and covers human rights including equal opportunity, privacy, and health and safety. It forbids discrimination and harassment of any kind. This commitment extends to all aspects of employment from recruitment to termination. The Telenet Code of Conduct also prohibits all political and charitable contributions or donations that could be considered a means of bribery or corruption.



Reviewed in 2019, the Telenet anti-corruption policy is in line with international regulations, Belgian legislation and the policies of our parent company Liberty Global. It distinguishes three categories of anti-corruption and bribery risks:





- **Active public corruption:** Presenting a public official (or a person introducing himself as such), either directly or through an intermediary, with an offer, promise or benefit of whatever kind in favor of that same official or any other person, to adopt a particular course of action that could yield some kind of commercial advantage.
- **Active private corruption:** Presenting any other person (business partner, supplier, ...), either directly or through an intermediary, with an offer, promise or benefit of whatever kind in favor of that person or any other person, to perform or refrain from a particular action as part of his position within his company, without the knowledge and authorization of that person's company.
- **Passive private corruption:** Requesting or accepting, directly or through an intermediary, an offer, promise or benefit of whatever kind from another person, without the knowledge and authorization of the company, to perform or refrain from a particular action as part of his position at the company.

We have identified a number of departments – Finance, Corporate Public & Regulatory Affairs, Procurement, and Telenet Business – that present a higher risk for any of these types of corruption than the rest of the organization.

In 2019, Telenet also adopted a separate **Gifts & Hospitality policy**, which contains a prohibition on the giving and taking of bribes, a limitation on the giving and receiving of gifts, a reminder to observe laws and regulations, and an obligation of transparency around political donations. The policies are illustrated with the help of specific examples and practical guidelines.

Telenet is fully committed to be a responsible company that considers the broader impact of its business activities and corporate decision making on the community it operates in. Telenet actively engages with corporate stakeholders – including public authorities – through consultation and dialogue. We have established a  **stakeholder engagement charter** with a number of principles that ensure we develop lasting, trusted relationships with our corporate stakeholders in an open and transparent way.

Employees are regularly informed about these codes of conduct through training and internal communications.

They can report compliance issues and breaches through the whistleblower procedure or the compliance mailbox. Complaints are handled by the Compliance team. In addition, Telenet applies the following standards:

- The **Corporate Governance Charter** outlines the rules and principles that underlie the Corporate Governance of the company. 
- The **Telenet Customer Data Policy** stipulates how we collect, use, store and protect customer data. It also describes how customers can control the use of their personal data and how Telenet is authorized to contact customers. It also details the rules around the passing of personal data to third parties. 

Compliance with external rules, charters and principles

The **United Nations Global Compact** guides our strategy and corporate culture, and ensures the sustainability of our daily operations. In 2011, we formalized our commitment to these ten principles. Telenet's progress on the principles is shown in the table on page 46 of this report.

Telenet also embraces the **UN Sustainable Development Goals**, which are outlined on page 45 of this report.

Telenet is compliant with the **General Data Protection Regulation 2016/679 ('GDPR')** and has taken the following actions to ensure compliance with the GDPR:

- the appointment of a dedicated Data Protection Officer;
- the set-up of several internal working groups to drive GDPR implementation across the different business units;
- the updating of internal procedures and IT systems.

While Telenet is compliant with the GDPR rules when it comes to customer communications about the Telenet Customer Data Policy, the company continues its investments to assure full compliance across the customer value chain.

When it comes to advertising and publicity, Telenet acts in accordance with the **rules of the Jury for Ethical Practices in Advertising (JEP)**. JEP is the self-disciplinary body of the advertising sector in Belgium and supervises the correct and fair nature of advertising messages. As



a leading provider of Internet services, Telenet has a special social responsibility with regard to **freedom of expression**. Our general principle is not to limit it in any way, except when requested to do so by an authorized authority. Together with other Belgian Internet providers, Telenet has signed a **Protocol with the Belgian Gaming Commission**, in which Telenet, in cooperation with the Federal and Regional Computer Crime Unit, commits

to act against websites offering illegal gambling. Legal authorities can also require the company to block websites that violate copyrights or that distribute illegal pornographic material. Finally, as a member of the **Association of Internet Service Providers in Belgium (ISPA)** Telenet adheres to the association's code of conduct to prevent and combat child abuse via chat applications and websites.

