

Sustainable Procurement Policy

Title	eir Procurement Policy (Internal)
Organisation	eir Procurement
Policy Owner	Stephen Tighe, CFO
Date	01.04.2024
Signed on behalf of the Board of Directors	<i>Philip O Meara</i>



1. Overview

eir is proud to be accredited to The Business Working Responsibly Mark. Based on ISO26000, this is the only independently audited standard for responsible and sustainable businesses in Ireland. eir is committed to responsible and ethical business operations and minimising the impact we make on the environment in which we operate through efficient resource management.

Sustainable Procurement integrates environmental and societal protection requirements, specifications and criteria. eir is not a manufacturer and so the business largely relies on Supply Chain processes to address eir's sustainability goals. eir effectively manages this through the eir supplier onboarding process (**Supplier Code of Conduct**) and the contractual agreements put in place with suppliers thereafter (either **eir Purchase Order Terms and Conditions**, or **eir Standard Terms and Conditions of Purchase agreement**).

eir expects all suppliers to comply with its Sustainable Procurement Policy and will monitor annually the steps taken by suppliers to ensure they are compliant with this Policy. In the unlikely event that a supplier fails to meet the requirements, eir will work with the supplier to ensure corrective measures are put in place to address these, benefiting the sustainability efforts of both the supplier and of eir. eir recognises many benefits are to be gained by implementing Sustainable Procurement including:

- Cost Reduction: Reduction in total cost of ownership linked to reduced energy costs, reduced consumption and reduced social and environmental compliance costs
- Risk Reduction: Financial impact on brand value from bad supplier practices (e.g., any human rights infringements, incidence of modern slavery, forced labour, child labour, local pollution); economic cost of sustainable procurement disruptions (e.g., noncompliance with environmental regulations)
- Revenue Growth: Additional revenue through innovation of eco-friendly products/services, price premium or income from recycling programmes

2. Supplier Code of Conduct

'Supplier' refers to any entity providing products, people or services to eir, including subcontractors and agents, and where applicable, the personnel of Supplier and its subcontractors and agents. Before a Supplier begins working with eir, the Supplier will be requested to sign eir's Supplier Code of Conduct. The eir Supplier Code of Conduct sets out principles to promote ethical conduct in the workplace, safe working conditions, protection of sensitive information, the expectations with regards to treatment of employees with respect and dignity, and responsible supply chains.

At a minimum, all Suppliers must operate in full compliance with the laws, rules and regulations of the jurisdictions (whether Irish or otherwise) in which they operate or where they provide services to eir. Where this Supplier Code of Conduct sets higher standards than the law, eir expects Suppliers to adhere to such standards. It supplements, but does not supersede, the contracts between eir and the Supplier. The relevant aspects of the Supplier Code of Conduct are captured below:

SECTION B – PERSONNEL

eir views it as a business imperative to uphold the human rights of workers by treating them with dignity and respect and we expect the same commitment from Suppliers. Accordingly, all participants in eir's supply chain are expected to adhere to the following standards:

1) No Child Labour

Suppliers must not use child labour. The term "child" refers to any person under the age of 15, or under the applicable minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest.

2) Freedom of Association and Collective Bargaining

Suppliers must comply with applicable laws and regulations governing the legal rights of their employees to join or not to join worker organizations, including trade unions, and the right to collectively bargain, if they choose to be represented.

3) Non Discrimination

Suppliers must not engage in discrimination on any basis prohibited by applicable/local law, including, without limitation, race, colour, religion, age, gender, pregnancy, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status or military status. eir embraces diversity and equal opportunity as fundamental principles and key

components of its corporate strategy. We strongly encourage that all Suppliers do the same. Suppliers must also maintain a workplace culture based on respect where all forms of unlawful harassment and abuse, including sexual harassment, is forbidden. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to employees and adequate training must be provided.

4) Working Hours and Wages

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Employees should have the ability to earn fair and equal wages, as determined by applicable local law.

Suppliers are fully responsible for the quality, performance, behaviour, supervision and protection of their personnel. eir retains the right in its absolute discretion to require the removal of any individual from a eir place of work for any reason.

SECTION D – ENVIRONMENTAL

eir considers environmental responsibility integral to delivering world class services and solutions that create shareholder and community value. eir expects Suppliers to demonstrate a commitment to responsible environmental stewardship, including:

1) Compliance with Environmental Laws

Suppliers must comply with all environmental laws and requirements, including those relating to: (i) the management and disposal of hazardous materials; (ii) contaminants in air, soil or water; (iii) the protection of natural resources, wildlife and wetlands; and (iv) recycling.

2) Pollution Prevention and Resource Reduction

Suppliers must strive to reduce, eliminate or prevent waste of all types, by conserving materials and modifying their production or maintenance or facility processes. Suppliers must also work to reduce the volume and toxicity of products throughout the life cycle.

3) Environmental Consideration in Business Decision-making

Suppliers are to work with their own sub-suppliers to assess and address environmental and sustainability issues within their supply chains. The Supplier shall evaluate its subcontractors' and the Suppliers' performance and set necessary environmental improvement targets. If a subcontractor is used for waste disposal the

Supplier shall ensure that the subcontractor is correctly authorized and licensed to do so.

4) Assessment and Improvement of Environmental Practices

Suppliers are to implement environmental management systems and focus on continuously monitoring and improving their performance. Well-designed "key performance indicators" and meaningful short- and long-term improvement targets are essential.

5) Environmental Policy and Management System

Suppliers shall have an up-to-date, documented Environmental Policy including commitment to environmental protection, prevention of pollution, compliant with environmental legislation, continuous improvement to procure in line with its policy.

