

BUSINESS PARTNER CODE OF CONDUCT



Owner	Published	Version
Legal	September 2018	1.0

Introduction

Working ethically, safely and with our end use customers in mind are all key to the way Liberty Latin America does business. Our customers depend on us to provide vital telecommunications products and services to better enable their businesses, connections with family member and friends and personal entertainment. It is imperative that our Business Partners embrace our values and mission.

We view our relationships with other businesses who help us deliver our products and services as true partnerships. We treat our Business Partners fairly by using transparent procurement and supply chain practices to enhance value for our customers, employees and shareholders. We encourage and support small, disadvantaged woman-owned and minority-owned businesses whose presence in our operations is important to us.

To protect our values and mission, we insist that all Business Partners endorse our ethics, sustainability, labor and employment and fair-trade practices. This Business Partner Code of Conduct outlines our expectations on how our suppliers, contractors, subcontractors and joint-venture partners should operate when doing business with us. This Business Partner Code of Conduct represents our mutual commitment to doing business the right way consistent with the values and mission of Liberty Latin America.

As you partner with us, there will be occasions when you have questions about making the right ethical choice. In those situations, you must make the right call and do business the right way, even if doing so is difficult or may cost an opportunity. When facing these situations, always err on the side of integrity and know that you can always reach out to a member of our Legal or Compliance & Ethics teams to guide you through making the right decision.

Thank you for all that you do to maintain high ethical standards and for your part in delivering exceptional value to our customers, employees and shareholders.

Balan Nair
President and Chief Executive Officer

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OUR BUSINESS PARTNER CODE OF CONDUCT

What is a “Business Partner”?

Our business partner network consists of suppliers of equipment, materials and other goods, agents, consultants, contractors, subcontractors and companies with whom we partner on a joint venture, consortium or other basis. Together, we refer to these essential components of our business as “Business Partners.”

Your Business Practices

Liberty Latin America deploys cutting-edge technology to enable businesses, to keep families and friends connected and to provide our customers with the best information, sports and entertainment options. Meeting this challenge and maintaining our strong culture of ethical business practices requires us and all of our Business Partners to uphold the same high standards of conduct.

We created this Business Partner Code of Conduct to help each Business Partner and their staff to understand our expectations and to guide you and your staff if any ethical issues arise. While some business practices reflected in this Business Partner Code of Conduct may not be customary in certain countries in which we operate, we require all Business Partners, wherever located, to comply with this Business Partner Code of Conduct because it is fundamental to the way we operate.

Health, Safety, and the Environment

Protecting the health and safety of our customers, employees and communities in which we operate is vitally important to us. We expect the same of our Business Partners. You must demonstrate a strong commitment to the health and safety of our customers, our and your employees and other people impacted by your work by taking all steps necessary to provide safe working conditions.

We also have a strong commitment to sustainable business practices and limiting our environmental impact and expect the same from our Business Partners. We expect you to take every precaution to protect the well-being of the communities we serve and protect and lessen your impact on the environment.

As part of our selection process, we will evaluate your health and safety and environmental stewardship history and reputation.

Conflicts of Interest

We expect our Business Partners to make their business decisions in the best interest of Liberty Latin America, our customers and our shareholders. You must be keenly aware of organizational and personal conflicts of interest that could impact our business. This means that you must avoid not only actual conflicts of interest, but also conflicts of interest that appear to or might later create a conflict of interest. You must promptly report to our Compliance & Ethics Team any actual or apparent conflict of interest so that we have an opportunity to resolve or otherwise manage the conflict of interest. If not properly handled, conflicts of interest may cause us to lose a business opportunity, violate laws or regulations or cause us reputational harm.

Gifts and Entertainment

Every Business Partner should have, promote and enforce a policy on gifts, entertainment and hospitality practices that conforms to accepted global practices to prevent corruption.

Generally, our employees cannot accept or give gifts, entertainment or hospitality intended to influence a business decision or to obtain or retain business. Moreover, we strictly prohibit any offer of cash or cash equivalents (such as a gift card). We do allow employees to accept infrequent and unsolicited non-cash gifts, entertainment or hospitality that are modest in value and intended to promote professional, working relationships. This exception, however, does not apply where accepting or providing such gifts, entertainment or hospitality would breach a contract, or violate laws or regulations.

Corruption

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All Business Partners must familiarize themselves and their staff with our Anti-corruption Policy and laws in effect in the places where we do business including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act and the Organization for Economic Cooperation & Development (OECD) Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions.

While working for us, you cannot offer, give or accept any form of a bribe, kickback, gift or benefit designed to influence a business decision or to obtain or retain business. This prohibition applies to payments, gifts in cash or in-kind whether made directly or through others.

Invitations or solicitations to pay a bribe can be, but are not often straightforward requests for cash or favors. Often they are subtle requests or suggestions or can be hidden in complex transactions or relationships. Be on the lookout for all forms of bribe requests and report any suspicious requests to our Compliance & Ethics Team or Legal Department. You can also refer to our Anti-corruption Policy for more information.

Providing lavish entertainment, travel and hospitality or directing or offering discounted business to one of our employees or their relatives, offering employment opportunities to family members of one of our employees or customers or supporting charities endorsed by or providing services or payments to government officials or their family members are examples of bribes and are prohibited. Simply put, we and our business partners do not give or accept any payment, gift, hospitality or advantage to influence a business decision, to obtain or retain business on our behalf or in connection with our business.