KEY DATA INSIGHTS

Demonstrating good governance & transparency 2019

Number of reported cases on anti-competitive behavior, anti-trust and monopoly practices	0 currently subject to 1 investigation
Number of confirmed corruption incidents	0
Number of breaches against the Code of Conduct	0
Number of breaches of Ethical Advertising Practices reported to JEP	7 breaches reported, of which 2 were acknowledged, resulting in 1 required modification and 1 reservation advice

Political contributions 2019

Telenet did not spend any money on political contributions in 2019.

Investments in lobbying activities, including consultant salaries, administrative fees and sponsoring contributions	€65,000
Total membership contributions to trade associations	€647,965
Highest trade association fees paid	Agoria: €222,395 VOKA: €63,586 RISS: €51,000

Stakeholder engagement 2019

Telenet organized eight stakeholder events in 2019.

Participation in these events was not remunerated and no expense fees were paid to the attendees.

Number of Telenet Talks expert round tables	3
Number of CEO Executive Circles	2
Number of academic round tables	2
Number of Mix & Mingle Networking events	1



[Telenet Responsible Business Practices >](#)



[Corporate Governance Charter >](#)



[Telenet Code of Conduct >](#)



[Telenet corporate memberships 2019 >](#)



[Stakeholder engagement charter >](#)

IN A NUTSHELL

TELENET'S PROGRESS ON ITS MAIN SUSTAINABILITY FOCUS DOMAINS

TARGET	RESULT 2016	RESULT 2017	RESULT 2018	RESULT 2019
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AMAZING CUSTOMER EXPERIENCE

Material issues covered	Customer health and safety Privacy and data security Product sustainability				
2020 Objective	Customer loyalty for Telenet & BASE : Net Promoter Score (NPS) of -5	Telenet: -8.8, BASE: -10.3	Telenet: -14.9, BASE: -4.5	Telenet: -13.4, BASE: 1	Telenet: -11.5, BASE: 9.7
	NPS rating of +15 for reputation item 'Sufficient attention to product quality'	N/A	+9.4	+10.6	+1.8
	NPS rating of +10 for reputation item 'Sufficient attention to product innovation'	N/A	+12.4	+9.3	+7.6
KPIs	Customer churn rate	8.0%	9.3%	12.1%	10.5%
	# Data subject requests received	N/A	N/A	1,737	1,133
	Privacy complaints and breaches	5 incidents reported to the Data Protection Authority. No fines	1 incident reported to the Data Protection Authority. No fines	8 incidents reported to the Data Protection Authority. No fines	23 incidents reported to the Data Protection Authority. No fines
	# Data protection breaches	0	0	0	0
	Billing NPS	-13.2	-12.0	-12.2	-9.6



GREAT WORKPLACE

Material issues covered	Responsible employer Employee diversity and equality				
2020 Objective	Employee engagement: Zoom employee score of 61%, with a clear ambition to reach a score in the top quartile	60%	58%	No Zoom survey	78%
	Bi-annual E-NPS survey with a clear ambition to reach a +13 score	N/A	N/A	+13	+3
KPIs	# newly hired employees	336	354	409	510
	Refer a friend program: # new hires based on employee recommendation	18	24	32	52
	Telenet Young Graduate Program (two-year training program for recently graduated master students)	15	20	27	36
	Voluntary employee turnover	5.0%	9.5%	8.0%	7.0%
	# employees who completed training	2,400	2,510	3,015	2,483
	Training hours per FTE	24.4	12.1	17.3	17.6
	% female employees	35.4%	35%	36%	36%
	% female senior managers (Senior Leadership Team)	50%	50%	42%	36%
	# women in the Board of Directors	3	3	3	3
Absentee rate (% of total days scheduled)	7.0%	7.2%	7.2%	7.8%	

Note: The Net Promoter Score (NPS) measures customer experience on a quarterly basis based on a series of standard questions related to a company's products, customer service and reputational issues. Residential and business customers are asked to what extent they would recommend the company, its products and services, yielding a score on a scale of 0-10. Respondents with a 9-10 score are 'promoters' who are highly loyal. 'Passives' are customers with a 7-8 score. They are satisfied but vulnerable to competitive offerings. Customers with a score between 0 and 6 are called 'detractors'. They are unhappy customers who might negatively impact the company's reputation. Subtracting the percentage of detractors from the percentage of promoters yields the Net Promoter Score, which can range from a low score of -100 to a high score of +100. Learn more about the NPS methodology [here](#). The Employee Net Promoter Score (E-NPS) applies the same methodology to measure employee engagement.

