Circular IT group

IMPACT REPORT 2024

Let's make IT circular

What's inside

Message from the CFO

An Invitation to join a new circular journey

Reflecting on the year 2024, we have gained deeper insights into the environmental and economic impact of IT. The way circular performance is calculated and interpreted continues to evolve. As new methodologies enter the market, measurement accuracy is increasing along with our commitment to continuous improvement.

Reinout van Tuyll, CFO

These advancements are enabling us, and the broader industry, to more precisely assess and communicate the real-world impact of circular IT strategies, and to motivate us to continuously innovate as a company. In this context, innovation drives us to refine our performance, and deliver meaningful, measurable progress.

Simultaneously, the regulatory landscape is shifting. Frameworks are being reviewed, expectations regarding compliance and transparency are increasing, and global geopolitical developments are reshaping supply chains and influencing strategic priorities. These external factors only reinforce the relevance of our mission and our propositions. In this changing environment, we are more prepared than ever to support organizations, businesses, and stakeholders in transitioning to circular IT models. Our cradle-to-cradle portfolio of products and services is designed to meet the demands of today's end-users: cost-efficient, secure, sustainable, and fully compliant.

Cost-efficiency has become a critical driver of success. Next to offering cost-efficient solutions, innovation has also proven to be a key success driver. Through Circular Workplace solutions, new devices are offered that contribute to sustainability targets through intelligent lifecycle management. Alongside this, IT Asset Disposition (ITAD), IT Asset Management (ITAM), and Re-Commerce services complete a portfolio unified by one mission: to make IT circular and accessible for all, while remaining cost-effective for both new and remarketed hardware.

And when reuse is no longer possible, we ensure that all assets are processed using durable recycling methods, minimising waste, and maximising accountability. This year's report represents both a continuation and an evolution of our journey. Above all, it provides transparent evidence of the progress we are making.

With every milestone, we strengthen our position as the European leader in making IT circular, demonstrating our commitment to measurable, sustainable, and cost-efficient impact.

As the Circular IT group we invite you to join us on this journey in making IT circular for all, recognising that change is now more accessible, cost-efficient, and urgent than ever before!

Let's make IT circular.

Reinout van Tuyll
CFO, Circular IT group

4

1. Management summary

circular IT group

contents

Making IT Circular: Impact at Scale

In 2024, Circular IT group (CITg) continued to accelerate its mission: making IT circular and accessible for all. We help customers reduce their environmental footprint, extend the life of IT equipment, and contribute to a more inclusive digital society. This year's report demonstrates how circularity, impact, and growth go hand in hand, and shows how we are embedding Environmental, Social and Governance (ESG) principles and cost-efficiency across our business.

Key achievements in 2024
- **22% total emission reduction**, with Scope 3 emissions versus 2023.
- **Renewable energy** use more than doubled: from 16% in 2023 to 27% in 2024.
- **Employee turnover** rate dropped from 18% to 5%, indicating increased engagement and retention.
- Over **38,000 laptops donated** to schools and Non-Governmental Organisations (NGOs), bridging the digital divide.
- **29,000+ devices** shipped by Close the Gap, of which 23,000 to Kenya, supporting access to education and IT.
- **EcoVadis Platinum** awarded to our NEG organisation for the second year in a row.

We continued to build on the strong foundation laid in 2023,— aligning internal processes, expanding circular services, and strengthening ESG governance. With Scope 3 emissions now mapped through most of our activities, we are improving transparency and enabling customers to make more sustainable IT decisions.

Progress on strategy and ESG roadmap

Our **ESG strategy** focuses on the Sustainable Development Goals (SDGs) where we can make the biggest difference:

- **SDG 8** – By creating fair jobs in refurbishment and reducing dependency on harmful raw material extraction.
- **SDG 12** – Through circular models that reduce e-waste, extend device life, and support responsible consumption.
- **SDG 13** – By lowering CO_2 emissions in the IT value chain and enabling customers to reduce their digital footprint.

We have made progress in implementing group-wide ESG policies, Key Performance Indicators (KPIs), and reporting processes aligned with the Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS).

Looking ahead
As we prepare for the years ahead, our focus remains on:

- Scaling circular services and reducing environmental impact across all operations.
- Enabling sustainable IT decisions for customers through data and transparency.
- Building an inclusive, healthy, and future-ready workforce.
- Strengthening ESG governance and due diligence in the supply chain.

Together with employees, customers, and partners, we continue to shape a more sustainable and circular future for IT, accessible for all.

© Circular IT group

Let's make IT circular

contents

2. Our impact
in numbers

Let's make IT circular
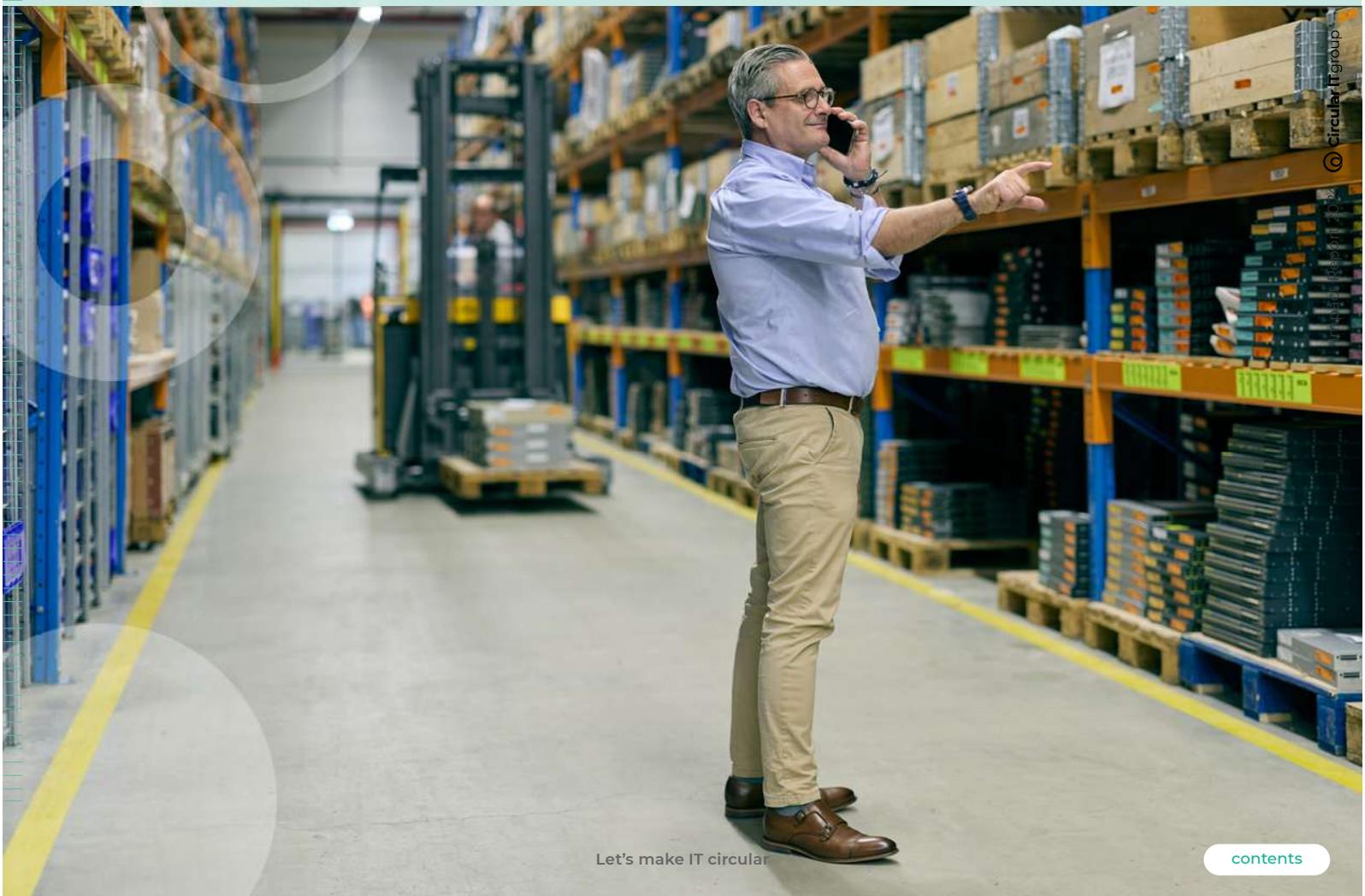
contents

2.1   2024 highlights

We avoided **20,307 tCO2e,** equal to the annual emissions of 1.35k Dutch households.

21% Total emission reduction; Scope 1,2 and 3 cumulated.

