



UNITED GROUP

UNITED GROUP

SUSTAINABLE SOURCING POLICY

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MEMBERS

CONTENT

1. INTRODUCTION	3
2. PURPOSE OF THE DOCUMENT.....	3
3. APPLICABILITY & WAIVER.....	4
4. GOVERNANCE, OVERSIGHT, ACCOUNTABILITY.....	4
5. ESG SOURCING CRITERIA.....	5
6. OUR APPROACH.....	6
7. ENHANCING SUPPLY CHAIN COLLABORATION THROUGH E-PROCUREMENT TECHNOLOGY	8
8. SPEAKING OPENLY.....	8
9. CONSEQUENCES FOR VIOLATIONS	9
10. TRANSPARENCY & ANNUAL REPORTING.....	9

1. INTRODUCTION

At United Group, we recognize that our operations have an impact that extends beyond the boundaries of our offices and facilities. As a leading telco and media company, we understand the importance of embracing sustainability as a core principle in everything we do. Our commitment to sustainability is not only a reflection of our values but also an essential element of our long-term success and contribution to a better world.

Our Sustainable Sourcing Policy embodies our dedication to responsible business practices and outlines our approach to sourcing goods and services in a manner that is environmentally responsible, socially equitable, and ethically sound. By prioritizing sustainability throughout our supply chain, we aim to minimize our environmental footprint, uphold human rights and fair labor practices, and contribute positively to the communities in which we operate.

This policy serves as a roadmap for our procurement activities, guiding our decisions and actions to ensure that they align with our sustainability objectives. It reaffirms our commitment to transparency, accountability, and continuous improvement as we strive to build a more sustainable future for ourselves, our stakeholders, and the planet.

Through collaboration with our suppliers, engagement with our employees, and dialogue with our stakeholders, we are confident that we can make meaningful progress towards our sustainability goals.

2. PURPOSE OF THE DOCUMENT

The purpose of this document is to establish a robust framework for sustainable sourcing practices at United Group that aligns with our strategic objectives and values. It serves as a guiding document for all employees, suppliers, and stakeholders involved in procurement activities within our organization.

This document outlines our commitment to sustainability and defines the principles, criteria, and responsibilities that govern our approach to sourcing goods and services. By establishing clear guidelines and expectations, we aim to:

Strengthen United Group's economic and operational performance by:

- Selecting suppliers rigorously, fairly, and responsibly to support our economic objectives, achieve operational and strategic business targets and ensure sustainable partnerships. Our stringent standards and criteria guide supplier evaluation and sourcing choices, ensuring that sustainability considerations are integrated into our procurement processes.

Protect United Group by:

- Integrating our Supplier Code of Conduct into contracts to enforce compliance with legal, fiscal, social, and environmental regulations, as well as United Group requirements.
- Implementing preventive measures to mitigate risks related to data protection, information security, financial integrity, Corporate Social Responsibility (CSR), corruption, sanctions, and supply chain vulnerabilities.
- Addressing dependency issues, including raw materials and critical resources, to safeguard our operations and business operations and mitigate supply chain disruptions.



Contribute to the success of United Group's environmental commitments by:

Making environmental criteria a key consideration in sourcing decisions, promoting sustainability throughout our supply chain.

Advocating for circular economy principles and critically assess purchasing needs to minimize environmental impact and resource consumption.

Actively pursuing renewable and low-carbon energy and product purchases to support United Group's environmental goals and reduce our carbon footprint.

By adhering to the principles outlined in this Policy we strive to not only achieve our strategic, economic and environmental objectives but also uphold our commitment to ethical business practices and social responsibility. Through collaboration with our suppliers and stakeholders, we aim to drive continuous improvement and create shared value for our company, our customers, and the wider community.

This Policy is regularly reviewed and updated to ensure its continued relevance, effectiveness, and alignment with evolving legal requirements, industry standards, and stakeholder expectations.

3. APPLICABILITY & WAIVER

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.

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 this Policy are integral to our commitment to responsible business practice. United Group's Board of Directors provides oversight and guidance on matters related to sustainable sourcing. It reviews and approves the policy, sets the strategic direction for the organization, and monitors compliance with relevant laws, regulations, and standards.