TARGET		RESULT 2016	RESULT 2017	RESULT 2018	RESULT 2019
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DIGITAL SOCIETY

Material issues covered	Digital inclusion and skills development				
2020 Objective	Unlock the potential of digital for all through at least 3 digital skills programs	2 programs in place	3 programs in place	3 programs in place	3 programs in place
	Accelerate 25,000 young people in the digital age	21,150 people reached	41,000 people reached	28,290 people reached	22,706 people reached
KPIs	Investments in network growth	€250.6 million	€295.7 million	€220.2 million	€109.1 million
	Investments in media & entertainment	€12 million	€8.4 million	€4.8 million	€9.7 million
	Total number of youngsters empowered through coding & entrepreneurship initiatives	450 (YouthStart)	450 (YouthStart), 50 (BeCode)	750 (YouthStart), 270 (BeCode)	806 (YouthStart), 400 (BeCode)
	Total number of children reached through digital skills training	20,700 (CoderDojo Belgium)	25,500 (CoderDojo Belgium), 15,000 (Digitale Duik)	22,700 (CoderDojo Belgium), 5,470 (other community initiatives)	20,000 (CoderDojo Belgium), 1,500 (other community initiatives)
	Total number of start-ups accelerated with Telenet investments	88	86	791	935
	Total number of SMEs accelerated through Digitale Vernsneling	N/A	1,400	1,100	3,372



RESPONSIBLE BUSINESS PRACTICES

Material issues covered	Business ethics and transparency Carbon and energy efficiency Electronic waste reduction Privacy and data security Supply chain risk management Responsibility of media				
2020 Objective	NPS rating of -5 for reputation item 'Enough efforts towards good causes'	N/A	-5.8	-7.1	-8.8
	NPS rating of -10 for reputation item 'Honest & fair business practices'	N/A	-13	-14.1	-17.8
KPIs	Carbon efficiency ratio: Total scope 1 + 2 CO ₂ -emissions including compensation per terabyte of data usage	0.009	0.007	0.005	0.005
	% renewable energy consumption	91%	80%	92%	90%
	% refurbishment of collected customer premise equipment	44%	45%	55%	46%
	% recycling of hazardous waste	100%	100%	100%	100%
	Reverse Logistics: % avoided waste through the recycling and revaluation of used set-top boxes and modems	329 tons	330 tons	375 tons	378 tons
	Waste recycling rate	71%	75%	71%	58%
	# suppliers monitored on ESG issues (EcoVadis)	46	100	68	57
Telenet EcoVadis CSR rating in points (Gold EcoVadis CSR Rating)	64	64	65	69	

SUSTAINABILITY REPORTING

OUR APPROACH TO REPORTING: GENERAL PRINCIPLES

Scope

This sustainability report offers an overview of the extra-financial parameters and indicators across all divisions of the company Telenet over the calendar year 2019 (01/01/2019 to 31/12/2019). This report follows on Telenet's Financial Annual Report 2019, published in March 2020.

Every year, Telenet offers detailed insight into its CSR activities by publishing a sustainability report. This report complements the non-financial information included in the Telenet Financial Annual Report 2019. Where 'Telenet', 'we', 'us', 'the company', 'the corporation', 'the group' or 'the business' is used, this refers to Telenet Group Holding NV/SA, including its subsidiaries, and its Belgian market engagement. Data and information about the extra-financial practices and performance of Telenet Group Holding NV/SA from the year 2019 are reported through two additional documents:

- Telenet Financial Annual Report 2019
- Telenet Sustainability Report 2019

Commitment

With this document, Telenet wants to truthfully report on the economic, social and ethical activities, and environmental achievements that are most relevant to the company and its stakeholders. In this annual report, Telenet provides an overview of the goals it strives to achieve, its latest achievements and the new initiatives that are being developed to meet the company's sustainability objectives.

In its sustainability management, Telenet strives to adhere to the generally applicable principles of inclusion, materiality and responsiveness. This report emphasizes the strengths and weaknesses of each of the defined material aspects and provides us with the opportunity to continuously improve processes and performance.

Because all concerned departments respect the results of this analysis, we can make an important contribution to further progress on the ratings in 2019. To us, extra-financial information is as important as financial information. Telenet is working to have more environmental aspects and social data externally verified. This report has been read and approved by Erik Van den Eenden, Telenet's Chief Financial Officer.

