



ESG

ENVIRONMENT,
SOCIAL & GOVERNANCE

REPORT

2022





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circet



Company



circet
Sascha Müller
Partnermanagement

ANGA.COM
circet
Nina Schmidt
Head of Business Unit

ANGA.COM
Nina Schmidt
Head of Business Unit
Visitor

Circet at a Glance

Circet is an international group and a global provider of turnkey integrated fixed and mobile network services for telecom service providers, local authorities, and key accounts, ranging from network engineering to rollout, installation, and maintenance - across all technologies. Circet is a market-recognized leader for its agility and flexibility and a pioneer in process industrialization.

» Global Operations

Circet operates on a global market with a unique decentralized business model, encouraging local subsidiaries to be independent, so they can tailor their approach to the needs of their domestic customers.



Global Revenue
2022

€3.624 billion



Locations

13 countries
3 continents



Global Workforce
2022

16,000*

*At of 31/12/2022

» ACQUISITIONS IN 2022

New Alliance in the United Kingdom

On December 23, 2022, Circet announced the acquisition of Qube, UK's leading in-home telecom installation and maintenance specialist. This will strengthen the last-mile proposition to altnets and full fiber network builders, which is anticipated to be a significant growth driver in the UK telecom installation market over the coming years, as more homes and businesses move to full fiber.

Circet Italia Is Born

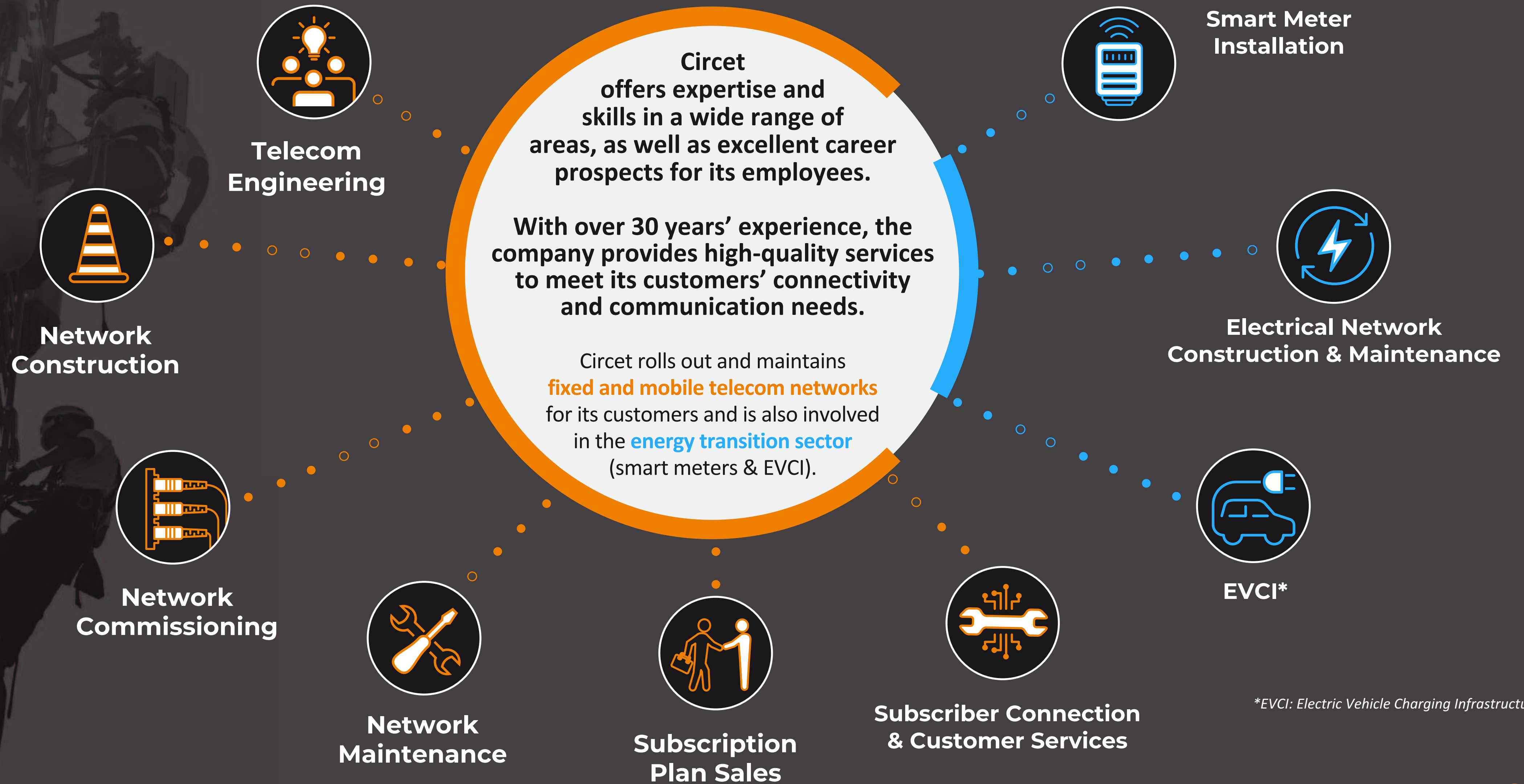
The agreement (authorized by the competition authority) for Circet to acquire CEIT, one of Italy's leading telecom network service providers, led to the creation of Circet Italia in 2022. It is one of Italy's leading companies in the telecom network services market, providing building, installation, and maintenance services for fixed and mobile service providers.

KGP Services, a Circet Company in the United States

KGP Services
a circet company

Circet officially crossed the Atlantic in 2022 with the ratified acquisition of KGP Services, a leading supplier of telecom network services across the United States. This has led to the creation of one of the largest and most experienced network infrastructure service providers on the North American and European markets. Circet and KGP Services intend to achieve strong organic growth on the back of the unprecedented demand in the United States for the rollout of fiber (FTTx), mobile networks (5G) and cloud solutions.

> AREAS OF EXPERTISE



*EVCI: Electric Vehicle Charging Infrastructure

Mission & Vision

OUR MISSION

**Efficiency.
Excellence.
Entrepreneurship.
Accountability.**

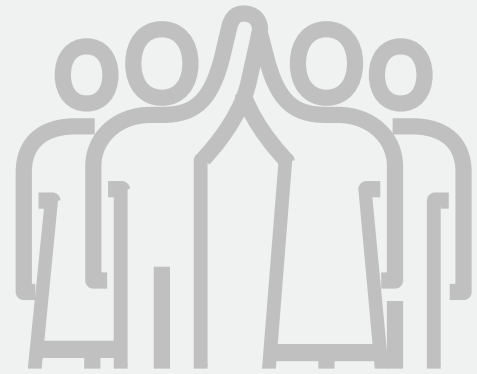
These are the core elements of Circet's DNA, which pursues its growth strategy through a customer-centric approach. Our high-performance model revolves around competitive pricing, quality of service and sustainable transformation.

OUR VISION

Circet aims to expand as a global telecom network service provider by leveraging a proven business model and strong regional positions, while optimizing its practices to address current CSR challenges.

Governance

Since its creation, Circet has grown thanks to its strong expertise in the field, an entrepreneurial spirit that is deeply ingrained in its DNA and a key focus on customer satisfaction.



>> Circet's DNA

Circet is entirely focused on its commitments and performance.

Its success is based on the focused and team-oriented management of its founding directors. Circet's 370 manager-shareholders are a tightly knit and talented team who know how to grow and develop the company in a buoyant market.

Circet is devoted to the success of its employees and encourages solidarity among them. We work hard to create a feeling of belonging and commitment among our employees, all of whom are involved in Circet's success. Every team adds to the company as a whole by working towards its own set of goals.

>> Our Governance

The leadership team is made up of experts from the telecom industry. Their experience and passion have helped to make the company as ambitious and successful as it is.

>> ESG – a Key Concern for our Management Team

Circet is committed to improving and expanding its environmental, social and good governance practices in response to the growing strategic importance of sustainability challenges. In September 2022, the company appointed Anaïde der Agobian as head of Environment, Social & Governance (ESG^o) to define, lead and support the implementation of the company's strategy in this area, in conjunction with the corporate leadership team. A network of contacts in each country has been set up to ensure coordinated implementation of the strategy wherever Circet operates.



In September 2015, the UN's 193 Member States adopted the sustainable development^o program Agenda 2030, a universal plan of action with 17 goals to be achieved by 2030, to build peace, end inequalities and ensure an inclusive ecological transition. This responsibility is shared by all stakeholders in the signatory countries, especially businesses, which need to act to support the changes needed.

