



SEPTEMBER 2018

# LIBERTY LATIN AMERICA

## CODE OF CONDUCT



LIBERTY  
LATIN AMERICA

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## 2018 LIBERTY LATIN AMERICA CODE OF CONDUCT



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# A MESSAGE FROM...

PRESIDENT and CEO | BALAN NAIR



“ Liberty Latin America (“LLA”) has established and enjoys a very positive reputation both in the way we conduct our business and how we strive to constantly innovate. Our reputation influences so many aspects of our Company - the way our customers feel about our products and services; whether or not investors choose to buy our shares; how regulators perceive us; and whether employees find Liberty Latin America a great place to work.

Our Code of Conduct principles define how we treat one another and all those we interact with on a daily basis so that we protect our reputation through a strong culture of integrity and ethical conduct.

- Customers – we treat our customers as we would wish to be treated
- Employees – we act with respect, honesty, and integrity
- Business partners – we work with business partners who will endeavor to meet our high standards
- Reputation – we protect our reputation through ethical and legal conduct

The Code is not designed to be a comprehensive guide to all of our policies or to all responsibilities under law that apply to your role. It should, however, provide the basic principles and core values to guide and support you to do your work to the best of your abilities and in the right way.

Thank you for your commitment in protecting the reputation of Liberty Latin America and making our Company such a great place to work. ”



BALAN NAIR  
CEO | LIBERTY LATIN AMERICA

# INTRODUCTION

DOES THE CODE APPLY TO ME | HELP AND GUIDANCE | OUR EMPLOYEES



## WHAT DO WE EXPECT FROM OUR EMPLOYEES?

- Read and make sure you understand the Code. We are all responsible for protecting and maintaining the integrity of the Company
- Comply with the Code and all laws, rules and regulations applicable to your role
- Act responsibly, ethically and with integrity in all your business dealings
- Complete any training assigned to you on the Code or other Company policies
- Seek help and guidance where you have questions or concerns
- Speak up if you think that there has been a breach of the Code or any other Company policy

## DOES THE CODE APPLY TO ME?

Yes, the Code applies to all of us, including every director, officer and employee of each company within the Liberty Latin America Group.<sup>1</sup> Violations of the Code, including violations of applicable laws, may subject our Company and the individuals concerned to severe consequences. A failure to follow the Code that involves a criminal act could result in prosecution after referral to the appropriate authorities. Violations of the Code may also result in disciplinary action, including termination of employment.

In the Code, when we refer to “the Company”, we mean each and every company, business unit or division within the Liberty Latin America Group. We recommend that contractors, consultants, agents and vendors read our Code to familiarize themselves with the standards our employees expect of each other. That said, we require our Business Partners to follow our Business Partner Code of Conduct, which you can find at [www.lla.com/business-partner-code-of-conduct](http://www.lla.com/business-partner-code-of-conduct).

## HOW CAN I GET HELP AND GUIDANCE?

We have included practical guidance and relevant examples throughout the Code to help bring these important topics to life. The Code does not address every legal requirement or ethical question that may arise, nor does it replace other more detailed Company policies. If you have any questions about anything in this Code you should speak to your line manager. If your line manager cannot answer your question then your local Legal or Ethics & Compliance team member or People team member will be able to help you.

You may also submit any question to SpeakUp, our employee hotline, online at [www.lla.com/speakup](http://www.lla.com/speakup), by telephone at +1 720 710 1355 (free of charge) or by email to [ethics@lla.com](mailto:ethics@lla.com).

<sup>1</sup>With the approval of the Board of Directors of Liberty Latin America Ltd. a Liberty Latin America Group company that has adopted its own code of conduct, which is substantially similar to the Code and has been approved by that company's board of directors, may be excluded from the application of the Code. All directors, officers and employees of any company so excluded from the provisions of this Code are required to comply with all provisions of such excluded company's code of conduct.

# INTRODUCTION

## REPORT A CONCERN | OUR MANAGERS



### WHAT ADDITIONALLY DO WE EXPECT FROM OUR MANAGERS?

- Model the behaviors and make decisions that are consistent with our Code
- Ensure that any business process or practice is in compliance with our Code
- Ensure that employees have adequate time to complete their training on the Code and other Company policies
- Support any team members who raise any questions or concerns to you and seek further advice where necessary
- Speak up if you think that there has been a breach of the Code or other Company policy

### HOW DO I REPORT A CONCERN?

If you become aware of, or suspect any conduct that you believe violates any applicable law, rule, regulation, Company policy or other provision of the Code, you are required to report such improper conduct as promptly as possible. You should report the conduct to your immediate supervisor, a member of our People team or a member of our Ethics & Compliance team.

However, if you are uncomfortable reporting the matter to your immediate supervisor or member of our People team or if the conduct involves an accounting, financial reporting, internal control or auditing matter, you should report the conduct to SpeakUp, our employee hotline, online at [www.lla.com/speakup](http://www.lla.com/speakup), by telephone at +1 720 710 1355 (free of charge) or by email to [ethics@lla.com](mailto:ethics@lla.com).

