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Release Date:	5 Aug 2026	Approved By:	Donagh Kelly
Review Due:	4 Aug 2027	Signature:	
Reference Standards:	ISO 14001:2015 - Environmental Management Systems		

1. 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.

2. 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.

3. Definitions

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.

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

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

4.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.

5.Objectives and Action Plans

5.1 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.

5.2 Suppliers and Subcontractor Social Practices

- Ensuring that suppliers and subcontractors adhere to ethical labour 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.

5.3 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, repairability, and ease of recycling.
- Working with suppliers and subcontractors committed to reduce their carbon footprint

5.4 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.
- Purchase from suppliers and subcontractors who meet our standards of data protection.

5.5 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.

5.6 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](#).

6. Implementation and Responsibilities

- 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.
- Everyone at Circet is responsible for the purchasing issues under their control, with the support of the purchasing team who provide ongoing advice and assistance in complying with this policy.
- The sustainable purchasing policy is periodically reviewed to ensure that it complies with applicable regulations, emerging best practices, and the nature and size of the organisation.
- The CEO of each national entity is responsible for ensuring compliance with this policy, for local policy implementation, and monitoring. Assistance is provided by local purchasing and ESG teams, periodically reviewing local action plans and key objectives, and monitoring results to adjust measures as necessary.
- Finally, the Group ESG Director is responsible for verifying policy implementation 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's commitment to making responsible procurement decisions and prioritizing suppliers that meet our ESG requirements.

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.

Further Circet encourages all stakeholders to actively support this policy, fostering a shared commitment to sustainable practices.

Related Documents

The documents below relate to this policy and its requirements.

Reference	Title / Description	Document Location
1	Sustainable Purchasing_Policy_EN_Group_Circet_April_2026	www.circet.com
2	IMS-POL-000 Corporate IMS Manual	Handbook 000
3	IMS-POL-303.001 Sustainability Policy	Handbook 303

Version Control

Policy documents shall be reviewed by the author every 12 months.

Version	Release Date	Details of Change(s)	Author	Reviewed By
3.0	5 Aug 26	Updated to align with the group sustainable purchasing policy	Adele Morrough	Donagh Kelly
2.0	27 Jan 26	Updated to reflect single IMS SharePoint site for hosting company documents	Adele Morrough	Donagh Kelly
1.0	30 Sept 25	ESG review and update	Michael McNamee	Donagh Kelly
0.1	Sept 25	Transition to new IMS	Adele Morrough	Governance Team