

LIBERTY GLOBAL

2024 SUPPLY CHAIN SUSTAINABILITY & RISK REPORT

Supplier Assessment, Screening & Development

VERSION CONTROL:

Date	Owner	Version comments
20/08/2025	Liberty Blume Procurement Solutions	V1-FINAL

PREFACE

Liberty Blume (previously Liberty Global Financial Services) is a wholly owned subsidiary of Liberty Global.

Liberty Blume Procurement Solutions (LBPS) fulfils the role of Liberty Global's parent procurement function, providing procurement services to both our parent organisation and some of the worlds most recognised brands, including: VMO2, Telenet, Vodafone Ziggo and Virgin Media Ireland (together referred to as Liberty Global Group).

Social and environmental responsibility is central to the way Liberty Global Group does business, as is anticipating and mitigating risks.

To ensure that the highest standards are met in this regard, the [Liberty Global Procurement Responsible Supplier Code of Conduct \(RSCoC\)](#), outlines the key principles for LBPS managed supply chains, and the [Liberty Global Supplier Assessment procedure](#), describes the risk screening and assessment processes performed on suppliers.

This **2024 Supply Chain Sustainability and Risk Report** summarises the outcome of the application of the [Liberty Global Supplier Assessment Procedure](#) and other supply chain risk mitigation initiatives implemented by Liberty Global for the calendar year 2024.

Report Structure:

1. Liberty Global Supply Risk Management Framework (SRMF)
2. Risk Supplier Screening Tools for New Suppliers
 - A. Moody's Supply Chain Catalyst
 - B. Dun & Bradstreet Finance Ratings
 - C. OneTrust
 - D. Privacy & Security assessments in OneTrust
3. Sustainability Assessments
 - i. EcoVadis
 - ii. Joint Alliance for CSR (JAC) Audits
 - iii. JAC Supplier Engagement Program
4. Grievance Mechanism
5. Conclusion

1. Liberty Global Supplier Risk Management Framework 2024 (SRMF)

Liberty Global faces many potential risks both on a macroeconomic and a microeconomic scale. The ever-changing global risk landscape must be monitored closely and mitigated correctly.

Section 1 details our systematic approach to Risk Management to support this objective.

Liberty Global's SRMF consists of five main steps:

- i. **Identify** – Identify suppliers that are key to our operations (Supplier Classification)
- ii. **Assess** – Evaluate the severity of identified risks of each supplier against different areas of risk (Financial, Environmental, Ethical, Security)
- iii. **Respond & Mitigate** – Respond & mitigate to specific risks or high risk suppliers
- iv. **Monitor** – Continuously track supplier risk exposure
- v. **Report** – Communicate risk insights to stakeholders

SourceRisk: In-life Monitoring of Key Suppliers

In August 2024, we successfully transitioned from a manual process to an automated system through the implementation of **SourceRisk**, a risk management platform that sits behind the SRMF. This platform, licensed from an independent consultancy partner, is specifically designed to monitor and manage supplier risks within our supply chain.

i. Identify (Supplier Classification)

Liberty Global classifies its suppliers according to the **Supplier Classification Process** as described in Figure 1 of the Appendix. As part of this process, we identify within our top 80% spend, four key categories of suppliers: strategic, preferred, critical and operational (see Appendix - Figure 2 for definitions).

The strategic, preferred and critical vendors identified in this exercise, as well as any additional key suppliers identified during the procurement process, are inputted in the **Supplier Risk Watchlist**.

The Supplier Risk Watchlist acts as our overarching supplier list and input into the **SourceRisk** supplier risk management platform for assessment, mitigation, monitoring and reporting.

ii. Assess (SourceRisk Ratings, Alerts and Triage)

Suppliers on the **Supplier Risk Watchlist** are continuously assessed and monitored in real-time using SourceRisk. The tool actively scans purchased databases and public sources to identify potential risks. SourceRisk uses this data to generate risk ratings, in line with agreed risk appetite methodology, across several areas, including:

- Financial: Credit, Liquidity, Insolvency
- Environmental: Environment, Energy
- Ethical: Safety, Labour, Politically Exposed Persons, Media, State, Compliance
- Security: Data Breaches, Cyber, Physical

SourceRisk includes a managed **triage** service by an independent consultancy where an external team, made up of risk subject matter experts, review risk ratings and negative alerts flagged.