Suppliers shall have a documented Environmental Management System to ensure effective planning, operation and control of environmental aspects. Continuous improvement efforts shall be addressed within the Environmental Management System.

3. eir Purchase Order Terms and Conditions

In cases where eir, consistent with eir's Procurement Policy, do not have a contract in place with a supplier then the terms of the Purchase Order that eir issues to the supplier will govern the purchase. By no later than the start of 2021, eir will amend these terms and conditions to capture any sustainability requirements not already included.

4. eir Standard Terms and Conditions of Purchase agreement

In cases where eir, consistent with eir's Procurement Policy, requires a contract in place with a supplier and where eir wishes to use eir's Standard Terms and Conditions of Purchase agreement then by no later than start of 2021, eir will amend these terms and conditions to capture any sustainability requirements not already included.

5. eir Modern Slavery Statement

Introduction

eir we are committed to ensuring that modern slavery or human trafficking does not enter our supply chain and that our business in no way supports such exploitation of human rights. This statement has been developed to provide an overview on eir's work to ensure the ethical procurement of goods and services on behalf of eir in compliance with eir's procurement policy and all relevant laws, regulations and standards. eir requires all companies and employees within eir to comply with eir's Procurement Policy even if it stipulates a higher standard than required by national laws or regulations.

Modern slavery refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. Modern slavery includes victims who have been brought from overseas and vulnerable people who are forced to work illegally against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing. Modern slavery can then be considered under five headings:

- - the trafficking of adults into conditions of labour exploitation
- - the trafficking of adults into conditions of criminal exploitation
- - the sexual exploitation of adults
- - the trafficking of minors into conditions of sexual, criminal or labour exploitation;
- other forms of exploitation

Relevant Policies

- Code of Ethics
- [Anti-Bribery and Corruption Policy](#)
- [Code of Ethical Business Conduct](#)
- [Corporate Social Responsibility Policy](#)
- [Ethical Business Practice and Conduct Policy](#)
- [Gifts and Hospitality policy](#)
- Group [Workplace Charter](#) and Dignity at Work
- Speak Up Policy

Due diligence process

To ensure that slavery and human trafficking does not take place in eir's supply chains, and in any part of its own business eir has put in place the following steps:

- A Group Procurement Policy which sets out the requirements for the effective and consistent management for the procurement of Goods and Services for the Group
- All suppliers to eir must agree to accepting eir's Sustainable Procurement Policy
- All employees have an obligation to report knowledge or suspicion of slavery or human trafficking as per eir's Speak Up Policy
- Partners and employees who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal
- These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with.

In accordance with eir's Speak Up process

Every effort should be made to raise an issue internally through normal processes with your line manager or direct reporting line or with Human Resources. If you do not feel comfortable reporting in this manner, you may engage the Speak Up process using one of the below methods.

Reporting methods:

1. Confidential email to the Disclosures Team- whistleblower@eir.ie
2. Speak Up Hotline - (1800 REPORT - 1800 737 678)
3. Director of Internal Audit - Keith Mulvey (085 711 7448) / Keith.Mulvey@eir.ie
4. General Counsel - Sorchá Nic Mhurchu (085 174 5518) / Sorchá.NicMhurchu@eir.ie

6. eir Sustainability Initiatives

1) Agile Working

eir has introduced an Agile Working Policy for employees, which means that eir employees who have the ability to perform their role remotely, can choose to work from home on a regular basis anywhere from one (1) day a week to five (5) days a week subject to manager agreement. This model has brought with it reduction of energy usage; reduction in car emissions as employees do not have to commute to the office; and, employee surveys show that from an employee wellbeing point of view employees feel positive benefits from this model.

2) Paper

Beginning in 2020 eir has made substantial changes to transition to a paperless business by limiting the need for paper use. Initiatives include the removal or limiting access to printers to a very small percentage of employees, removing printers from offices, implementing ePaySlips and digital contracts for customers.

3) New Vehicles

eir continues to modernise its fleet with vehicles with smaller engines and Euro6 compliant, these are more fuel efficient and eir has also removed roof racks and ladders to further improve fuel efficiency.

4) Charging Points

eir recently signed contract with EasyGo who will replace 180 telephone kiosks around the country with electric vehicle rapid charge points.

5) Network Modernisation

eir has invested significantly in transforming its network from a copper based solution to a fibre to the home solution.

eir's commitments:

- Optimise efficiency of the eir fleet, to reduce energy consumption and environmental impact
- Provide guidance on the proper use of company fleet vehicles, encouraging good driving behaviours at all times
- Comply with all Road Safety Authority (RSA), the Health and Safety Authority (HAS) and An Garda Síochána Regulations and Guidelines to ensure safe driving practises within eir

- Continuous engagement with external organisations and relevant stakeholders to promote good environmental and sustainable business practises
- Keep abreast of industry developments such as electric or gas operated vehicles and adopt such technology once they become operationally and economically practical.
- Begin the transition to electric vehicles for company cars from 2021

7. Compliance

On an annual basis eir will engage with suppliers to understand what steps the suppliers are taking to comply with eir's Sustainable Procurement Policy. If a supplier should fail to fully meet eir's requirements then prompt corrective action will be put in place accordingly. eir will identify suppliers who are responsible for manufacturing goods that eir procures as well as suppliers who operate in countries where there are or may be human rights concerns. eir will incorporate findings of supplier compliance into its business relationships and procurement decisions.

Reporting

Annually eir will present its performance on sustainable procurement to eir's CEO and Corporate Social Responsibility (CSR) Steering Group, composed of senior employees, representing all parts of eir. Progress will also be reported externally in the Environmental, Social and Governance section of eir's annual Bondholder document.