Explanation of key numbers

The reported results and key social figures relate to all Telenet Group Holding NV/SA offices and locations, unless stated otherwise. Telenet's policy is to include any new subsidiaries that were acquired in the first six months of the reporting period. We therefore include the recent acquisition of De Vijver Media, as completed in May 2019.

GLOBAL REPORTING INITIATIVE STANDARDS – CORE

RELEVANT TOPICS	CATEGORY	ASPECT	GRI STANDARDS DISCLOSURE	BOUNDARY WITHIN ORGANIZATION	BOUNDARY OUTSIDE ORGANIZATION
Business ethics and transparency	Economic	Anti-corruption, Anti-competitive Behavior, Public Policy, Marketing and Labeling	205, 206, 415 & 417	Telenet Group Holding NV/SA	Customers
Responsible employer	Economic	Employment, Occupational Health and Safety, Training and Education	401, 403 & 404	Telenet Group Holding NV/SA	-
Privacy & data security	Economic	Customer Privacy	418	Telenet Group Holding NV/SA	Customers
Product sustainability	Economic	Materials, Energy	301 & 302	Telenet Group Holding NV/SA	Customers
Digital inclusion and skills development	Economic	Local Communities	413	Telenet Group Holding NV/SA	Customers, Society
Supply chain risk management	Economic, Social	Supplier Social Assessment, Supplier Environmental Assessment	308 & 414	Telenet Group Holding NV/SA	Suppliers
Customer health and safety	Social	Customer Health and Safety	416	Telenet Group Holding NV/SA	Customers
Carbon and energy efficiency	Environmental	Energy, Emissions	302 & 305	Telenet Group Holding NV/SA	Society
Employee diversity and equality	Social	Diversity and Equal Opportunity	405	Telenet Group Holding NV/SA	-
Electronic waste reduction	Environmental	Materials	301	Telenet Group Holding NV/SA	Society
Responsibility of media	Social	Socio-economic Compliance	419	Telenet Group Holding NV/SA	Customers, Society



Principles followed to determine the content of the sustainability report

Telenet considers various elements in deciding on the content of this report. Telenet has identified its main stakeholders, identified their key expectations and described how Telenet meets their expectations. In addition, the company looks at its own performance in the broader sustainability context by determining, among others, the most important trends faced by telecommunications companies today. With this report, Telenet wants to show how the company will encourage economic, social and environmental developments locally, regionally and globally. Telenet does this with a focus on the material aspects, provided by its stakeholders.

Significant changes and restatements

Telenet is part of Liberty Global plc and in order to align group reporting, the reporting for Telenet is fully aligned with that of its main shareholder Liberty Global since 2014. Previously reported environmental figures in the report have been restated for the past three years (2016, 2017 and 2018).

Assurance

We report our environmental data to our majority shareholder Liberty Global plc, using its Credit360 system. As such, Liberty Global annually reviews Telenet's environmental data. At Group level, Liberty Global engages KPMG to provide limited assurance of the energy consumption and greenhouse gas emissions data presented in Liberty Global's Annual Report and Accounts. Reporting to Liberty Global plc, KPMG uses the assurance standards ISAE 3000 and ISAE 3410. Telenet has opted for a limited assurance of its sustainability performance and has deliberately chosen to focus its efforts and resources on the implementation of actions and initiatives that can help structurally improve its overall performance.