SpeakUp is our confidential hotline for seeking guidance, asking questions, raising concerns or reporting potential violations of the Code, our policies or any law. SpeakUp is a third-party service providing 24/7 access to report any workplace issues or to ask any question about our Code, our policies or the way we work. Where allowed by law, you can choose to remain anonymous. That said, we encourage you to provide us with your name and location so that we can better investigate a report or most accurately answer a question.

Reports of violations will be kept confidential to the extent possible, consistent with our Company's need to investigate and take action. Employees are also expected to keep information regarding such matters confidential and understand that they are expected to fully cooperate with any such investigation.

We will not permit retaliation against any employee who, in good faith, reports, complains of, or seeks advice concerning the Code or other illegal or unethical conduct. If, however, an employee makes a false report of a violation or of questionable behavior for the purpose of harming another person, the reporting employee will be subject to disciplinary action.



Macarena de Diego | Chile

*"We treat our customers  
as we wish to be treated."*

# WHAT DOES IT MEAN TO TREAT A CUSTOMER FAIRLY?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I overheard one of my sales colleagues promising potential customers a free tablet if they take our services. There is currently no promotion like this and I think the agent is deliberately misleading customers to boost sales. What should I do?

A. Misleading sales tactics are never acceptable. You should report the matter to your supervisor, a member of the Ethics & Compliance team or SpeakUp.

Q. We would like to use some competitor broadband speed data as part of an advertising campaign – can we do this?

A. You should check with our Legal team regarding what data can be used as part of our advertising – it needs to be truthful, accurate and compliant with Company and industry guidelines as well as local laws and regulations.

Q. I work in sales and a prospective customer asks if we can avoid completing a credit check. What should I do?

A. It is important that credit checks are completed to protect both the customer and the Company. You have been trained on when credit checks are required – if you are unsure, consult with your supervisor.

## THE CONTEXT

Our Company's scale and commitment to innovation enables us to develop market-leading products and services.

Our goal is to deliver a great experience for our customers – this means delivering innovative products and services, and treating our potential, existing and former customers fairly and with respect.

## WHAT DOES THIS MEAN FOR ME?

Ensure that sales activities or customer contacts comply with company processes and guidelines.

Ensure that advertising or marketing materials are accurate, transparent and comply with Company guidelines and local laws and regulations.

## WHERE DO I GET HELP OR GUIDANCE?

Legal Team

# WHY IS PERSONAL AND CUSTOMER DATA SO IMPORTANT?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I work in a contact center and I receive a call from someone who claims they are a relative of the account holder. They wish to cancel their services. Can I do this?

A. It is important that we do not give out any account information or make any changes to customer accounts unless we are sure that we have the appropriate customer authorization. You have been trained on what is required – if you are unsure, consult your supervisor.

Q. I need to send some customer data to a colleague. What is the best way to do this?

A. You should consult your local Privacy Officer or a member of the Legal team prior to sending the data. If you do send any personal data you should always send this via an approved secure method (your local IT team can advise on this).

Q. I have received an email which contains a link to a free pass for a prestigious industry conference. I am concerned about the security risk posed by clicking the link. What should I do?

A. Never click on links or open attachments from unknown sources. If in any doubt do not click on the link and forward the email to your local IT helpdesk with a brief explanation of your concern.

## THE CONTEXT

When our customers provide personal data, they put their trust in us to protect that data. The same applies for all of our employees.

It is therefore important that we all use our Company's information systems in a responsible way and to protect the personal data on these systems. These systems include computers, voicemail, email and mobile devices.

Whenever we collect personal data, we must ensure that we keep it private and safe, and we handle it in a way that complies with applicable regulations.

Personal data includes names, addresses, birthdates, social security numbers, and for our customers, location data, IP addresses and other internet usage data and set-top box data.

## WHAT DOES THIS MEAN FOR ME?

Ensure that you have read and understand any local or group-wide Privacy policy and have completed any training assigned to you.

If your role involves handling personal data ensure that you understand and adhere to the relevant Company policies and processes with regards to the collection, processing, storage, and deletion of that data.

Only use personal data for valid business purposes. You should never access personal data which is not required as part of your role in the Company.

Personal data may not be disclosed to anyone unless such disclosure is properly authorized, and the data is required for a valid business reason.

## WHERE CAN I FIND OUT MORE?

Data Privacy And Information Security Policies

## WHERE DO I GET HELP OR GUIDANCE?

Information Security Team, Legal Team



# WHAT ARE COMPANY ASSETS?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I accidentally left my company mobile phone on a train. What do I need to do?

A. You should contact your local IT helpdesk for advice on the process that you need to follow for lost devices.

Q. I broke my personal mobile handset. My friend works in the mobile division and offered to give me a replacement one from the handsets that they have been given to trial.

