
Distribution
All Eltel companies

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RESPONSIBLE PROCUREMENT POLICY

1 PURPOSE

This policy describes Eltel's commitment to ensuring its procurement operations are in line with Eltel's values and are performed in a responsible manner.

2 APPLICABILITY AND SCOPE

This policy applies to all entities and employees of the Eltel Group.

3 DEFINITIONS

Procurement: Procurement includes all activities related to the obtaining of goods and services which Eltel needs to successfully perform its daily operations. This includes sourcing and supplier selection, negotiating terms, purchasing items and services, receiving and inspecting goods when necessary and keeping records of all the steps in the process

Supplier: In this document supplier refers to any entity providing Eltel with goods or services (i.e. definition also includes subcontractors).

4 POLICY STATEMENT

Eltel is committed to carrying out our procurement operations in accordance with the highest ethical standards, this includes complying with all sanctions as defined in the Sanctions policy, ensuring adherence to Eltel's Anti-Bribery and Anti-Corruption Policy as well as Labour and Human Rights Policy. All Eltel's procurement operations are also expected to comply to Eltel's Environmental Policy and Sustainability Policy.

Eltel aims for excellence in every aspect of its business and is committed to minimise the social, environmental and ethical impacts of its supply chain. We aim to purchase goods and services that minimise negative and enhance positive impacts on the environment and society whilst meeting our business requirements.

By incorporating social, environmental and ethical considerations into purchasing decisions we endeavour to make a positive contribution to the environment and society.

Through this procurement policy, we intend to make our operations more sustainable by:

- Upholding the laws and regulations of the respective countries we operate in;
- Endorsing the highest standards of economic, social, ethical, and environmental practices;
- Identifying and moderating risks associated with our procurement process; and,
- Communicating the policy with stakeholders (internal and external) and raising awareness among our suppliers.

In accordance with our commitment to the highest standards, we also expect our suppliers to aspire to the same standards in their business operations.

5 RESPONSIBLE PROCUREMENT PROCESS REQUIREMENTS

Eltel is committed to ensuring that the third parties Eltel engages with fulfil certain minimum requirements and are signees of Eltel's Supplier Code of Conduct.

Eltel is also committed to fostering fair and equitable relationships with all our suppliers. For example, we aim to ensure that our payment terms are fair and reasonable.

In order to ensure Eltel's procurement processes fulfil Eltel's commitments regarding responsible procurement, Eltel has:

- Integrated due diligence practices in our procurement processes;
- Put in place mechanisms to identify and assess potential adverse human rights and environmental impacts within our supply chain;
- Put in place mechanisms to prevent, cease or minimise any identified adverse human rights and environmental impacts within our supply chain;
- Put in place mechanisms to assess the effectiveness of our due diligence processes, and take remediating actions where and if required; and,
- Committed to communicating publicly on our due diligence practices according to CSRD and ESRS requirement.

More detailed requirements regarding procurement practices are further outlined in the Instruction for Responsible Procurement.

6 SUPPLIER ENGAGEMENT PROGRAM

Eltel is committed to actively engaging with its suppliers and ensuring an open dialogue exists between Eltel and its suppliers.

The formal process is further outlined in the Instruction for Responsible Procurement.

7 RESPONSIBILITIES

General Counsel – Responsible for overseeing and ensuring processes intended to ensure Responsible Procurement Policy compliance are in place and followed.

Local Procurement – Responsible for ensuring responsible procurement practices are followed throughout the business.

We require employees to be alert to the requirements set forth in this responsible procurement policy and to report any issues or non-compliances that are identified.

8 EXCEPTIONS

There are no exceptions to this policy.

9 REFERENCES TO ASSOCIATED DOCUMENTS

Code of Conduct
Supplier Code of Conduct
Whistleblowing Policy
Anti-Bribery and Anti-Corruption Policy
Sanctions Policy
Human and Labour Rights Policy
Environmental Policy
Sustainability Policy
HSSEQ Policy