

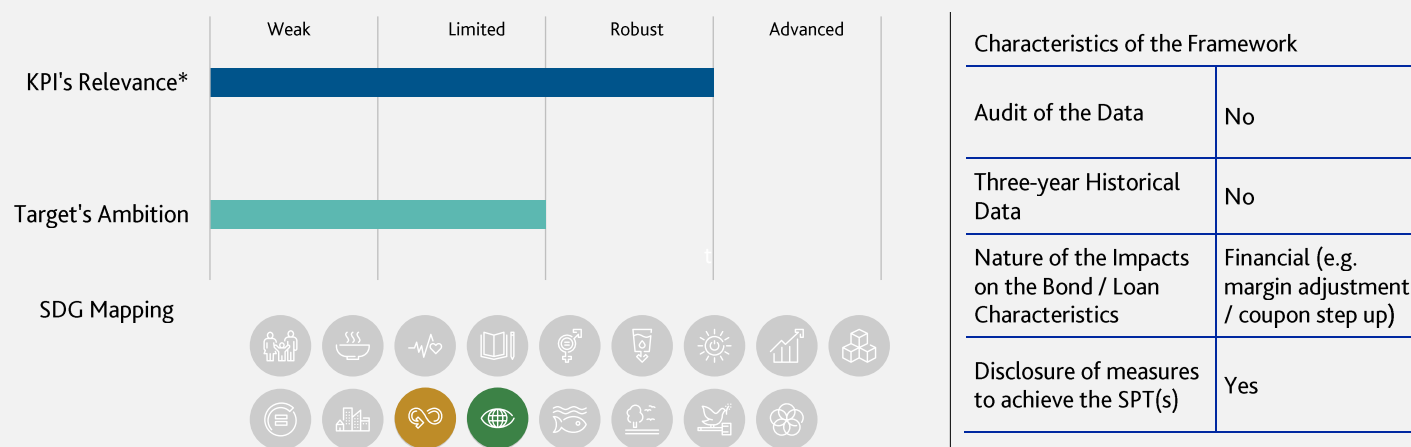
# SECOND PARTY OPINION

## on Liberty Costa Rica's Sustainability-Linked Financing Framework

At the request of Liberty Costa Rica, this Second Party Opinion was amended on 1 September 2022 to reflect the recent change in company name from Cabletica S.A. to Liberty Costa Rica. No other information that was used by Moody's ESG Solutions for the preparation of the original Second Party Opinion issued on 9 June 2022 was updated for this purpose and, accordingly, the effective date of this Second Party Opinion remains 9 June 2022.

Moody's ESG Solutions considers that Liberty Costa Rica's Sustainability-Linked Financing Framework is aligned with the five core components of ICMA's/LMA/APLMA/LSTA's Sustainability-Linked Bond Principles (SLBP) 2020/Sustainability-Linked Loan Principles (SLLP) 2022.

### Framework



\*Moody's ESG Solutions' opinion on the KPIs' relevance is a consolidation of the materiality assessment of both KPIs. However, KPI 1, on its own, does not address Scope 3 emissions. Therefore, Moody's ESG Solutions considers that KPI 1, on its own, is partially relevant, core and material to the company's business strategy for its current and future operations and partially reflects relevant sustainability challenges for its industry sector (See p.7).

### Sustainability Performance Targets (SPTs)

**KPI 1: Absolute Scope 1 and 2 GHG Emissions (MTCO2e)**

- Reduction in Scope 1 and 2 GHG emissions by 2027 from the 2021 baseline by the greater of 30% or the SBTi-validated target

**KPI 2: Scope 3 GHG Emissions per Value Added (MTCO2e per Operating Profit Unit)**

- Reduction in Scope 3 GHG emissions per Operating Profit unit by 2027 from the 2021 baseline by the greater of 35% (equivalent to a 7% CAGR) or the SBTi-validated target

	2021 (Baseline)	2027*
KPI 1 (MTCO2e)	1,969	1,378
KPI 2 (GEVA)	0.38	0.25

\*Trigger event

### Company

#### ESG Controversies

Number of controversies	None
Frequency	N/A
Severity	N/A
Responsiveness	N/A

#### Involvement in Controversial Activities

- |   |  |   |   |
|---|--|---|---|
| <input type="checkbox"/> Animal welfare       | <input type="checkbox"/> Fossil Fuels industry | <input type="checkbox"/> High interest rate lending | <input checked="" type="checkbox"/> Pornography     |
| <input type="checkbox"/> Cannabis             | <input type="checkbox"/> Coal                  | <input type="checkbox"/> Human Embryonic Stem Cells | <input type="checkbox"/> Reproductive medicine      |
| <input type="checkbox"/> Chemicals of concern | <input type="checkbox"/> Gambling              | <input type="checkbox"/> Military                   | <input type="checkbox"/> Tobacco                    |
| <input type="checkbox"/> Civilian firearms    | <input type="checkbox"/> Genetic engineering   | <input type="checkbox"/> Nuclear power              | <input type="checkbox"/> Unconventional oil and gas |
| <input type="checkbox"/> Alcohol              |  |   |   |

## Key Findings

### Note on the score of SPTs:

Liberty Costa Rica established its SPT 1 and 2 based on the Science Based Targets initiative's (SBTi) 1.5 degree scenario, using both an absolute contraction approach (SPT 1, Scope 1 and 2 emissions) and an economic intensity contraction approach (SPT 2, Scope 3 emissions intensity). While neither target is currently verified by SBTi, the Company expects full verification prior to the 2027 target measurement date. The Company has committed, in both its framework and pending debt documentation, to set the SPTs at the greater of its currently stated targets or the SBTi-validated targets. The Company has further stipulated that in the event of SBTi certification not being obtained prior to the target measurement date in 2027, it will follow other best practices/verifications in order to confirm that the SPTs are aligned with the Paris Agreement, and will update its Framework and request an updated Second Party Opinion (SPO) in the event of material changes in the SPT calibration.

While these measures demonstrate the Company's commitment to align its SPTs with science-based targets, our analysis is challenged by both the lack of available historic data<sup>1</sup> for the Company's targets, as well as difficulty in benchmarking its targets against peers, especially under the economic intensity approach. Taking into account these challenges as well as the Company's commitment for its SPTs to be the more ambitious of its currently stated targets or the final SBTi-verified targets, we assess the framework to be aligned with the ICMA principles,<sup>2</sup> the relevance of the KPIs to be robust and the ambition of the SPTs to be limited.