The members of the ESG Committee, especially the Procurement as well as the Compliance, Risk & Sustainability functions 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. ESG SOURCING CRITERIA

At United Group, we are committed to sourcing goods and services in a manner that prioritizes sustainability, efficiency, responsibility, and data protection. We incorporate Environmental, Social, and Governance (ESG) performance as part of the selection criteria, encouraging suppliers to improve their sustainability practices. Suppliers are evaluated based on their ESG performance metrics, and we collaborate with them to identify areas for improvement and drive positive change. Our sourcing decisions are guided, among other things, by the following criteria:

Environmental Performance:

- We prioritize suppliers who demonstrate a commitment to environmental stewardship by implementing practices that minimize their environmental impact. This includes considerations such as product carbon footprint assessments, energy efficiency, waste reduction, pollution prevention, safeguarding biodiversity and resource conservation.
- We prioritize suppliers with proven commitments to reducing their carbon footprint through the use of science-based targets, particularly targets validated by the Science Based Targets Initiatives (SBTi).
- We assess suppliers' environmental performance based on their adherence to relevant certifications, standards, and best practices in sustainability.

Social Performance:

- We uphold human rights, fair labor practices, and social responsibility throughout our supply chain. Suppliers must provide safe working conditions, fair wages, and opportunities for employee development.
- We evaluate suppliers' social performance by assessing their compliance with labor laws and regulations, as well as their engagement with local communities and stakeholders.

Ethical Sourcing:

- We conduct business with integrity and transparency, avoiding suppliers involved in unethical practices such as corruption, bribery, or human rights violations.
- Suppliers are expected to adhere to high ethical standards and comply with all applicable laws and regulations. We prioritize partnerships with suppliers who share our commitment to ethical conduct and corporate responsibility.

Data Protection and Security:

- We prioritize suppliers who demonstrate a commitment to protecting data privacy and ensuring information security. Suppliers must implement robust measures to safeguard confidential information, prevent data breaches, and comply with relevant data protection laws and regulations.

By applying these sourcing criteria, we aim to build a resilient and sustainable supply chain that delivers value not only for United Group and its entities but also for our customers, employees, suppliers, and communities.



We are committed to continuously improving our sourcing practices and collaborating with our stakeholders to promote sustainability, responsible business conduct, and data protection throughout our operations.

6. OUR APPROACH

We have strategically built a multiphase and diversified approach to our supply chain, recognizing the importance of resilience, agility, and sustainability. Central to this approach is our focus on cultivating strong partnerships with key suppliers who play a critical role in supporting our operations and delivering value to our customers and other stakeholders. Through collaborative engagement and continuous dialogue, we work closely with the selected key suppliers to align our objectives, optimize performance, and drive innovation.

By leveraging our diversified supplier base and implementing robust risk management strategies, we enhance our ability to navigate challenges, seize opportunities, and ensure business continuity. This approach not only strengthens our supply chain but also reinforces our commitment to sustainability, responsible sourcing, and long-term value creation for the company.

6.1 STEP 1: ESG Screening

To ensure alignment with United Group's commitment to ESG principles, we require all our suppliers to complete a questionnaire focusing on key aspects of sustainability and responsible business practices. This questionnaire is designed to assess suppliers' performance in areas such as environmental impact, social responsibility, ethical sourcing, and governance practices. By gathering this information, we aim to evaluate suppliers' ESG performance, identify areas for improvement, and foster transparency and accountability throughout our supply chain.

Suppliers are expected to provide accurate and comprehensive responses to these questions, demonstrating their commitment to ESG principles and their willingness to collaborate with United Group in advancing common sustainability goals. The information gathered through this questionnaire will be used to evaluate suppliers' suitability for partnership and to inform our decision-making processes regarding supplier selection, engagement, and performance evaluation.

United Group views the completion of this questionnaire as a crucial step in our efforts to promote sustainability, responsible sourcing, and ethical business conduct across our supply chain.

In addition, once a supplier is selected, United Group's Compliance team performs additional checks using dedicated software to screen for reputational issues, politically exposed persons (PEPs), and sanctions. Leveraging advanced technology and access to open-source information, these screenings enable us to assess the integrity and credibility of potential suppliers and identify any red flags or compliance risks that may warrant further investigation. We maintain ongoing monitoring of suppliers, with our system promptly alerting us to any changes requiring attention.. By proactively identifying and addressing potential reputational and compliance concerns, we mitigate risks and uphold our commitment to ethical business conduct and regulatory compliance.



6.2 STEP 2: Supplier Code of Conduct & Compliance Annex

Once onboarded, all suppliers are requested to comply with United Group's [Supplier Code of Conduct](#), which outlines our expectations regarding ethical behavior, environmental sustainability, labor practices, human rights, and compliance with laws and regulations.

In addition, we endeavor to include dedicated contractual clauses (the "[Compliance Annex](#)") in all contracts with suppliers, reinforcing their commitment to upholding our standards and facilitating ongoing monitoring and enforcement of compliance obligations. The Compliance Annex indicatively covers areas such as data protection, financial integrity, anti-corruption measures, business ethics, sanctions, audit rights and supply chain transparency.

