



# Sustainable Purchasing Policy

Group Environment, Social and Governance Department

September 2025

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## PURPOSE

As a global player in telecoms and energy industries, Circet and its subsidiaries (hereafter Circet) provide our customers with bespoke or turnkey solutions of multi-technology infrastructure services.

Circet is committed to the principles of environmental sustainability, social responsibility and effective corporate governance across all facets of our business ensuring that our decisions align with regulatory requirements and contribute to a sustainable future.

This policy aims to ensure that our purchasing practices support our environmental, social, and governance (ESG) strategy. It also demonstrates our commitment to establishing and maintaining respectful and balanced relationships with suppliers and subcontractors whose policies are fully in line with our environmental, social and governance objectives.

## SCOPE OF THE POLICY

This policy applies to all Circet group companies. It is implemented in all geographical areas where Circet operates, unless otherwise specified by local regulations. It outlines key ESG topics relevant to Circet's purchasing and explains our approach to managing these aspects.

This policy applies to all purchases made by Circet, whether goods or services from suppliers or subcontractors.

By extension, the policy applies to any employee likely to make purchases on behalf of the company: purchasing, support, production or administrative functions.

## DEFINITIONS

**Supplier:** A supplier is an individual or legal entity that provides products or services to Circet.

**Subcontractor:** A subcontractor is a natural or legal person to whom Circet, under its responsibility, entrusts the execution of all or part of a work or service, for which Circet has itself contractually committed to its own customer.

Together, suppliers and subcontractors constitute Circet's supply chain, also known as the upstream value chain.

## KEY SUSTAINABLE PURCHASING ISSUES

As part of our ESG strategy, our ambition is to ensure health and **safety for the workers**, respect for **human rights**, protection of the **environment**, **ethical business practices** and, more broadly, promote **social responsibility** throughout our supply chain.

## OBJECTIVES AND ACTION PLANS

### HEALTH AND SAFETY IN THE SUPPLY CHAIN

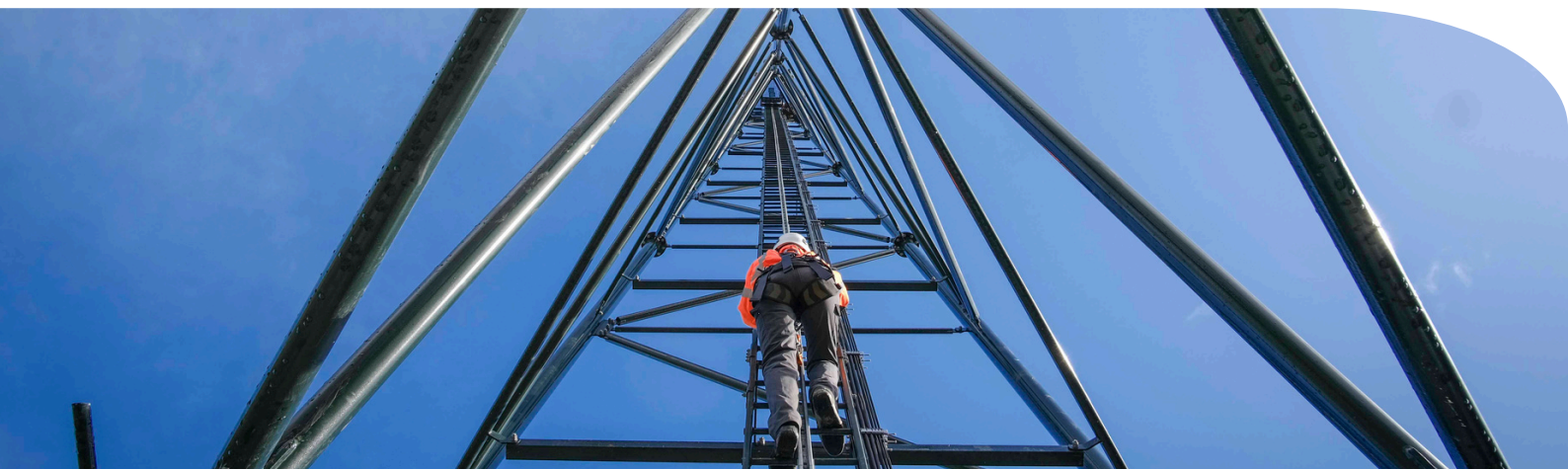
- Prioritize engagement with suppliers who maintain a certified safety management system or uphold a formal occupational health and safety policy ensuring alignment with industry best practices.
- Select subcontractors who demonstrate a commitment to employee safety through structured training programs, fostering a culture of safety awareness and compliance.
- Implement rigorous supervision and monitoring of subcontractor safety performance on construction sites, safeguarding all personnel involved in operations.

### SUPPLIERS AND SUBCONTRACTORS SOCIAL PRACTICES

- Ensure that suppliers and subcontractors have ethical working practices, including fair wages, safe working conditions, and compliance with relevant labour laws and International Labour Organisation (ILO) conventions.
- Avoiding engagement with suppliers and subcontractors involved in child labour, forced labour, or any form of human rights violations.
- Promoting diversity and inclusivity by seeking out suppliers that promote equal opportunities and diverse representation in their workforce.

### ENVIRONMENTAL CONSIDERATIONS

- Prioritizing the procurement of goods and services with the lowest possible environmental footprint, including energy efficiency and reduced waste generation.
- Incorporating life-cycle assessments into procurement decisions to evaluate the environmental impact of products and services over their entire lifespan.
- Encouraging the adoption of circular economy principles by procuring products that are designed for longevity, reparability, and ease of recycling.
- Working with suppliers and subcontractors committed to reduce their carbon footprint.