Use of renewable energy increased from **16 to 27%**.

Employee turnover rate decreased from **18% to 5%**.

Value of the hardware donated to CSR destinations by IT Donations: **€120,423.00**.

Number of laptops going to schools/ NGO's: **38,000**.

Indicator	2023	2024	Trend
Total CO_2 emissions (tCO₂e)	57,567	45,285	Improved by 21%
Scope 3 emissions (tCO₂e)	56,907	44,646	Improved by 22%
Renewable energy use (%)	16%	27%	Improved by +11% pp
Employee turnover rate	18%	5%	Improved by 72%
Donated laptops (Schools/NGOs)	40,000	38,000*	≈ Status quo**
Value of IT donations (€)	€325,000	€120,423	Decrease**

*Preliminary estimate; final number to be confirmed. New calculation methods and progressive insights impact the outcome.
**Increased level of customers using the residual value as reinvest instead of donation.

2.2   Co₂ savings, cost reductions, and circular performance

- 17% Total emission reduction (45,285 vs 57,567 tCO2e).
- 23% Revenue intensity (tCO₂e/€m Rev) (440 vs 576).
- 1,392,077 kg of material recycled.

3. Who we are and what we stand for

Circular IT group

Let's make IT circular

3.1 Business overview

CITg was founded in July 2022 and merges 15 specialised companies under one shared mission. While some of the policies and actions described in this report originate from individual companies, we are in the process of identifying what works best and scaling these practices across the group. In this way, we grow stronger together and drive transparency for all stakeholders.

In 2024, we aligned our organisations and data systems further, improving the scope, consistency, and depth of reporting.

3.1.1 Sector & circular value proposition

CITg operates in the Circular IT industry. Our core objective is to help organisations extend the lifespan of their IT assets, optimise usage, and reduce environmental impact, lowering costs while supporting sustainability goals.

Save money, go sustainable
Our services help customers cut IT expenses, improve efficiency, and reduce their carbon footprint, all while boosting their circular performance and social impact.

In 2023, CITg established the foundation for a fully circular IT life-cycle management platform, built on four pillars:

– **Lifecycle Management Services, including ITAD and ITAM.**
– **Distribution.**
– **Network, Server & Storage.**
– **Computing & Mobile.**

Each pillar enables the delivery of high-quality, sustainable IT products and services, whether individually or in combination, to partners and end-users.

Through this model, we deliver on our promise to extend the life of IT assets and minimise environmental impact by reducing, reusing, recycling, and managing the full IT lifecycle. Certified services and high-quality (new and refurbished) products offer secure, cost-effective solutions for every user, from Small Office/ Home Office (SOHO) to Corporate Enterprise.

We actively promote repairability, upgradeability, and digital inclusion, while upholding strong governance and data protection. Our vision is to empower users with circular IT solutions and become a global leader in circular IT lifecycle management.

3.1.2 Facts & figures

323 FTE
specialists across 4 regional service centres

>10,000
B2B customers served globally

80+
years of combined experience in circular IT

19,990 m²
of warehouse capacity
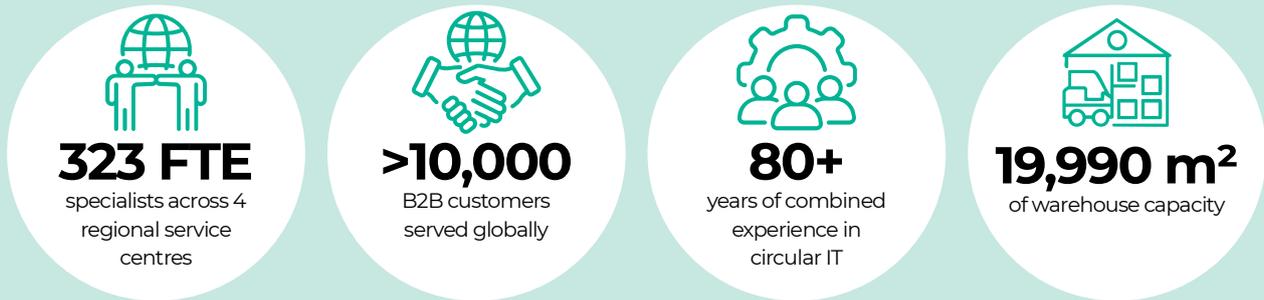
We offer services to end-users in a high variety of vertical markets, such as Public, Finance, Healthcare, Education, Logistics, Professional Services within the SOHO, SME and Enterprise market. Our products and services are offered through our own organisation and by partners in the Netherlands, Denmark, Belgium, Germany, France, Italy, Spain, and the UK ensuring full European and global coverage.

NET-REVENUES 2022 – 2024 (IN MILLIONS EUR)

2022	2023	2024
115	100	103
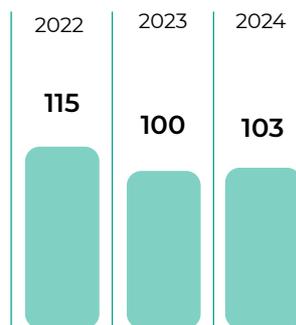
Our teams work from offices, service centres and warehouses located in Amsterdam, Nieuwegein, Zoetermeer (NL), Kontich (BE), Allerød (DK) and Glasgow (UK).

Number of employees (FTE)

	Own employees	Contractors
Netherlands	**225.4**	**5.6**
Belgium	**27.2**	**3**
Denmark	**12**	**0**
Singapore	**3.2**	**0**
Scotland	**46.6**	
	314.4 FTE	**8.6 FTE**

– Retention rate 2024: 5%

2022	2023	2024
270	300	315
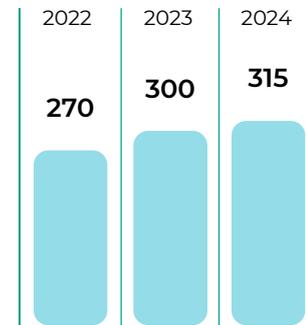
FTE 2022 – 2024 (IN NUMBERS)

3.1.3 Key features in the value chain

The value chain connects a broad network of suppliers and customers in the circular IT ecosystem.

Suppliers
We work with a variety of partners, including IT hardware manufacturers, leasing companies, organisations looking to replace their IT equipment, and other ITAD companies. These partners play a key role in supplying pre-used equipment for reuse, recycling, or remarketing.

Customers
We serve a wide customer base, ranging from professional consumers (Prosumers) to businesses and resellers. Our B2B customers, over 10,000 spread across the globe, span from large corporates and enterprises to SMEs, small offices, and home offices. These organisations operate in diverse sectors such as public services, IT, transport, retail, data centres, Internet Service Providers, banking and insurance, trade, education, healthcare, and industry. What they all share is a need for reliable IT assets, Asset Management and lifecycle management solutions in computing, networking, server, and storage.

3.1.4   Key drivers in the value chain

Success in our circular model depends on several key drivers that shape both upstream and downstream value.

Product sourcing
The ability to source high-quality pre-used and new IT equipment at competitive prices is vital. We focus on strong supplier relationships, smart inventory management, and product availability across all categories.

Quality assurance
Reliable quality builds trust. That's why we invest heavily in testing, inspection, and refurbishment. We continuously seek to improve and streamline these processes.

Technical expertise
Skilled technicians and engineers are essential for efficient diagnosis, repair, and refurbishment. Their expertise ensures product quality and drives operational excellence.

Logistics & distribution
Fast, efficient logistics are key to delivering value. We optimise transport, manage warehousing, and coordinate delivery to meet customer expectations.

contents

Environmental sustainability
Sustainability is a core driver for us. We embed circular practices across the entire value chain, from reuse and recycling to energy efficiency and waste reduction, supporting both our mission and customers' goals, whilst delivering cost-efficient products and services, that also align with the principles of sustainability.

Customer support & service
Strong support builds loyalty. We offer warranties, technical assistance, and responsive communication to help customers quickly and effectively.

Regulatory compliance
Compliance is non-negotiable. We adhere to all relevant standards on safety, data privacy, and environmental regulations to ensure legal certainty and protect our reputation.

Together, these drivers strengthen our value proposition, support operational excellence, and help us build a more sustainable future, both for customers and the planet.

contents

3.2 Our vision, mission, and market context

VISION
We make IT circular.

MISSION
We empower users with our circular IT solutions, driving a more sustainable future for all.

How we create value
At CITg, our business model and strategy are deeply rooted in sustainability principles and a strong commitment to responsible practices. Our mission reflects our dedication to environmental stewardship, social responsibility, and delivering real value to customers while minimising ecological impact. We also embed sustainability at a commercial level. Cost-efficient products and services support customers' long-term success and enable a sustainable model based on "people, planet, and profit."