### Selection of the Key Performance Indicators (KPIs) – aligned with the SLBP/SLLP

- The KPIs are clearly defined, including the unit of measurement, the rationale and process to select the KPIs, the calculation methodology and the scope and they will be publicly disclosed on the Liberty Costa Rica website.
- The KPIs are measurable and externally verifiable.
- The calculation methodology is expected to be consistent, and the Company commits to inform the investors of changes in the methodology.
- The KPIs' definitions rely on external references allowing for benchmarking.
- The selected KPIs reflect one of the most material sustainability issues for the Company's current and future operations, as well as one of the relevant sustainability challenges for its sector. The two selected KPIs cover more than 95% of the Company's activities.

### Calibration of the Sustainability Performance Targets (SPTs) – aligned with the SLBP/SLLP

- The SPTs are consistent with the Company's existing sustainability strategy. However, at the time of this assessment, the Company has not disclosed quantified GHG reduction objectives within its sustainability strategy.
- The SPTs demonstrate a limited level of ambition.
- The timeline, baseline and trigger event are clearly disclosed.
- The means for achieving the SPTs are disclosed and considered credible for both KPI 1 and KPI 2. Any other key factors beyond the Company's direct control that may affect the achievement of the SPT and strategic information that would decisively impact the achievement of the SPT will be disclosed.

### Bond/Loan Characteristics – aligned with the SLBP/SLLP

- The potential variation of the instrument's financial and/or structural characteristics depending on whether the selected KPIs would reach (or not) the predefined SPTs is clearly defined in the Framework and will be disclosed to investors in the relevant documentation including the Offering Memorandum and/or Pricing Schedule pertaining to each note tranche or the credit agreement pertaining to each loan or revolving credit facility, as applicable.
- The meaningfulness of the variation of the financial instrument's structural and financial characteristics of the instrument cannot be assessed due to the lack of details of financial implications at the Framework level.

### Reporting – aligned with the SLBP/SLLP and best practices identified by Moody's ESG Solutions

- The Company has committed to disclose all relevant information in public documentation in its annual impact report, to be published on its website (including information on the performance of KPIs, information enabling investors to monitor the level of ambition of the SPTs and baselines).
- The intended scope and granularity of the reporting is clear and covers all the required elements.
- The selected KPIs' related data will be covered by an internal and external verification.

<sup>1</sup> The Company's acquisition of Telefónica Costa Rica closed in August 2021. Prior to the acquisition, the two entities operated under different ESG and accounting policies, preventing the compilation of an aggregated inventory. Therefore, the Company has only provided data for 2021, the benchmark year. See pages 10 and 13 for more details.

<sup>2</sup> ICMA's/LMA/APLMA/LSTA's Sustainability-Linked Bond Principles (SLBP) 2020/Sustainability-Linked Loan Principles (SLLP) 2022

Verification –aligned with the SLBP/SLLP and best practices identified by Moody's ESG Solutions

- The performance of each KPI against each SPT will be covered by an external verification, on an annual basis and in case of material changes impacting the instrument's financial and/or structural characteristics (such as a trigger event), until the maturity of the financial instrument.
- The verification assurance report will be publicly available on the Company's website.

Type of External Reviews supporting this Framework

<input checked="" type="checkbox"/>	Pre-issuance Second Party Opinion	<input checked="" type="checkbox"/>	Independent verification of KPI(s) reported data
<input checked="" type="checkbox"/>	Independent verification of SPT(s) achievement		

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## SCOPE

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Moody's ESG Solutions was commissioned to provide an independent Second Party Opinion (SPO) on the integration of two environmental factors to the Sustainability-Linked Bonds/Loans (the "Finance Instrument") to be issued by Liberty Costa Rica (also known as the "Company") in compliance with the Sustainability-Linked Financing Framework (the "Framework") created to govern their issuances.

Of note, sustainability-linked debt instruments are intended to finance general corporate purposes. As opposed to other sustainable financial instruments such as green/social bonds or loans, these instruments are typically agnostic on how funds are used. The main feature of this type of financing is the variation of the bond/loan's financial and/or structural characteristics, depending on whether the Company achieves predefined sustainability/ESG objectives.

Our opinion is established using our Environmental, Social and Governance (ESG) assessment methodology and the International Capital Market Association's (ICMA) Sustainability-Linked Bond Principles (SLBP), voluntary guidelines, published in June 2020 and the Loan Market Association, Asia Pacific Loan Market Association, Loan Syndications & Trading Association's (LMA/APLMA/LSTA) Sustainability-Linked Loan Principles (SLLP), voluntary guidelines, published in March 2022. This opinion is strictly limited to the integration of two environmental factors to the instruments. This opinion does not cover the integration of broader sustainability factors (i.e., social and governance), or the labelling of the Finance Instrument where the final decision is left to Liberty Costa Rica. This opinion does not constitute a verification or certification.

Our opinion is built on the review of the following components:

1. Framework: we assessed the Framework, including the coherence between the Framework and the Company's environmental commitments, and the Framework's alignment with the five core components of the SLBP 2020 and SLLP 2022.
2. Company<sup>3</sup> we assessed the Company's management of potential stakeholder-related ESG controversies and its involvement in controversial activities.<sup>4</sup>

Our sources of information are multichannel, combining data (i) gathered from public sources, press content providers and stakeholders, (ii) from Moody's ESG Solutions' exclusive ESG rating database, and (iii) information provided from the Company, through documents and interviews conducted with the Company's managers and stakeholders involved in the Instruments issuance, held via a telecommunications system.

We carried out our due diligence assessment from May 16, 2022 to June 6, 2022. We consider that we were provided access to all documents and interviewees we solicited. To this purpose, we made reasonable efforts to verify the accuracy of all data used as part of the assessment.

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<sup>3</sup> The Company is not part of our ESG performance rating universe.

<sup>4</sup> The 17 controversial activities screened by Moody's ESG Solutions are: Alcohol, Animal welfare, Cannabis, Chemicals of concern, Civilian firearms, Fossil Fuels industry, Coal, Gambling, Genetic engineering, High interest rate lending, Human Embryonic Stem Cells, Military, Nuclear power, Pornography, Reproductive medicine, Tar sands and oil shale, and Tobacco.

# COHERENCE

Coherent
Partially coherent
Not coherent

Moody's ESG Solutions considers that the selected KPIs are coherent with Liberty Costa Rica's strategic sustainability priorities and sector issues and that they contribute to achieving the Company's sustainability commitments.