A. You should not accept your friend's offer. The handsets are Company property and you should advise your friend that this would be theft of Company property.

Q. My previous employer had developed some software that would help me do my current job a lot more efficiently. Can I get a copy of this from one of my friends at my old company?

A. No. You would be infringing their intellectual property rights. If you want to use this software, please contact a member of the Legal team.

## THE CONTEXT

Company assets include:

### Physical assets

Physical assets include office facilities, network, and information technology equipment. Employees should protect the Company's physical assets and use them solely for business purposes, except for limited personal use that does not interfere with our Company's business and is otherwise in compliance with all applicable Company policies.

### People

Our employees and the abilities and talent that they bring to our Company are an asset. We must ensure that we protect our employees' time in the same way we protect our other assets and allow them to perform their duties while at work.

### Data and information systems

It is your responsibility to maintain the confidentiality of any non-public information concerning our Company and any non-public information provided to us by a third-party.

### Intellectual property

Our logos, trademarks, designs, inventions and writings are valuable assets. We protect them through the use of patents and trademark registrations. We are also highly respectful of all intellectual property rights of others.

## WHAT DOES THIS MEAN FOR ME?

Keep your mobile equipment safe – don't leave laptops or mobiles in cars.

Treat employees' time as you would any other Company asset and use it for Company business only.

Keep personal use of information systems to a minimum. It is generally not our intent to monitor internet usage or messages on our voicemail or email systems. However, the Company reserves the right to do so in appropriate circumstances, where this is allowed by local law and in a manner consistent with applicable laws and regulations.

Company confidential information may not be disclosed to anyone unless such disclosure is properly authorized.

You may not disclose any former employer's confidential information.

If you are creating new products or services ensure that you talk to the Legal team about how these can be protected by patents.

If you want to use intellectual property created by someone else, e.g. technical designs, then you must engage with the Legal team to obtain permission from the owner.

## WHERE DO I GET HELP OR GUIDANCE?

Information Security Team, Legal Team

# WHAT SHOULD I KNOW ABOUT DIVERSITY AND EQUAL OPPORTUNITIES?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I would like to fill a vacancy in my team by promoting internally. One of the candidates is a new mother and I believe that she would be great in the job but I am concerned that she will not be able to do the travel that is required so I think it would be best to offer the job to another candidate. Is this the right decision?

A. You should offer the role to the best candidate for the job, based upon merit, business needs, and confirmation that they can meet specific requirements of the job such as travel.

Q. I manage a store and have an applicant for a job who has a disability. I am concerned that their disability may mean customers don't want to deal with them. Can I put their application to one side?

A. No. We recruit individuals who are the best people for the job and this individual's application should be considered on the same basis as all other applicants.

## THE CONTEXT

We are committed to equal opportunities for our employees and those seeking employment with our Company.

Company employment decisions must be based on individual merit and business needs, irrespective of race, color, ethnic, cultural, community or national origin, religion, sexual orientation / identity, family or marital status, gender, disability or age.

This commitment extends to all aspects of employment including recruitment, hiring, evaluation, promotion, compensation, training, development, and termination.

## WHAT DOES THIS MEAN FOR ME?

You should understand the recruitment and performance management processes and ensure you apply these fairly, making decisions based upon merit.

Speak up about any views or concerns you have about potentially discriminatory behavior by contacting your supervisor, a member of our People team, or by contacting [SpeakUp](#).

## WHERE CAN I FIND OUT MORE?

People Policies

## WHERE DO I GET HELP OR GUIDANCE?

People Policies



*"We act with respect,  
honesty and integrity."*

# WHAT BEHAVIORS ARE NOT ACCEPTABLE AND HOW CAN WE KEEP THE WORKPLACE RESPECTFUL?

## CAN YOU GIVE ME AN EXAMPLE?

Q. I was listening to some of my team members sharing a joke. I felt that the joke was in bad taste and offensive. What do I do?

A. If you feel comfortable to do so, you should raise your concerns with your team members. If you don't feel comfortable with this then you should raise this with your supervisor or People team representative.

Q. My manager speaks to me and my colleagues in an aggressive manner and accuses us unfairly of missing deadlines. What should I do?

A. You should raise this with your People team representative.

## THE CONTEXT

A great working environment depends on the way we behave.

There are some behaviors, which are never acceptable at work, including things that are illegal or that violate Company policies.

We will not tolerate harassment in our workplace.

We consider harassment to be actions, conduct, or behavior that any individual or group of individuals is reasonably likely to find offensive, humiliating, intimidating or hostile.

Harassment can take many forms, such as verbal (derogatory statements, slurs, epithets, threats and innuendo), visual (cartoons, drawings, postings, email) or physical (assault, physical interference).

## WHAT DOES THIS MEAN FOR ME?

Treat others with respect and don't engage in behavior which others may find offensive, intimidating or unwelcome.