We are driven by a long-term ambition to make IT fully circular, pioneering a holistic approach to the use and management of IT equipment across the industry. By demonstrating how IT assets can serve diverse user needs for extended periods, we promote sustainability and longevity throughout the sector, whilst complying with the commercial customer needs.

Our approach focuses on extending the lifespan of IT equipment through refurbishment and reuse rather than disposal. This strategy helps reduce waste, lower energy consumption, and uphold circular economic principles, including responsible recycling and eco-friendly material recovery at the end of a device's life.

Beyond environmental goals, we are motivated by a broader purpose: to reduce electronic waste, bridge the digital divide, and contribute to a fairer, more sustainable society. Ultimately, our work aims to lessen the IT sector's impact on climate change and natural resource depletion.

Impact Report 2024   **Circular IT** group

contents

Vision

We make IT circular.

Mission

We empower users with our circular IT solutions, driving a more sustainable future for all.

contents

4. Strategy & governance

We make IT circular

Let's make IT circular

4.1 Our strategy to drive impact and growth (ESRS-2)

Focus on Sustainable Development Goals
Based on the materiality analysis (see chapter 5) and aligned with our core business, we have identified three SDGs where we can deliver the most immediate and meaningful impact.
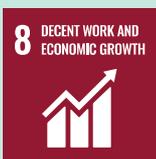
SDG 8. Decent Work & Economic Growth

Industry challenge:
The IT hardware sector faces a complex challenge: balancing economic growth with sustainability while fostering fair employment and inclusive development both within the industry and in society at large. A significant global issue is the digital divide, many underprivileged communities lack access to affordable and reliable technology, limiting their participation in the global economy and their opportunities for advancement.

Our strategy:
By offering refurbished and extending the life of new IT hardware, we reduce demand for new products. This decreases the need for mining and manufacturing new components, processes often linked to human rights violations. Instead, we help create a new value chain that generates employment opportunities in refurbishment and recycling.

CITg is committed to maintaining a safe, healthy, and inclusive work environment for all employees, regardless of gender, cultural background, or disability. We prioritise health and well-being throughout the value chain, demand decent working conditions, and firmly oppose modern slavery and child labour. We ensure fair wages across the supply chain by partnering with key suppliers who adhere to Responsible Business Alliance (RBA) standards and require smaller suppliers to comply with our code of conduct.

Moreover, by providing refurbished IT hardware, we help bridge the digital divide, enabling underprivileged communities to access affordable technology and empowering them to join the global economy.

SDG 12. Responsible production & consumption

Industry challenge: :
Electronic waste (e-waste) is among the fastest-growing waste streams globally. According to the Global E-waste monitor, in the European Union, approximately 60% of e-waste is not recycled, with the global rate around 80%. This poses serious environmental and health risks due to hazardous pollutants. Additionally, valuable materials within electronics, such as cobalt and lithium, critical raw materials (CRMs), are lost, even as demand for these scarce and expensive resources surges.

Our strategy:
We are committed to drive circularity by reducing e-waste and keeping products and materials in use for as long as possible. To support this, we apply the 9(R) principles of circularity (see paragraph 6.4.2).
We also invest in expanding our media presence to raise awareness about sustainable alternatives. By collaborating closely with suppliers, customers, and consumers, we are committed to becoming a fully circular company by 2040.

SDG 13. Climate action

Industry challenge:
Addressing global warming and strengthening resilience to climate change represents humanity's greatest challenge. In the IT sector, production of hardware contributes substantially to carbon emissions, making it imperative to reduce this environmental footprint.

Our strategy:
Our responsibility extends beyond direct operations to the entire lifecycle of our products. Most of CITg's environmental impact is indirect, stemming from manufacturing partners and the services we provide. Through sustainable procurement, reuse, and recycling of IT hardware, we actively reduce emissions.

We are working toward climate neutrality by 2050, both by reducing our own footprint and by supporting customers in doing the same. In addition to minimising our own footprint, we help customers to reduce carbon emissions. CITg aims to follow the Paris Agreement and become carbon neutral in 2050 through reduction policies.

Our ESG strategy

Impacts

These SDGs serve as the foundation for CITg's ambitions and guide the ESG strategy, which we have structured into three categories:

– **Impact Goals:** SDGs where our company has the greatest potential to drive significant sustainability outcomes.
– **Improvement Goals:** Areas where we actively seek to continuously improve our sustainability performance
– **Compliance Goals:** SDGs that we are required to follow to meet regulatory or stakeholder expectations.

SDG Focus CITg

SUSTAINABLE DEVELOPMENT G🔵ALS

Impact Goals

| 8 DECENT WORK AND ECONOMIC GROWTH | 12 RESPONSIBLE CONSUMPTION AND PRODUCTION | 13 CLIMATE ACTION |

Improvement Goals

| 4 QUALITY EDUCATION | 5 GENDER EQUALITY | 6 CLEAN WATER AND SANITATION | 10 REDUCED INEQUALITIES | 15 LIFE ON LAND | 16 PEACE, JUSTICE AND STRONG INSTITUTIONS | 17 PARTNERSHIPS FOR THE GOALS |

Compliance Goals

| 1 NO POVERTY | 2 ZERO HUNGER | 3 GOOD HEALTH AND WELL-BEING | 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE | 7 AFFORDABLE AND CLEAN ENERGY | 11 SUSTAINABLE CITIES AND COMMUNITIES | 14 LIFE BELOW WATER |

4.2 Governance structure and ESG oversight (ESRS G1)

4.2.1 Roles & responsibilities

Since 2023, CITg has been focused on embedding ESG principles into its core leadership structure. As the organisation evolves, executive management and the board of directors must lay the foundation for robust governance. This may include dedicated audit, compliance, risk, and ESG committees.

Each member of the executive team plays a vital role in driving ESG performance and ensuring long-term value creation for both stakeholders and the planet. By integrating ESG considerations into their respective domains, they help steer CITg toward a more sustainable and resilient future.

Chief Executive Officer (CEO)
- Leads the development of CITg's ESG strategy, ensuring alignment with business objectives.
- Oversee the implementation of ESG frameworks and practices across the organization.
- Acts as the ambassador of sustainability, both internally and externally.
- Identifies key ESG risks and opportunities, embedding them into strategic decision-making.

Chief Financial Officer (CFO)
- Evaluates the financial implications of ESG initiatives and integrates them into planning and reporting.
- Ensures ESG-related financial disclosures are transparent, accurate, and compliant with relevant standards.
- Assesses ESG-related risks and opportunities, implementing measures to mitigate potential impacts on the organisation's financial and operational performance.
- Tracks ESG performance metrics and offers insights to inform strategic and risk-related decisions.
- Engages with investors and stakeholders on ESG matters.
- Translates ESG strategy into day-to-day operations and drives process efficiency.
- Oversees environmental performance across operational activities, identifying areas for improvement.
- Works closely with supply chain partners to ensure responsible

sourcing and ethical procurement.
- Ensures operational compliance with ESG-related standards and regulations.

HR Director
- Develops HR policies that reinforce ESG goals, including initiatives around diversity, equity, and inclusion.
- Builds employee awareness and engagement around sustainability through training and communication.
- Monitors workplace well-being and safety, addressing ESG-related concerns.
- Embeds ESG criteria into recruitment, talent development, and performance management processes.

Director IT
- Aligns IT strategy with ESG goals, driving the adoption of sustainable technologies and practices.
- Ensures cybersecurity, data privacy, and IT system integrity.
- Supports ESG data collection, monitoring, and reporting through digital tools.
- Explores innovations in IT that enhance ESG outcomes.
- Director End-user Computing
- Leads the development of user-focused IT solutions that optimise energy use and productivity.
- Promotes sustainable IT behaviour among users through education and engagement.
- Implements measures to monitor and reduce energy and resource consumption.
- Collaborates with IT and ESG teams to define and track performance benchmarks.

Director IT Asset Disposition (ITAD)
- Develops ITAD policies focused on reuse, responsible recycling, and secure disposal.
- Ensures ITAD practices meet ESG regulations and industry standards, especially regarding data security.
- Partners with certified vendors and recyclers that follow ethical and sustainable practices.
- Tracks environmental performance and continuously looks for ways to improve impact.

contents

Director Procurement & Category Management
- Leads procurement strategy with a focus on ESG, including ethical sourcing and supplier diversity.
- Assesses supplier performance in ESG criteria and conducts necessary audits.
- Identifies and implements sustainable procurement opportunities.
- Monitors supplier compliance with ESG goals and contractual obligations.

