

# LIBERTY GLOBAL PROCUREMENT SUPPLIER ASSESSMENT PROCEDURE

## VERSION CONTROL:

Date	Owner	Version comments
31/01/2024	Liberty Global Procurement Services	V1

## PREFACE

Social and environmental responsibility is central to the way Liberty Global Group is doing business, so is anticipating and mitigating risks. As to ensure the highest standards are met in that regard, Liberty Global has developed the [Liberty Global Procurement Responsible Supplier Code of Conduct](#), which outlines the Key Principles against which Liberty Global Procurement Services (LPS) is managing its supply chain.

Risk assessments are performed on the suppliers that LPS cooperates with and are outlined in this document.

This document also describes the way LPS assesses its Supply Chain against the Key Principles outlined in the [Liberty Global Procurement Responsible Supplier Code of Conduct](#).

LPS reserves the right to update this document on a regular basis.

## ASSESSING SUPPLIERS

In order to assess its suppliers, LPS is using several tools and procedures across the different stages of the Procurement cycle, from tendering to contracting and supplier lifecycle management. Below is a list of these tools and procedures (not exhaustive). LPS reserves the right to engage other actions and / or Partners to control adherence to the Key Principles and to monitor any risk as part of its Risk Management processes.

### 1. RFx questionnaires and evaluation

As part of its tendering process, in addition to commercial and technical evaluation, LPS might assess and select participants on additional criteria:

- 1) Corporate Social Responsibility (CSR) – assessing the Environmental, Social and Governance (ESG) maturity of LPS potential partners via relevant questionnaires and / or documentation requests (e.g. carbon footprint and emissions, ESG questionnaire, certifications and evidence, benchmarks scoring, etc.). Such criteria will be part of the evaluation with a weight of 20% over the entire evaluation (commercial weight 40%, technical weight 40%, CSR weight 20%) \*.
- 2) Security & Privacy Assessment – questionnaire assessing the capability of LPS potential partners to manage its data.
- 3) Financial Assessment – questionnaire assessing the financial health of LPS potential partners.

\*This is our standard position and could alter dependant on purchasing requirements

### 2. EcoVadis\*, a third-party environmental sustainability ratings platform to assess corporate social responsibility and sustainable procurement.

LPS works with its Suppliers on the implementation of its key principles and assesses selected suppliers on an annual basis by using the [EcoVadis](#) 21 CSR Criteria\*\*. The criteria covers four material areas: Environment, Social, Ethics, and Sustainable Procurement. This constitutes

\*\*Assessment subject to fees. More on [this](#).

the basis for the ESG performance of our suppliers. EcoVadis enables LPS to assess and benchmark its suppliers through a scorecard with actionable feedback and online corrective actions.

If a Supplier declines LPS Ecovadis assessment requests, this may affect LPS's ability and willingness to continue business relations with the relevant Supplier.

EcoVadis assessment also benefits the assessed Suppliers who might use the opportunity to demonstrate their CSR performance with their other customers by sharing their scorecard.

### **3. Moody's Analytics**

LPS uses Moody's Analytics Supplier Risk Assessment tool to assess supplier performance and supplier related risks such as financial, compliance, cybersecurity, reputational, sanctions, ESG, supply chain resilience, etc.

### **4. Privacy & Security assessments in One Trust**

In addition to the RFx Privacy & Security Questionnaire described above, LPS is using OneTrust to assess risks around personal data processing and security via specific questionnaires to be filled in by the supplier and the requester for the applicable projects.

OneTrust assessments are performed on an annual basis or at contract renewal.

### **5. D&B and Treasury Financial risk assessment**

LPS is both assessing internally and externally the financial stability of its suppliers (via D&B and Internal analysis ran by Liberty Global Treasury team) on regular basis.

### **6. Joint Alliance for CSR (JAC)**

As of September 2023, Liberty Global joined the [Joint Alliance for CSR \(JAC\)](#), the international association of telecom operators dedicated to developing and assessing Corporate Social Responsibility (CSR) standards across the industry's supply chain. With the aim of promoting sustainable sourcing, JAC members share audit data, resources and best practices to verify, assess and develop sustainable sourcing principles for suppliers of the telco sector. As a member of JAC, Liberty Global collaborates alongside the world's largest telco providers, conducting and sharing CSR on-site audit reports of major Information and Communications Technology (ICT) suppliers. As part of JAC commitments, Liberty Global will be conducting at least five manufacturing audits of its Tier 1 Suppliers per year (selected suppliers at Liberty Global's discretion and according to JAC processes).

### **7. Carbon emissions questionnaire**

To ensure Liberty Global will achieve its commitments to reduce its carbon emissions, LPS is supporting this goal by gathering the relevant data from its supply chain via a Scope 3 Carbon Emissions questionnaire sent annually. Based on the output of the reporting, LPS may further work with its supply chain partners (?) and suppliers to reduce their carbon footprint.

## **MONITORING AND REVIEW OF SUPPLIER PERFORMANCE**

- Supplier is expected to identify, correct and monitor the continued compliance of any activities that fall below the standards of Liberty Global Key Principles outlined in the Liberty Global Procurement Responsible Supplier Code of Conduct.

- LPS reserves the right to monitor and review Suppliers' adherence to the Key Principles on a regular basis as well as set targets to improve their performance.
- Supplier shall provide LPS with reasonable access to all relevant information and premises for the purposes of assessing performance against its Key Principles and use reasonable endeavours to ensure that sub-tier Suppliers do the same.
- In the event that non-adherence is identified or reasonably suspected, LPS shall be entitled to audit (the allocation of costs for and the scope of such audit to be agreed) such (non-) adherence whether itself or through a third party.
- Audits may be conducted by [Liberty Global Group](#), LPS, Liberty Global Joint Ventures, or any other third party deemed appropriate by Liberty Global.

## CORRECTIVE ACTIONS

- If a completed assessment shows, or it subsequently transpires that, a new or existing Supplier is not adhering to the Key Principles, LPS will seek to work with them to address such non-adherence through a mutually agreed remediation plan.
- Furthermore, suppliers shall immediately report to LPS any serious non-adherence to the Key Principles and together agree a remediation plan.
- Failure to agree on a mutually acceptable corrective action plan may affect LPS's ability and willingness to continue business relations with the relevant Supplier.
- Suppliers are expected to identify, correct and monitor the continued compliance of any activities that fall below the standards set out in the Key Principles. Where serious breaches of the Key Principles are identified and persist, LPS may consider termination of the business relationship with the Supplier concerned subject to the terms and conditions of the relevant underlying contract between LPS and such Supplier.

## RAISING ISSUES IN SUPPLY CHAIN AND SEEKING GUIDANCE

Liberty Global Group's Suppliers and third party partners shall raise any concerns regarding adherence to, and enforcement of, the Key Principles and / or issues identified in their Supply chain by Liberty Global Group's Suppliers using the [Liberty Global Compliance Portal](#).