The triage process creates **Risk Cases** for potential threats to suppliers on the watchlist and notifies the relevant procurement owners through the tool in the form of an '**Alert**'.

iii. Respond & Mitigate (Case Review and Take Action)

Our procurement owners receive the alert notification via SourceRisk and receive an email providing details of the risk case. These risk cases are reviewed, and procurement owners decide if the risk cases are valid and needs monitoring or immediate action.

Valid cases that need attention are treated as '**active cases**' and procurement owners initiate discussions with relevant stakeholders to decide on the appropriate action. All activity is logged in the system to form an **audit trail**.

iv & v. Monitor & Report

All suppliers in our Supplier Risk Watchlist are monitored daily via SourceRisk. Any identified risk exposures are highlighted and discussed during our **Periodic Risk Management** meeting which is hosted by the LBPS Sustainability and Risk Team and attended by the Procurement Management Team and Directors.

This forum allows for the subsequent escalation of cases and increases awareness of risk themes and trends which impact our suppliers to relevant Liberty Global stakeholders.

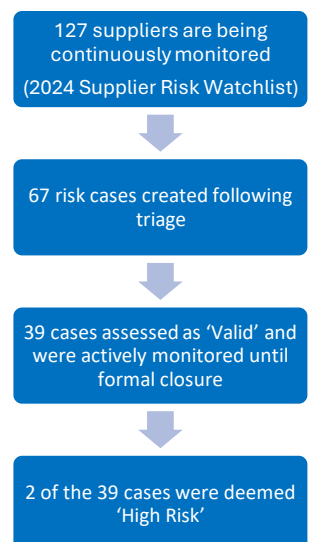
2024 SourceRisk Results

As of December 2024: we identified **127** suppliers as part of the Supplier Risk Watchlist and monitored in SourceRisk.

SourceRisk flagged risks on 55 suppliers which were reviewed by the external triage team and resulted in 67 risk cases. Procurement owners reviewed the 67 risk cases, of which **39** (representing 13 unique suppliers) were assessed as "**Valid**" and were actively addressed (aka Active Cases).

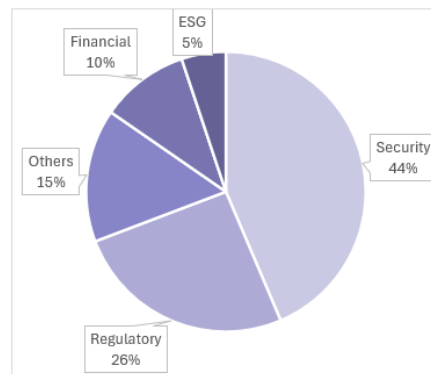
Of the 39 **valid risk cases**:



- 37 were deemed low to medium risk, (across 11 unique suppliers), and were actively monitored until formal closure.
- 2 risk cases were deemed high risk, (across 2 unique suppliers), which resulted in specific actions being identified for the suppliers to address the cause of the risk.
 - 1 high risk case was closed within the reporting year (2024)
 - 1 high risk case remains active for continuous mitigation and monitoring in the following year (2025)



Total Active Cases Breakdown per Risk Type:

Risk Type	Valid Risk - Monitor	Valid Risk - Take Action	Total
Security	17		17
Regulatory	10		10
Others	6		6
Financial	2	2	4
ESG	2		2
Grand Total	37	2	39



-  Actively monitored cases
-  Actioned cases

Next steps:

We will continue real-time assessment of the supplier risk watchlist via SourceRisk and actively monitor any required mitigation efforts for active cases.

Liberty Global's SRMF approach is regularly reviewed to ensure we are using the best processes, technologies and data sources. We aim to test and implement further improvements to our process, leveraging AI and other tools to aid risk identification, assessment and mitigation.

2. Risk Supplier Screening Tools for New Suppliers

When Liberty Global engages with new or prospective suppliers, it is part of our due diligence process to assess supplier related risks such as financial, compliance, cybersecurity, reputational, sanctions, Environmental Social Governance (ESG), supply chain resilience.

Section 2 outlines the tools used as part of the initial risk assessment and onboarding process:

A. Moody's Supply Chain Catalyst

Moody's Supply Chain Catalyst is a next-generation data and analytics platform designed to monitor, manage, and mitigate supply chain risk. It provides a 360-degree view of suppliers by integrating Moody's proprietary risk data with user-supplied information, enabling a comprehensive understanding of vulnerabilities across the supply chain.