Director Marketing
- Ensuring that all ESG-related disclosures, including the CSRD & Impact report, are clearly communicated across channels and aligned with the organisation's sustainability strategy and regulatory frameworks.
- Leads communication initiatives that engage customers, investors, and other stakeholders on the company's ESG commitments, progress, and impacts.
- Actively monitors and manages brand reputation in relation to ESG topics, ensuring consistent and ethical representation of the company's sustainability credentials.
- Develop and oversees campaigns that promote the company's role in circular economy and environmental stewardship, in close coordination with ESG and operational teams.

Director Recommerce
- Drives the execution of recommerce strategies by commercial propositions that reduce environmental footprint, enlarge social impact, and support sustainable resource use.
- Provides input on relevant KPIs, such as e-waste reduction correlating to the commercial efforts, product reuse rates, and carbon footprint savings, which contribute to sustainability reporting.
- Supply responsibility: Ensures ESG compliance and due diligence across sourcing, refurbishment, and resale practices, fostering ethical and environmentally sound operations.
- Innovation & impact: Champions innovation in product lifecycle management and tracks the social and environmental impacts of recommerce operations for inclusion in ESG disclosures.

Each leadership role is instrumental in realising CITg's ESG ambitions. By embedding ESG accountability across management functions, we foster a culture of transparency, responsibility, and continuous improvement, all essential to shaping a more sustainable and circular IT sector.

Integration of sustainability in updates & training
We rolled out KPIs and integrated ESG in policies and procedures in 2024.
In 2025 we will add relevant ESG trainings and internal updates to create
awareness on our own performance. On the KPI's, CITg will continue to
objectively review the relevance and impact and, if needed, adjust the
KPI, the measurements to assure a realistic visualiszation of the created
impact and its relevance.

4.2.2   Supervisory board & management

The shares of the CITg are owned by Waterland, an international private
equity firm with an explicit focus on reduction of the carbon footprint,
talent retention, and high customer satisfaction.

While the management team retains operational control, Waterland
actively supports the company's growth through acquisitions, financing,
organisational development, and talent management.

The management team
Our 2024 management team of the CITg consisted of:

CEO **Maarten de Roos**   CFO **Reinout van Tuyll**

The executive leadership team
– IT-director **Lennart van den Dool**
– HR director **Blerim Mustafa**
– Director End-user Computing **Jan-Dirk Krispijn**
– Director ITAD **Daan van Nieuwenhoven**
– Marketing director **Erwin van der Valk**
– Procurement director **Marcel Does**
– Director recommerce **Sander Cornelissens**

4.2.3 Information of management and SB about sustainability matters

Regular ESG meetings
In 2024, Marco Woudenberg was appointed as QHSE manager. He attends the management meeting every two weeks to update the wider management team on QHSE topics and progress. For decisions and review, the QHSE manager briefs the CFO (the board's ESG representative) on all relevant sustainability matters.

Key performance indicators
The QHSE manager, together with representatives from Human Resources, Operations, Sales & Marketing, and IT, is responsible for completing the KPIs and submitting them to senior management. The CEO reviews the KPIs and monitors progress during monthly meetings with the board and shareholders.

We are harmonising ESG objectives across all entities to ensure clear roles, targets, and accountability by 2025. For the most material topics, we have already started to break down the data at entity level. We anticipate that it will take another one to two years to complete this process.

4.2.4 Sustainability matters addressed by management and SB's

The Supervisory Body Waterland establishes sustainability related KPIs and policies, expecting timely implementation.

The Supervisory Body and the management team both acknowledge the growing prominence of ESG in corporate management. Waterland views ESG performance as a direct determinant of company outcomes. Waterland encourages CITg to adopt a thoughtful approach to ESG, mitigating risks, and seeking opportunities for value creation beyond financial returns.

Sustainability matters that were discussed with Waterland in 2024 include:

- ESG strategy, goals & KPIs.
- Circular IT calculator.
- CSRD / Impact reporting.
- How we can pursue opportunities from EU regulations.
- ESG certification(s).

4.3   Risk management and stakeholder engagement

4.3.1   Description of the processes to identify and assess material IROs

To ensure compliance with the EU CSRD and apply a structured, thorough approach to identifying material Impacts, Risks, and Opportunities (IROs), we engaged an external consultancy firm specialising in ESG.

For each material topic and sub-topic under the Environmental, Social, and Governance pillars, we systematically analysed:

- Where the impact occurs (own activities/ value chain).
- Type of impact (actual/ potential).
- How the impact occurs.
- Impact description.
- Severity of impact (score.)
- Likelihood of occurrence (score).
- Overall impact score.

In parallel, and using the same structured method, we also assessed potential positive impacts, as well as related financial risks and opportunities across the value chain.

For a full description of the double materiality process, see Chapter 5.3.

4.3.2 Disclosure of material IROs across the value chain

Domain	Impacts	Risks	Opportunities
Environment	– Upstream energy use in IT hardware value chain – Air and soil pollution in the supply chain – Water consumption and pollution upstream – Resource inflows: high use of virgin materials, energy, water – Resource outflows: e-waste or re-entry via reuse/recycling – Positive impact through circular sourcing, refurbishment, and operations	– Climate-related risks (e.g. policy changes, carbon pricing, energy cost volatility, supply chain disruptions) – Reputational risk from pollution incidents upstream – Water stress in supply chain regions – Resource scarcity leading to cost increases or unavailability	– Increased demand for low-carbon IT products – Pollution prevention as a competitive advantage – Advanced recycling and circular business models support compliance and efficiency – Access to green finance and public tenders – EU support for eco-design, EPR, right-to-repair
Social	– Inclusion of people with disabilities – Diversity and safe workplaces – Local job creation through refurbishment – Digital inclusion and affordability – Reduced harm from linear IT practices – Quality and reliability of reused goods – Consumer rights and protection	– Exclusion of vulnerable groups (e.g. people with disabilities) – Workplace violence and harassment – Human rights violations in upstream supply chains – Inequality and digital divide – Data privacy and cybersecurity concerns	– Inclusive employment and diversity – Ethical sourcing and traceable supply chains-Stronger consumer trust through transparency and education – Job creation in repair, logistics, and reuse – Promoting digital equity and circular advocacy
Governance	– Whistleblower protection – Anti-corruption and anti-bribery standards	– Complexity and cost of implementing uniform governance across subsidiaries – Resistance to policy changes – Evolving ESG and IT governance expectations – Data protection and cyber risk	– Improved operational efficiency and alignment – Greater trust from stakeholders and investors – Risk reduction through compliance – Competitive advantage via strong data protection and governance frameworks

5. What matters most: our material topics

Let's make IT circular

The structured IRO assessment described above directly informed the double materiality analysis presented in the next chapter. By combining stakeholder input with impact and financial materiality, we defined what topics are of highest strategic relevance to CITg.

5.1 Double materiality explained

This report considers materiality from both an outside-in and inside-out perspective:

We examine how external factors, such as environmental and societal developments, affect our business in the "Impacts, Risks & Opportunities" sections for each ESG topic throughout the report.

Double Materiality

Impact resulting from planet & society on the company

Outside-In Perspective

Inside-Out Perspective

Impact resulting from the company on the planet & society

COMPANY
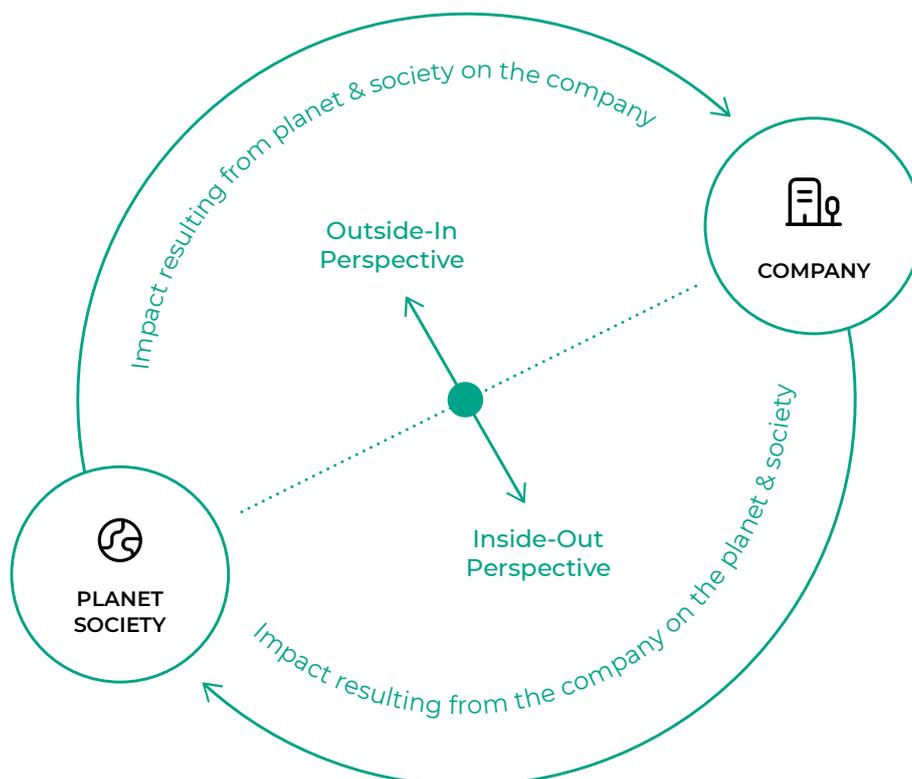
PLANET SOCIETY

We also assess how business activities impact the planet and society, using a materiality analysis to evaluate the significance of our influence.