If you are told to do something illegal or unsafe then explain that you are not comfortable doing so and report the matter.

There are some behaviors which are never acceptable in the workplace:

- Committing any illegal act
- Being under the influence of alcohol or any drug or narcotic. Moderate alcohol consumption at Company sponsored events or in connection with business meals or entertainment is permissible
- Possessing, selling or otherwise providing illegal drugs or narcotics to other employees
- Stealing, destroying, defacing, or misusing Company property or another employee's property
- Use of abusive, threatening, or obscene language
- Failing to comply with any Company policy

Speak up if you feel that you may have seen or experienced behavior which is not acceptable in the workplace.

## WHERE CAN I FIND OUT MORE?

People Policies

## WHERE DO I GET HELP OR GUIDANCE?

People Team

# WHAT DO I NEED TO KNOW TO ENSURE THE SAFETY OF MYSELF AND OTHERS?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I am part of a team performing network repairs and maintenance. What do I do if I have not received training to use equipment required as part of my role?

A. You should speak to your line manager to ensure that you receive the training appropriate to your role.

Q. What should I do if I see something which I think may be potentially dangerous?

A. We all have responsibility for ensuring that we work in a safe environment. You should report anything you consider dangerous to your local Health and Safety team so that it can be investigated.

## THE CONTEXT

We all share the responsibility to ensure that our places of work are safe, and our products and services are delivered in a safe way to protect our employees, partners, customers, and the communities in which we operate.

## WHAT DOES THIS MEAN FOR ME?

Follow relevant procedures and instructions and ensure you have completed any training assigned to you.

Ensure the safety and wellbeing of yourself and others by taking adequate precautions.

Help others by challenging dangerous behaviors and situations.

Report any safety and wellbeing risks and concerns.

Report all work related accidents and incidents.

## WHERE DO I GET HELP OR GUIDANCE?

People Team

# WHEN SHOULD I NOT TALK ABOUT THE COMPANY?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I saw commentary on an internet forum about the broadband speeds we provide. I think some of the commentary is wrong and would like to join the conversation to correct the errors. Can I do this?

A. You should not post anything on behalf of the Company unless you have been authorized to do so by the External Communications team. If you comment, you should be clear that these are your personal views.

Q. I have been asked to speak at an external event about the work that my team has been leading. Can I do this?

A. Before you speak at an external event you should speak with the External Communications team.

Q. My friend is a journalist and while we were having dinner he asked me how the Company is performing. Can I talk to him about this?

A. Unless you have prior approval, you should not talk to anyone outside the Company about our results or future performance, even informally. You should refer them to the Investor Relations team.

## THE CONTEXT

We keep the public, including our investors, creditors and customers, informed through public release of relevant and clear financial and operational information about our Company. Only designated individuals serve as spokespersons for the Company, and any communications must be in compliance with our policies on sharing information.

We are prohibited from selectively disclosing material information to securities professionals and investors before such information is disclosed to the general public.

## WHAT DOES THIS MEAN FOR ME?

You should not talk to anyone inside or outside the Company about our results unless the individual has the right to know. If information has been disclosed, you must immediately contact our Compliance team or a member of the Legal team.

You should not make any comments on behalf of the Company unless you have prior approval. Do not make any disclosure (public or otherwise) about our financial results or prospects without prior consultation with, and approval by, our Investor Relations team.

All press or other media releases and requests for interviews must be coordinated through the External Communications team. The External Communications team must receive prior notification of all country specific releases and must be copied on the final release.

Only approved individuals are permitted to communicate on behalf of the Company on social media channels.

## WHERE CAN I FIND OUT MORE?

Disclosure, Communications, & Social Media Policies

## WHERE DO I GET HELP OR GUIDANCE?

External Communications Team, Investor Relations Team

# WHEN CAN I OFFER AND ACCEPT GIFTS AND HOSPITALITY?



## CAN YOU GIVE ME AN EXAMPLE?

Q. We are currently in negotiation with a prospective supplier and the meeting runs into the evening. The prospective supplier offers to buy dinner for the team. Is this acceptable?

A. No. Accepting hospitality during a negotiation phase with a current or potential supplier is not permitted and you should split the cost of dinner.

Q. As a thank you for helping a business partner resolve some billing issues, I have been sent a small box of chocolates worth around \$10. Do I need to register this gift?

A. Gifts below nominal value (as defined in our Gifts and Hospitality Policy) are acceptable without requiring registration or approval.

Q. A vendor has offered me tickets to a conference being held overseas and has offered to pay for my travel and hotel.

A. The offer to pay for travel and the hotel should not be accepted. You should discuss with your supervisor the merits of attending the conference.

## THE CONTEXT

The exchange of gifts and hospitality can build goodwill in business relationships, but can sometimes result in, or give the impression of, improper influence or create a commercial advantage, which is prohibited by anti-corruption and bribery laws.