Liberty Costa Rica's sustainability strategy largely reflects that of its parent company, Liberty Latin America Ltd. (LLA), which has committed to a sustainability strategy that includes reducing its negative environmental impact as one of its main objectives. The KPIs selected by Liberty Costa Rica, which aim to reduce Scope 1, 2 and 3 GHG emissions, are coherent with LLA's Sustainable Business Practices pillar, which includes:

- Lessening its impact on the environment
- Reducing energy usage
- Providing resilient telecommunications services during and after natural disasters and other large-scale disruptions
- Leading in responding to and recovering from natural disasters

Climate change remains a key focus area for the mobile industry. According to the Global System for Mobile Communications (GSMC), an industry organization representing the interests of mobile network operators worldwide, the sector aims to transform the mobile industry to reach net-zero carbon emissions by 2050. Moreover, the organization's 2020 Sustainability Assessment Framework revealed that climate risk was the highest-ranking issue for the mobile industry, reflecting increasing efforts toward improving climate emissions disclosures and setting targets for reductions.

The Science Based Targets initiative's (SBTi) "Guidance for ICT Companies Setting Science Based Targets" sets a mid-term trajectory for the sector from 2020-2030 with a 45% reduction in greenhouse gas (GHG) emissions reduction for mobile network and a 62% reduction for fixed networks by 2030.<sup>5</sup> Furthermore, according to the GSMC, 31% of operators by connections have set science-based targets to cut their carbon emissions over the next decade.<sup>6</sup> In addition, the International Telecommunications Union (ITU) standard highlights that compliance with the Paris Agreement will require the information and communication technology (ICT) industry to reduce GHG emissions by 45% from 2020 to 2030.<sup>7</sup>

Liberty Costa Rica operates in Costa Rica, which has a National Decarbonization Plan to become a net-zero emission economy by 2050.<sup>8</sup> The government has been successfully implementing its decarbonization strategy for decades, especially in the electricity sector, with more than 98% of renewables in its energy mix. By operating in Costa Rica's mostly clean-energy driven economy, Liberty Costa Rica is in a better position to maintain lower levels of Scope 2 emissions relative to its peer companies based in other countries.

The Framework has underlined some important initial steps to implement the Company's environmental strategy by establishing key benchmarks and formalizing its commitment to decarbonize business operations across the value chain. Over the last year, Liberty Costa Rica has assessed its direct and indirect GHG emissions from its business activities to estimate its material Scope 1, 2 and 3 GHG emissions for 2021, following the GHG Protocol Corporate Standard established by the World Resources Institute and World Business Council for Sustainable Development. In addition, Liberty Costa Rica has begun a verification process with the SBTi to set science-based targets in line with reduction requirements to limit global warming increases to 1.5°C above the preindustrial level.

Going forward, the company's main focus in the coming years will be to improve its GHG data collection processes, reduce its Scope 1 and 2 GHG emissions through replacing a material part of its diesel, gasoline and liquefied petroleum gas (LPG) fleet and work with its suppliers to reduce the GHG emissions produced along its value chain.

<sup>5</sup> Guidance for ICT Companies Setting Science Based Targets

<sup>6</sup> 2021 Mobile Industry Impact Report: Sustainable Development Goals, September 2021

<sup>7</sup> "ICT industry to reduce greenhouse gas emissions by 45 per cent by 2030," International Telecommunication Union, February 2020

<sup>8</sup> National Decarbonization Plan, Government of Costa Rica 2018-2050

# FRAMEWORK

The Company has described the main characteristics of the Financial Instruments within a formalized Framework which covers the five core components of the SLBP 2020/SLLP 2022 (the last updated version was provided to us on May 13, 2022). The Company has committed to make this document publicly accessible on its website at the first issuance date, in line with good market practices.

## Alignment with Sustainability-Linked Bond Principles and Sustainability-Linked Loan Principles

### Selection of the Key Performance Indicators (KPIs)



Table 1. Analysis of the KPI(s) selected by the Company

KPI 1: ABSOLUTE SCOPE 1 & 2 GHG EMISSIONS – MTCO <sub>2e</sub>	KPI 2: SCOPE 3 GHG EMISSIONS PER VALUE ADDED (GEVA) METRIC – MTCO <sub>2e</sub> PER OPERATING PROFIT UNIT
Definition: Clarity and Disclosure	
<p>The KPIs are clearly defined, including the unit of measurement, the rationale and process to select the KPIs, the calculation methodology and the scope and they will be publicly disclosed on the Liberty Costa Rica website.<sup>9</sup> More than 95% of all Liberty Costa Rica's business activities are covered by both KPIs.</p> <p>The rationale and process to select the KPIs are based on Liberty Costa Rica's business commitments as well as that of its parent company Liberty Latin America Ltd (LLA)<sup>10</sup> which includes the reduction of negative environmental impacts. Liberty Costa Rica's Sustainable Business Practice pillar includes its commitment towards the reduction of its environmental impact as well as GHG emissions. This target references the materiality matrices of SASB and other external bodies, which identify carbon emissions and energy management as material issues for the industry.</p> <p>Liberty Costa Rica's KPIs are based on LLA's Sustainable Business Practice pillar and set GHG emissions reduction as a target.</p> <p>The Company has provided the following calculation methodologies:</p> <ul style="list-style-type: none"> <li>• KPI 1: Absolute Scope 1 &amp; 2 GHG emissions – MTCO<sub>2e</sub> uses the absolute contraction approach based on the GHG Protocol Corporate Standard.</li> <li>• KPI 2: Scope 3 GHG emissions per Value Added (GEVA) metric – MTCO<sub>2e</sub> per Operating Profit unit.</li> </ul> <p>To determine its Scope 3 GHG emissions, all upstream and downstream GHG Protocol categories deemed relevant for the business were analyzed. According to the Company, the top two categories representing the largest share of Scope 3 emissions are purchased goods and services and capital goods, which together account for 80% of Scope 3 emissions. The remaining 20% of Scope 3 emissions are mainly from the fuel- and energy-related activities, upstream transportation and distribution, business travel and employee commuting categories.</p> <p>Appropriate emissions factors from industry-leading sources together with assumptions were used to convert spend and activity data into CO<sub>2e</sub> emissions. For KPI 2, Liberty Costa Rica selected Operating Profit in Costa Rican Colons (CRC), Costa Rica's local currency and Liberty Costa Rica's reporting currency, as a value-added metric.</p>	

<sup>9</sup> Liberty Costa Rica's website  
<sup>10</sup> Liberty Latin America website

Measurability, Benchmark and Verifiability

The KPIs are measurable and externally verifiable.

Liberty Costa Rica's Scope 1 and 2 emissions and relevant Scope 3 emissions have been calculated using the GHG Protocol methodology and industry emissions factors' sources. For calculating the Scope 1 GHG emissions, Liberty Costa Rica gathered consumption data for its fleet and generators and used the Environmental Protection Agency's 2021 emissions factors to convert fuel consumption into CO<sub>2</sub>e emissions.<sup>11</sup> For Scope 2, the monthly electricity consumption data for all sites was converted into CO<sub>2</sub>e emissions using the International Energy Agency's location-based electricity emissions factors. The electricity consumption data includes the electricity used to charge electric vehicles.<sup>12</sup>

The calculation methodology is expected to be consistent, and the Company commits to inform the investors of changes in the methodology.