In 2023 and in 2024 we conducted materiality analysis on ESG topics, based on quantitative research among five stakeholder groups:

- Employees
- Customers
- Financiers
- Partners/Suppliers
- General public

We asked them to rate each topic based on how much they think CITg can influence it or contribute positively to it, using a scale from 1 (no influence) to 5 (very strong influence).

The analysis ensures we focus on the areas in which we can have the most meaningful impact, as well as the areas of greatest interest to stakeholders. We must work together to reach our common ESG goals.

To define the ESG issues of concern, we used several sources:

- The standards compiled by the CSRD guidelines.
- Sustainability reports from peer companies to identify emerging trends, stakeholder expectations, and material issues found in the sector or comparable sectors.

5.2 Key impact areas for CITg and its stakeholders

Double Materiality Analysis

The most material topics for CITg are mentioned below, including the paragraph in this report where we elaborate for each topic on the impacts, risks, opportunities, policies, targets, actions, and results. The material topics are mapped against the relevant European Sustainability Reporting Standards (ESRS), including E1–E5, S1–S4, and G1–G2

Topic	Financial Materiality	Impact Materiality	Paragraph
Climate change mitigation & energy	4	4.4	6.1
Resource use & circular economy	1	5	6.4
Pollution	1.6	4.1	6.2
Water & marine resources	1.8	4.1	6.3
Own workforce	5	3.1	7.1
Workers in the value chain	5	1.9	7.2
Affected communities	2.9	3.8	7.3
Consumers & end-users	2.3	3.1	7.4
Business conduct	1.6	3.1	8.3

We plotted the material ESG topics for CITg in a materiality matrix based on their combined normalised scores:
– **Y-axis: Impact materiality (1 = low, 5 = high)**
– **X-axis: Financial materiality (1 = low, 5 = high)**

This allows us to visually position each topic in terms of its relative significance.

Based on the matrix, we identified three types of material topics:

contents

5. What matters most: our material topics

– Topics in the top right corner (high on both axes) are of highest strategic priority.
– Topics with high impact but low financial materiality (e.g., circularity) are still important for long-term sustainability and sector influence.
– Topics with minimal impact but high financial materiality (e.g., labour practices in the value chain) are crucial for compliance and risk management.

Materiality Matrix

Scatter plot with axes FINANCIAL MATERIAL (1–5) on x-axis and IMPACT MATERIAL (1–5) on y-axis, showing the following topics:
- Resource use & circular economy (≈1.5, 5.0)
- Climate change mitigation & energy (≈4.0, 4.4)
- Pollution (≈1.6, 4.1)
- Water & marine resources (≈1.8, 4.1)
- Affected communities (≈2.9, 3.8)
- Business conduct (≈1.6, 3.1)
- Consumers & end-users (≈2.3, 3.1)
- Own workforce (≈5.0, 3.0)
- Workers in the value chain (≈5.0, 1.9)
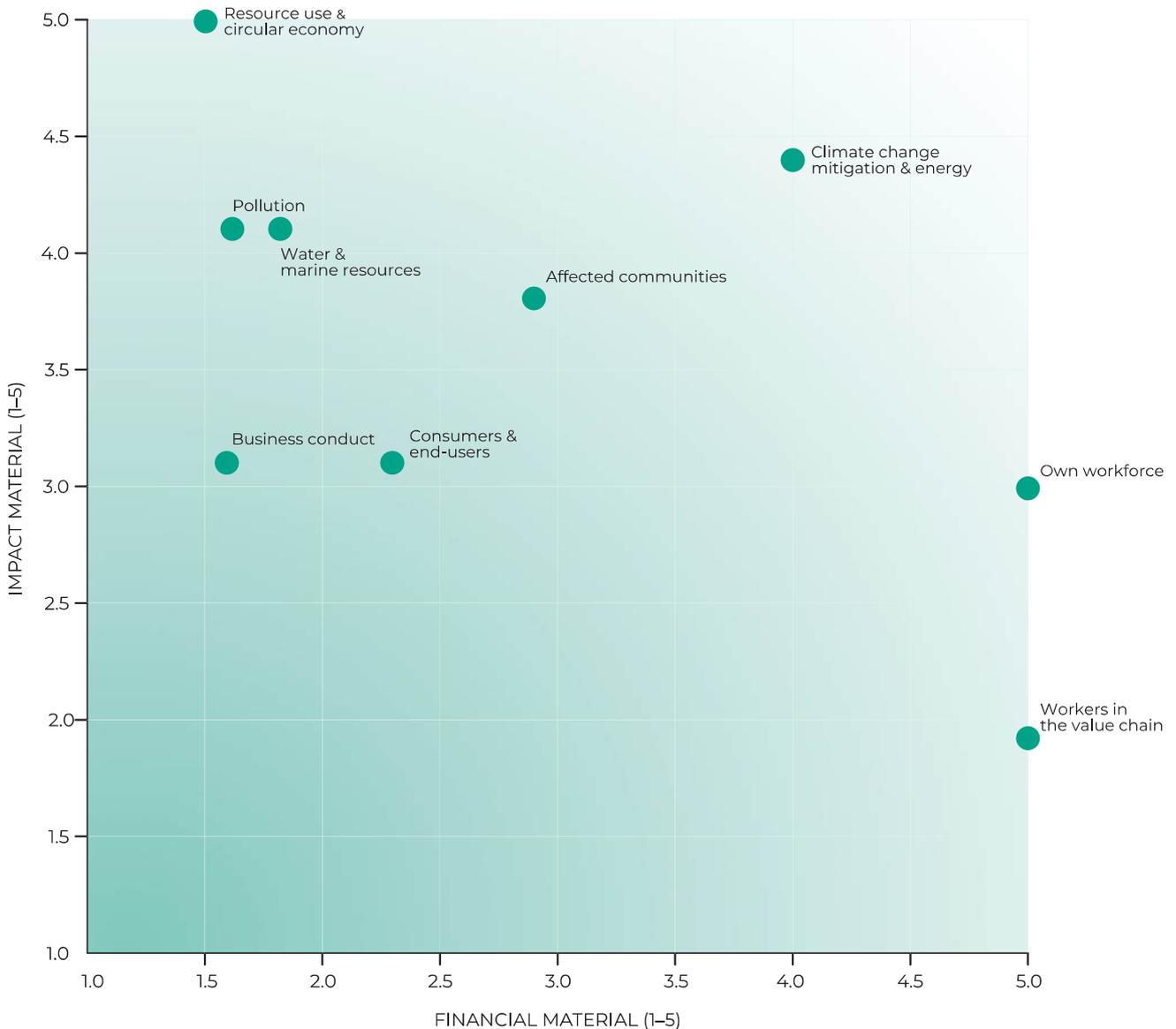
5.3 How we determined our priorities

To identify the most material sustainability topics for CITg, we followed a structured, evidence-based process, fully aligned with the European Sustainability Reporting Standards (ESRS). The double materiality assessment (DMA) consisted of the following steps:

1. Starting with an ESRS-based longlist
We began with a comprehensive long list of 92 potential ESG topics across the environmental, social, and governance (E, S, G) domains. These were directly derived from the ESRS framework and served as the foundation for the analysis.

2. First selection based on internal and external insights
Using insights from a previous materiality analysis, complemented by internal calculations, literature reviews, and discussions with both internal and external stakeholders, we made an initial selection. We assessed which topics needed further investigation and which could reasonably be classified as not relevant for the business context.

3. Assessing impact and financial materiality
For each topic, we evaluated both impact materiality and financial materiality:

– Impact materiality was assessed based on the scale, scope, irremediability, and likelihood of the actual or potential positive and negative impacts on people or the environment.
– Financial materiality was evaluated based on the magnitude and likelihood of risks and opportunities (see 4.3) that could affect CITg's financial position or enterprise value.