We want to make sure our employees are never put in a position where their judgment or impartiality is called into question.

## WHAT DOES THIS MEAN FOR ME?

Before you offer or accept any gift or hospitality you should ensure that you have read and understood our Gifts and Hospitality Policy.

There are some gifts or hospitality that will never be acceptable. Some examples of these include:

- Gifts or hospitality offered or received when in a tender or negotiation process with a third-party
- Cash or gift certificates
- Any gift or hospitality that creates an obligation or compromise, or could have the appearance of affecting your judgment
- Any offer of travel and/or accommodation in relation to hospitality

If you do not feel comfortable accepting a gift of any value, use your best judgement or check with our Compliance team.

## WHERE CAN I FIND OUT MORE?

Gifts & Hospitality Policy

## WHERE DO I GET HELP OR GUIDANCE?

Compliance Team



Alber Fernandez | Puerto Rico

*"I speak up if I see something that isn't right..."*



# WHAT DO I NEED TO KNOW WHEN DEALING WITH A COMPETITOR?

## (COMPETITION LAWS)



### CAN YOU GIVE ME AN EXAMPLE?

Q. While at an industry event, a friend who now works for a competitor started talking to me about margin pressures in one of our markets and the need for prices to rise. What should I do?

A. You must stop the conversation and make clear that you do not think it is appropriate to discuss such topics. You should not listen silently if competitors start to disclose such information.

Q. In order to enhance the benefit of network build projects it would make sense for us to agree with our competitor that we will not build in the same areas. Is this allowed?

A. No. This kind of geographic division of market focus is not permitted.

Q. My colleague has sent me an email suggesting that we can use our market power to drive a new competitor out of business. The email is a joke and it is clear we would have no such power but do I need to do anything?

A. You should advise your colleague not to write joking or exaggerated emails and forward the email to our Legal department. Emails are used by competition regulators as a key source of evidence and it would not be easy to demonstrate to a regulator that this email was intended as a joke.

### THE CONTEXT

Most countries have laws that are designed to protect free and fair competition. We are committed to complying fully with applicable competition laws and regulations.

These laws apply to all individuals within the Company and there are significant penalties for breaching the law.

The following issues are typically addressed in the laws of countries in which we do business:

- Agreements that have an anti-competitive purpose or effect, are illegal
- The communication of commercially sensitive information between competitors is illegal
- Dominant companies face special restrictions on their commercial behavior to ensure that they do not abuse the lack of competitive constraint
- Mergers and acquisitions, joint ventures, and some financial investments often require prior clearance from a regulator

In addition to competition rules, the nature of our business means that we are often subject to telecommunications or broadcasting sector regulations.

### WHAT DOES THIS MEAN FOR ME?

Be vigilant in dealings with competitors, suppliers, or customers:

- Do not discuss or agree (formally or informally) current or future prices, product offers, bids or business strategy with competitors and trade associations
- Take note that many of our suppliers or business customers are also competitors
- Agreements or understandings (formal or informal) with competitors, suppliers or customers that prevent or restrict competition in the supply of any type of goods or services are usually illegal
- Beware of limiting resale prices, agreeing to or insisting on exclusivity, agreeing or insisting on non-compete restrictions
- Avoid talking about bidding intentions with other potential bidders

Avoid the appearance of wrongdoing:

- If a competitor approaches you with a proposal you think is not compliant with competition rules, it is not sufficient to stay silent. You must inform the Legal team of the situation
- Wherever you are in doubt about compliance with competition rules, consult the Legal team in advance of meetings or discussions

### WHERE DO I GET HELP OR GUIDANCE?

Legal Team

# WHAT DO I NEED TO KNOW WHEN CHOOSING AND MAINTAINING A SUPPLIER?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I manage the Procurement team for network equipment. A close personal friend works on the Liberty Latin America account at a vendor that is bidding to become a supplier in this area. Can I be involved in the supplier selection?

A. We must ensure that our supplier selection process is objective and impartial. To avoid any actual or perceived impartiality you should complete a Conflict of Interest declaration (contact our Compliance team for guidance on this), and implement any guidance. If you have any doubt whether there is a potential conflict of interest you should disclose this.

Q. What do I do if a supplier that I am working with is in the press for abusing human rights?

A. You should contact the Procurement team for guidance.

## THE CONTEXT

Our reputation is an asset and we must ensure that this is protected by working with reputable suppliers.

Our suppliers are expected to agree to our responsible procurement and supply chain principles that cover:

- Labor standards
- Ethics
- Health and safety
- Environment
- Sourcing

We work with our suppliers to assess their risk and performance on environmental, social and ethical activities, including human rights.

We also have a responsibility for ensuring that we treat our suppliers fairly and with integrity.

## WHAT DOES THIS MEAN FOR ME?

Follow Procurement policies and procedures when selecting suppliers.