The KPIs were not previously disclosed and there was no external verification.

Liberty Costa Rica began its data gathering process and methodology development in 2021. The Company highlights that following Liberty Costa Rica's acquisition of Telefonica Costa Rica in August 2021, the emissions reporting methodologies and perimeters for the company changed. No historical data on business activities have been provided for either Liberty Costa Rica and its subsidiary or Telefonica Costa Rica before 2021.

The KPIs' definitions rely on external references allowing their benchmark. However, KPI 2's economic intensity-based approach is less common in the mobile industry than the absolute contraction or product intensity approaches, which limits the ability to compare the KPI against sector peers.

The KPIs are based on definitions by the Greenhouse Gas Protocol.

Relevance and Materiality

The selected KPIs reflect one of the most material sustainability issues for the Company's current and future operations, as well as one of the relevant sustainability challenges for its sector. The two selected KPIs cover more than 95% of the Company's activities.

The Global System for Mobile Communications' (GSMA) 2020 Sustainability Assessment Framework revealed that climate risk was the highest-ranking issue among social and environmental challenges for the mobile industry. Furthermore, SASB identifies energy management as a relevant issue for the sector. Although significant emphasis is placed on emissions reduction for the ICT sector, it is not among the largest emitters of CO<sub>2</sub> relative to other industries.<sup>13</sup> The GSMA estimates that the global ICT sector accounts for just 1.4% of global emissions and around 4% of global electricity use.<sup>14</sup> Furthermore, Liberty Costa Rica operates in Costa Rica, a country with more than 98% of renewables in its energy mix,<sup>15</sup> which might reduce the expected impact in the reduction of Scope 2 emissions compared to other companies in the ICT sector located in countries with a lower level of renewable energy mix in the grid.

Although the Company confirmed that KPI 1 will be used in conjunction with KPI 2 for each future issuances, the reduction of Scopes 1 and 2 emissions alone will have a limited impact on the global emission levels. Moody's ESG Solutions' opinion on the KPIs' relevance is a consolidation of the materiality assessment of both KPIs. However, KPI 1, on its own, does not address Scope 3 emissions. Therefore, Moody's ESG Solutions considers that KPI 1, on its own, is partially relevant, core and material to the company's business strategy for its current and future operations and partially reflects relevant sustainability challenges for its industry sector.

BEST PRACTICES

- ⇒ The KPIs definition relies on external references allowing their benchmark.
- ⇒ The KPIs cover more than 90% of the company's total activity.

<sup>11</sup> EPA 2021 GHG Emission Factors Hub

<sup>12</sup> IEA Emissions Factors 2021



<sup>13</sup> 2021 Mobile Industry Impact Report: Sustainable Development Goals, September 2021

<sup>14</sup> Mobile industry generates 220m tons of carbon emission yearly, The Guardian, July 2021.

<sup>15</sup> National Decarbonization Plan, Government of Costa Rica 2018-2050

SDG Contribution

The selected KPIs are likely to contribute to of the United Nations' Sustainable Development Goals ("SDGs"), namely:

KPI	SDG	SDG TARGETS
KPI 2: Scope 3 GHG Emissions per Value Added (GEVA) Metric – MTCO <sub>2e</sub> Per Operating Profit Unit	 12 Responsible Production and Consumption	12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.
KPI 1: Absolute Scope 1 & 2 GHG Emissions – MTCO <sub>2e</sub> KPI 2: Scope 3 GHG Emissions per Value Added (GEVA) Metric – MTCO <sub>2e</sub> Per Operating Profit Unit	 13 Climate Action	13.1 Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries.



Calibration of the Sustainability Performance Target (SPT)



Ambition

**KPI 1: Absolute Scope 1 & 2 GHG Emissions**

By using the absolute value of Scope 1 & 2 GHG emissions per year, the data set should show positive or negative KPI trends, reflecting the Company's commitment to fighting climate change, thus enabling investors to make an appropriate assessment of the overall environmental performance.

Table 2 – Absolute Scope 1 & 2 GHG Emissions (measured in absolute CO<sub>2</sub> equivalent emissions)

REPORTED DATA		OBJECTIVES
Absolute Scope 1 & 2 GHG Emissions (MTCO <sub>2</sub> e)	2021 ( <u>Baseline</u> )	2027*
	1,969**	1,378
Absolute GHG emissions reduction (MTCO <sub>2</sub> e)		-591
Average Annual Variation (%)		-5.77
Total Variation (%)		-30

\* Trigger event

\*\* Refrigerants were excluded from Scope 1 calculations for the baseline. Emissions are expected to be negligible because most of the cooling relies on electricity. However, this may be reported in the future.

Based on a combination of benchmark analysis approaches detailed below, Moody's ESG Solutions considers that the SPT demonstrates a robust level of ambition. However, Scopes 1 and 2 emissions account for only about 5% of the Company's total GHG emissions. More emphasis should therefore be placed on the ambition of SPT 2, which focuses on Scope 3 emissions and is far more material.

The objective is to reach a 30% reduction in absolute Scope 1 and 2 emissions by 2027 from a 2021 baseline. This is equivalent to 591 MTCO<sub>2</sub>e, bringing annual Scope 1 and 2 emissions down to 1,378 MTCO<sub>2</sub>e from 1,969 MTCO<sub>2</sub>e. The SPT is consistent with the Company's existing sustainability strategy. However, at the time of this assessment, the Company has not disclosed quantified GHG reduction objectives within its sustainability strategy.

The timeline, baseline and trigger event are clearly disclosed.

Business-as-usual Trajectory Benchmark Analysis

The Company has not provided historical data. We were thus not able to evaluate the Company's historical performance against the KPIs selected.

The Company's acquisition of Telefónica Costa Rica closed in August 2021. Prior to the acquisition, the two entities operated under different ESG and accounting policies, preventing the compilation of an aggregated inventory. Therefore, the Company has only provided data for 2021, the benchmark year. The absolute emissions are expected to see an average annual variation of -5.77% between 2021 to 2027, forecasting a steady decline.