Moody's 2024 Results

In 2024, 679 entities were scanned via Moody's SupplyChain Catalyst, this includes multiple entities from the same supplier and suppliers as part of the RFI / RFP process who did not progress to being onboarded.

Next steps

We will continue to use Moody's as a first assessment gate before onboarding or selecting suppliers for procurement events.

B. Dun & Bradstreet (D&B) Finance Ratings

Dun and Bradstreet is used to check the financial ratings of a supplier including business information, financial health, credit scores, corporate linkages and risk indicators for companies worldwide.

D&B 2024 Results

In 2024, 1686 entities were scanned via D&B portal, this includes multiple entities from the same supplier and suppliers as part of the RFI / RFP process who did not progress to being onboarded.

Next steps

We will continue to use D&B during the initial risk assessment process, onboarding process and look to incorporate D&B insights into internal and external sustainability and risk reports.

C. Privacy & Security assessments in OneTrust

Liberty Global takes the Privacy and Security of our data very seriously, and have implemented multiple systems and processes in order to ensure that, when it comes to our vendors and outsourced activities, we have assessed and mitigated risks in these areas where appropriate.

We are using OneTrust to assess risks around personal data processing and security via specific questionnaires designed by specialist Privacy and Security teams within Liberty Global. The questionnaires are filled in by the supplier and the operational Business stakeholder for the applicable projects that requires data collection and processing.

Depending on the nature of the product/service in question, OneTrust assessments may be performed prior to contract signature, on an annual basis or at contract renewal as part of our due diligence.

As of 2024, risks related to AI (Artificial Intelligence) has been added to the OneTrust assessment process. Relevant language to ensure that our suppliers are aware of our requirements regarding the use of AI have also been added in the [Liberty Global Procurement Responsible Supplier Code of Conduct \(RSCoC\)](#).

OneTrust 2024 Results

In 2024, **153** vendor projects related to 91 unique suppliers have been assessed on the privacy and security module for Liberty Global. Based on the assessments output, Privacy and Security teams provided their recommendations for next steps (as needed) such as additional contractual clauses to be added.

43 vendors went through an additional Third-Party Security Due diligence assessment which consists of an additional set of questions to ensure they meet minimum acceptable security standards in lieu of the provision of certified security standards such as ISO27001 or a SOC2 Type-2 report.

OneTrust Next steps

We are investing in technologies, including in AI, that further support the identification of Privacy and Security related risks. We plan to run these tools in parallel to OneTrust to support the overall assessment of new and existing vendors. Multiple data sources will therefore inform the required technical and contractual mitigations needed to ensure our supply base are resilient to the risks in this space.

3. Sustainability Assessments

In addition to the SourceRisk in-life monitoring of key suppliers, we also perform additional monitoring of ESG related risks using the tools described below.

Additionally, during the RfP process, new or prospective suppliers complete an 'ESG Questionnaire' which makes up a weighting of the overall RfP process – typically between 10-20% of the overall scoring metrics.

i. **EcoVadis**

EcoVadis is a third-party environmental sustainability rating platform to assess corporate social responsibility (CSR) and sustainable procurement. The EcoVadis methodology focuses on sustainability priorities and is aligned to global standards such as the UN Global Compact Principles, the Global Reporting Initiative (GRI), the ISO 26000 standard and the Ceres principles.

Suppliers are required to provide evidence of their environmental, social and ethical activities. Once each supplier is assessed, the EcoVadis platform provides a scorecard against such criteria, enabling us to evaluate the performance and risk associated with each supplier. EcoVadis is used on our top 80% spend suppliers to sign-up for a scorecard evaluation.

We assess these suppliers on an annual basis using the EcoVadis CSR criteria. The criteria cover four material areas: Environment, Social, Ethics, and Sustainable Procurement.