## ETHICAL BUSINESS PRACTICES

- Prohibiting any form of bribery, corruption, or unethical behaviour in supplier and subcontractor relationships.
- Conducting thorough due diligence on potential suppliers and subcontractors to ensure they align with our ethical standards and are not associated with any criminal activities.
- Working with suppliers and subcontractors who meet our standards of data protection.

## LOCAL ECONOMY AND COMMUNITY SUPPORT

- Giving preference to local suppliers to stimulate regional economic growth.
- Giving preference to suppliers contributing to social and environmental initiatives to support local communities.

## CONTINUOUS IMPROVEMENT

- Setting measurable targets related to sustainability in procurement and tracking progress over time.
- Providing sustainability training and awareness programs to employees involved in procurement activities.

KPI: 100% of the purchasers trained each year

- Providing sustainability training and awareness programs to subcontractors
- Leveraging the EcoVadis supply chain assessment program to improve ESG risk assessment and monitoring of suppliers' environmental, social, and governance performance.
- Use Circet signalling platform to report any behaviour that violates this policy. [Report a concern](#). [Circet Corporate International](#).



## IMPLEMENTATION AND RESPONSIBILITIES

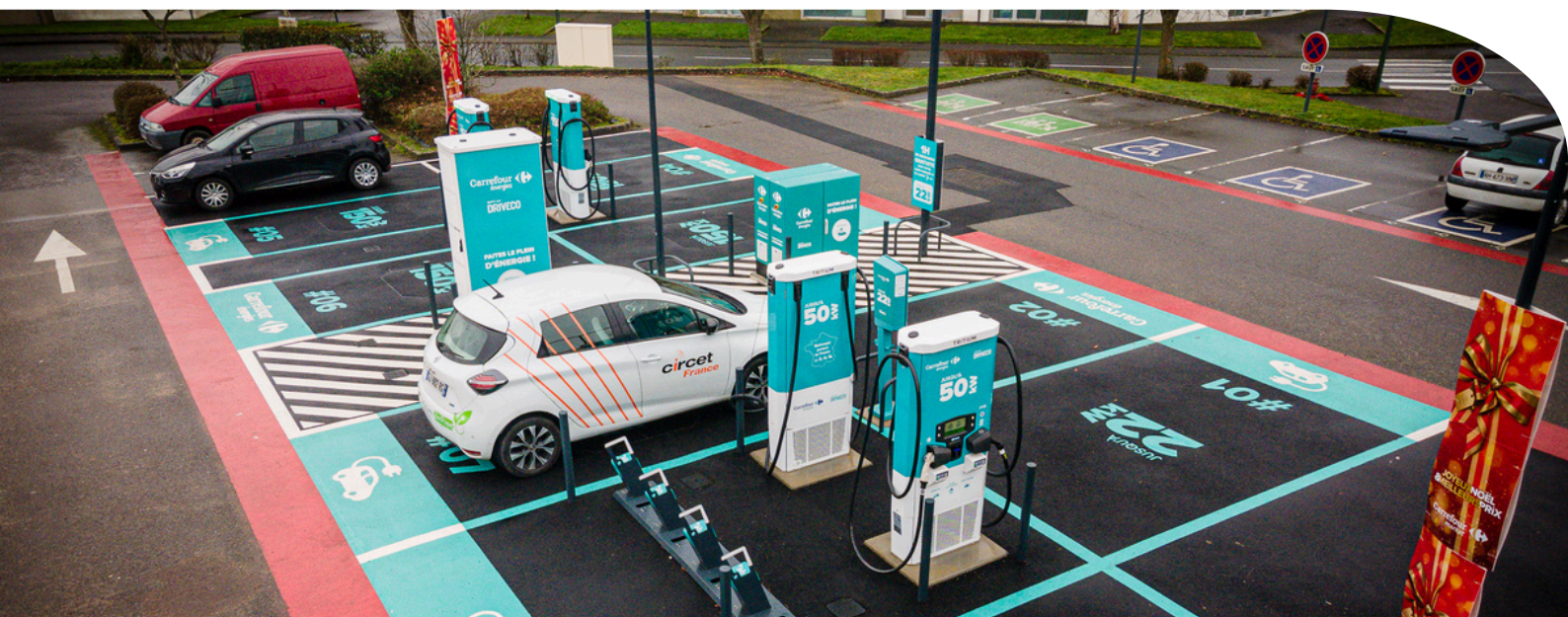
- Firstly, this policy is made available to all interested parties, both internal and external. To raise awareness and involve employees, subcontractors, suppliers, and relevant stakeholders with our purchasing approach, the policy is published on the group website ([Publications](#) | [Circet Corporate International](#)) and distributed to all interested parties.
- Indeed, everyone at Circet is responsible for the purchasing issues under their control, with the support of the purchasing team, which provides advice and assistance in complying with our policy.
- The sustainable purchasing policy is periodically reviewed to ensure that it complies with regulations, with emerging best practices and with the nature and size of the organisation.
- In each national entity, the CEO is responsible for ensuring compliance with this policy for local policy implementation and monitoring, assisted by the local purchasing and ESG teams, reviewing local action plans and key objectives, and monitoring results to adjust measures as necessary.
- Finally, the Group ESG Director is responsible for verifying that the policy is being implemented in all Circet Group companies, reviewing action plans and key objectives, and checking the effectiveness of this policy to ensure its ongoing relevance and alignment with our sustainability goals.

## CONCLUSION

This Sustainable purchasing policy demonstrates Circet commitment to making responsible procurement decisions and prioritizing suppliers and subcontractors that meet our ESG requirements.

We encourage all stakeholders to actively support this policy, fostering a shared commitment to sustainable practices.

This policy is implemented in strict compliance with the principles of the Group's ethical code and is supplemented by a Supplier code of conduct that Circet suppliers must adhere to.







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