Sector Peers Benchmark Analysis

COMPANY NAME	TARGET TYPE	REDUCTION TARGET (%)	BASELINE TO TARGET (B/T)	BASELINE EMISSIONS (TCO <sub>2</sub> e)	AVERAGE ANNUAL VARIATION (%)	TIMEFRAME (A-B)	1.5 C ALIGNED	NET-ZERO COMMITTED***
Liberty Costa Rica	Absolute	30	2021/2027	1,969	-5.77	6 years	Yes*	No
América Móvil S.A.B. de C.V. <sup>16</sup>	Absolute	52	2019/2030	3,081,873	-6.45	11 years	Yes**	Yes
Deutsche Telekom AG <sup>17</sup>	Absolute	90	2017/2030	4,030,000	-16.23	13 years	Yes**	Yes
Millicom International Cellular S.A. <sup>18</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes
Teléfono <sup>19</sup>	Absolute	70	2015/2025	1,912,188	-11.34	10 years	Yes**	Yes
	Absolute	80	2015/2030		-10.17	15 years		
Telia Company AB <sup>20</sup>	Absolute	50	2018/2025	62,590	-9.43	7 years	Yes**	Yes

\* Not yet verified by an external party; The target's alignment is based only on the Company's calculations and use of the SBTi's Target Setting Tool.

\*\* SBTi validated

\*\*\* Committed to setting net-zero targets under the SBTi's Corporate Net Zero Standard

The SPT demonstrates a robust level of ambition compared to sector peers' performances.

By average annual variation rate, Liberty Costa Rica's Scope 1 and 2 emission reduction rate of -5.77% appears to be a laggard among its peers. América Móvil, one of the Company's direct competitors, has committed to a 52% reduction of Scope 1 and 2 emissions over a 12-year stretch, equal to an annual average variation of -6.45%. Teléfono, another direct competitor, targets a 70% reduction by 2025 and an 80% reduction by 2030 vs 2015 baseline, translating to an average annual variation of -11.34% and -10.17%, respectively. Of the five peers analyzed, it appears all but one are working towards stronger reduction targets with more ambitious average annual variations than Liberty Costa Rica.

However, statistics alone may not tell the whole story as differences in regional energy mix play a significant role. Costa Rica, Liberty Costa Rica's home market, has one of the highest percentages of renewable-sourced electricity in the world at 98%. In contrast, most of the peers identified above operate in countries that are more highly dependent on electricity from nonrenewable sources. For example, América Móvil and Teléfono have the largest presence in Mexico and Spain, respectively, where renewables account for less than half of the countries' electricity generation.<sup>21 22</sup> Due to the Company's relatively low baseline emissions given Costa Rica's almost entirely renewable source of electricity, there are fewer opportunities for the Company to further reduce its Scope 2 emissions. Taking this into account, the Company's 30% reduction target does exhibit a degree of ambition relative to the higher targets of other sector peers.

In conclusion, despite a lower reduction target, this SPT is considered ambitious. It should be noted, however, that all of the assessed peers have made a public commitment to setting and/or validating their net-zero targets under the SBTi's Corporate Net-Zero Standard,<sup>23</sup> while the Company has not. Moreover, the Company's lower baseline emissions value results in a lower reduction of absolute emissions. While the level of ambition for the target is robust, the resulting impact of this SPT will be less meaningful than that of many of its peers.

<sup>16</sup> América Móvil 2020 Sustainability Report

<sup>17</sup> Deutsche Telekom Environmental Guideline, February 2020

<sup>18</sup> Millicom Climate Change 2021 CDP Report

<sup>19</sup> SBTi Companies Taking Action

<sup>20</sup> Telia Company Sustainability web page

<sup>21</sup> IEA: Mexico

<sup>22</sup> IEA: Spain

<sup>23</sup> "Committed" is the first step of the SBTi's Corporate Net-Zero Standard target setting process

### Official International Targets and Scenarios Benchmark Analysis

The SPT demonstrates a robust level of ambition based on comparison to science-based benchmarks.

Liberty Costa Rica calculated the 30% Scope 1 and 2 emissions reduction target using the SBTi Science-Based Target Setting Tool with the absolute contraction approach and the 1.5C scenario.

While its target has not yet been validated by an external party, the Company has engaged with the SBTi and is expecting SBTi verification prior to the trigger event (2027). The Company's current status with the SBTi is "committed", which is the first step of the SBTi target setting process. Additionally, the Company has stated, both within its Framework and bond Offering Memorandum and/or credit agreement, that SPT 1 will be set at the greater of 30% or the SBTi-validated target.

### MEASURES TO ACHIEVE THE SPT

The means for achieving the SPT are disclosed and considered credible. Any other key factors beyond the Company's direct control that may affect the achievement of the SPT and strategic information that would decisively impact the achievement of the SPT will be disclosed.

The Company reports vehicle fleet decarbonization as the main initiative to reduce emissions related to this SPT.

In the long term, the Company is also considering investments in more efficient lighting and air condition equipment, as well as the replacement of generators with industrial-range electric batteries. However, these improvements will have a much smaller impact on emissions due to the high share of renewables in the energy mix in Costa Rica<sup>24</sup> and the relatively low fuel consumption of generators.

#### Vehicle Fleet Decarbonization

Fuel consumption of diesel, gasoline and LPG vehicles accounted for 80% of the Company's Scope 1 and 2 emissions in 2021. A percentage of these fuel-powered vehicles will be replaced with electric vehicles. The Company intends to start with diesel vehicles, which are the most polluting part of the fleet, and replace as many as possible.

The Company has committed to disclose any factor that could pose a risk to achieving the SPT, and has identified the following main risks:

- Availability of electric commercial vehicles in Costa Rica that suit the Company's technical requirements
- Organizational transformation and portfolio activity, such as integrations, mergers or separation
  - Specifically, the ongoing integration of the acquired Telefonica mobile assets
- Adverse political and regulatory measures impacting their strategy

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<sup>24</sup> IEA: Costa Rica

**KPI 2: SCOPE 3 GHG EMISSIONS PER VALUE ADDED (GEVA) Metric**

By using the Scope 3 GHG emissions per value added per year metric, the data set should fairly show positive or negative KPI trends, reflecting the Company's commitment to fighting climate change, thus enabling investors to make an appropriate assessment of the overall environmental performance.

Table 3 – GHG emissions per Value Added (MTCO2e per Operating Profit Unit)

	REPORTED DATA	OBJECTIVE
GHG emissions per Value Added (GEVA) metric – MTCO2e per Operating Profit Unit	2021 (Baseline)	2027*
	0.38	0.25
Reduction in GHG emissions per Operating Profit Unit		0.13
Annual variation (%)		-6.7
Total Variation (%)		-35

\*Trigger event

\*\*Absolute emissions, which is included as a proxy, is not externally verified and not in the scope of analysis

Based on a combination of benchmark analysis approaches, Moody's ESG Solutions considers that the SPT demonstrates a limited level of ambition. While the Company's SPT exemplifies a reduction trajectory that seems to be aligned with the SBTi's required 7% year-on-year reduction rate, the combination of lacking both historical performance data and comparable peer data negatively impacted our assessment of the SPT's overall ambition. Furthermore, the absence of long-term targets for Scope 3 emissions reductions beyond 2027 and the lack of a 2050 net-zero commitment also limited our understanding of the Company's plans to achieve lasting declines in emissions over the long run.