EcoVadis Assessment Criteria:

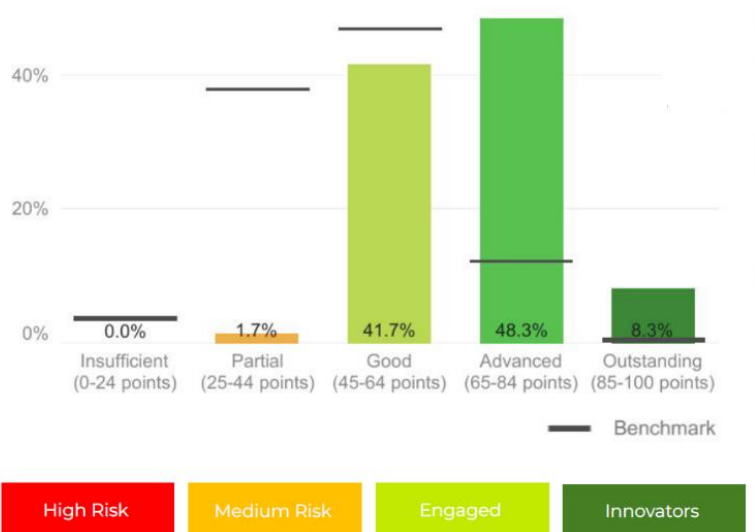
Environment	Labor & Human Rights	Ethics	Sustainable Procurement
<ul style="list-style-type: none"> • Energy Consumption & GHGs • Water • Biodiversity • Local and accidental Air Pollution • Materials, Chemicals, & Waste • Product Use • Product End-of-Life • Customer Health & Safety • Environmental Services & Advocacy 	<ul style="list-style-type: none"> • Employee Health & Safety • Working Conditions • Social Dialogue • Career Management & Training • Child Labor, Forced Labor & Human Trafficking • Diversity, Discrimination & Harassment • External Stakeholder Human Rights 	<ul style="list-style-type: none"> • Corruption • Anticompetitive Practices • Responsible Information Management 	<ul style="list-style-type: none"> • Supplier Environmental Practices • Supplier Social Practices

EcoVadis enables us to assess ESG performance and benchmark its suppliers through a scorecard with actionable feedback and online corrective actions.

2024 Results

In 2024, **93 suppliers' performance** were rated in EcoVadis, of which:

- 0% were rated "insufficient" (0-24 points /100 points)
- 1.7% were rated "partial" (25-44 points /100 points)
- 41.7% were rated "Good" (45-64 points /100 points)
- 48.3% were rated "Advanced" (65-84 points /100 points)
- 8.3% were rated "Outstanding" (85-100 points /100 points)



**Scorecard publication between 1st Jan 2024 and 31st Dec 2024*

EcoVadis Corrective actions

The EcoVadis Corrective Action Plan (CAP) capability is a collaborative tool designed to help companies improve their ESG performance. It is generated directly from the supplier scorecards, which identify areas of non-compliance and highlight improvement opportunities. CAPs allows companies to develop and manage improvement plans online, set priorities, timelines, and coordinate engagement with multiple stakeholders simultaneously.

This approach helps in optimising the use of scorecard results and supports continuous monitoring and follow-up on the progress of corrective actions

Based on the supplier performance in EcoVadis in 2024, **256** corrective actions (CAs) were issued to 21 suppliers. These corrective actions were classified as follows:

- **22.66%** (58 CAs) were issued in **Environment theme**
 - Mainly due to inconclusive documentation for policies on customer health & safety;
- **25%** (64 CAs) in **Ethics theme**
 - Mainly due to no conclusive documentation regarding corruption risk assessments;
- **29.3%** (75 CAs) in **Labour & Human Rights**
 - Mainly due to inconclusive documentation for policies on social dialogue;
- **22.66%** (58 CAs) in **Sustainable Procurement**
 - Mainly due to no conclusive documentation on risk assessment of adverse sustainability impacts in the supply chain; and
- **0.39%** (1 CA) belonging to all themes due to formal alignment with a sustainability reporting standard (e.g. in accordance with GRI, SASB) but no supporting documentation.

Next Steps

We will continue increasing the number of suppliers assessed in EcoVadis, as well as monitoring the improvement rates for suppliers identified with insufficient EcoVadis performance scores. We will continue to foster supplier improvements using the EcoVadis

CAPs, engage with supplier stakeholders to promote remedial actions and report on progress.

The use of EcoVadis is ongoing, with our key list of suppliers and their associated EcoVadis assessments or re-assessments being refreshed annually. This process provides us with an up-to-date view of the ESG credentials of our supply base.

ii. Joint Alliance for CSR (JAC) Audits

JAC on-site audits

In September 2023, Liberty Global joined the Joint Alliance for CSR (JAC), the international association of telecom operators dedicated to developing and assessing CSR standards across the industry's supply chain with the aim of promoting sustainable sourcing.

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 conduct at least five manufacturing audits of its Tier 1 Suppliers per year (selected suppliers at Liberty Global's discretion and according to JAC processes).