Disclose any potential conflict of interests which could influence or be perceived to influence your decisions when selecting suppliers. Potential conflicts with suppliers include:

- A direct or indirect interest (including through family members, friends or others on your behalf)
- A close personal relationship

If you are involved in supplier selection ensure that you objectively select the supplier that best meets our business needs.

Do not accept gifts or hospitality from suppliers when you are engaged in a selection process.

If you have any concerns as to whether a supplier is acting in accordance with our Business Partner Code of Conduct or any of our Procurement or Supply Chain policies, guidelines or practices, then you should speak to the Procurement team.

## WHERE DO I GET HELP OR GUIDANCE?

Procurement Team, Compliance Team

# WHAT DO I NEED TO KNOW ABOUT TRADE LAWS?



## CAN YOU GIVE ME AN EXAMPLE?

Q. We are looking to sell surplus set-top boxes to a third-party. The third-party indicates that these will be re-sold throughout the Middle East region. Do I need to do anything further?

A. We have a responsibility to ensure that these will not be sold within any country that appears on a sanctions list. You should consult your Legal team before proceeding.

## THE CONTEXT

We are subject to many trade laws that include things such as sanctions and export controls.

Sanctions prevent us from engaging in commercial relationships with certain individuals, entities and governmental organizations (including persons or entities acting on their behalf).

Export controls include prohibitions and restrictions over the export of goods, technologies and software to specific individuals or countries.

Exports are not limited to traditional shipping methods. An export can be made electronically, through discussions and by visual inspection.

## WHAT DOES THIS MEAN FOR ME?

If you are involved in the export of any items or the transfer of technology internationally you should ensure that the necessary licenses and approvals are in place before proceeding.

If you are uncertain whether any restrictions or sanctions apply in a situation you should seek advice from the Legal team.

In addition, we may have certain reporting requirements as a result of payments made to or received from certain countries that are subject to sanctions. If you have any questions about such payments, you should contact the Legal team.

## WHERE DO I GET HELP OR GUIDANCE?

Legal Team, Compliance Team

# WHAT DO I NEED TO KNOW ABOUT ACCURATE FINANCIAL RECORDS?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I have exceeded my sales target for this quarter. Can I hold back reporting sales until next quarter to help meet my next quarterly target?

A. No, you must always ensure that all transactions are reported accurately in the period they occurred.

Q. I stayed at a hotel on Company business but I have lost the receipt for the hotel. Can I still claim this on my expenses?

A. Yes, but you are required to have receipts to reclaim expenses. In this example you should contact the hotel to obtain a copy of the receipt.

Q. As a result of a delay in a project I have unused budget which I would like to spend on a team event. Is this acceptable?

A. No, expenses budgeted for one purpose should not be used for any other purpose and Company money should only be spent where there is a business requirement. You should consult with your supervisor and Finance if you anticipate any changes to your budgeted spend for any reason.

## THE CONTEXT

We are subject to extensive and complex regulations with regards to our financial records and other disclosures about the Company's performance. We must ensure that our books and records accurately reflect the Company's transactions and are retained for the time required.

All of our books, records, accounts and financial statements must be maintained in reasonable detail, appropriately reflect the Company's transactions and conform both to applicable legal requirements and to the Liberty Latin America system of internal controls.

Accounting and financial reporting practices must comply with applicable generally accepted accounting principles and other criteria, such as local statutory reporting and tax requirements.

## WHAT DOES THIS MEAN FOR ME?

Ensure that you obtain the correct approvals and signatories for any transaction.

Record any financial transactions accurately – this includes your expenses.

Ensure that non-financial data, such as customer numbers, is reported accurately.

Ensure any documentation is retained for the required length of time and destroyed safely when they are no longer required.

Cooperate with and truthfully represent matters to the internal or external auditors.