At Circet, we incorporate environmental, social and governance challenges into the company's strategy to implement effective, responsible policies while raising our stakeholders' awareness of these questions and increasingly engaging in dialog with them. For Circet, it's about tackling the undeniable challenges of sustainability and I am proud to lead the company's initiatives in this area.

Anaïde der Agobian,
Head of ESG, Brand & Communications
Circet Group

>> Circet & Entrepreneurship

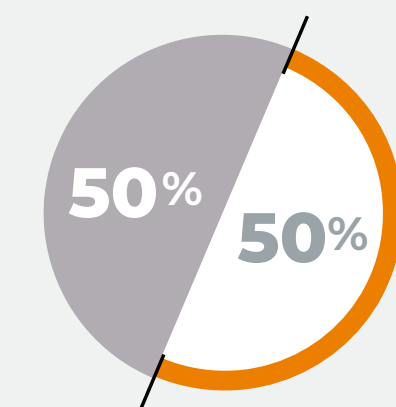


- > Company led by its founders
- > Investment in Circet by acquisition managers
- > Bonuses linked to company performance

>> Ownership

The shareholders who own Circet equally (50/50) include (i) the founders of the company, leadership team members and managers and (ii) Intermediate Capital Group (ICG), a world-leading private equity firm.

circet
Company founders
& managers



ICG
Intermediate
Capital Group



»» **Our ESG**
Approach

ESG Areas

As well as complying with the numerous regulations in force, Circet is working to improve its environmental, social, and governance practices and is committed to becoming a responsible corporate citizen, with a focus on five main areas. These encompass numerous actions aimed at achieving these goals, each of which involves company stakeholders.



1. Health & Safety

Developing and maintaining a healthy, safe workplace for employees and subcontractors



2. People & Organization

Creating a work environment in which all employees can flourish and be valued



3. Environment

Committing to protecting the environment and reducing the company's carbon footprint



4. Supply Chain

Maintaining a healthy, lasting relationship with subcontractors



5. Business Ethics

Maintaining a position as a trusted partner

ESG actions are led by the local management team and ESG contact, in conjunction with the corporate ESG department, in each of the 13 countries where Circet operates, allowing an appropriate response to national regulatory requirements and, in particular, better employee ownership of the actions taken. The company's management system is based on collaboration, sharing best practices and cultural adaptation.

Each of the pillars underpinning our strategy reflects the Sustainable Development Goals° (SDGs), adopted by the UN's 193 Member States in 2015. The global agreement reached in 2015 shows the growing understanding among Member States that only a sustainable development model will reduce poverty and ensure a better future for all. The SDGs reflect the global challenges we face, in particular those associated with poverty, inequality, the climate, environmental damage, prosperity, peace and justice.



Business Units Included in the ESG Report

This report includes all Circet business units that were part of the company in 2022.



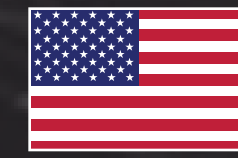
France

Includes contributions from Circet France and its French subsidiaries, and the holding companies Circet Europe and Circet Holding, which are both located in France.



Ireland & United Kingdom

Includes contributions from Circet Ireland & UK and all its subsidiaries in Ireland and the United Kingdom.



United States

Includes the contribution from Circet's subsidiary KGP Services in the United States, whose acquisition was finalized in March 2022.



Benelux

Includes contributions from Circet Benelux and its subsidiaries in Belgium and the Netherlands.



Italy

Includes the contribution from Circet Italia, following the acquisition of CEIT in February 2022.



Germany

Includes contributions from Circet Deutschland and the acquisitions Cableway, SNG and K&R Eilers completed in 2020.



Spain

Includes contributions from Circet España and its acquisitions Itete and Smartel in 2021.



Switzerland

Includes the contribution from Circet Switzerland.



Morocco

Includes the contribution from Circet Morocco.



Greece

Includes the contribution from Circet Hellas.



Romania

Includes the contribution from Circet Romania.



Our Initiatives



Health & Safety

Circet is committed to delivering high-quality work while ensuring the safety of its people.

People are at the heart of the company's concerns, which is why it takes care to offer its employees a safe working environment. Health and safety are critical issues for Circet, which implements prevention, information and training initiatives with its stakeholders to limit the risk of accidents.

» Monitoring & Audits

Everyone in Circet keeps health and safety at the very front of their minds at every stage of their working lives. The company evaluates these initiatives through daily monitoring of projects in all our countries. Recurring internal or external site audits are carried out to verify compliance with the local safety measures and specific training programs may be implemented as a follow-up.

» Certification – a Guarantee of Quality and Safety



Circet's quality assurance system is **ISO 9001-certified** in **Germany, Benelux, Spain, France, Ireland, Italy, and the United Kingdom** for engineering, construction, upgrades, operations, commissioning, works, and maintenance for telecommunications networks and infrastructure.

Circet occupational health and safety management systems are **ISO 45001-certified** in the same countries.



Its **information security management system is ISO 27001-certified** in **Belgium, Spain, Ireland, Italy, the Netherlands and the United Kingdom**, guaranteeing the performance, protection and continuous improvement of international information security practices.

Circet Benelux is **VCA/LSC** ("Veiligheid Checklist Aannemers" or Contractor Safety Checklist) certified. This certification covers all aspects of HSE* (Health, Safety and Environment), from direct management of HSE in the workplace to the HSE structure itself (HSE policy and organization, and plans for improvement).



» Health & Safety

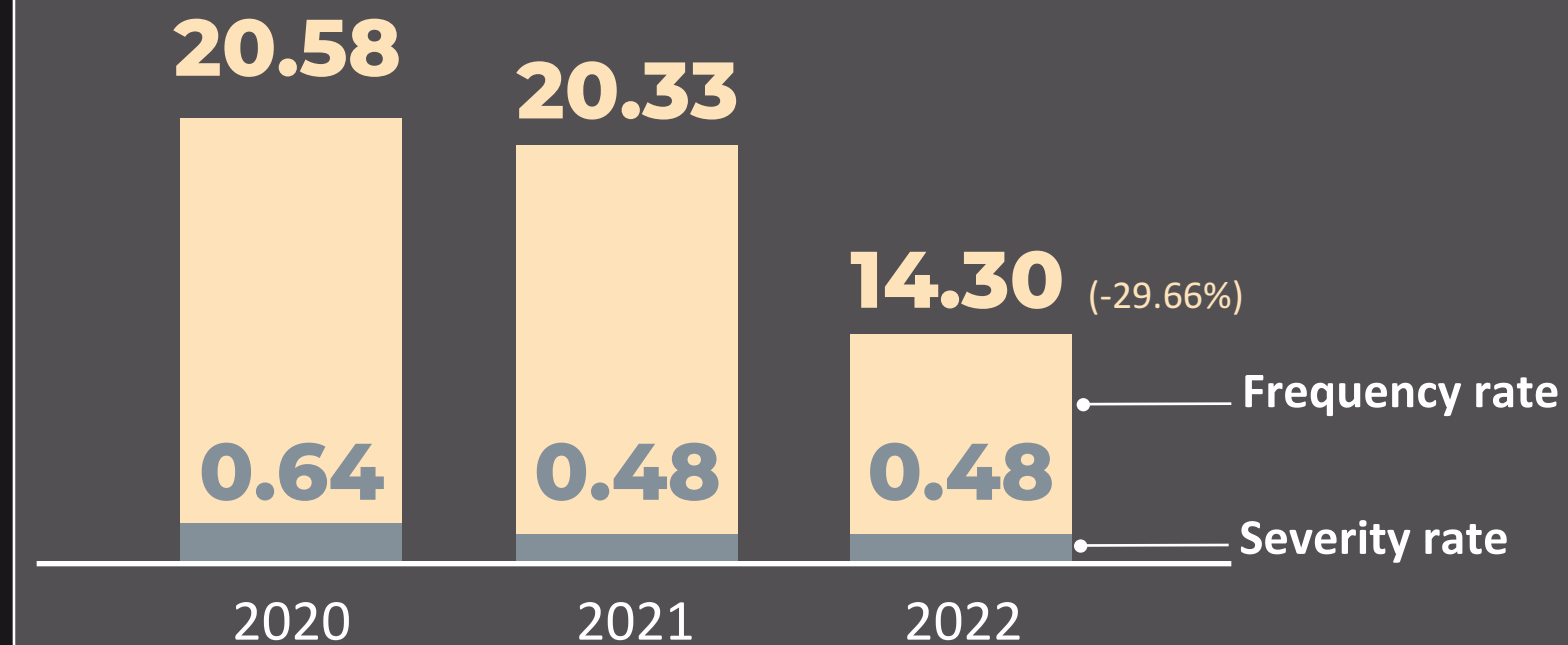
KEY PERFORMANCE INDICATORS

The company measures the impact of its health and safety initiatives using two common indicators – the frequency rate and severity rate of work-related accidents – and monitors the progress of its safety training programs.