JAC on-site audits are performed by an external auditor company, using a JAC questionnaire template. The JAC audit focuses on the assessment of the following CSR aspects (non-exhaustive):

- Child labour & juvenile workers
- Forced labour
- Health and safety
- Freedom of association
- Discrimination
- Disciplinary Practices
- Working hours
- Wages and compensations
- Environment
- Business ethics

The JAC audit assessment results in the following grading: "A- Excellent"; "B- Good"; "C- Conditional acceptable"; "D- Poor". For "C" and "D" grades. A corrective action plan (CAP) is developed for the supplier and its implementation followed up by the JAC member responsible for the audit.

2024 JAC Audit Results

Liberty Global conducted **6** on-site manufacturing CSR audits in 2024, of which:

- **3** were rated "A- Excellent" or equivalent
 - JAC accepts Responsible Business Alliance (RBA) audits, as their methodology is similar to JAC's. In this context, two audits were conducted under the RBA framework and received a "Platinum" rating, which is the highest score and equivalent to an A- Excellent.
- **2** were rated "B- Good"
- **1** was rated "C- Conditional acceptable"
- **0** were rated "D- Poor"

JAC corrective actions

JAC audits corrective actions are classified in 3 categories: "minor", "major" and "priority" ("priority" being the most critical category).

Following Liberty Global's 6 on-site audits done in 2024, **19** corrective actions were raised and followed up: 4 were assessed as "minor", and 15 as "major".

- 9 corrective actions (47%) are due to non-compliance identified in the "health and safety" criteria of the JAC questionnaire
 - (e.g. potential emergency preparedness, workers training, annual inspection).
- 4 corrective actions (21%) were related to "working hours"
 - (e.g. Working hours Policy employee awareness, regular and overtime working hours, days off regularity).
- 3 corrective actions (16%) related to "Environment"
 - (e.g. energy efficiency opportunities or engagement on gas emission of sub-suppliers).
- 3 corrective actions (16%) relation to "Wage and compensation"
 - (e.g. legal social insurance or minimum wage).

5 of the corrective actions were successfully addressed and closed in 2024. The remaining actions, which have completion deadlines in 2025, are currently being actively monitored. Professional internal auditors are assessing the suppliers' responses to ensure that all necessary improvements are being implemented effectively.

Wider JAC Audit Results

Collectively, across all JAC Members, in 2024, 52 on-site Manufacturing CSR audits were conducted on 26 Tier-1 vendors common to Liberty Global. This includes the 6 audits Liberty Global carried out. In some instances, multiple CSR audits were conducted by JAC Members per supplier due to the numerous manufacturing sites included within the supply chain.

Results from all 52 audits:

- **19** have been rated "A - Excellent" or equivalent
- **25** have been rated "B - Good"
- **4** have been rated "C - Conditional acceptable"
- **4** have been rated "D - Poor".
 - After internal verification, 3 of those sites are not relevant for us (i.e. the suppliers do not deliver any products and / or services from those sites).

After completion of the 52 JAC-wide audits, 45 sites underwent corrective action plans. These plans were managed by the relevant JAC members who oversaw the audits, ensuring that necessary improvements were implemented effectively.

Although only responsible for performing 6 of the 52 audits, Liberty Global had access to all of the above audits and used the results and insights to manage suppliers.

JAC audit next steps

In 2025, Liberty Global will be conducting **5 on-site CSR audits** and will continue to follow up on the relevant corrective action plans (as needed) as part of its annual JAC audit commitments. We will also continue monitoring other relevant audits performed on its common

supplier base by the JAC members and address any risks accordingly with the relevant supplier.

iii. JAC Supplier Engagement Program

In 2024, Liberty Global joined the JAC SEP (Supplier Engagement Program). This program has four main objectives:

1. **Scope 3 carbon reduction:** The SEP focuses on addressing emissions throughout operators' value chains by working collectively with their suppliers to tackle emissions.
2. **Supplier engagement:** The programme aims to work collaboratively with suppliers by outlining their current positions and opportunities on a common maturity model.
3. **Knowledge-sharing:** Suppliers are supported in the decarbonisation process through knowledge-sharing webinars and have the opportunity to make pledges to progress up the maturity curve.
4. **Measuring progress:** The SEP monitors suppliers' progress against pledges and maturity levels by updating the scoring annually based on reported data.