Fair Dealing

We deal fairly with our Business Partners and we expect you to do the same both with us and with other Business Partners. We do not work with Business Partners that restrict their employees' right to associate freely with labor organizations.

Trade and Export Controls

We comply with all applicable international trade laws and regulations, including trade sanctions, and we expect you to do the same. You should be aware that export and trade control laws and regulations apply not only to goods, but also to technology, software and technical information. Export laws frequently restrict "deemed exports", such as sharing information with certain foreign nationals - even if the information does not leave its country of origin - or the movement of information to or through certain countries. When working with Liberty Latin America, you must ensure that you have policies and procedures in place to avoid violations of international trade and export laws.

Inclusion, Diversity, and Harassment

We believe in diversity and will not tolerate discrimination or harassment in the workplace. Given this strong commitment, we expect you to comply with and have policies, procedures and training in place to ensure that you and your staff comply with all applicable laws on discrimination and anti-harassment in the workplace and in the hiring process.

Human Rights

We provide reasonable wages and working conditions and expect you to do the same. We will not tolerate the use of child labor, forced labor or human trafficking. We expect you to do the same and have proper policies, procedures and training in place to prevent human rights violations. We refuse to do business with those who do not share our zero tolerance stance on these issues.

Confidentiality and Data Privacy

You may never share or disclose our confidential information, personal information about our employees or any customer information without our express, written permission. We take our obligations regarding data privacy seriously and have put in place systems, policies procedures and training to safeguard our confidential information and that of our customers.

We expect that you will employ adequate policies, procedures, training and information and physical security measures for your computer systems, portable electronic devices, laptops and other storage devices to ensure

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the safety of our and our customers' information. This includes ensuring that you and your staff do not store our or our customer's confidential information on shared data-storage devices that lack adequate protection. Moreover, should you or your staff become aware of a possible information security or physical security breach that might involve our or our customers' confidential information you must immediately notify our Legal Department.

Intellectual Property

We expect our Business Partners will respect our intellectual property rights. When working with us, you must take necessary steps to protect our trademarks, copyrights, patents and other intellectual property used or that you observe in your work for us. If you or your staff have any questions about any proposed use of our intellectual property, please contact a member of our Legal Department.

Lobbying Activities

Do not directly or through others engage in any lobbying activities on our behalf unless you have received express, written permission from us. We define lobbying as any form of communication with or direct or indirect political contributions to government officials and members of their families specifically designed to influence government policies, legislation, regulatory approvals or the award or administration of government contracts.

Marketing Materials and Interactions with the Media

You must receive our express, written approval before including any reference to Liberty Latin America or any of our products, services, employees, customers or shareholders in any press release, media interview, trade publication, promotional materials or any other form of communication with or involving the media or the use of social media.

Communication and Training

We expect that you will communicate the contents and purpose of our Business Partner Code of Conduct to your staff. We expect you to establish an ethics awareness and training program that promotes making ethical business decisions and explains the benefits of ethical business practices. We also expect you to periodically evaluate your compliance with our Business Partner Code of Conduct, make the records of any such evaluations available to us upon request and to maintain an ongoing dialogue with us to foster continuous improvement in your and our ethics and compliance programs.

Recordkeeping and Right to Audit

We expect that you will maintain records to demonstrate your compliance with our Business Partner Code of Conduct. We will not tolerate falsification of business records or financial information or making false statements regarding your work with us. Such practices violate this Code of Conduct, could violate the law and will irreparably harm your business relationship with us.

We reserve the right to periodically audit your business practices and business and financial records to ensure your compliance with this Business Partner Code of Conduct. We expect you to comply with our reasonable inquiries related to your work for us and to cooperate with our periodic audits. We also expect you and to require your staff to cooperate and share relevant information with us or our consultants in any investigation concerning potential violations of our Business Partner Code of Conduct or any of our other policies or procedures.

Reporting Concerns Without Retaliation

You and your staff have an affirmative obligation to report to us any actual or suspected violation of this Business Partner Code of Conduct or any laws as they relate to any work you do for us. You can report any actual or suspected violations to us or seek guidance on any question you might have by contacting SpeakUp (our hotline) via the web at www.lla.com/speakup or by telephone at +1 720 710 1355 (United States and International collect calls accepted). We will seek to safeguard the confidentiality or anonymity (if allowed by law) of reporters to SpeakUp. That being said, we do promote a culture of speaking out and prefer that reporters provide their names and other important information. We will investigate all reports to SpeakUp and

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will seek to promptly respond to any questions. In the case of reports involving violations, we will take prompt corrective action if appropriate under the circumstances.

We believe that any person, including Business Partners and their staff, should feel free to report any actual or suspected violation of this Business Partner Code of Conduct, our policies or any violation of the law without fear of retaliation. Accordingly, we expect you to take steps to prevent any retaliation against any individual who, in good faith, submits a report or a question to us through SpeakUp. Good faith means that a person genuinely believes that the reported violation occurred and believes the circumstances reported to be true and accurate when making the report.

Liberty Latin America reserves the right to amend or cancel this Business Partner Code of Conduct at any time.