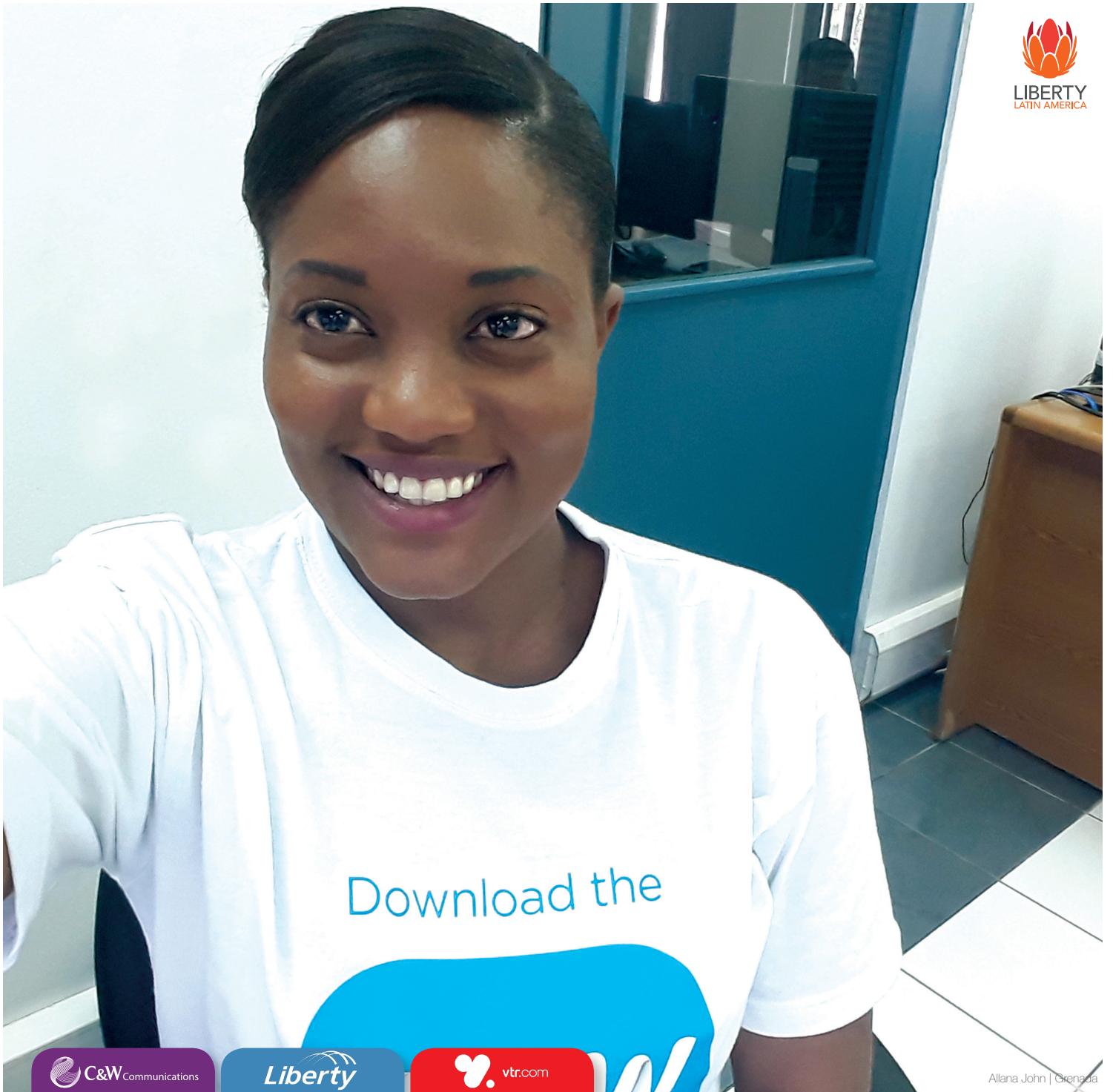
Seek guidance from the Finance team if you are unsure or report any matters which you have concerns about.

## WHERE CAN I FIND OUT MORE?

Travel & Expenses, Procurement, Purchasing Policies

## WHERE DO I GET HELP OR GUIDANCE?

Finance Team, Procurement Team



Allana John | Grenada

*"We protect our reputation through ethical and legal conduct."*

# HOW DO I RECOGNIZE CORRUPTION AND BRIBERY?



## CAN YOU GIVE ME AN EXAMPLE?

- Q. A government official is processing some permit requests for the Company and has asked if we could find a role within the Company for her niece. Is there an issue?
- A. There could be. All hiring decisions must be based on business need and merit. Finding a role for the official's niece could be viewed as offering something of value to gain a business advantage. In these situation, you must contact our Compliance team or Legal team for guidance.
- Q. We have been asked to provide our standard package to a government official at no cost. Can we do this?
- A. No. We can only provide discounts that are broadly available and aligned with the market. We cannot offer additional discounts or free service to any public officials or public organizations. You should also report this matter to our Compliance team.
- Q. One of our government customers has approached us to make a donation to a charity. Can we do this?
- A. Our Compliance team or Legal team can advise on charitable donations and all contributions must be approved in accordance with our Anti-Corruption policy. Donations must be made to legitimate charities and should not be given with the intent of gaining an improper business advantage or influencing a decision.

## THE CONTEXT

We comply with all applicable anti-corruption laws and conduct our business in a manner that avoids the appearance of impropriety. Allegations of corruption can do serious damage to our business and reputation.

We prohibit improper payments in all our commercial dealings. This prohibition applies to dealings with public officials as well as purely private sector transactions.

We employ strict policies and procedures designed to prevent improper payments, including special procedures for dealing with third-parties acting on our behalf in business dealings with public officials.

The Company is politically neutral. We do not have political affiliations and we do not participate in the political or electoral process in countries where we operate. Donations to political parties, political party officials and candidates for office are prohibited.

## WHAT DOES THIS MEAN FOR ME?

### Absolute prohibition against improper payments

Never offer, promise, make or authorize a payment or the provision of anything of value in order to obtain any type of business advantage.