The suppliers which are part of the program are measured on the following categories: Strategy; Measurement, Reporting & Verification; Emissions Reduction and Communication & Engagement.

The assessments result in the below maturity level classification (from lower to higher maturity level):

- Maturity level 1 - Sustainability Potential
- Maturity level 2 - Sustainability Underway
- Maturity level 3 - Sustainability Health
- Maturity level 4 - Sustainability Established
- Maturity level 5 - Sustainability Leadership

JAC SEP 2024 Results

117 suppliers relevant for Liberty Global have been assessed through the SEP. The majority of our suppliers (94%) are classified Level 3 ("Sustainability Health") or above, with 14% being high performers (categorised as "Sustainability Leadership").

15 suppliers (13%) have made pledges to work towards improving their sustainability maturity scores. Making a pledge in SEP involves suppliers committing to specific actions aimed at improving their sustainability and environmental performance. These pledges are part of a structured approach to help suppliers progress along the maturity model and by making a pledge, suppliers agree to implement measures that align with the program's goals, such as reducing carbon emissions, enhancing energy efficiency, or adopting more sustainable practices.

The SEP monitors the progress of these pledges and updates the scoring annually based on reported data. This process ensures that suppliers are held accountable for their commitments and are supported in their journey towards greater sustainability.

JAC SEP Next steps

Liberty Global has renewed its subscription to this program for 2025. The focus for 2025 will be to progress assessed suppliers towards a higher maturity level, by following up on their pledges and supporting them with further knowledge-sharing resources. We will also work with suppliers to increase the number of pledges.

4. Grievance mechanism

As Liberty Global continues to evolve, our shared commitment to one of our Company values, 'Straight Up', means we treat our customers fairly, treat our colleagues with respect, and uphold the highest ethical and legal standards. As a result, we have a strong reputation with our customers, our employees, our business partners and in the communities we serve. We expect the same from our suppliers.

Every year Liberty Global purchases significant quantities of equipment and services. With this comes a responsibility to ensure that we incorporate ethical, environmental and social considerations into our spending decisions.

Liberty Global Group's employees, suppliers and third party partners can raise any concerns regarding adherence to, and enforcement of, the Key Principles documented in the [Liberty Global Procurement Responsible Supplier Code of Conduct \(RSCoC\)](#) and the Liberty Global Employee [Code of Conduct](#), and / or issues identified in their Supply chain using the [Liberty Global Compliance Portal](#) or raising their concerns directly to the [Liberty Global Compliance team](#).

Grievance 2024 Results

In 2024, there were no reported cases related to Supply Chain.

Grievance Next Steps

Liberty Global will continue monitoring and taking necessary steps as needed to address any relevant reported cases.

5. Conclusion

This 2024 Supply Chain Sustainability and Risk Report sets out actions and performance against the Liberty Global Supply Assessment Procedure:

- In August 2024, we transitioned from a manual process to an automated platform by implementing SourceRisk, a risk management platform designed to monitor supplier risks within our supply chain. **127 key suppliers** are monitored daily. As of the end of 2024, **39 active cases** were monitored or taking action on, of which 2 are assessed as "high".

