



UNITED GROUP

CONFLICT MINERALS POLICY

Document type	Policy
Document name	Conflict Minerals Policy
Author	Executive Director Compliance, Risk & Sustainability
Approved by	United Group's Board of Directors
Responsible for implementation	Executive Director Compliance, Risk & Sustainability Executive Director Controlling & Procurement
Version	V.1.0.
Date of the last version	24/4/2024
Implementation date	24/4/2024

MEMBERS

CONTENT

1. INTRODUCTION	3
2. PURPOSE OF THE DOCUMENT	3
3. APPLICABILITY	4
4. GOVERNANCE, OVERSIGHT, ACCOUNTABILITY	4
5. OUR APPROACH	4
5.1 RISK BASED APPROACH	4
5.2 SUPPLIERS' ENGAGEMENT	5
5.3 OVERSIGHT & RISK MITIGATION STRATEGY	5
6. SPEAKING OPENLY	5
7. CONSEQUENCES FOR VIOLATIONS	6
8. TRANSPARENCY & ANNUAL REPORTING	6

1. INTRODUCTION

At United Group, we are committed to conducting our business in a manner that upholds the highest ethical standards and respects human rights across all aspects of our operations. As a leading telecommunications and media operator, while our core business may not revolve around mineral extraction - we recognize the importance of responsible and ethical mineral sourcing and the critical role it plays in promoting peace and stability in conflict-affected regions.

This Policy reflects our commitment to avoiding the use of minerals sourced from conflict-affected areas, where extraction and trade may contribute to human rights abuses, environmental degradation, and armed conflict. While we may not directly engage in mineral extraction, we acknowledge our role in promoting responsible sourcing practices throughout our supply chain. By adhering to this policy, we aim to mitigate the risk of inadvertently supporting such activities through our supply chain and demonstrate our dedication to corporate social responsibility.

Through proactive engagement with our suppliers, stakeholders, and industry partners, we work collaboratively to uphold the principles outlined in this Policy and foster transparency and accountability throughout our mineral supply chain.

2. PURPOSE OF THE DOCUMENT

We understand that our actions as a company can have far-reaching impacts on communities and ecosystems around the world. Therefore, we take seriously our responsibility to ensure that the minerals used in our products and operations, even indirectly, are sourced in a manner that respects human rights, promotes sustainable development, and contributes to positive social outcomes.

As part of our commitment to conducting our business operations in a socially responsible and ethical manner, we declare our dedication to avoiding the use of Conflict Minerals, including but not limited to tantalum, tin, tungsten, and gold (referred to as the "3TG minerals"), in our products and operations. We recognize that responsible mineral sourcing is essential not only for ethical reasons but also for the long-term sustainability and success of our business.

Conflict Minerals sourced from conflict-affected or high-risk areas, have been associated with severe human rights abuses, including forced labor, child labor, bribery and funding of armed conflicts. We recognize the importance of promoting responsible mineral sourcing practices to mitigate these risks and contribute to positive social and environmental outcomes.

In alignment with international standards and best practices, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the U.S. Dodd-Frank Act, the EU Conflict Minerals Regulation (REGULATION (EU) 2017/821), United Group is committed to implementing robust due diligence measures to ensure that the minerals used in our products are conflict-free.

We strive to work to identify and assess the risk of conflict mineral sourcing in our supply chain, engage with our suppliers to promote responsible sourcing practices, and foster transparency and accountability throughout our mineral supply chain.

3. APPLICABILITY

This Policy applies to you if you are an employee, director, board member, officer, contractor, agent, or representative 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.

United Group is committed to working only with likeminded business partners who share the same ethical requirements, which are set out in detail in United Group’s [Supplier Code of Conduct](#) and reiterated in this Policy. We expect our suppliers to adhere to the principles outlined in this Policy and actively support our efforts to promote responsible mineral sourcing practices.

Any request for a waiver of this Policy must be submitted in writing to United Group Compliance Department at compliance@united.group and be properly documented.

4. GOVERNANCE, OVERSIGHT, ACCOUNTABILITY

The governance, oversight, and accountability of the Conflict Minerals Policy are integral to our commitment to responsible business practice. United Group’s Board of Directors provides oversight and guidance on matters related to human rights and environmental sustainability. It reviews and approves this Policy, sets the strategic direction for the organization, and monitors compliance with relevant laws, regulations, and standards.

The Executive Director Compliance, Risk & Sustainability together with the Executive Director Controlling & Procurement provide leadership and direction in ensuring the effective implementation of this Policy across the organization and update the Board of Directors about its implementation and performance.