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SUMMARY OF THE PERFORMANCE

Scope: Telenet Group Holding NV/SA

ENVIRONMENTAL PERFORMANCE	METRIC	2016	2017	2018	2019
Energy consumption					
Non-renewable fuel					
Burning oil	kWh	0	0	0	0
CNG	kWh	38	11,849	11,849	5,339
Diesel	kWh	27,587,034	24,706,510	28,913,500	23,348,749
Fuel oil	kWh	0	0	0	0
Gas oil	kWh	1,765,965	1,506,804	1,506,804	943,543
Jet fuel	kWh	0	0	0	0
LPG	kWh	0	0	0	0
Natural gas	kWh	4,099,468	4,679,344	1,789,249	2,452,736
Petrol	kWh	120,043	477,064	1,582,024	3,428,803
Total	kWh	33,572,548	31,381,570	33,803,426	30,179,170
Electricity, heating and cooling					
Electricity	kWh	188,276,412	189,441,397	184,342,545	168,517,670
Heating and cooling	kWh	0	0	0	0
Total	kWh	188,276,412	189,441,397	184,342,545	168,517,670
Electricity sold	kWh	0	0	1,326	2,602
Total energy consumption(1)	kWh	221,848,961	220,822,968	218,144,645	198,694,238
Energy intensity					
Energy intensity	kWh of electricity / terabyte of data usage	135.0	98.4	81.4	59.1
Electricity generated from onsite renewables	kWh	31,474	30,613	170,077	163,122
GHG Emissions(2)					
Scope 1 emissions	Metric tons CO ₂ e	9,085	8,607	9,390	10,567
Scope 2 market-based emissions	Metric tons CO ₂ e	3,243	5,235	2,069	3,301
Scope 2 location-based emissions	Metric tons CO ₂ e	32,591	32,792	31,910	28,951
Scope 3 emissions	Metric tons CO ₂ e	6,098	5,598	3,666	3,405
Total location-based GHG emissions	Metric tons CO₂e	47,765	46,997	44,966	42,923
Total market-based GHG emissions	Metric tons CO₂e	18,418	19,440	15,124	17,273
Carbon credits	Metric tons CO ₂ e	(8,627)	(8,473)	(8,627)	(8,627)
Emissions intensity (scope 1 and 2 market-based)	metric tons CO ₂ e / terabyte of data usage	0.009	0.007	0.005	0.005
Emissions from business travel	Metric tons CO ₂ e	951	920	634	385
Waste by type and disposal method					
Reuse	Metric tons	127	167	0	309
Recycling	Metric tons	1,961	2,662	1,648	1,219
Incineration	Metric tons	649	708	622	541
Landfill	Metric tons	0	0	0	0
Composting	Metric tons	9	14	21	21
Total waste generated	Metric tons	2,746	3,551	2,290	2,090
Recycling rate	%	71	75	71	58
Water withdrawal by source					
Municipal water supplies	m ³	21,976	21,785	25,483	26,140
Other	m ³	1,453	1,062	278	583
Total	m ³	23,429	22,847	25,761	26,723
Initiatives					
Emissions reductions	Metric tons CO ₂ e	173	346	58	372
Energy saved through efficiencies	kWh	1,000,000	2,000,002	64,000	2,165,002
Cost savings from environmental initiatives	€	107,771	197,947	41,020	216,823
Revenue generated from environmental initiatives	€	0	0	27,801	57,390

(1) Sum of total energy consumption from non-renewable fuel and electricity, heating and cooling, minus electricity sold

(2) See page 40 for definitions of our greenhouse gas emissions

SUMMARY OF THE PERFORMANCE

Scope: Telenet Group Holding NV/SA

SOCIAL PERFORMANCE	METRIC	2016	2017	2018	2019				
Total community investment	€	1,225,618	1,887,085	728,045	2,033,971				
Total workforce and breakdown by employee category									
Employees	Headcount, year end	3,290	3,364	3,310	3,611				
Outsourced employees	Headcount, year end	2,444	3,151	3,226	3,053				
Employees by contract type									
Permanent contracts	Headcount, year end	3,261	3,313	3,245	3,555				
Temporary contracts	Headcount, year end	29	51	65	56				
Employees by contract type									
Full time	Headcount, year end	2,714	2,775	3,084	3,343				
Part time	Headcount, year end	576	589	226	268				
Average age*									
Total	In years	38	39	38	38				
Men	In years	39	41	39	39				
Women	In years	36	36	36	36				
Employees by age group									
Under 30 years old	Headcount, year end	619	696	682	725				
30-50 years old	Headcount, year end	2,239	2,220	2,189	2,363				
Over 50 years old	Headcount, year end	360	448	439	523				
Women in management									
Female share of total workforce	% of total workforce	35.4	35	36	36				
Females on the board of directors	% of total board of directors	30	30	33	33				
Females in all management positions	% of total management workforce	29	30	32	32				
Equal remuneration									
Employees, Non-Management level	Ratio of the average female salary and average male salary	0.88	0.93	0.84	0.85				
Leadership	Ratio of the average female salary and average male salary	0.85	0.91	0.86	0.88				
Senior Management	Ratio of the average female salary and average male salary	0.96	0.91	0.84	0.83				
CEO pay ratio	Ratio of mean employee compensation and total annual compensation of the CEO	17	21	21	23				
New employee hires and employee turnover									
New employee hires by age group and gender									
Under 30 years old	Headcount	233	205	227	295				
30-50 years old	Headcount	91	141	166	192				
Over 50 years old	Headcount	12	8	16	23				
Total	Headcount	336	354	409	510				
New hires - male	Headcount	192	129	262	304				
New hires - female	Headcount	144	225	147	206				
Rate of new hires	Rate (%)	10	11	12	14				
Employee turnover by age group									
Under 30 years old	Number of leavers	97	173	115	134				
30-50 years old	Number of leavers	131	187	232	198				
Over 50 years old	Number of leavers	37	28	28	27				
Total	Headcount	265	388	375	359				
Employee training									
Average training hours	Hours per FTE	24.4	12.08	17.27	17.60				
Average training investment	€ per FTE	384	334	305	328				
Freedom of association									
Employees represented by an independent trade union or covered by collective bargaining agreements	% of employees	100	100	96	98				
Occupational health and safety									
Absentee rate	% of total days scheduled	7.00	7.17	7.15	7.79				
Recordable workplace injuries	#	74	84	74	69				
Occupational accidents with temporary incapacity**	#	15	16	20	22				
Occupational accidents without absence from work**	#	21	25	17	34				
Accidents to and from work**	#	37	43	37	68				
Lost days due to occupational work accidents	#	488	434	303	331				
Work-related fatalities	#	0	0	0	0				
Employee performance reviews									
Employees reviewed	%	93	98	100	87				
Employee performance reviews - Breakdown by gender and employee category									
		Male	Female	Male	Female	Male	Female	Male	Female
Senior management	%	100	100	100	100	100	100	100	100
Managers/supervisors	%	82	84	99	100	100	100	100	100
Non-management	%	98	92	98	99	100	100	70	100