### Gifts and hospitality

Our Anti-Corruption and Gifts and Hospitality policies prohibit the giving of gifts or entertainment to any person or entity if made with the intention of gaining any type of business advantage.

If you are interacting with a public official, you must have an enhanced level of vigilance and awareness of your responsibilities under our Anti-Corruption policy.

### Indirect payments via third-parties

Improper payments are often the result of actions of third-parties such as consultants, advisors or entities that have relationships with public officials. If you want to engage third-party intermediaries you should consult our Compliance Team or Legal team.

## WHERE CAN I FIND OUT MORE?

Anti-Corruption Policy, Gifts & Hospitality Policy

## WHERE DO I GET HELP OR GUIDANCE?

Compliance Team, Legal Team

# WHAT IS CONSIDERED INSIDER TRADING AND HOW DO I AVOID IT?



## CAN YOU GIVE ME AN EXAMPLE?

Q. I work in procurement and I know that one of our vendors is having trouble renewing key contracts. My sister has a lot of money invested in this company. Can I tell her what I know?

A. If the information that you have is because of your role within the Company and is not public information you should not share that information.

Q. I work in the finance team and know that one of our key business units will not achieve planned financial targets. Can I sell any stock I have in the Company before this information is made public?

A. You are prohibited from transacting in Company securities either directly or through other persons (such as family members), based upon material non-public information that you have about the Company's performance. You should follow the Insider Trading policy which gives guidance on when it would be appropriate for you to trade.

## THE CONTEXT

As a publicly traded Company, we are subject to laws concerning access to Company information and our securities that are traded.

Employees may learn material, non-public information about the Company or other companies. Company employees are prohibited from using or disclosing material non-public information about the Company.

Information is "material" if there is a significant likelihood that a reasonable investor would consider it important in making a decision to buy, hold or sell securities of the entity or if publication would likely affect the market price of such securities. Examples include:

- Projections of future financial results
- Financial or operational results, especially quarterly and year-end results
- Proposed acquisition or disposition
- Significant events regarding the Company's securities (e.g. dividend or distribution)
- Significant developments or events regarding products, services or strategic plans, including regulatory developments, significant pricing changes, etc.

## WHAT DOES THIS MEAN FOR ME?

You can buy or sell Company securities and other companies' securities in most instances.

However, if you have knowledge of material, non-public information you are prohibited from transacting in Company securities.

Avoid sharing inside information with anyone outside the Company unless it is necessary for the Company's business activities and proper controls are in place (such as a non-disclosure agreement).

"Tipping" or recommending the Company or other securities to anyone, including friends and family, when you might have inside information is not permitted.

Consequences of noncompliance may include criminal prosecution or fines for both our Company and the individual involved.

## WHERE CAN I FIND OUT MORE?

Insider Trading Policy

## WHERE DO I GET HELP OR GUIDANCE?

Legal Team

# WHAT SHOULD I DO IF I FIND MYSELF IN A POTENTIAL CONFLICT OF INTEREST SITUATION?

## CAN YOU GIVE ME AN EXAMPLE?

Q. My team is recruiting for a role in which my nephew is interested. Can I pass his CV to the recruiting manager?

A. You can pass along your nephew's details to the hiring manager, but you must not be involved or influence the hiring process.

Q. I am a keen artist and I sell my paintings online. Is this a conflict?

A. As long as this does not adversely impact your ability to perform your role within the Company this is permissible.

Q. I have been with the Company for two years as a Manager. In the past month, I have started dating one of my team members. Is this an issue?

A. You should disclose this relationship to your line manager so appropriate action can be taken to avoid any potential conflict of interest.

## THE CONTEXT

A conflict of interest situation can exist if your business judgment could be affected as a result of any relationship you have with another person or business entity.

Even the appearance of a conflict of interest can create a perception that you may be acting improperly.

## WHAT DOES THIS MEAN FOR ME?

Report any possible conflict of interest (or possible appearance) to our Compliance team.

You should make this disclosure as soon as you are aware of the potential or actual conflict.

Remove yourself from any potential conflict of interest situations.

Ensure that you are not involved in hiring or managing a relative or close friend.

Remove yourself from any decision process relating to a supplier or other third-party if you have a direct or indirect interest or close personal relationship with them.

You should not take another job or position which could affect your ability to perform your role for the Company or that may impact your ability to make decisions in the best interest of the Company.

## WHERE DO I GET HELP OR GUIDANCE?

Compliance Team





## LIBERTY LATIN AMERICA

Our global head office:  
Liberty Latin America  
1550 Wewatta Street  
Suite 710  
Denver, CO  
80202

### How to report a concern:

If you have any questions or need to report a violation of our Code of Conduct or Policies, contact our People team, our Ethics & Compliance team, or SpeakUp, our employee hotline, at:

Phone: +1 720 710 1355

Online: [www.lla.com/speakup](http://www.lla.com/speakup)