WORK-RELATED ACCIDENTS

Frequency rate and severity rate



SAFETY TRAINING

	2022	UNIT
Total number of training hours for employees	145,918	hours
Number of training hours per full-time employee	9.39	hours

» Health & Safety

*Local Initiatives***Raising Awareness of Workplace Health and Safety***Belgium*

Circet in Belgium ran a series of awareness-raising campaigns to mark World Health Day on March 29, 2022, followed by the European Week for Safety and Health at Work in October 2022.

Employees were given the latest safety information through dedicated web pages, posters, and emails and were reminded of the importance of personal protective equipment and prevention, as well as the procedures to follow in the event of harassment, bullying, inappropriate behavior, stress or burnout.

A quiz was also distributed, with a prize awarded to 10 employees chosen from everyone who answered all the questions correctly.

“The next step in our QSE° strategy is to strengthen the safety culture among all our employees. Most technicians work in good safety conditions because Circet’s procedures and protective measures ensure that they do, but it isn’t enough. We want to develop an attitude where everyone sees their safety as a personal goal to achieve. It’s an approach known as “intrinsic safety”. World Health Day and the European Week for Safety and Health at Work are useful tools in this respect. Every year, we organize a dedicated campaign, with inspiring films, first-hand accounts from accident victims, a reminder of the main safety measures, a quiz, etc. Over 400 people visited the dedicated website and over 800 articles/films were read and viewed during the week.

Rudi Calcoen

Quality, Safety & Environment Manager
Belgium

Optimizing the Vehicle Fleet and Driver Safety*Ireland & United Kingdom, United States*

Circet equips its vehicles in Ireland and the United Kingdom with the Samsara system to improve security, efficiency and sustainability. The system identifies the main risks to driver safety, allows to manage the fleet in real time on a dashboard, improves sustainability, reduces environmental impact and simplifies regulatory compliance.

All vehicles in the United States are equipped with a GEOTAB GPS system, which optimizes driver safety, the vehicle fleet and costs, but also helps meet sustainability targets. The system sends out an alert if someone is driving dangerously and provides analytical reports based on various indicators, including safety, inactivity, fuel consumption, mileage, etc. Customized reports have been available to managers for all vehicles linked to their cost center or market since 2022.

» Health & Safety

*Local Initiatives***Health and Safety Procedures***United States*

Circet uses the US Illness & Injury Prevention Program (I2P2), which establishes procedures for ensuring the health and safety of employees and other stakeholders, as well as for protecting property and the environment. The program sets out a series of governance, administration, safety, notification, communication, monitoring, and audit rules. The documentation includes the health and safety manual, which details the measures employees and contractors must comply with, and the accreditation manual for the compliance and safety of installations and equipment.

Site Audits*Italy*

Scheduled audits of teams and contractors are carried out at all Circet sites in Italy by QSE^o specialists to assess compliance with the safety and environmental protection procedures in place.

“With TracFax, I can locate the teams quickly and easily on a map in real time to check that they’re complying with all the safety rules. The daily analysis of workplace risks and real-time certification mean I know whether we’ve got qualified teams on site or whether they need more training. I can use the system to carry out more safety audits, and it’s easier to make sure our employees and contractors are safe while they are on the job.”

Rustin Fagan
Health & Safety Manager
United States



People & Organization

Motivating teams over the long term by establishing a healthy workplace where people feel valued is a key issue for Circet.



»» Certifications



Human Resources (HR) management in Italy is certified to **ISO 30415**, an international standard for managing diversity and inclusion.

The training center in France is Qualiopi-certified for the “Training Programs” category. This certification attests to the quality of the Circet France training center’s processes and operation.



Ireland & UK have been shortlisted for the Chartered Institute of Personnel and Development (CIPD) HR Awards in the “Learning and Development” category, recognizing excellence in HR.



»» A Trusted Partner

Circet helps its subcontractors with their administrative procedures, third-party evaluations, and efforts to comply with legal obligations.

»» An Employer That Cares About Its Teams

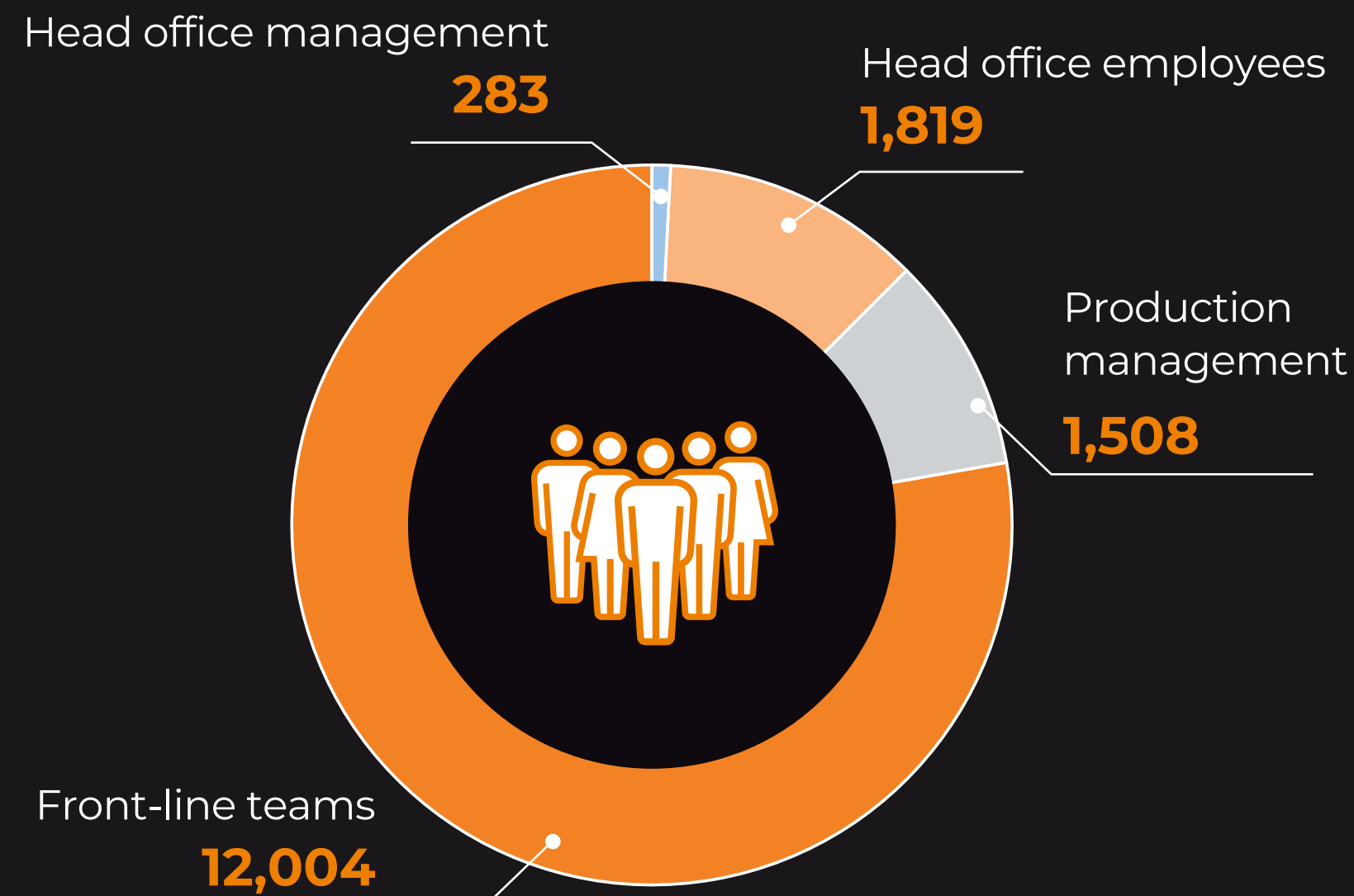
Circet offers its employees numerous benefits to ensure that everyone feels their work is valued as much as possible. Training is one of the company’s leading differentiating factors, promoting both personal and professional development, combined with management based on trust and independence.