*Key figures and percentages shown only relate to (employees of) Telenet NV

**Figures exclude De Vijver Media

TELENET'S REPORTING METHODOLOGY

All environmental and social data relate to the period from 1 January to 31 December unless otherwise stated. Previously reported environmental figures in the report have been restated for 2016, 2017 and 2018.

Telenet's reported environmental data follow the World Resources Institute and World Business Council on Sustainable Development's GHG Protocol Corporate Standard, using the operational control approach. Emissions from businesses in which we have non-controlling equity stakes are not included in our reported figures.

Our Scope 1 and 3 emissions are calculated by using the UK Department for Environment, Food and Rural Affairs (DEFRA 2019) emission factors. We calculated our Scope 2 location-based emissions by using the International Energy Agency emissions factors (IEA).

Our market-based emissions are calculated by using supplier-specific emissions information wherever available and then applying the relevant "residual mix" emissions factor to any electricity that does not have supplier-specific emissions information. Reliable Disclosure (RE-DISS 2018) European Residual Mixes emission factors are available for all operations.

Carbon offsets and their related CO₂ savings have been reported separately and they do not form part of our total GHG emissions, as per the GHG Protocol Corporate Standard.

- **Scope 1 (Direct):** emissions from sources that are company-owned or controlled, including: emissions from static combustion (i.e. fuel used in generators for heating/power); mobile combustion (i.e. vehicle and aviation fuel from company-owned or leased fleet); and coolants and propellants used (i.e. in air conditioning units and fire suppression systems). This information is collected via company fuel cards, business travel expenses, third-party invoices and third-party site visits.

- **Scope 2 (Indirect):** emissions from purchased electricity, heat and steam. This information is collected via electricity consumption invoices, co-location service invoices (i.e. where electricity is estimated by market operations), and on-site meters or inverters.
- **Scope 3 (Indirect):** emissions from business air and land travel (includes the use of employee-owned vehicles for business purposes, flights taken by employees, rental and taxi travels and public transportation); emissions arising from water, waste (which includes the impact of recycling customer premises equipment) and travel by our third-party service and installation vehicles. As of 2014, emissions from travel by our third-party service and installation vehicles are included as part of our Scope 3 emissions. This information is collected via third-party service invoices and reporting (e.g. corporate travel agency), business travel expenses and estimations based on market operations.

Location-based and market-based emissions

As prescribed by good practices, we publish both the location-based and market-based emissions, which provide a good illustration of the impact of our purchase and production of alternative energy. **Location-based emissions** are calculated using the average conversion factors of the national grid for the entire electricity consumption. This does not take into account activities that reduce emissions, such as the purchase of CO₂ compensation or the use of electricity from renewable energy sources. **Market-based emissions** are calculated using a conversion factor of zero for all the used electricity that comes from locally generated renewable energy and certified green energy contracts.