Both scores were normalised on a 1–5 scale (with 5 being the highest) to allow for consistent comparison and visualisation in a 2D matrix.

4. Stakeholder survey
In both 2023 and 2024, we conducted a quantitative survey with five key stakeholder groups:

– Employees
– Customers
– Financial institutions
– Partners and suppliers
– General public

We asked each group to rate our influence on the selected topics, using a scale from 1 (no influence) to 5 (very strong influence). This input was used to enrich the impact materiality dimension and ensure stakeholder expectations were included in the analysis.

Scope and limitations

This assessment is based on available data and stakeholder input. Some important nuances include:

For certain topics like water use or biodiversity, our influence is indirect, mainly upstream in the IT hardware value chain.

- **Biodiversity** was considered relevant based on its broader system impact. The underlying drivers, such as climate change, air, and water pollution, are areas where we do exert influence. Therefore, we chose to focus the reporting and actions on addressing these root causes, rather than reporting separately on biodiversity outcomes. This allows us to target the areas where we can have the most realistic and measurable impact.

– **Water Use:** In our own operations, we use very little water. However, upstream in the IT hardware value chain, such as in semiconductor manufacturing, component cleaning, and metal processing, significant volumes of water are consumed. These processes can also result in polluted wastewater containing heavy metals, solvents, and other hazardous substances. By extending the lifecycle of IT hardware through circular practices, we help reduce the demand for new production, thereby indirectly contributing to substantial water savings and reduced water pollution. Our influence may be indirect, but our overall impact on water use in the industry is significant.

This materiality assessment provides a clear direction for the ESG strategy. It highlights where we can drive the greatest measurable impact, respond to stakeholder concerns, and mitigate key risks. The following chapters explain our actions, targets, and progress per material topics.

Whilst conducting the surveys, we have registered a requirement for change during this process; conducting the surveys based on a mix of quantitative questionnaires and qualitative interviews will have a more robust outcome, as by quantitative input only, by doing so the outcome of the DMA is less vulnerable for the risk of collecting answers based on limited insights of the stakeholders interviewed.

6. Environmental impact

Let's make IT circular

contents
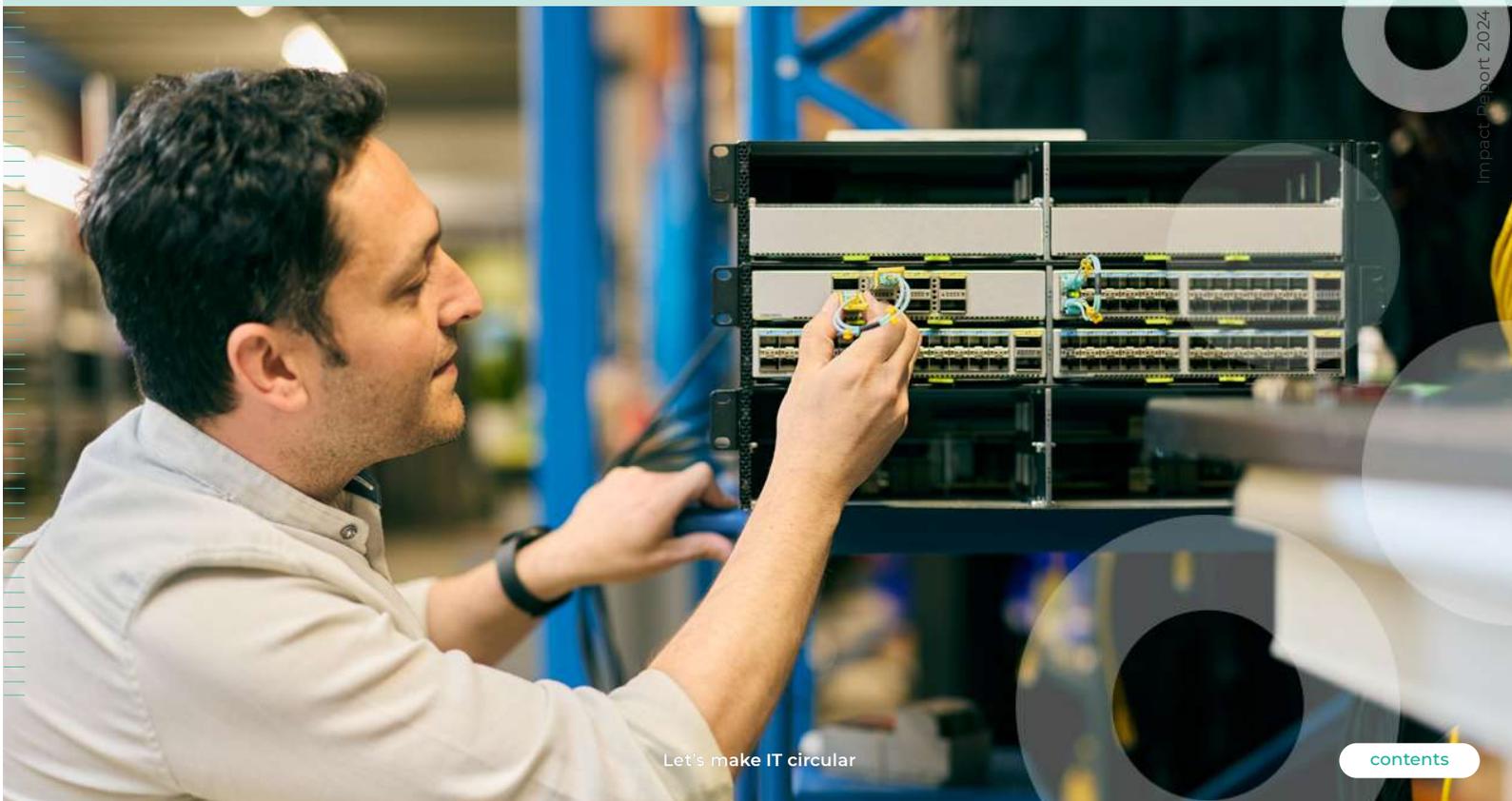
6.1 Climate change mitigation (ESRS E1)

Climate action

6.1.1 Impacts, risks & opportunities

13 CLIMATE ACTION

Impacts
Upstream energy use in the IT hardware value chain

The production of IT equipment, including semiconductors, batteries, and screens, is highly energy-intensive and heavily reliant on fossil fuels. Energy consumption is especially significant during raw material extraction and component manufacturing. These processes primarily occur in regions where renewable energy sources are limited, making decarbonisation challenging and long-term.

Scale: High, electronics manufacturing is among the most energy-consuming sectors globally.

Scope: Global, covering Original Equipment Manufacturers (OEMs), component suppliers, and transport networks, all contributing significantly to Scope 3 Green House Gas (GHG) emissions.

Irreversibility: High, shifting the energy mix of upstream partners requires systemic change and long-term partnerships.

Likelihood: High, unless active decarbonisation efforts are in place across the supply chain.

contents

Global IT CO$_2$eq growth forecast vs reduction goals

+ 11,5%

Carbon emissions
in GtCO$_2$

- Reduction required to meet Paris goals
- % of IT of total CO$_2$eq footprint without change
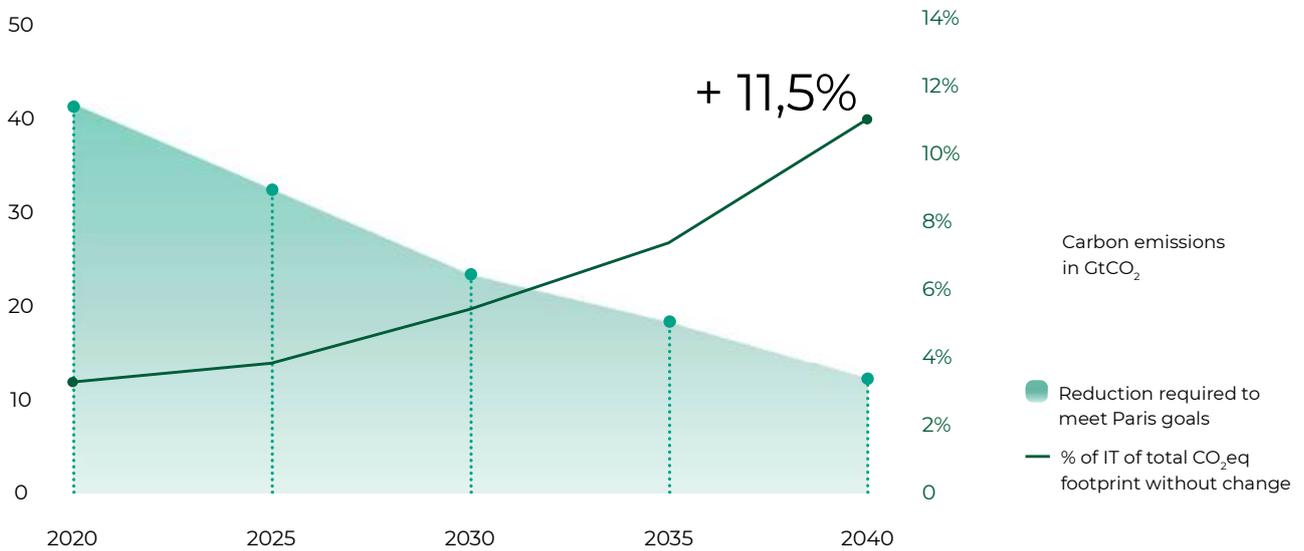
Source: ScienceDirect.com

Positive impact through circularity

By extending the lifecycle of IT products through refurbishment, reuse, and redeployment, CITg reduces the need for new production, avoiding substantial embodied emissions. As demand for sustainable IT solutions increases, the impact of this circular model is amplified across the global value chain.