5. OUR APPROACH

We have implemented a robust due diligence measure to ensure compliance with this Conflicts Minerals policy. The following requirements outline the steps that will be taken to identify, assess, and mitigate the risk of conflict mineral sourcing in our supply chain:

5.1 Risk Based Approach

- **Step 1: Identification of High-Risk Regions:** We are committed to identify regions and countries that are known to be conflict-affected or high-risk for the sourcing of minerals, particularly tantalum, tin, tungsten, and gold (3TG minerals).
- **Step 2: Mapping of Supply Chain & Due Diligence:** We regularly map our supply chain to trace the origin and chain of custody of minerals used in our products and operations. This involves gathering information from suppliers which will be considered in scope as a result of step 1 above (“In-Scope Suppliers”) about the sources of minerals and the countries through which they pass along the supply chain to identify the original sources of minerals and assessing the likelihood of their involvement in conflict-affected or high-risk areas.
 - Upon request from United Group, In-Scope Suppliers must complete a Conflict Minerals Reporting Template approved by United Group, such as those provided by the

“Responsible Minerals Initiative”. This reporting aims to enhance transparency about Conflict Minerals within our value chain.

5.2 Suppliers’ Engagement

- **Step 3: Supplier Engagement:** We engage with our In-Scope Suppliers to communicate our commitment to responsible mineral sourcing and encourage their support in implementing due diligence measures. We also request information from suppliers regarding the origin and chain of custody of minerals used in their products.
- **Step 4: Supplier Code of Conduct:** All Suppliers are required to adhere to our Supplier Code of Conduct, which prohibits the use of conflict minerals in the products supplied to United Group and provide documentation and assurances demonstrating compliance with this Policy.
 - In-Scope Suppliers are expected to work collaboratively with their sub-contractors to achieve traceability of Conflict Minerals to the smelter level. This ensures transparency and accountability throughout the supply chain.
 - As producers of objects, not just resellers, In-Scope Suppliers must actively support relevant industry efforts to eliminate the use of Conflict Minerals and promote responsible sourcing practices. This includes participation in industry-wide initiatives aimed at eradicating Conflict Minerals from supply chains.
- **Step 5: Reporting Requirements:** In-Scope Suppliers are required to report on their efforts to comply with this Policy, including any due diligence measures undertaken and steps taken to address identified risks.

5.3 Oversight & Risk Mitigation Strategy

- **Step 6: Evaluation of Due Diligence Measures:** We evaluate the effectiveness of due diligence measures implemented by our suppliers to mitigate the risk of conflict mineral sourcing. This may include reviewing supplier reports, conducting site visits, and engaging with third-party auditors, including via industry-wide association’ efforts, to verify compliance with this Policy.
- **Step 7: Non-Compliance Remediation:** In the event of non-compliance with this Policy or other provisions of the Supplier Code of Conduct, suppliers are expected to take prompt corrective action to remedy the situation. Failure to address non-compliance may result in termination of the supplier relationship.

6. SPEAKING OPENLY

We highly encourage both internal and external stakeholders to raise concerns related to conflicts with the law, regulations, the Code of Business Conduct & Ethics, the Supplier Code of Conduct or United Group’s policies, including this Policy.

As soon as an issue arises, or you become aware of it, you can report it using one of the following channels:

- emailing the Compliance Department at compliance@united.group;



- contacting the Compliance Department via the Integrity Helpline at unitedgroup.ethicspoint.com

For more details on your rights if you have reported a concern see the [Protected Disclosure Policy](#).

If you have doubts on how to implement this policy, you can contact the Compliance department at compliance@united.group which can offer additional online or face to face [training](#) in all aspects of this Policy.

7. CONSEQUENCES FOR VIOLATIONS

Violation of this Policy by employees or suppliers shall result in appropriate disciplinary action, up to and including termination of employment or contract termination, depending on the severity and frequency of the violation. Consequences may also include legal action and financial penalties, as deemed necessary.

8. TRANSPARENCY & ANNUAL REPORTING

We are committed to transparency and accountability in our efforts to avoiding the use of minerals sourced from conflict-affected areas. We believe in openly communicating our policies, practices, and performance to stakeholders and the public. We will regularly monitor and evaluate our progress toward this Policy.

We produce an annual sustainability report that provides transparency into our mineral sourcing practices and demonstrate our commitment to responsible business conduct. We will continue to engage with stakeholders to solicit feedback on our sustainability report, including input on our mineral sourcing practices and suggest areas for enhancement.

To facilitate easy access to our annual reports and other relevant information, we maintain a dedicated page on our website where stakeholders can find comprehensive information about our human rights and environmental initiatives, including our annual reports, policies, and performance data. This dedicated page serves as a central hub for transparency and accountability, allowing stakeholders to access information easily and stay informed about our progress and activities.