» People & Organization

KEY PERFORMANCE INDICATORS

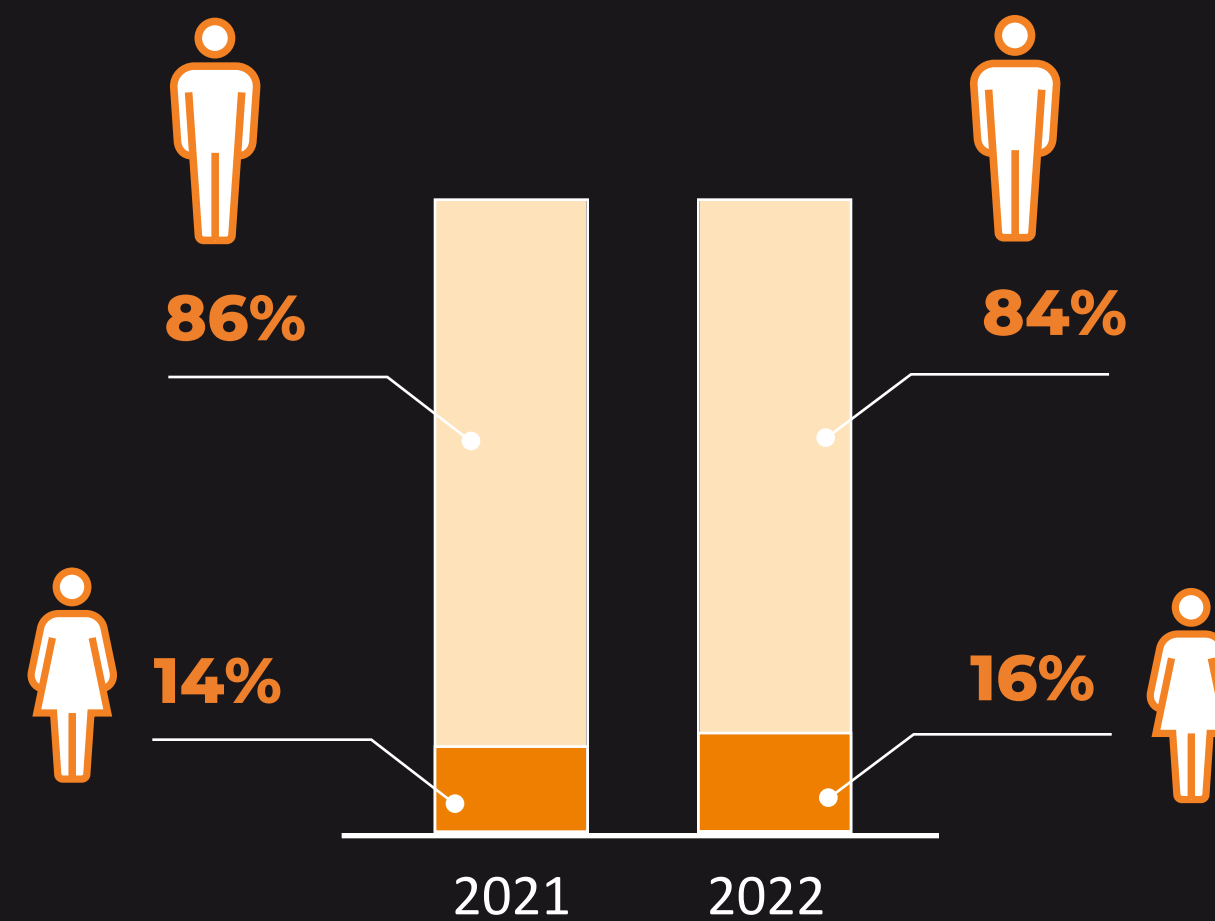
EMPLOYEE BREAKDOWN 2022

out of 15,614 employees at the end of the period



GENDER PARITY

Circet’s HR policy prohibits discrimination when hiring and offers equal opportunities to all, particularly in terms of internal promotion. Circet operates in the construction sector, where women are still underrepresented; the emphasis on internal promotion therefore means that achieving parity will still take some time.



INTERNAL PROMOTION

Everyone in Circet has the possibility of internal promotion, depending on the employee’s situation and the objectives set. Circet is committed to equality in the workplace for men and women and does not tolerate any form of discrimination against minorities of any kind. The company ensures equal access to career progression and that promotions are balanced between full-time and part-time employees.



871 Number of employees promoted in 2022

i.e. an internal promotion rate of **6.46%**

In France, Circet has committed to checking that the number of women and men promoted in the company is coherent and separately, to examining the share of promotions for part-time employees, by gender.

