



UNITED GROUP

UNITED GROUP

BASE YEAR & RECALCULATION POLICY

Document type	Policy
Document name	Environmental Policy
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Approved by	United Group's Board of Directors
Responsible for implementation	Executive Director Sustainability, Compliance & Risk Management
Version	V.1.0.
Date of the last version	3/7/2023
Implementation date	3/7/2023

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1. INTRODUCTION

1.1 At United Group, we are steadfast in our commitment to environmental sustainability and responsible business practices. As a leading entity in the telecommunications and media industry, we recognize the vital role we play in shaping a more sustainable future.

1.2 This Base Year and Baseline Recalculation Policy represents United Group's commitment to maintaining the integrity and accuracy of sustainability measurements, fostering transparent communication, and adapting to operational changes while pursuing sustainable development goals. Along with our broader sustainability strategy, this Policy serves as a testament to our belief that responsible business practices are integral to our long-term success.

2. PURPOSE OF THE DOCUMENT

2.1 This Policy establishes a structured framework for establishing and maintaining of a Fixed Base Year in accordance with the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard, the measurement of baseline data, and the recalibration of baseline measurements when necessary.

2.2 It also outlines the guidelines and procedures to establish a base year and recalibrate baseline measurements for sustainability and environmental performance metrics within United Group by ensuring accurate, transparent, and consistent tracking of progress toward sustainability goals while accommodating changes in operational context.

2.3 Our aim is to ensure the accuracy, transparency, and consistency of United Group's sustainability and environmental performance metrics. By adhering to these guidelines, we demonstrate our unwavering commitment to credible reporting, responsible resource management, and continuous improvement.

3. APPLICABILITY & WAIVER

3.1 This Policy applies to all employees, directors, board members, officers, contractors, agents, or representatives of United Group B.V., its (in) direct shareholders up to Summer MidCo B.V., its (in) direct subsidiaries, affiliates, or joint ventures (together, "**United Group**"). All other policies and procedures related to this subject matter must be aligned with this Policy.

4. BASE YEAR ESTABLISHMENT

4.1 In our methodology, we follow the principle of a Fixed Base Year, as outlined in "The Greenhouse Gas Protocol Corporate Accounting and Reporting Standard" which involves selecting a specific base year against which a company's emissions performance will be assessed against. Once Based on this principle, once a Fixed Base Year is chosen, it remains constant and does not change throughout the reporting period, even if there are changes in emissions calculation methodologies, data sources, or other factors.

4.2 The Fixed Base Year methodology provides a consistent and reliable reference point for evaluating our progress in reducing our greenhouse gas emissions over time. By keeping the base years fixed, any changes in emissions levels or emissions intensity can be more accurately attributed to our actual efforts to reduce emissions, rather than being influenced by fluctuations in methodologies or data adjustments.

4.3 United Group identified the following Target Base Years which will serve as the reference point for tracking sustainability goals:

- **Scope 1 and Scope 2:** January 2020 to December 2020;
- **Scope 3:** January 2022 to December 2022

4.4 The chosen Target Base Years reflect, respectively, (i) the first year with reliable data collected by United Group Sustainability Team and (ii) the completion of the first Scope 3 GHG inventory. Similarly, these Target Base Years provide a reasonable period to demonstrate progress in line with United Group's current GHG emissions reduction targets. United Group has pledged to:

- reduce by 2030 absolute Greenhouse Gas (GHG) emissions in Scope 1 and Scope 2 by 90% and in Scope 3 by 40%;
- increase its annual sourcing of renewable electricity to 100% by 2027; and
- achieving Net Zero GHG emissions across the value chain by 2040.

5. BASELINE MEASUREMENT

5.1 We established our baseline measurements on key sustainability metrics, including energy consumption, carbon emissions, water usage, waste generation, and other relevant indicators.

5.2 The baseline data will encompass the defined operational scope for sustainability goals and will accurately reflect the metrics' initial state.

5.3 A robust data collection and verification process will ensure accuracy, transparency, and reliability of baseline measurements.

6. BASELINE RECALCULATION

6.1 Baseline recalculation may be necessary due to changes in operational scope, mergers, acquisitions, divestitures, technological advancements, or other significant alterations affecting the accuracy and comparability of baseline data.

6.2 To determine when historic emissions should be recalculated, we consistently apply a 5% significance threshold for each category which is a qualitative and/or quantitative criterion used to define any significant change to the data, inventory, boundaries, methods or other relevant factors.

6.3 The baseline recalculation can be triggered, among others, by one of the following events:

- Structural changes in the organisation that have a significant impact on the base year emissions, including mergers, acquisitions. Disinvestments, outsourcing and insourcing of emitting activities;
- Changes in calculation methodology or improvement in accuracy of emission factors or activity data that result in a significant impact on base year data.
- Discovery of a material calculation error or a series of cumulative minor errors that is deemed significant when considered collectively.

6.4 Organic growth shall not qualify as a trigger because it is a new emission that will be added to the reporting year's emissions in which the organic organisational growth or decline occurred without adjusting the Target Base Year data.

6.5 Clear documentation of reasons for recalculations, methods employed, and resulting changes will be maintained to ensure transparency and accountability.

7. Recalibration Process

7.1 The decision to recalibrate a baseline will be made by United Group's ESG Committee based on a thorough assessment of relevant factors.

7.2 The recalibration process will involve comparing recalculated baseline data with original baseline data, highlighting the adjustments and the rationale for each modification.

7.3 In the event of substantial structural changes taking place within the fiscal year, the base year will be subject to recalibration using a pro-rata methodology, in accordance with the GHG Protocol. If valid reasons, such as data inadequacies, necessitate, both the recalibration and reporting shall be deferred to the subsequent year.

7.4 Stakeholders, including regulatory bodies and investors, will be informed of recalibrations, and updates will be transparently communicated in relevant sustainability reports.

8. Communication & Reporting

8.1 United Group is committed to maintaining the accuracy, consistency, and transparency of reported data. Baseline recalculations will be clearly communicated in annual sustainability reports, demonstrating the recalculated baseline figures alongside the original baseline for transparency and comparability.

8.2 The rationale for recalculations, including changes in methodologies, operational context, and potential impacts on sustainability goals, will be adequately communicated to all relevant stakeholders.

9. Record Keeping & Regular Review



9.1 All documentation related to base year selection, baseline measurement, recalculations, methodologies, and communication will be retained and made available for internal and external auditing purposes.

9.2 This Policy is subject to regular review to ensure that it continues to reflect the aims of United Group and promotes continuous environmental improvement throughout its operations.