6.3 STEP 3: Risk Based Approach

We recognize that our supplier base is broad and diverse. Therefore, we prioritize our efforts and resources by focusing on strategic suppliers with a material annual spend and greater potential sustainability risks. For the suppliers with material spend, United Group's Sustainability Team conducts a risk-based review using companies specialized in ESG Risk data. Through this process, we assess whether there are heightened risks associated with specific sustainability criteria within our supplier companies. Additionally, we assess these suppliers' climate carbon management practices reduction strategy through their CDP submissions. By prioritizing these strategic relationships and conducting targeted reviews, we aim to effectively manage risks, strengthen partnerships, and drive continuous improvement in sustainability performance throughout our supply chain.

6.4 STEP 4: Supplier's Self-Assessment Questionnaire

For our strategic suppliers and those identified as having higher risks during the initial risk assessment process, we take further steps to gain deeper insights into their ESG performance. We request these suppliers to complete an extensive Self-Assessment Questionnaire, which covers a comprehensive range of ESG issues. This questionnaire is designed based on international Corporate Social Responsibility (CSR) standards such as, among others, the UN Global Compact, ISO 26000, International Labour Organization (ILO) conventions, and Global Reporting Initiative (GRI) guidelines. By engaging our suppliers in this self-assessment process, we aim to foster transparency, dialogue, and mutual understanding of sustainability expectations and performance. Through collaborative efforts, we strive to address potential areas for improvement, drive positive change, and strengthen the sustainability of our supply chain.

6.5 STEP 4: Risk Based Audit, Monitoring & Corrective Actions

In addition to self-assessments, United Group conducts regular audits of its strategic suppliers and those identified as having higher risks to ensure ongoing compliance and performance improvement. These audits are conducted by qualified professionals with expertise in sustainability and supply chain management. We leverage industry-level efforts and cooperation, including partnerships with organizations such as the Responsible Business Alliance (RBA), to enhance the effectiveness of our audit processes and promote consistent standards across the supply chain. Through comprehensive audits, we verify compliance with our Supplier Code of Conduct and other relevant standards, identify areas for improvement, and collaborate with suppliers to implement corrective actions.

Our primary goal is to work collaboratively with our suppliers to improve sustainability performance and address any identified issues. Throughout the audit process, we prioritize engagement and support for our suppliers. We monitor the implementation of corrective actions and provide assistance and guidance as needed to ensure successful outcomes.

However, if suppliers fail to address identified issues or show insufficient progress, we may take measures up to and including termination of the relationship. This decision is made after careful consideration and in alignment with our commitment to responsible sourcing and ethical business conduct. By maintaining accountability and fostering continuous improvement, we aim to build resilient and sustainable partnerships that deliver long-term value for all stakeholders.

7. Enhancing Supply Chain Collaboration through E-Procurement Technology

We leverage advanced e-procurement technology to streamline and optimize our sourcing processes. Our e-procurement tool serves as a centralized platform for managing supplier relationships, sourcing activities, and procurement transactions. Through this platform, we aim to foster dialogue and collaboration with our supply chain partners by providing a transparent and efficient channel for communication. Suppliers have access to relevant information, including tender opportunities, procurement requirements, and contract terms, enabling them to respond promptly and effectively to our business needs. The e-procurement tool also facilitates seamless interactions between United Group and its suppliers, allowing for real-time communication, document exchange, and performance tracking. By embracing digital solutions, we enhance transparency, visibility, knowledge retention, efficiency, and accountability in our procurement operations, driving value for both United Group and our supply chain partners

8. SPEAKING OPENLY

We highly encourage United Group's employees, suppliers, or any other stakeholders to raise concerns related to conflicts with the law, regulations, the Code of Business Conduct & Ethics, the Supplier Code of Conduct or any other United Group's policy, including this Policy.

As soon as an issue arises, or you become aware of it, you can report it, even anonymously, 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.

9. 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.

10. TRANSPARENCY & ANNUAL REPORTING

We are committed to transparency and accountability in our efforts to uphold our Sustainable Sourcing standards. We believe in openly communicating our policies, practices, and performance to stakeholders and the public. We will regularly monitor and evaluate our progress toward our Sustainable Sourcing goals, holding ourselves accountable for creating meaningful change.

We produce an annual sustainability report that provides a comprehensive overview of our Sustainable Sourcing initiatives, including our progress, challenges, and achievements.

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 ESG related 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.