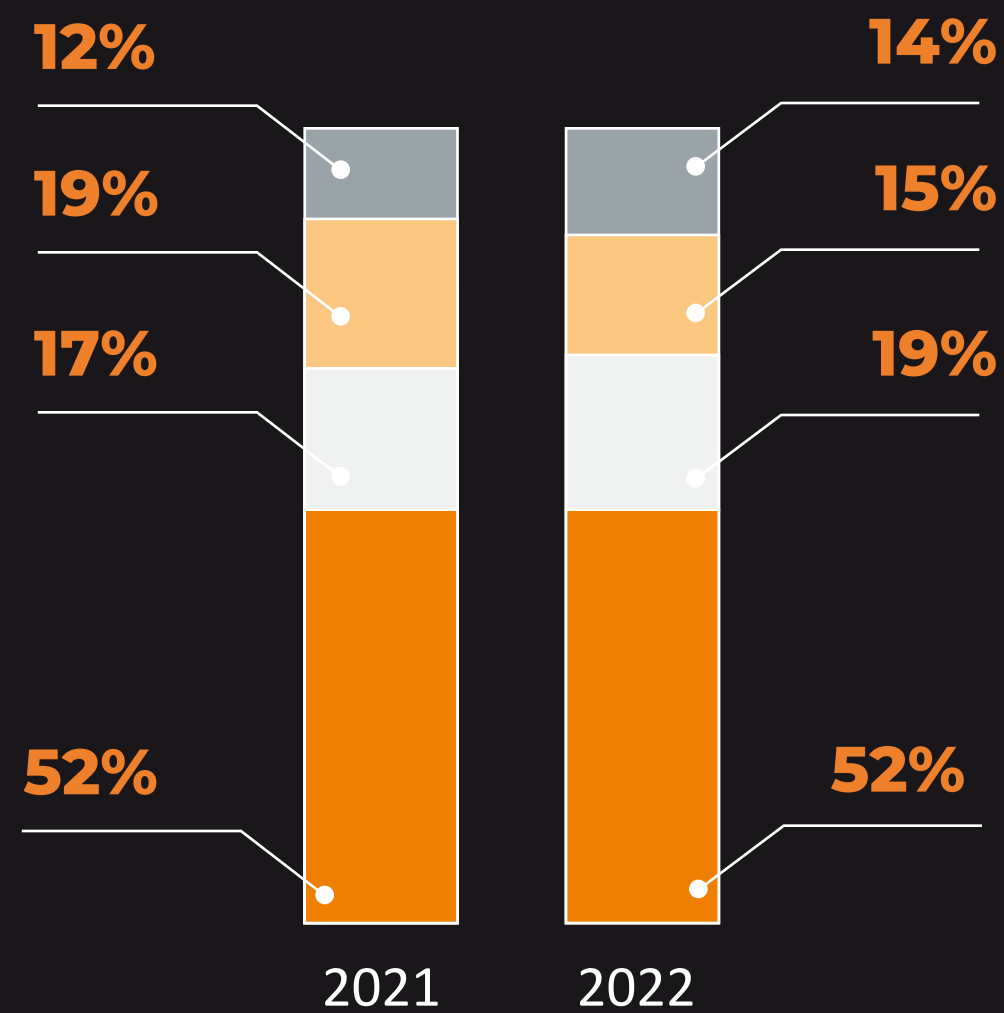
Elia Rodenburg
HR Officer
France

» People & Organization

KEY PERFORMANCE INDICATORS

BREAKDOWN BY SENIORITY

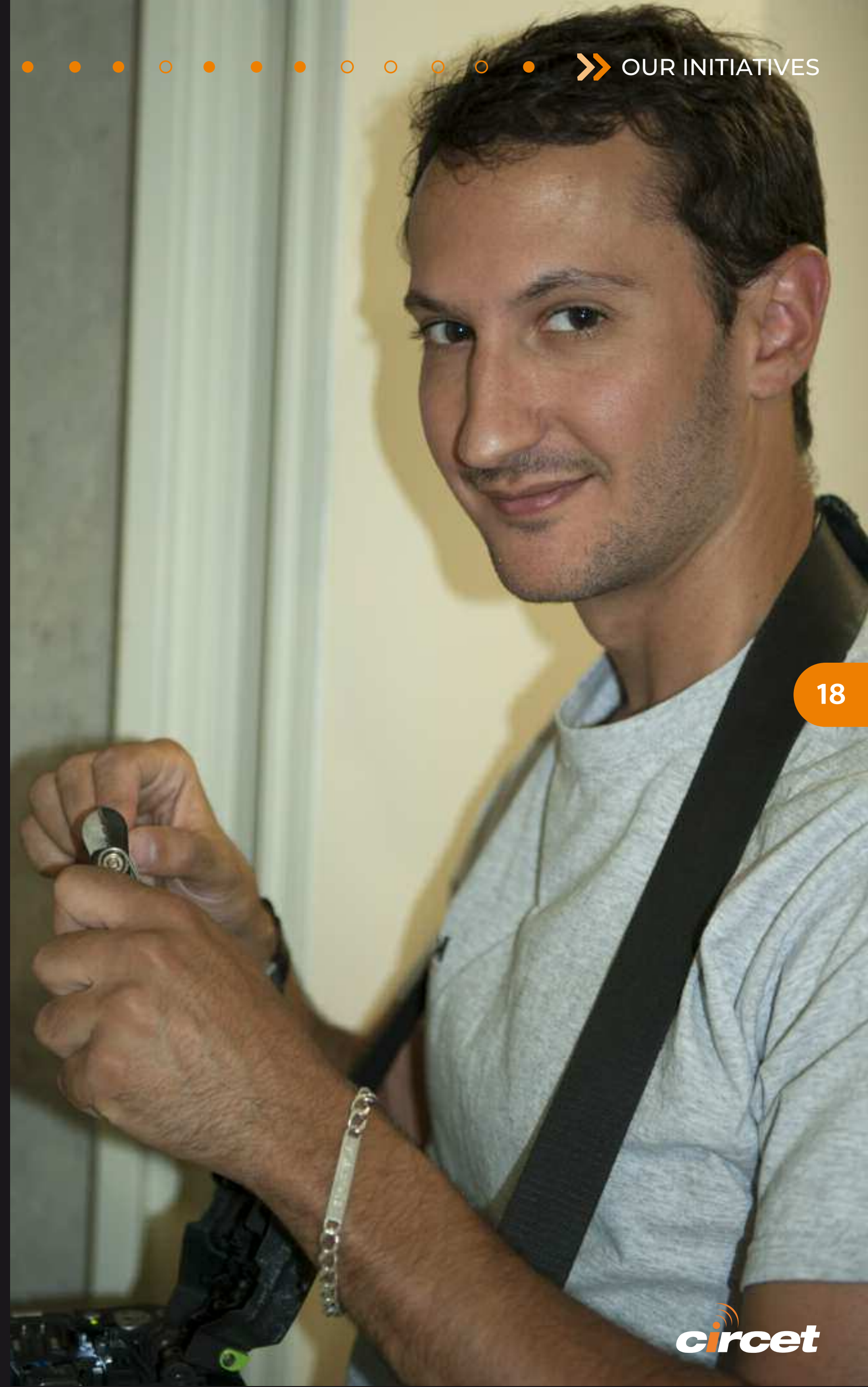
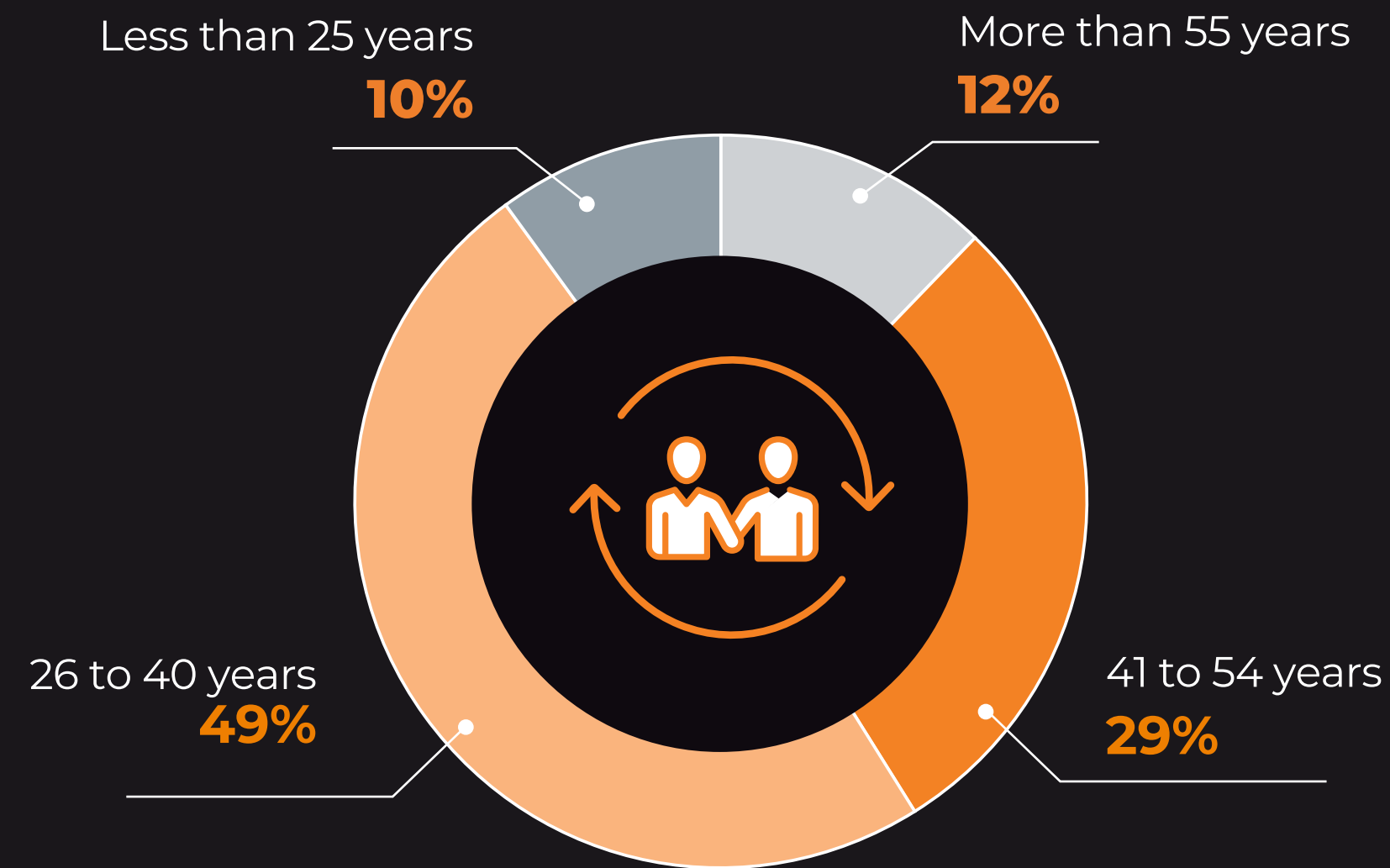
The company's rapid growth in recent years means that many employees are new to the organization. Nonetheless, Circet always strives to offer good working conditions to retain their loyalty and encourage them to stay with the company.



- Less than 3 years
- Between 3 and 5 years
- Between 6 and 10 years
- More than 10 years

BREAKDOWN BY AGE

Circet values what young workers can offer. Linking them with experts in their field allows a smooth transfer of experience and creativity between the different generations in the context of intergenerational collaboration, while maintaining high-quality work. Moreover, Circet is keen to retain its most experienced employees as part of the team and has an above-average share of older workers.



»» People & Organization

Local Initiatives

Buddy Scheme for New Recruits

Belgium, Netherlands

Circet Benelux has set up a buddy scheme for new recruits, who are supported by an experienced colleague (with no line-management relationship) for six to 12 months to learn more about the company, its areas of expertise, best practices, etc. The program is currently only available to technical employees but is set to be rolled out to the rest of the organization, especially support-type functions such as HR, finance, and IT.

Well-Being at Work Survey

Belgium, Morocco

In 2022, the Circet teams in Belgium and Morocco were invited to respond to an anonymous questionnaire on various aspects of well-being at work. The aggregate responses were used to produce an action plan for each country, with key priorities incorporated into the annual QSE^o action plan.

Talent Development

Italy

Circet in Italy has introduced a talent development program that aims to realize the full potential of employees responsible for strategic projects. The program helps those who join it to have a clearer vision of their work, their role, and their personality. Awareness-raising of this kind increases a sense of responsibility, which is essential for the company's success.

“It is a genuine opportunity to learn more about yourself and other people. The program helps you gain a clear understanding of the intangible elements that drive the company and interpersonal behaviors.”