For more information and to review our criteria for environmental reporting in full, visit www.libertyglobal.com/responsibility/reporting-and-performance/



TELENET'S GRI CONTENT INDEX 2019

The extra-financial parameters and indicators reported in this document are organized in accordance with the Global Report Initiative (GRI) guidelines. This report was prepared in accordance with the GRI Standards Core option, which on the one hand means that the report is

focused on general disclosures, and on the other hand that it plots the eleven most important material issues to Telenet and reports on at least one of the indicators per aspect. Where this information was available, multiple indicators were included in the report.

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION
GRI 101: FOUNDATION 2019 GENERAL DISCLOSURES			
GRI 102: General Disclosures 2019	102-1 Name of the organization	Page 6	
	102-2 Activities, brands, products, and services	Page 6	
	102-3 Location of headquarters	Page 165 of Telenet Financial Annual Report 2019	
	102-4 Location of operations	Page 6	
	102-5 Ownership and legal form	Page 6	
	102-6 Markets served	Page 6	
	102-7 Scale of the organization	Pages 34, 70, 169 of Telenet Financial Annual Report 2019	
	102-8 Information on employees and other workers	Page 39	Due to our limited geographic scope, Telenet does not differentiate between regions, therefore employee data is not reported per region, but at company level.
	102-9 Supply chain	Pages 28-29 and Telenet Supplier Policy	
	102-10 Significant changes to the organization and its supply chain	Page 37	
	102-11 Precautionary Principle or approach	Pages 29	
	102-12 External initiatives	Pages 30-31	
	102-13 Membership of associations	Page 12 and Corporate Memberships overview	
	102-14 Statement from senior decision-maker	Pages 4-5	
	102-16 Values, principles, standards, and norms of behavior	Pages 6, 29-31	
	102-18 Governance structure	Pages 46-50 of Telenet Financial Annual Report 2019 and Governance approach	
	102-40 List of stakeholder groups	Page 12 and Stakeholder overview	
	102-41 Collective bargaining agreements	Page 39	
	102-42 Identifying and selecting stakeholders	Page 12 and Stakeholder overview	
	102-43 Approach to stakeholder engagement	Page 12 and Stakeholder overview	
	102-44 Key topics and concerns raised	Page 7	

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION
	102-45 Entities included in the consolidated financial statements	Pages 165-166 in Telenet Financial Annual Report 2019	
	102-46 Defining report content and topic Boundaries	Page 35	
	102-47 List of material topics	Page 7 and Materiality matrix	
	102-48 Restatements of information	Page 37	
	102-49 Changes in reporting	Page 37	
	102-50 Reporting period	Page 35	
	102-51 Date of most recent report	Page 35	
	102-52 Reporting cycle	Page 35	
	102-53 Contact point for questions regarding the report	Page 37	
	102-54 Claims of reporting in accordance with the GRI Standards	Page 41	
	102-55 GRI content index	Pages 41-44	
	102-56 External assurance	Pages 26, 37	
MATERIAL TOPICS			
Business ethics and transparency			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Page 10 and Management Approach overview	
	103-2 The management approach and its components	Pages 10, 29-31 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 33	
GRI 205: Anti-corruption	205-3 Confirmed incidents of corruption and actions taken	Page 31	
GRI 206: Anti-competitive behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Page 31	
GRI 415: Public Policy	415-1 Political contributions	Page 31	
GRI 417: Marketing and Labeling	417-3 Incidents of non-compliance concerning marketing communication	Page 31	
Responsible employer			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Page 10 and Management Approach overview	
	103-2 The management approach and its components	Pages 10, 16-18 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 32	
GRI 401: Employment	401-1 New employee hires and employee turnover	Page 39	
GRI 403: Occupational Health and Safety	403-4 Worker participation, consultation, and communication on occupational health and safety	Page 17	
GRI 404: Training and Education	404-1 Average hours of training per year per employee	Pages 32, 39	
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 39	
Privacy and data security			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Page 11 and Management Approach overview	