Risks

Climate-related business risks

CITg faces both transition and physical risks related to climate change. These include:

- Compliance costs: due to evolving climate policies (e.g., carbon pricing, CSRD).
- Supply chain disruption: extreme weather events affect manufacturing, logistics, or refurbishment operations.
- Energy cost volatility: potentially impacting operating margins, especially in regions with fossil-dependent grids.

Likelihood: Medium to high-driven by increasing policy pressure and climate-related disruptions.

Impact: Operational delays, reputational damage, increased costs.

Opportunities

Climate-driven market and operational opportunities

Growing customer and investor demand for low-carbon IT products increases market potential for CITG's refurbished hardware.

As companies aim for carbon footprint transparency (Scope 3 included), there is a rising need for traceable, circular IT solutions supported by verifiable data.

Regulatory compliance (e.g., CSRD, EU Taxonomy) creates a first-mover advantage for providers with transparent, sustainable practices.

	2025	2026	2027
Reduce scope 1, 2 & 3 emissions (vs 2022)	-15%	-20%	-25%
Raise awareness of CO_2 reduction options: reach at least 80% of our target audience via earned and owned media.	80%	85%	85%

6.1.2   Goals, results, policies & actions

Goals

We are committed to reducing our own CO_2 footprint and enabling customers to reduce theirs. To support this, we have set the following goals:

- Decrease total energy consumption.
- Increase renewable energy.
- Reduce energy intensity.

Results

Carbon Indicators	2023	2024
Scope 1 emissions (tCO$_2$e)	445*	510*
Scope 2 emissions (tCO$_2$e)	214	128
Scope 3 emissions (tCO$_2$e)	56,907	44,646
Scope 1+2 emissions (tCO$_2$e)	659	638
Total emissions (tCO$_2$e)	57,567	45,285
Scope 1+2 revenue intensity (tCO$_2$e/€m Rev)	6.6	6.2
Revenue intensity (tCO$_2$e/€m Rev)	576	440
Employee emission intensity (tCO$_2$e/FTE)	186	140
Renewable energy use (%)	16	276
Total renewable energy consumption (MWh)	456	902
Total energy consumption (MWh)	2,852	3,468
Energy Intensity (MWh/€m rev)	29	34
Renewable energy produced (kWh)	0	34,499
Non-renewable energy produced (MWh)	0	0
Total energy production (kWh)	0	34,499

*The growth of Scope 1 emissions is a direct result increased activity of the organisation related to growth in business volume.

Let's make IT circular

contents

Emission sources

	2023* tCO$_2$e	2024 tCO$_2$e
Scope 3, use of sold products	45,244	35,344
Scope 3, extraction, production & transportation of capital goods	525	358
Scope 3, purchased goods & services	8,240	5,975
Scope 3, upstream transportation and distribution	2,047	1,822
Scope 1, direct emissions	445	510
Scope 3, upstream leased assets	275	404
Scope 3, fuel and energy-related activities	165	204
Scope 3, business travel	80	121
Scope 3, employee commuting	326	329
Scope 2, indirect emissions (purchased energy)	214	128
Scope 3, waste generated in operations	7	90
Scope 3, downstream transportation and distribution	0	0
Scope 3, downstream leased assets	0	0

*due to a change in methodology and calculation systematics the figures from 2023 changed compared to the previous Impact Report.

As the graph shows, most emissions come from Purchased goods and services.

GHG Intensity
2023*: 57,567 t CO$_2$eq./ 108 million revenue ≈ 0.00046 tCO$_2$e per dollar
2024: 45,285 t CO$_2$eq / 101 million revenue ≈ 0.00037 tCO$_2$e per dollar

*due to a change in methodology and calculation systematics the figures from 2023 changed compared to the previous Impact Report.

Overall, we have good control over our main emissions. We completed a full update of the environmental aspects inventory in 2024, now fully aligned with the group structure and operations. Key developments in the past year include:

- Replaced warehouse lighting with LED.
- Installed a battery to help balance the energy grid.
- Expanded Climax to measure scope 1, 2, and 3 CO$_2$ emissions for all entities.
- Took steps to complete the groupwide EED-audit.
- Deactivated charging facilities.

contents

Scope 1, 2, 3

SCOPE 2
INDIRECT

Purchased
electricity

SCOPE 1
DIRECT

SCOPE 3
INDIRECT

SCOPE 3
INDIRECT

Purchased
goods and
services

Capital
goods

Energy related
activities

Transportation
& distribution

Waste
generated in
operations

Waste
management

Business
travel

Leased assets

IT Hardware

Company
facilities

Company
vehicles

Transportation &
distribution

Processing of
sold products

Use of sold
products

End of life
treatment of
sold products

Leased assets

IT Hardware

| UPSTREAM ACTIVITIES | CITg | DOWNSTREAM ACTIVITIES |

Framework based on The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised edition)

Avoided GHG emissions from products and services

Thus far, we have gathered computing-related data from subsidiaries Maxicom, CTG Circular and iUsed. By providing customers with refurbished end-user computing devices and smartphones, we avoided 22,296 million tonnes of CO_2eq emissions from new device manufacturing in 2024. Additionally, our own refurbishing operations generates 1,989 million tonnes of CO_2eq. This results in a net balance of 20,307 million tonnes of CO_2eq avoided by CITg. These efforts demonstrate our commitment to SDG 12 (Responsible Consumption and Production) and contribute directly to SDG 13 Climate Action).

In 2025 we will extend our analysis to include avoided emissions from other products offered by CTG.

Let's make IT circular

contents

Policies & actions

Minimising our own footprint
To minimise our environmental impact, CITg is exploring various strategies to reduce GHG emissions across our operations and value chain.

Scope 1

Scope 1 emissions derive from our own buildings and vehicles. We aim for ongoing enhancements to the company's energy-related performance. We enacted a transition to green energy use and energy-saving measures, considering lighting, heating, ventilation, and more stringent travel policies.

Scope 2

Renewable energy: We prioritise renewable energy sources to power operations whenever possible, thereby diminishing the dependence on fossil fuels.

Energy reduction: We have taken several initiatives to promote energy conservation, including installing LED and movement detection lighting in most of our locations.

Energy efficiency: We are committed to incorporating energy-saving practices throughout CITg. This includes optimising equipment, utilising energy-efficient lighting and heating, implementing building-wide energy-saving measures, and providing staff with guidance on reducing electricity consumption in their workspaces.

Employee engagement: We engage employees in the importance of reducing electricity consumption and encourage them to adopt energy-saving practices in the workplace, such as turning off lights and equipment when not in use. We have established clear employee guidelines for sustainable practices, including energy conservation, in both office behaviour and operations.

Continuous monitoring and reporting: We investigate implementation systems to monitor and track energy consumption and emissions regularly. By regularly analysing energy usage data, CITg can identify areas for improvement and implement targeted strategies to further reduce scope 2 emissions over time.

Impact Report 2024 ⊚ **Circular IT** group

Scope 3

Scope 3 includes all the goods we purchase and use as working capital. For example, the tools and equipment we use for refurbishing and administration.

Sustainable IT hardware: CITg uses refurbished servers and networking equipment, and all employees use refurbished laptops and phones.

Employee commute: It is our policy to allow hybrid working (where possible) and stimulate lease of full electrical and hybrid cars. Cars with diesel engines or emitting over 135 grams of CO_2 per kilometre are prohibited.

We encouraged employees to leverage the benefits of work life balance delivered by remote working and to raise awareness of the environmental impact of commuting.