Giusy
IT Department
Italy

“It was like opening Pandora's box and discovering aspects of my personality I didn't know existed.”

Valentina
Administration Department
Italy

Volunteering

France

The volunteering platform set up by Circet in France allows employees to provide help or expertise to people who need it. For the company, the platform is also a lever to improve sustainability and its contribution to society:

- For employees, it provides an opportunity to make a commitment, feel useful, develop new skills, and make suggestions for associations they want to support, but also to strengthen team cohesion.
- For future employees, it is an attractive aspect of Circet's employer brand.
- For stakeholders, it represents the added value offered by Circet as it develops and strengthens its position as a responsible company.

»» People & Organization

*Local Initiatives***Mentoring***Ireland & United Kingdom*

Employees at Circet Ireland & UK support children in schools in disadvantaged areas by helping them improve their skills and self-confidence, to prepare them for the world of work.

Mentoring is an excellent way of guiding and supporting someone as they develop. It's great to see the young people who attend program meetings become more confident and develop new skills and knowledge, as well as having the opportunity to learn from each other.

Olivia Hamilton

Member of the mentoring program
United Kingdom

Raising Awareness of Breast-Cancer Screening*Morocco*

Circet Morocco ran a campaign in late 2022, alongside the annual Pink October cancer-screening awareness program, to remind people about the importance of screening to combat the disease. This was an opportunity to revisit the definition of breast cancer, its diagnosis, treatment, and prevention with a positive message so that as many employees as possible were aware, had regular check-ups and remembered to examine themselves routinely.

Blood donation saves thousands of lives a day, all over the world. It's a rare thing, but essential for those who need it to survive. As part of its role as a good corporate citizen, Circet Morocco organized its first blood drive, not only to help patients but also to raise awareness about its importance with employees, encourage them to take part, and help them see the impact of blood donation on society.

Imane Sodki

Administration Manager
Morocco

Toy Collection*Spain*

In late 2022, the teams at Circet España handed out dozens of toys to children suffering from domestic violence or facing social exclusion. The initiative grew out of a desire to donate new and secondhand toys in good condition to families supported by two associations, Berrituz and Lagun Artean, based in Vizcaya, in northern Spain.

No one hesitated for a second. Everyone in the Erandio team supported the project with huge energy and enthusiasm. It involved everything from communication to tracking, organizing collection points, keeping in touch with the associations, distributing the toys, taking photos and more. In the end, we were able to hand out 13 boxes of toys.

Jéssika Heras

Human Resources Department
Spain



Environment

» Circet's ambition is to produce responsibly, while limiting its environmental impact.

The company is working alongside industry stakeholders to create more responsible digital technology through a sustainable, high-performance, and accessible telecom network.

Circet is taking action to measure and reduce its scope¹, 2 and 3 greenhouse gas emissions to the level expected and is committed to implementing a climate strategy to achieve ambitious targets by 2030, as well as supporting its customers' strategies for carbon neutrality by 2040.

» Environmental Challenges for the Telecom Industry

- Reducing energy consumption in the telecom sector
- Contributing to European environmental performance improvement goals at a national level
- Promoting sustainable consumption
- Setting an example for our partners and suppliers by implementing responsible purchasing policies
- Engaging in continuous improvement

“The climate emergency is here! It's my job to find the most relevant solutions for reducing our carbon footprint without destabilizing the smooth running of the company and its profitability.”

Xavier Richard
Head of Environment, Circet Group



>> Environment

GREENHOUSE GAS EMISSIONS

The main environmental challenge Circet faces is reducing its scope° 1, 2 and 3 greenhouse gas emissions.

Scope 1: Circet's direct emissions come mainly from fuel consumption for the vehicle fleet and office heating.

Scope 2: covers indirect emissions generated by production, i.e. electricity, heating, and cooling consumed and purchased by the company.

Scope 3: covers all indirect emissions (not included in scopes 1 and 2) generated in the company's value chain.

Circet has produced an annual carbon footprint assessment for scopes° 1 and 2 since 2011, and for scope° 3 since 2022. The company was assisted by the international audit firm KPMG to produce its 2022 assessment, which will be used as a baseline. KPMG's experience allows Circet to make strict use of the GHG Protocol°, which provides detailed definitions of the calculation methods used.

Circet's aim for 2023 is to set the trajectory for reducing its carbon footprint, and in particular, to engage with the SBTi°, which brings together all the companies that have made a strategic decision to comply with the Paris Agreement and do everything they can to limit global warming to 1.5 °C.

>> Carbon Footprint Assessment

The carbon footprint assessment is a tool for recording the greenhouse gas emissions of an organization, product or service. It is used to identify sources of CO₂ emissions and suggest actions for reducing them. The assessment is often used to evaluate an activity's environmental impact and implement strategies to reduce its carbon footprint.

>> The SBTi in Brief

The Science-Based Targets° initiative (SBTi) asks companies to produce science-based carbon neutrality targets to keep global warming below 1.5 °C. The aim is to reduce greenhouse gas emissions by 50% by 2030 and achieve carbon neutrality for emissions by 2050.

The SBTi sets out a series of steps for developing targets:

- **Commit:** make a commitment aligned with SBTi standards to declare your intention of acting to help the climate and submit it to the SBTi.
- **Develop a target:** prepare and define science-based targets in line with SBTi criteria.
- **Submit:** submit your science-based targets to the SBTi for validation.
- **Communicate:** announce your commitment and science-based targets to your stakeholders.
- **Disclose:** monitor and publish your total annual emissions.

»» Environment

EXTERNAL ASSESSMENTS



Circet's environmental management is ISO 14001-certified in Germany, Spain, France, Ireland, Italy, the Netherlands and the United Kingdom.



Its energy management system in Italy is ISO 50001-certified for energy performance optimization.

»» ecovadis

Business Sustainability Ratings



France, Italy



Spain, Benelux

Circet's ESG data are audited by EcoVadis. The analysis provided at the end of the audits allows Circet to improve and adjust its ESG strategy. The scores given also allow to demonstrate the ESG efforts made by each unit. In 2022, the French and Italian subsidiaries achieved a silver (top 25%) medal, while Spain and Benelux were awarded a bronze (top 50%).



Circet presented its first report to the Carbon Disclosure Project[°] in 2022, with the aim of increasing transparency for its customers and various stakeholders about its actions and impact on the environment. Customers require Circet's commitment to the CDP Insight Disclosure[°] initiative, which measures environmental impacts, risks, opportunities, investments, and strategies for Circet's environmental activities. CDP is a not-for-profit charity that runs the global disclosure system for investors, companies, cities, states, and regions to manage their environmental impacts. The global economy looks to CDP as the gold standard of environmental reporting with the richest and most comprehensive dataset on corporate and city action.

» Environment

KEY PERFORMANCE INDICATORS

CARBON FOOTPRINT ASSESSMENT

Scope 1	60,763 tCO ₂ e
Scope 2	1,701 tCO ₂ e°
Scope 3	639,096 tCO ₂ e
Emissions intensity per employee	48 t CO ₂ e/employee

*market based approach

MOBILITY

Total number of vehicles	10,239 units
Of which less than 2 years old	43.7%
Of which electric	1.7%
Of which hybrid	0.5%
Average fuel consumption per vehicle (l)	1,933 liters

Renewable Energy Rate **33%**

The renewable energy rate refers to the energy produced from renewable sources, such as solar, wind, hydraulic, geothermal or biomass, as a proportion of total energy consumption.



» Environment

*Local Initiatives***Raising Awareness of Environmental Impact***Belgium*

Circet in Belgium runs regular internal information campaigns to raise the teams' awareness of the environmental impact of the company and its activities. Among other things, the initiatives and advice it offers focus on reducing printing and energy consumption on site.

Consumption Management & Energy Saving*Italy, Ireland & United Kingdom, Germany*

Circet in Italy organized an energy-management awareness campaign to encourage its teams to reduce their consumption, which included publishing advice on its intranet on saving energy in the workplace, for example, by turning off lights, using low-energy bulbs, turning off computer equipment and air-conditioning systems, cutting down on printing, and referring to the national plan on reducing natural gas. Involving employees is essential for effective energy management across the company.

The Italian team also set up a daily electricity consumption monitoring system at its main operational facilities, using smart meters connected to the Wi-Fi network to provide continuous monitoring of consumption and generate significant savings. The meters – called Shelly EM – monitor the consumption of all electrical appliances, circuits, and office equipment, including lights, power lines, security systems, convector heaters, air-conditioning units, etc.