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION
	103-2 The management approach and its components	Pages 11, 14-15 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 32	
GRI 418: Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Pages 15, 32	
Product sustainability			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Page 11 and Management Approach overview	
	103-2 The management approach and its components	Pages 11, 24-27 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 32	
GRI 301: Materials	301-3 Reclaimed products and their packaging materials	Pages 27, 33	
GRI 302: Energy	302-5 Reductions in energy requirements of products and services	Page 26	
Digital inclusion and skills development			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Page 11 and Management Approach overview	
	103-2 The management approach and its components	Pages 11, 22-23 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 33	
GRI 413: Local Communities	413-1 Operations with local community engagement, impact assessments, and development programs	Local engagement applies to 100% of the organization.	
Supply chain risk management			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Management Approach overview	
	103-2 The management approach and its components	Pages 28-29, Telenet Supplier Policy and Management Approach overview	
	103-3 Evaluation of the management approach	Page 33	
GRI 308: Supplier Environmental Assessment	308-2 Negative environmental impacts in the supply chain and actions taken	Page 28	
GRI 414: Supplier Social Assessment	414-2 Negative social impacts in the supply chain and actions taken	Page 28	
Customer health and safety			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Management Approach overview	
	103-2 The management approach and its components	Page 15 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 32	
GRI 416: Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Page 15	
Carbon and energy efficiency			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Management Approach overview	

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION
	103-2 The management approach and its components	Pages 24-27 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 33	
GRI 302: Energy	302-1 Energy consumption within the organization	Page 38	
	302-3 Energy intensity	Page 38	
GRI 305: Emissions	305-1 Direct (Scope 1) GHG emissions	Page 38	
	305-2 Energy indirect (Scope 2) GHG emissions	Page 38	
	305-3 Other indirect (Scope 3) GHG emissions	Page 38	
Employee diversity and equality			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Management Approach overview	
	103-2 The management approach and its components	Page 17 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 32	
GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Pages 18, 39	
	405-2 Ratio of basic salary and remuneration of women to men	Pages 18, 39	
Electronic waste reduction			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Management Approach overview	
	103-2 The management approach and its components	Pages 24-27 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 33	
GRI 301: Materials	301-3 Reclaimed products and their packaging materials	Pages 27, 33	
Responsibility of media			
GRI 103: Management Approach 2019	103-1 Explanation of the material topic and its Boundaries	Management Approach overview	
	103-2 The management approach and its components	Pages 30-31 and Management Approach overview	
	103-3 Evaluation of the management approach	Page 33	
GRI 419: Socio-economic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	Page 31	

UN SUSTAINABLE DEVELOPMENT GOALS



4 **SDG 4** – Telenet helps children, youth and adults develop digital skills that prepare them for employment and entrepreneurship.

8 **SDG 8** – Telenet is an important player in the Belgian economy. We stimulate growth by providing competitive and innovative products and services to our customers and by investing in a leading converged network. We create good jobs in our own company and help entrepreneurs thrive. Of course, we also ensure decent working conditions in our supply chain.

9 **SDG 9** – Telenet offers connected and innovative IT solutions to its customers and is consequently also responsible for the privacy and data security of those customers.

12 **SDG 12** – Telenet promotes sustainable management and efficient use of natural resources. We actively reduce the amount of waste generated in our business processes through prevention, reduction, recycling and reuse.

UN GLOBAL COMPACT COP

Area	Indicator	Description	Page
Human rights	GRI 414-1	New suppliers that were screened using social criteria	28
	GRI 414-2	Negative social impacts in the supply chain and actions taken	28
Labor	GRI 102-8	Information on employees and other workers	39
	GRI 108-41	Collective bargaining agreements	39
	GRI 404-1	Average hours of training per year per employee	32, 39
	GRI 404-3	Percentage of employees receiving regular performance and career development reviews	39
Environment	GRI 302-1	Energy consumption within the organization	38
	GRI 302-2	Energy consumption outside of the organization	38
	GRI 302-3	Energy intensity	38
	GRI 302-4	Reduction of energy consumption	38
	GRI 302-5	Reductions in energy requirements of products and services	24, 26, 38
	GRI 305-1	Direct (Scope 1) GHG emissions	38
	GRI 305-2	Energy indirect (Scope 2) GHG emissions	38
	GRI 305-3	Other indirect (Scope 3) GHG emissions	38
	GRI 305-4	GHG emissions intensity	38
	GRI 305-5	Reduction of GHG emissions	38
	GRI 306-2	Waste by type and disposal method	38
	GRI 306-3	Significant spills	27
	GRI 308-1	New suppliers that were screened using environmental criteria	28
	GRI 308-2	Negative environmental impacts in the supply chain and actions taken	28
Anti-corruption	GRI 102-16	Values, principles, standards, and norms of behaviors	29-31

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