The objective is to reach a greater than 35% reduction in Scope 3 GHG emissions per Operating Profit Unit by 2027 from a 2021 baseline. This is equivalent to a 0.13 MTCO2e per Operating Profit Unit reduction, bringing the Scope 3 emissions down to 0.25 MTCO2e per Operating Unit by 2027 from the 2021 0.38 MTCO2e per Operating Profit Unit baseline. The SPT is consistent with the Company's existing sustainability strategy. However, at the time of this assessment, the Company has not disclosed quantified GHG reduction objectives within its sustainability strategy.

The methodology sets targets using contraction of economic intensity as referred to in the Relevance and Materiality section of this report. Under this target, a 7% CAGR reduction per annum is required in order to achieve the SBTi's long-term target of 75% total reduction in absolute Scope 3 emissions by 2050 vs. a 2010 baseline.<sup>25</sup> See additional detail in the Official International Targets and Scenarios Benchmark Analysis section later in this report.

The timeline, baseline and trigger event are clearly disclosed.

**Business-as-usual Trajectory Benchmark Analysis**

The Company has not provided historical data. We were not able to evaluate the Company's historical performance against the KPIs selected.

The Company's acquisition of Telefónica Costa Rica closed in August 2021. Prior to the acquisition, the two entities operated under different ESG and accounting policies, preventing the compilation of an aggregated inventory. Therefore, the Company has only provided data for 2021, the benchmark year. In terms of the forward-looking reduction targets, the GEVA estimates an average annual variation of -6.7% between 2021 to 2027, forecasting a steady decline.

<sup>25</sup> SBTi Corporate Manual, page 25

Sector Peers Benchmark Analysis

COMPANY NAME	TARGET TYPE	REDUCTION TARGET (%)	BASELINE TO TARGET (B/T)	AVERAGE ANNUAL VARIATION (%)	TIMEFRAME (A-B)
Liberty Costa Rica	Intensity (GEVA)	35	2021/2027	-6.7	6 years
América Móvil S.A.B. de C.V. <sup>26</sup>	Absolute	14	2019/2030	-7.67	11 years
Deutsche Telekom AG <sup>27</sup>	Intensity (per customer)	25	2017/2030	-2.19	13 years
Millicom International Cellular S.A. <sup>28</sup>	N/A	N/A	N/A	N/A	N/A
Teléfono <sup>29</sup>	Absolute Intensity (per euro from purchased goods and services and capital goods)	25*	2016/2025	-3.15	9 years
		30*	2016/2025	-3.89	9 years
Telia Company AB <sup>30</sup>	Absolute	29**	2018/2025	-4.77	7 years

\* Telefonica targets are only commitments to reducing absolute emissions from fuel and energy-related activities (Scope 3 Category 3 from GHG Protocol) and Intensity emissions per euro from purchased goods and services and capital goods (Scope 3 Categories 1 and 2 from GHG Protocol) respectively.

\*\*Telia Company's absolute target is only a commitment to reduce use of sold products (Scope 3 Category 11 from GHG Protocol)

Economic intensity-based SPT calculations are far less common in the mobile industry than absolute contraction or product intensity approaches. In analyzing the same five peers previously identified, none appear to have used economic intensity as their only approach to calculating Scope 3 emissions targets (see table above for details). Due to limited visibility in peers' comparable data and/or their respective forecasting assumptions and company-specific adjustments inherent in this approach, Moody's ESG Solutions does not have sufficient data to conduct a comprehensive peer analysis under the economic intensity approach. As a result, the sector peers benchmark analysis has been deactivated.

Official International Targets and Scenarios Benchmark Analysis

The SPT demonstrates a robust level of ambition based on comparison to science-based benchmarks.

According to SBTi, economic intensity target-setting methods are considered less robust than absolute and physical intensity methods; regardless, GEVA is an accepted emissions calculation methodology for Scope 3 emissions and is eligible for verification under SBTi standards. SBTi states the advantages of utilizing GEVA include the flexibilities for companies that are expecting significant growth and enabling early actions from companies with limited data<sup>31</sup>. The Company positions itself as being in line with this description based on its projected Operating Profit growth and the recent acquisition activity preventing the availability of historical data.

The Company calculated the 35% Scope 3 emissions reduction target using the SBTi Science-Based Target Setting Tool with the economic intensity reduction approach. The Company indicates that its Scope 3 SPT is aligned with the SBTi standard that requires companies to reduce their GEVA by 7% per year to align with IPCC Representative Concentration Pathway (RCP) 2.6 emission projections. At the time of this assessment, the Company's SPTs are pending SBTi certification, and the robustness of the underlying assumptions has not been reviewed or accepted by SBTi. However, the Company has committed to obtaining SBTi certification for the initial SPT and/or to adjusting the SPT as necessary to a more ambitious SBTi-validated target if required. This commitment will be included in the relevant issuance documentation such as the Offering Memorandum and/or credit agreement.

<sup>26</sup> América Móvil 2020 Sustainability Report

<sup>27</sup> Deutsche Telekom Environmental Guideline, February 2020

<sup>28</sup> Millicom Climate Change 2021 CDP Report

<sup>29</sup> SBTi Companies Taking Action

<sup>30</sup> Telia Company Sustainability web page

<sup>31</sup> SBTi Corporate Manual

#### MEASURES TO ACHIEVE THE SPT

The means for achieving the SPT are considered credible. They are disclosed along with any other key factors beyond the Company's direct control that may affect the achievement of the SPT. However, the respective contributions are not disclosed in quantitative terms.

The Company has detailed different components to achieve their Scope 3 emissions reduction target. The first is through supplier engagement. For existing suppliers, the Company will ensure they are conducting GHG assessments and setting Scope 1 and 2 targets aligned with SBTi standards. Continuing a contract or selecting a new supplier will depend on suppliers' ability to reduce Scope 1 and 2 emissions. The Company will also introduce specific ESG requirements when contracting with suppliers during the Request for Proposal (RFP) process.

The second component to support achieving their Scope 3 emissions target is through improvements to the Company's internal operations. The Company will adapt the sections of their operations and supply chain that rely on high GHG activities such as fossil fuel extraction and air shipments. The Company will also adjust workforce management policies by minimizing business travel and allowing employees to work from home to reduce emissions caused by commuting.

