

NON-RETALIATION



POLICY

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Liberty Latin America reserves the right to amend or cancel this Policy at any time.

PURPOSE

Liberty Latin America promotes a work environment free from all forms of retaliation and encourages LLA Team Members to engage in Protected Work Activities without fear of retaliation.

POLICY

LLA and LLA Team Members shall not retaliate against individuals who engage in Protected Work Activities, and no LLA Team Members shall be discharged, demoted, suspended, threatened, harassed or in any other manner discriminated against in the terms and conditions of employment for engaging in Protected Work Activities. LLA will review complaints of Retaliation. Any LLA Team Members found to engage in Retaliation will be subject to disciplinary action, up to and including termination of employment.

This Policy does not exempt any LLA Team Members from the consequences of his or her own misconduct or poor work performance and self-reporting of such issues is not a Protected Work Activity. Engaging in a Protected Work Activity does not shield any LLA Team Members from discipline or termination for non-retaliatory or non-discriminatory reasons.

LLA Team Members are prohibited from making reports to LLA regarding violations of laws, regulations or the LLA Code of Conduct or Policies that are knowingly false, made with malicious intent or with willful or reckless disregard of facts that would disprove the allegations. LLA Team Members who file any such reports may be subject to disciplinary action, up to and including termination.

Recognizing Retaliation

Retaliation can take several forms, all of which seek to punish or deter LLA Team Members from participating in Protected Work Activities. Retaliation can be subtle and may not directly affect promotional or financial opportunity, but generally fall into one of two categories: (i) *unjustified adverse employment actions* or (ii) *unjustified changes to the workplace environment*.

Unjustified adverse employment actions include:

- Termination of employment,
- Suspension of employment,
- Demotion,
- Reprimands,
- Refusal to consider an otherwise qualified employee for transfer, promotion or hire,
- Poor performance evaluation,
- Failure to award a raise or bonus, or
- Denial of workplace benefits.

Unjustified adverse employment actions do not include petty slights and annoyances in the workplace such as stray or negative comments in an otherwise positive or neutral evaluation or meeting or negative comments justified by an individual's poor work performance or history.

Unjustified changes to the workplace environment include:

- Harassment,
- Discrimination,
- Threats,
- Repeated and targeted unprofessional behavior,
- Exclusion from department-wide or team-wide activities such as meetings or lunches,
- Exclusion from department or team organized after-work activities,

NON-RETALIATION



POLICY

- Moving a work location to an undesirable location for no legitimate reason,
- Removal of access to resources necessary to perform one's job, or
- Instructing or encouraging team or department members to give the individual the silent treatment.

Reporting Retaliation

Please submit any questions or any observed or suspected Retaliation to any of the following LLA Team Members, provided that the person is not directly involved in the issue or the Retaliation:

- Your supervisor or line manager;
- A People Team member; or
- SpeakUp – online at www.lla.com/speakup or by telephone at +1 720 710 1355.

DEFINITIONS

Liberty Latin America or LLA means Liberty Latin America Ltd. and all of its affiliates, subsidiaries, and majority owned or controlled joint ventures or similar arrangements worldwide.

LLA Team Members means all directors, officers, employees and contingent personnel of Liberty Latin America.

Protected Work Activity(ies) means the exercise of rights under the law in the workplace, refusal to engage in unlawful activity or activity prohibited by our Code of Conduct or Policies, participation in investigations or the good faith submission of a report or question to LLA regarding an actual, suspected or potential violation of laws, regulations or LLA Policies.

Retaliation means any action or actions taken with the intent to punish or deter any LLA Team Members from participating in Protected Work Activities.

DISCIPLINE

We take any violation of this Policy (or any other Liberty Latin America Policy or the Code of Conduct) very seriously. Violators may be subject to disciplinary actions, up to and including termination. In addition, individuals may be subject to incarceration, or fines if prosecuted by law enforcement authorities for certain types of Retaliation.

EXCEPTIONS

There are no exceptions to this Policy.

APPLICABILITY

This Policy applies to:

- (i) Liberty Latin America and to all LLA Team Members wherever located;
- (ii) Each joint venture or jointly-owned entity (whether a partnership, incorporated, unincorporated or consortium) (together, "joint venture entity") and to the directors, officers and employees of any joint venture entity in which Liberty Latin America has: (a) a majority ownership interest; or (b) effective or management control; and
- (iii) All Business Partners.

RESPONSIBILITIES

All LLA Team Members have a duty to each other and to Liberty Latin America shareholders to prevent actions or commitments that may violate this Policy.

IMPLEMENTATION AND TRAINING

Our Head of Compliance & Ethics has responsibility to implement this Policy and establish the procedures necessary to implement and monitor compliance with this Policy, including without limitation the provision and regular review and updating of any required training. Our Head of Compliance & Ethics may report matters related to this Policy directly to the Audit Committee of our Board or through our Chief Legal Officer.

REFERENCES

None.