The Circet team in the United Kingdom decided to strengthen energy consumption monitoring at its British sites by using an energy broker to guarantee the accuracy of contracts and invoices and ensure that energy bills reflect actual consumption. The broker will act as their intermediary if there is a dispute with an energy provider.

Circet in Germany installed solar panels to produce and consume renewable energy with the aim of reducing its scope¹ 1 and 3 emissions. The subsidiary also purchased seven electric vehicles and two electric bikes.

Circet had 148 solar panels installed on one of the buildings at its headquarters in Barßel-Harkebrügge. Each panel is rated to produce 370 watts of power, resulting in a total yield of 54.76 kWp. This means that the 12 electric vehicle charging stations installed at the same time are powered independently. A similar installation is planned for the Circet premises in Bad Harzburg and Westerstede.

Alexander Felsenberg

Head of Circet Academy,
Innovation & ESG
Germany

» Environment

*Local Initiatives***Waste Management***Ireland & United Kingdom, France, United States*

A more stringent policy to control waste production and management has been implemented in the United Kingdom, using the waste management and recycling platform, Go Green. Among other things, the system provides detailed reporting on waste production and emissions.

In France, sorting bins have been installed, depending on the space available in the various branches, to comply with regulations that require five different types of waste – cardboard, plastic, glass, metal and timber – to be separated. Waste management providers supply an annual statement, summarizing the weight of waste recovered over the year for each of the five categories.

In the United States, Circet monitors waste production and disposal by identifying opportunities for reducing costs and emissions and increasing recycling. The team realized it could lower its carbon emissions by reducing the mileage involved in transporting waste. The solution was to increase the tonnage of each load to maximize each journey, as well as reducing the number of trips. More bins have also been installed at sites to improve their recycling capacity. The US team also uses the data supplied by its waste management provider to create dynamic reports in the data visualization tool Microsoft PowerBI, helping it to target its actions more effectively for optimal impact.

Document Digitalization*France, Benelux*

Circet France is continuing to digitalize its Human Resources and administrative activities, for example, by setting up a secure area to manage payslips, dematerializing legal and contractual documents, and rolling out new digital tools such as HIVEO (for collecting supplier information), Subclix, and DocuSign (an electronic signature solution that is compliant with the European eIDAS° regulation).

The Benelux countries are reducing paper consumption, printing, carbon emissions, and postage costs by scanning invoices and documents using Optical Character Recognition (OCR) software, and all suppliers are invited to submit their invoices electronically.

eMobility*Benelux, Italy, France*

Circet is planning for the future in the Netherlands with the Green Driving pilot project, which offers technicians an electric cargo bike for working in city centers, which are often difficult to access by car or van. These covered bikes have a loading area for carrying equipment and sufficient range to cover urban distances between different customer appointments.

There are two big advantages to using an electric bike when working on customers' premises: first, it's easy to park close to their front door without any traffic constraints and in places where other vehicles aren't allowed. And secondly, cycling is good for your health! Our customers have been pleasantly surprised to see me arrive on an electric cargo bike. They're definitely the future of customer jobs in city centers!

Narcis Alagic
Technician
Netherlands

»» Environment

*Local Initiatives***Electric Vehicle Fleet***Belgium, Italy, France*

Since 2022, Belgium has only allowed orders of 100% electric or hybrid rechargeable vehicles. Circet has had electric charging stations installed at the homes of employees entitled to a company vehicle as part of transitioning the fleet to electric cars.

The company is updating its fleet in Italy by replacing obsolete vehicles with ones that meet the Euro VI antipollution standard. Circet's vehicle fleet accounts for a very significant share of its total energy consumption. Since better fleet management contributes to reducing costs and CO₂ emissions, the Italian team examined a number of options before deciding to purchase Euro VI vehicles. In practical terms, the standard reduces nitrogen oxide emissions by 55% for light diesel vehicles, lowers fine particulate emissions from gasoline direct injection engines, and applies the strictest monitoring criteria for depollution systems. In 2022, 97% of Circet's vehicle fleet in Italy was compliant with Euro VI.

France's Mobility Act (loi d'Orientation des Mobilités – LOM 2022) includes an obligation for businesses with over 100 vehicles to purchase a minimum percentage of low-emission vehicles (LEV) as part of their annual fleet replacement schedule, with different deadlines: 10% from January 1, 2022 and 20% from January 1, 2024. Circet France hired a consultant to help identify the drivers affected by these deadlines, raise awareness among its managers and test various LEV models, after which it opted for the Renault ZOE, which offers a range of 350 km.

“

10% of the vehicles we replaced in 2022 are fully electric, thanks to Circet's determination to improve its environmental practices and stringent efforts internally. Several Circet sites in France are now equipped with electric vehicle charging stations as part of the same strategy.

Vanessa GrafeProcurement & Logistics Manager
France

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Supply Chain

Maintaining exceptional long-term relationships with its partners is a key objective for Circet.

»» Suppliers & Subcontractors

Circet works with more than 6,000 suppliers and subcontractors, whom it trains to ensure service quality. Training helps to strengthen the relationship with partners and establish a safe working environment.

Its partner base is diverse, made up mostly of microbusinesses (MBs) and small and medium-sized enterprises (SMEs). The company has long-standing partners in each country, with which it has established relationships of trust. Relationships with suppliers and subcontractors are managed locally by branches to ensure the quality and reliability of their operations and to guarantee a high level of flexibility.

»» Procurement

Circet purchases supplies such as telecom materials and highly regulated equipment recommended or even supplied by its customers. The number of suppliers is therefore limited.

A responsible purchasing policy, along with procedures that respect our environmental, social, and safety commitments, are in place within the company as a way to evaluate these suppliers.

» Supply Chain

KEY PERFORMANCE INDICATORS

Number of subcontractors trained	3,440
Number of training hours delivered to subcontractors	66,714
Average number of hours for each subcontractor trained	19.39

Local Initiatives

Developing a Common Policy Across the Company

France, Ireland & United Kingdom, Spain

Suppliers in France must meet the requirements of the Responsible Supplier Relations Charter.

In Ireland and the United Kingdom, an engagement charter has been put in place, along with a manual for suppliers and a dedicated web portal for our partners.

In Spain, a supplier approval procedure has been created that takes safety measures, environmental impacts and quality into account.

Provision of Logistical Resources

France

Circet France lends its subcontractors logistical resources to transport people and goods. In 2022, it provided 91 vehicles (almost 3% of the national fleet), of which 42% were utility vehicles or specialist resources, such as bucket or digger derrick trucks. The vehicles are insured and maintained by Circet so that partners can work in optimal conditions.



Business Ethics

Circet aims to apply and comply with the highest ethical standards to ensure an impeccable level of shared integrity.

>> Shared Ethics

Circet is underpinned by unifying values and principles that are shared across all its entities, ensuring that employees, partners, customers, and third parties can rely on committed, respectful, and accountable collaboration. These focus on health and safety, workplace well-being, human resources, and the environment.

>> A Legal Duty

Circet and its subsidiaries have established a rule for themselves that they will always pursue their activities in a way that complies with any relevant laws and regulations. The company expects each and every employee to act and make decisions in a way that reflects their commitment to compliance with the rules in effect, as part of a shared contribution to ethical business conduct.

>> Commitment to Free Competition

Circet is also committed to open and fair competition in its relationships with competitors. The company is committed to complying with competition rules, i.e. not engaging in practices that could hinder or noticeably diminish competition in the market.



WE SUPPORT

>> United Nations Global Compact

Circet has been compliant with the UN Global Compact^o since 2011, and follows its ten principles on human rights, labor, the environment, and anti-corruption.

KEY PERFORMANCE INDICATORS

ANTI-CORRUPTION

Number of incidents reported **5**

Number of confirmed cases **2**



» Business Ethics

*Local Initiatives***Fighting against Corruption***Group Level*

Circet has developed tools, a Code of Conduct° and a whistleblowing platform that are accessible from all its company websites so that any problems within the company can be reported.

The **Anti-Corruption Code of Conduct** offers guidance to Circet employees and stakeholders by defining the key terms in combating corruption and providing numerous examples to make them easier to understand. The Code is common to the whole company. It provides a clear definition of scope and concepts such as corruption, influence peddling, conflicts of interests, and facilitation payments, along with the relevant rules and reminders about gifts and invitations from third parties. Finally, it describes the whistleblowing mechanism and the steps to take to report any breach of the Code.

Alongside the traditional channels, Circet has set up a secure **whistleblowing platform**, accessible via the company website, for its employees and external or occasional partners, where they can report behavior contrary to the public interest of which they have personal knowledge or have witnessed.