Overall, the material components of the Company's Scope 3 emissions are addressed. SBTi explains in its "Guidance for ICT companies setting science based targets" that the most significant Scope 3 categories for an ICT companies are "Purchased Goods and Services" and "Use of Sold Products".

Additionally, the Company discloses the following factors that could pose a risk to achieving the SPTs:

- Organizational transformation caused by significant portfolio activity, such as integrations, mergers or separations
- Unexpected supply chain disruptions to global supplier network that would prevent the Company from executing key strategic plans.
- Adverse political and regulatory measures impacting their strategy

## Instrument Characteristics



The potential variation of the Instrument financial and/or structural characteristics depending on whether the selected KPIs would reach (or not) the predefined SPTs is clearly defined in the framework and will be disclosed to investors in the relevant documentation including the Offering Memorandum and/or Pricing Schedule pertaining to each note tranche or the credit agreement pertaining to each loan or revolving credit facility, as applicable.

Liberty Costa Rica confirms that there will be one trigger event in case the KPIs fail to achieve the predefined SPTs or its performance cannot be calculated or observed in a satisfactory manner (non-satisfactory manner to be understood as a verification assurance certificate provided by the independent auditor containing a reservation or the independent auditor not being in a position to provide such certificate).

The impact on the financial characteristics in case of aforementioned circumstances may include coupon step-up(s), coupon step-down(s) and/or may lead to a higher or a lower redemption price payable in the optional redemption price in the case of notes.

The meaningfulness of the variation of the Financial Instrument's structural and financial characteristics of the Instrument cannot be assessed due to the lack of details of financial implications at the Framework level.

\*Moody's ESG Solutions considers that, as of today, there is insufficient information and market precedent to appropriately assess the potential best practices regarding the bond/loan characteristics' variation. In this sense, the "Aligned" level is currently considered to be the highest level to be achieved by Company on this pillar.

Reporting

Not Aligned      Partially Aligned      Aligned      **Best Practices**

**KPI 1: ABSOLUTE SCOPE 1 & 2 GHG EMISSIONS – MTCO<sub>2</sub>E**

**KPI 2: SCOPE 3 GHG EMISSIONS PER VALUE ADDED (GEVA) METRIC – MTCO<sub>2</sub>E PER OPERATING PROFIT UNIT**

Reporting Accessibility and Frequency

The Company has committed to disclose all relevant information in public documentation in its annual Impact Report, published on its website (including information on the performance of KPIs, information enabling investors to monitor the level of ambition of the SPTs and baselines).

The reporting will be published annually and for any material changes, for the whole period that is relevant for assessing the SPTs and related trigger events.

Reporting Scope and Granularity

The intended scope and granularity of the reporting is clear and covers all the required elements.

The Company's reporting will include:

- The performance of the selected KPIs, including baselines, results, methodologies, and assumptions where relevant, covered by an assurance statement of the independent auditor.
- Information enabling investors to monitor the level of ambition of the SPTs, including any update in Liberty Costa Rica's sustainability strategy or on the related KPI/ESG governance.
- Information relevant to the analysis of the KPIs and SPTs, including instrument financial and/or structural characteristics.
- Following a target observation date, a verification assurance certificate confirming whether the performance on the KPIs meets the relevant SPT will be published on LLA and/or Liberty Costa Rica's website.

Reporting Process, Monitoring and Control

The selected KPIs related data are covered by an internal and external verification.

Internally, reporting and monitoring will follow Liberty Costa Rica's standard ESG governance process, which includes quarterly reporting to its ESG Committee. The Committee is led and sponsored by the Chief People Officer & Chief Legal Officer, who are responsible for providing regular updates to the LLA Board.

An assurance statement by an independent auditor on the KPI information will be included in the annual Impact Report published on Liberty Costa Rica's website. The assurance statement will be delivered until maturity of respective financing instrument.

**BEST PRACTICES**

- ⇒ All relevant information is publicly disclosed by the company in public documentation.
- ⇒ KPI data undergoes both internal and external verification.



Verification



The performance of each KPI against each SPT will be covered by an external verification, on an annual basis and in case of material changes impacting the instrument's financial and/or structural characteristics (such as a trigger event), until the maturity of the financial instrument. The verification assurance report will be publicly available on the Company's website.

BEST PRACTICES
<ul style="list-style-type: none"> <li>⇒ Verification of the KPI will be conducted until maturity of the financial instrument</li> <li>⇒ The verification assurance report will be publicly available</li> </ul>

# COMPANY

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## Management of ESG Controversies

As of May 2022, the review conducted by Moody's ESG Solutions did not reveal any ESG controversy against Liberty Costa Rica (or related entity Telefonica Costa Rica) over the last four years.

## Involvement in Controversial Activities

LLA (Liberty Costa Rica's parent company) is involved in one of the 17 controversial activities screened under our methodology:

- Minor involvement in Pornography: Similar to several of its peers in the telecommunications sector, LLA's revenue related to facilitating access to pornography is within the lowest possible range for a company identified to be involved in controversial activities under our methodology. This minor involvement is from the Company providing access to adult TV channels by group subsidiaries. Upon further assessment, all five of LLA's peers discussed prior in our analysis have an equivalent level of involvement in Pornography due to the same factors.

The Company appears to not be involved in any of the other 16 controversial activities screened under our methodology, namely: Alcohol, Animal welfare, Cannabis, Chemicals of Concern, Civilian firearms, Coal, Fossil Fuels industry, Unconventional oil and gas, Gambling, Genetic engineering, Human embryonic stem cells, High-interest rate lending, Military, Nuclear Power, Reproductive Medicine and Tobacco.

The controversial activities research provides screening of companies to identify involvement in business activities that are subject to philosophical or moral beliefs. The information does not suggest any approval or disapproval on their content from Moody's ESG Solutions.

# METHODOLOGY

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In Moody's ESG Solutions' view, Environmental, Social and Governance (ESG) factors are intertwined and complementary. As such they cannot be separated in the assessment of ESG management in any organisation, activity or transaction. In this sense, Moody's ESG Solutions provides an opinion on the Company's ESG performance as an organisation, and on the processes and commitments applicable to the intended issuance.

Our Second Party Opinions (SPOs) are subject to internal quality control at three levels (Analyst, Project Manager and Quality Reviewer). If necessary, this process is complemented by a final review and validation by the Expertise Committee and Supervisor. A right of complaint and recourse is guaranteed to all companies under our review.

