

Human Rights Policy

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1 Scope of application

This policy applies to all employees, members of the Management Board, business partners and other representatives of Sunrise UPC LLC and its subsidiaries to which this policy has been declared applicable (hereinafter referred to as «Sunrise UPC»).

2 Goal

Sunrise UPC is committed to safeguarding human rights. As the basis of its corporate culture, Sunrise UPC firmly believes that the safeguarding of human rights is an indispensable prerequisite for sustainable economic and social development that benefits everyone.

3 Legal basis and commitment

As a Swiss company, Sunrise UPC is guided by the human rights laid down in the Swiss Federal Constitution, the European Convention on Human Rights, and UN Covenant I and II.

Sunrise UPC is committed to protecting the fundamental human rights of its employees, customers and suppliers, including protection of human dignity, equal rights, the right to life and personal freedom, protection of children and young people, protection of privacy, freedom of belief and conscience and freedom of expression, assembly and association.

The commitment of Sunrise UPC to human rights is based on the UN Guiding Principles on Business and Human Rights and the international human rights principles contained in the Universal Declaration of Human Rights, including the International Charter of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

4 Measures

Sunrise UPC expects its employees, as well as members of the Management Board and the Board of Directors, to comply with all current legislation, rules and regulations at all times (Liberty Global Code of Conduct).

4.1 Awareness and training

Employees and members of the Management Board are regularly made aware of the values of Sunrise UPC (bold, passionate, one) and the Liberty Global Code of Conduct. Every year, all employees and members of the Management Board must complete an online training course on the Code of Conduct.

4.2 Complaints procedure and remedy of grievances

Employees can file a report via an external whistleblowing portal if an action does not seem right to them: e.g., an incident that violates laws (fraud, theft, etc.) or internal rules (regulations, policies); behavior that is discriminatory, offensive or simply inconsistent with the employee's sense of ethics. Reports can also be made anonymously. In addition, employees have the option of contacting their employee representative or the responsible HR Business Partner. If an employee feels discriminated against, they are also entitled to the procedure stipulated by the Diversity and Anti-Discrimination Regulations.

Customers, suppliers and other contract partners can also report misconduct via the whistleblowing portal.

The respective body then decides which measures are necessary and which entities should be involved in order to support the individual concerned and to investigate the matter.

4.3 Reporting and reviewing

Every month, Sunrise UPC informs the parent company Liberty Global in anonymized form of all possible violations (substantiated and unsubstantiated) of the Code of Conduct by employees or contractual partners acting on behalf of Sunrise UPC as well as the investigative steps taken and any resulting consequences («Allegation Reporting»). If the Allegation Reporting analysis identifies an increased need for action, the necessary measures will be defined by Liberty Global in coordination with the responsible bodies within Sunrise UPC.

In addition, the Allegation Reporting and the resulting measures are reviewed once a year by an external auditor to determine their effectiveness and possible risks.

5 Suppliers

Sunrise UPC suppliers are contractually obliged to comply with the Liberty Global Code of Conduct, the Anti-Corruption Policy, the Responsible Procurement Policy and the Supply Chain Principles.

These principles are based on the ILO Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights and the UK Modern Slavery Act.

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6 Effective date

This policy enters into force on 16.12.2021.

Glattpark, 16.12.2021



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