“At Circet in the United States, we define ethics as understanding, adopting, and applying the highest possible standards of integrity in the day-to-day conduct of our activities. We’ve established a dedicated program to protect these values, combining processes, policies, and training to guarantee compliance with federal and state laws and regulations. Our company is only as solid as its reputation in the minds of our customers, commercial partners, suppliers, and employees. That’s why compliance with the strictest possible rules on professional ethics is each employee’s personal responsibility. These are core principles which we communicate to the whole company every year, since they remain fundamental to everything we say and do.”

Matthew R. Drevlow
Head of Legal & Compliance
United States

Investing in Cybersecurity*Benelux, Group Level*

Circet Benelux has implemented a series of recurring activities to respond quickly to cyberincidents and minimize damage. They include awareness-raising campaigns (newsletters and phishing° campaigns, cybersecurity training for all employees (based on a questionnaire, with a certificate for successful completion), a presentation of new IT tools (such as multi-factor authentication, threat detection and EDR° flaws, anti-virus software, etc.), ethical hacking° actions, and ISO 27001 certification. Combined with best practices in Circet’s other geographical entities, these measures contribute to the creation of a cybersecurity policy that applies across the company.

“Cybersecurity is a priority for Circet and we invest a lot in it. Two topics, in particular, are on the agenda: first, “cyberinsurance” wherever the company operates. This is now essential and required by many of our customers, and already involves a high level of protection and control. Secondly, we’re in the process of mapping best practices at our two security operations centers in Benelux, so that they can be shared with other countries.”

Tom Van der Aa
Head of Digital Transformation
Benelux



Circet Academy

The Circet Academy, a Major Asset for ESG



Circet has made the strategic decision to invest in an internal training center – the Circet Academy – to ensure that all members of its front-line team have the cutting-edge skills needed to deliver outstanding service. Founded in 2012 and rolled out across the company, the Circet Academy is a training school staffed by subject-matter experts and carefully selected technical trainers.

» **35** training centers in
13 countries in 2022

» Going the Extra Mile, Together

Training is an important part of Circet's identity. Training centers offer programs that strengthen the company's culture of a job well done and develop participants' knowledge and expertise.

Their goal is to standardize working methods and offer customers the highest standard of quality. Thanks to the Circet Academy's programs, the company now has highly trained teams that are committed to continuous improvement and updating of their skills.



»» The Circet Academy



Training at Circet

The Circet Academy network has a catalog of practical training courses based on the needs of customers.

Its centers offer training not only to employees as part of their ongoing skills development programs, but also to contractors, to ensure high quality of service. Every year, employees’ and subcontractors’ needs are analyzed to produce a list of adaptable and innovative training courses.

There are two main types of programs: those for building “support” knowledge, and those for developing “field” knowledge. There is also a special focus on training to ensure the safety of field technicians. Comprehensive technical training covers areas of activity such as optical fiber, mobile networks and radio links, design, infrastructure and technical environments, pylons, EVCI, customer relations, business operations, customer interventions, safety, and regulations.

KEY PERFORMANCE INDICATORS

Number of internal trainers **145**

Number of centers **35**

Number of training programs **65**



»» The Circet Academy

Local Initiatives

The Circet Academy Expands into Italy Italy

Circet's well-regarded training academy continues to grow and expand into other countries. Its most recent move is to Segrate, in Italy, where it has already opened one center and aims to create a further three in 2023. The Italian subsidiary became part of Circet in 2022 and has two subject-matter experts and a training program.

"The technical training provided by the Circet Academy is just one part of the training strategy in Italy, which has already been investing for several years in developing the best possible people, with a focus on soft (non-technical) skills and a modern approach to lifelong learning. At the same time, onboarding new colleagues through a training facility gives them an overarching view and is an opportunity to communicate the company's values, since the day-to-day commitment made by every employee is the organization's core strength."

Fiorindo Doriano
Manager of the Circet Academy
Italy

Training Subject-Matter Experts

United Kingdom

Mandatory programs were set up in 2022 for the 17 center trainers in Ireland and the United Kingdom. Innovation and the constant changes taking place in the telecom industry mean that subject-matter experts need regular training. The new programs provide subject-matter and safety accreditation, including NRSWA^o, SSSTS^o (Site Supervision Safety Training Scheme) and training/surveys on dealing with incidents. A total of 32 evaluation modules are available, with trainees expected to demonstrate a certain level of skill.

Onboarding & Training

United States

The US training center is responsible for onboarding and training new entry-level recruits in a face-to-face setting. Training for work on indoor networks takes place in Irving (Texas) and on outdoor networks in Charlotte (North Carolina) and Rochester (New York State); training on mobile networks is delivered in Ball Ground (Georgia). Follow-ups with employees in the field take place at 30, 60 or 90 days to identify any additional training needs. In 2022, the training team developed skills evaluations for technicians working on fixed networks. The aim for 2023 is to extend these assessments to work on mobile and outdoor networks. Circet's US subsidiary also offers a wide range of online courses.

Glossary

CDP (Carbon Disclosure Project): a non-profit organization that offers investors, companies, cities and countries a platform where they can communicate voluntarily about their environmental impacts, particularly in relation to the climate. Over the last 20 years, the CDP has created a system that has enabled an unprecedented commitment to environmental issues all over the world.

CO₂e (carbon dioxide equivalent): a standard unit for measuring carbon emissions. The aim is to express the impact of each of the greenhouse gases in terms of the quantity of carbon dioxide that would contribute to the same level of global warming. This allows carbon emissions made up of various greenhouse gases to be expressed consistently.

Code of Conduct: a document that sets out the values and principles governing the management of the company's activities, established as a set of rules on good conduct. The rules are accompanied by a series of scenarios to help employees adopt the right behavior in response to any risks that may arise in the course of their duties.

EDR (Endpoint Detection and Response): a security solution for endpoints (user devices) that detects unknown attacks and applies automatic patches to deal with the threat, with advanced functionalities for remote investigations.

eIDAS (Electronic IDentification And Trust Services): the regulation on electronic identification and trust services for electronic transactions applicable to the 27 EU Member States.

ESG (Environment, Social & Governance): the three pillars of the non-financial analysis of corporate performance, i.e. the environmental, social, and governance criteria used to analyze and evaluate the extent to which sustainable development and long-term issues are taken into account in companies' strategies. The **environment** criterion covers factors such as CO₂ and greenhouse gas emissions, waste recycling, electricity consumption and preventing environmental risks. The **social** criterion considers, for example, the quality of social dialog within companies, work-related accident prevention, employment of disabled people and employee training. The **governance** criterion ensures the transparency.

Ethical hacking: hacking a company's IT systems with the positive intention of exposing security flaws. This helps organizations to correct the vulnerabilities identified before a malicious attacker attempts to exploit them.

GHG Protocol (Greenhouse Gas Protocol): an international protocol that provides a framework for measuring and managing greenhouse gas emissions from private and public-sector activities.

NRSWA (New Roads and Streetworks Act) : a UK Act of 1991 that sets out the concession agreement for creating toll roads and defines the powers of the concessionaire.

Phishing: a type of fraud designed to lure web users and persuade them to share their personal data (accounts, passwords, etc.) or bank details by making them think the fraudster is a trusted person. In corporate settings, simulated phishing campaigns involve sending employees a fake email to persuade them to share confidential information or download an attachment. By analyzing the number of employees who click on the link or download the attachment, it is possible to assess the company's vulnerability to phishing hazards. The aim is to raise employees' awareness of this type of hacking so that they respond appropriately if they receive a suspicious email.

QSE : Quality, Safety & Environment

SBTi (Science-Based Targets, also called the SBT initiative): a partnership between the Carbon Disclosure Project, the United Nations Global Compact, the World Resources Institute and the World Wide Fund for Nature aimed at helping companies to reduce their carbon footprint and optimize their use of resources.

Scope : refers to the scope within which the greenhouse gas emissions of the organization or product in question are examined, where scope 1 is the smallest and scope 3 the largest.

Sustainable Development Goals (SDGs): global goals adopted by the United Nations in 2015. The SDGs are a global appeal to end poverty, protect the planet and act so that all human beings live in peace and prosperity by 2030. The 17

goals are all interconnected, recognizing that interventions in one area will affect results in the others and that development must balance out social, economic, and environmental considerations.

Sustainable development: development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

United Nations Global Compact: the world's most important initiative on companies' sustainable development. The UN Global Compact requires companies to align their strategies and operations with ten universal principles relating to human rights, labor, the environment and combating corruption, as well as taking steps to progress societal objectives and implement the Sustainable Development Goals.



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