## Framework

### Alignment with the Sustainability-Linked Bond Principles and Sustainability-Linked Loan Principles

Scale of assessment: Not aligned, Partially aligned, Aligned, Best Practices

*The Framework/Bond has been evaluated by Moody's ESG Solutions according to the LMA/APLMA/LSTA's Sustainability-Linked Loan Principles – March 2022 ("SLLP") and / or the ICMA's Sustainability-Linked Bond Principles - June 2020 ("SLBP") and on our methodology based on international standards and sector guidelines applicable in terms of ESG management and assessment.*

### Selection of Key Performance Indicators (KPIs)

KPI's materiality and coherence with the Company overall sustainability strategy and with the Company sector's main sustainability challenges. KPI's measurability and clarity, internal and external control over the KPI's data, exhaustiveness of the KPI's coverage.

### Calibration of Sustainability Performance Targets (SPTs)

Coherence of the SPTs with the overall sustainability strategy, ambition of the SPTs (compared the Company own performance, sector peers and relevant international standards), trigger events' disclosure, disclosure and credibility of the means for achievement (including scope and geographical coverage of the means).

### Instrument Characteristics

Disclosure of the bond/loan characteristics' variation, the meaningfulness of these variations (for alignment with SLBP only).

### Reporting

Reporting process formalization and verification, data's accessibility.

### Verification

Verification of the performance against the SPTs and disclosure of the assurance reports.

## Company

### Management of Stakeholder-Related ESG Controversies

Moody's ESG Solutions defines a controversy as public information or contradictory opinions from reliable<sup>32</sup> sources that incriminate or make allegations against an Company regarding how it handles ESG issues as defined in our ESG framework. Each controversy may relate to several facts or events, to their conflicting interpretations, legal procedures or non-proven claims.

Moody's ESG Solutions reviewed the information provided by the Company, press content providers and stakeholders (partnership with Factiva Dow Jones: access to the content of 28,500 publications worldwide from reference financial newspapers to sector-focused magazines, local publications or Non-Government Organizations). Information gathered from these sources is considered as long as it is public, documented and traceable.

Moody's ESG Solutions provides an opinion on companies' controversies risks mitigation based on the analysis of 3 factors:

- **Frequency:** reflects for each ESG challenge the number of controversies that the Company has faced. At corporate level, this factor reflects on the overall number of controversies that the Company has faced and the scope of ESG issues impacted (scale: Isolated, Occasional, Frequent, Persistent).
- **Severity:** the more a controversy is related to stakeholders' fundamental interests, proves actual corporate responsibility in its occurrence, and have caused adverse impacts for stakeholders and the Company, the higher its severity is. Severity assigned at the corporate level will reflect the highest severity of all cases faced by the Company (scale: Minor, Significant, High, Critical).
- **Responsiveness:** ability demonstrated by an Company to dialogue with its stakeholders in a risk management perspective and based on explanatory, preventative, remediating or corrective measures. At corporate level, this factor will reflect the overall responsiveness of the Company for all cases faced (scale: Proactive, Remediate, Reactive, Non- Communicative).

The impact of a controversy on an Company's reputation reduces with time, depending on the severity of the event and the Company's responsiveness to this event. Conventionally, our controversy database covers any controversy with Minor or Significant severity during 24 months after the last event registered and during 48 months for High and Critical controversies.

### Involvement in Controversial Activities

17 controversial activities have been analyzed following 30 parameters to screen the Company's involvement in any of them. The Company's level of involvement (Major, Minor, No) in a controversial activity is based on:

- An estimation of the revenues derived from controversial products or services.
- The specific nature of the controversial products or services provided by the Company.

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<sup>32</sup> 'Reliable' means that there are sufficient details to substantiate claims made, with due attention paid to the political dimension of news and the danger of misinformation. Moody's ESG Solutions draws on investigative journalism, the business press, NGO and trade union reports which focus on corporate behavior relating to ESG issues. It is neither possible nor advisable to create a prescriptive fixed list of sources as new, valid sources arise all the time and it is necessary to investigate these as and when they are retrieved in order to comprehensively cover evolving issues and media.

**Moody's ESG Solutions' Assessment Scales**

Scale of assessment of the Issuer's the KPI(s) materiality and the associated SPT(s) ambition.	
Advanced	<p>The selected KPI(s) reflects the most material issues for the Issuer's core sustainability and business strategy and address the most relevant environmental, social and/or governance challenges of the industry sector.</p> <p>An advanced ambition is achieved when the SPT(s) can demonstrate the following: (i) alignment with the 2D scenario/recognized sector standards (when available) (ii) a top performance in comparison to sector peers, and (iii) an improvement of the company's performance.</p>
Robust	<p>The selected KPI(s) reflects material issues for the Issuer's core sustainability and business strategy and address relevant environmental, social and/or governance challenges of the industry sector.</p> <p>A robust ambition is achieved when the SPT(s) can demonstrate at least two out of three of the following items: (i) alignment with the 2D scenario/recognized sector standards (ii) a performance in line with the average performance of sector peers, and (iii) an improvement of the company's performance.</p>
Limited	<p>The selected KPI(s) does not appropriately reflect material issues for the Issuer's core sustainability and business strategy and partially address relevant environmental, social and/or governance challenges of the industry sector.</p> <p>A limited ambition is achieved when the SPT(s) can demonstrate only one out of three of the following: (i) alignment with the 2D scenario/recognized sector standards (ii) a performance in line with the average performance of sector peers, and (iii) an improvement of the company's performance.</p>
Weak	<p>The selected KPI(s) does not reflect material issues for the Issuer's core sustainability and business strategy and do not address relevant environmental, social and/or governance challenges of the industry sector.</p> <p>A weak ambition is achieved when the SPT(s) (i) is not aligned the 2D scenario/recognized sector standards (ii) is below the average performance of its sector peers, and (iii) shows a negative trend in the company's performance.</p>

Scale of assessment of financial instrument's alignment with Sustainability-Linked Bond and Loan Principles	
Best Practices	<p>The Instrument's practices go beyond the core practices of the ICMA's Sustainability-Linked Bond Principles and/or of the LMA/APLMA/LSTA's Sustainability-Linked Loan Principles by adopting recommended and best practices.</p>
Aligned	<p>The Instrument has adopted all the core practices of the ICMA's Sustainability-Linked Bond Principles and/or of the LMA/APLMA/LSTA's Sustainability-Linked Loan Principles.</p>
Partially Aligned	<p>The Instrument has adopted a majority of the core practices of the ICMA's Sustainability-Linked Bond Principles and/or of the LMA/APLMA/LSTA's Sustainability-Linked Loan Principles, but not all of them.</p>
Not Aligned	<p>The Instrument has adopted only a minority of the core practices of the ICMA's Sustainability-Linked Bond Principles and/or of the LMA/APLMA/LSTA's Sustainability-Linked Loan Principles.</p>

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