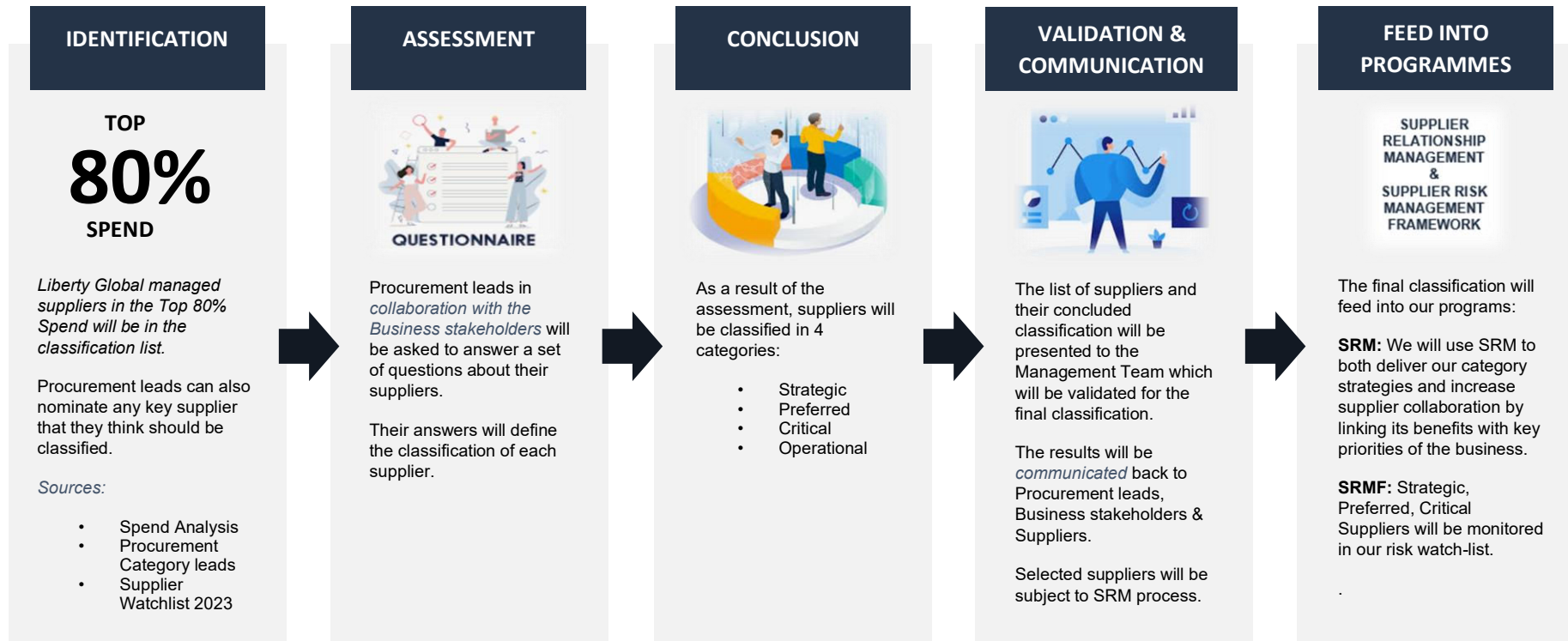
- Our ratings platform Ecovadis allows us to assess supplier CSR performance, gather high quality data from our supply base and use this data for continuous improvement. Over 98% of assessed suppliers were rated with **“Good” performance or above**.
- We continued leveraging the Joint Alliance for CSR (JAC) to obtain detailed audit data on key vendors and make sure they are following our CSR related policies in practice. We audited **6 suppliers on-site** on their CSR performance, of which **5** have been assessed **“Good” or “excellent”**.
- Liberty Global joined the JAC SEP, measuring our suppliers’ maturity on carbon emission reduction. **117 suppliers** were assessed on that program, **94%** of them already heading towards a healthy sustainable journey.
- Liberty Global uses bespoke questionnaires, written by our specialist Privacy and Security teams and managed through the OneTrust platform, to support onboarding and continuous improvement of our vendors in this area.
- Liberty Global reporting mechanisms enable Liberty Global employees, suppliers and third-party partners to raise any concerns or issues regarding adherence to, and enforcement of, our policies and principles using the Liberty Global Compliance Portal or raising their concerns directly to the Liberty Global Compliance team.

Summary of key results:

	Liberty Global Process Step	Tool	# Suppliers	# Risks / Alerts / Instances	# High risks / escalations / additional actions
1	Liberty Global Supply Risk Management Framework 2024	SourceRisk	127 monitored	67 risk cases	39 valid (of which 2 High Risk)
2	Risk Supplier Screening Tools for New Suppliers	Moody's	679 entities scanned	-	-
3	Risk Supplier Screening Tools for New Suppliers	OneTrust	91 suppliers	153 vendor projects	43 additional Third-Party Security Due diligence assessments
4	Risk Supplier Screening Tools for New Suppliers	D&B	1,686 entities scanned	-	-
4	Sustainability Assessments	EcoVadis	93 suppliers		256 corrective active plans across 21 suppliers
5	Sustainability Assessments	JAC Audits	6 supplier sites	-	19 corrective action plans
6	Sustainability Assessments	JAC Supplier Engagement Program	117 suppliers	-	-

APPENDIX

Figure 1



- **MT:** Management Team
- **SRM:** Supplier Relationship Management
- **SRMF:** Supplier Risk Management Framework
- **Liberty Global Managed Suppliers:** Suppliers in scope of Liberty Blume Procurement Services.

Figure 2

SUPPLIER CLASSIFICATION CRITERIA