To reduce carbon emissions from business travel, we stimulate online meetings to avoid unnecessary international air travel.

Supply chain optimisation: Streamlining the supply chain is another crucial strategy for minimising transport-related emissions. CITg prioritises sourcing products from within the EU to reduce transportation distances and consolidates shipments to decrease the number of journeys required. Another solution to reducing scope 3 is to order products well in advance. By estimating the required quantities well in advance, the products can be transported by ship instead of by plane.

45

Impact Report 2024 @ **Circular IT** group

Let's make IT circular

contents

Contributing to a lower carbon footprint through circular IT solutions

The biggest impact we can have on fighting climate change is helping customers to reduce their climate impact. Like CITg, we offer insights, products and services that help customers decrease their IT hardware carbon footprint:

Footprint versus handprint

Carbon Handprint

We strive to help customers reduce their carbon footprint through our products and services. Our carbon handprint is a measure of these emission reductions. A larger handprint indicates a greater positive impact.

Maximise carbon handprint

Carbon footprint

Direct & indirect GHG emissions (scope 1, 2, 3)

Minimise our own footprint

Carbon handprint
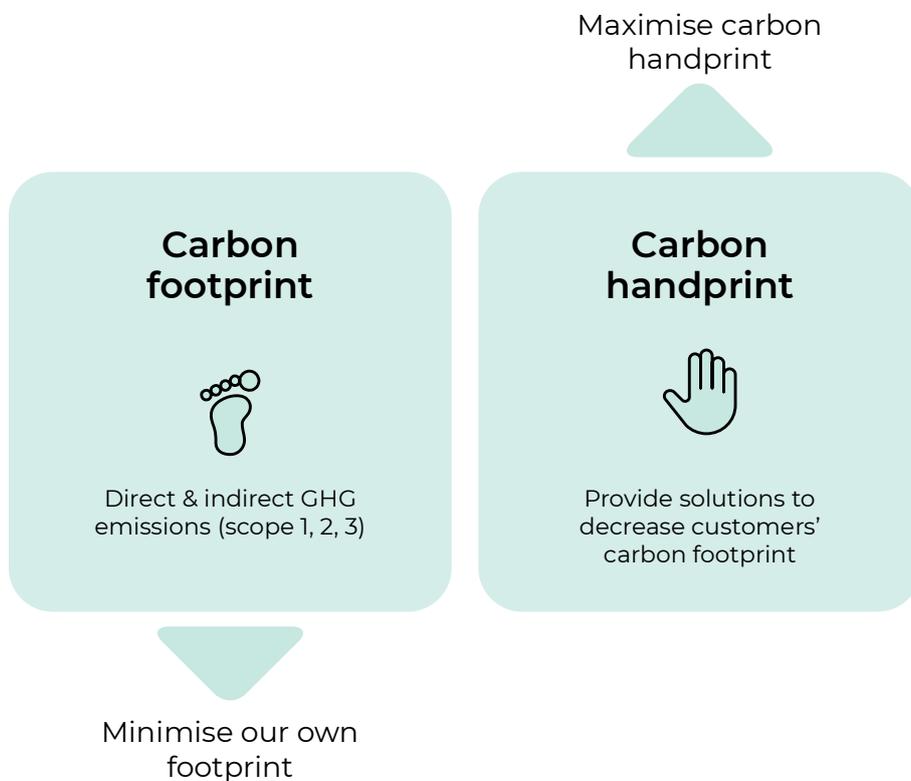
Provide solutions to decrease customers' carbon footprint

1. Extending product lifetimes

Extending the lifespan of IT equipment directly contributes to a lower annual carbon footprint. At CITg, we offer several services designed to maximise the use of existing devices:

Laptop lifetime extension carbon improvement potential

THE AMOUNT OF CO_2EQ FOOTPRINT IN KILOGRAMS (kg) ● Non-carbon improvement ● Carbon improvement

Baseline	Year 1	Year 2	Year 3
240	**80**	**80**	**80**

→ **80 kg**
Annual CO_2eq footprint

Eco	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
126	**21**	**21**	**21**	**21**	**21**	**21**

→ **21 kg**
Annual CO_2eq footprint
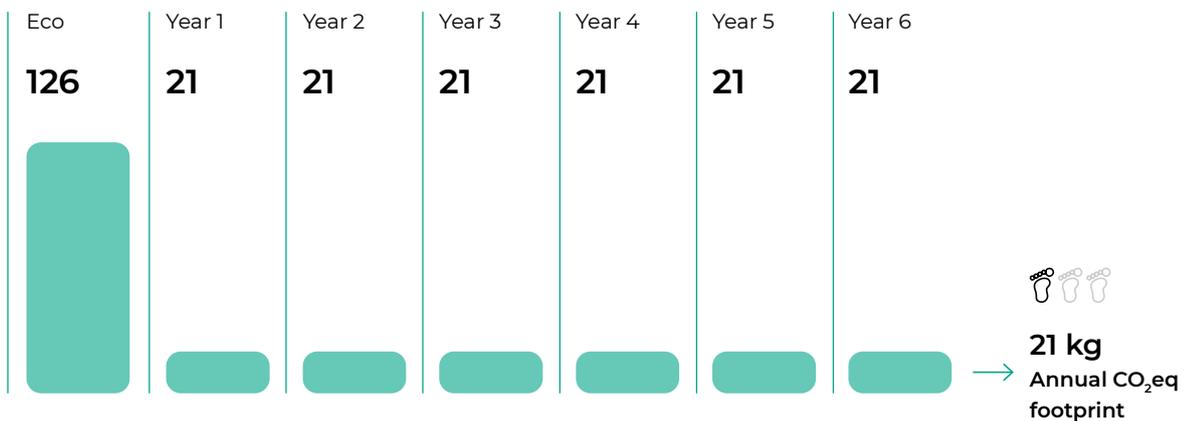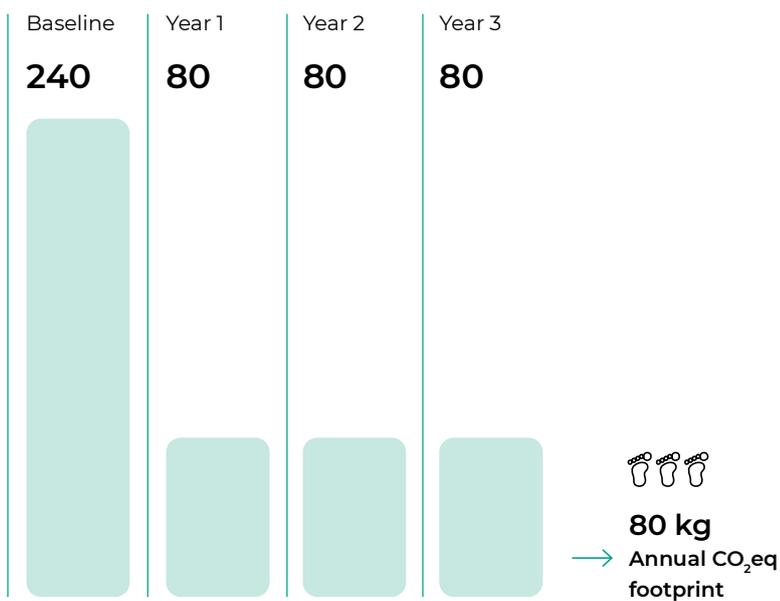
- **DaaS:** Our DaaS solutions promote efficient use of devices, helping to avoid over-purchasing and preventing idle assets. With proper maintenance and reuse, we significantly extend the useful life of equipment.
- **ITAD & Refurbishment:** Through ITAD services, we assess, and grade used devices, prioritising refurbishment for a second or even third lifecycle. This reduces the demand for manufacturing new products and cuts associated emissions.

2. Responsible recycling

When refurbishment is no longer feasible, CITg ensures that devices are recycled responsibly. We raise awareness among customers and help them improve their recycling performance, thereby further reducing their environmental footprint. This approach minimises waste and prevents harmful environmental impacts.

3. Energy-efficient technology

We prioritise procuring energy-efficient devices with recognised certifications such as TCO, Energy Star, and EPEAT. These products use less energy throughout their entire lifecycle. We also support customers by providing insights into the energy performance of different devices, enabling them to make informed choices with lower environmental impact.

4. Sustainable procurement

Our procurement strategy focuses on selecting environmentally responsible products and suppliers. We collaborate with partners that prioritise eco-design, use recycled materials, and employ low-carbon logistics. Additionally, we offer customers transparency into the footprint of various devices, including factors such as recycled content, use of renewable energy in production, packaging reduction, repairability, and transport emissions.

48

Circular IT group

Improvement potential laptop
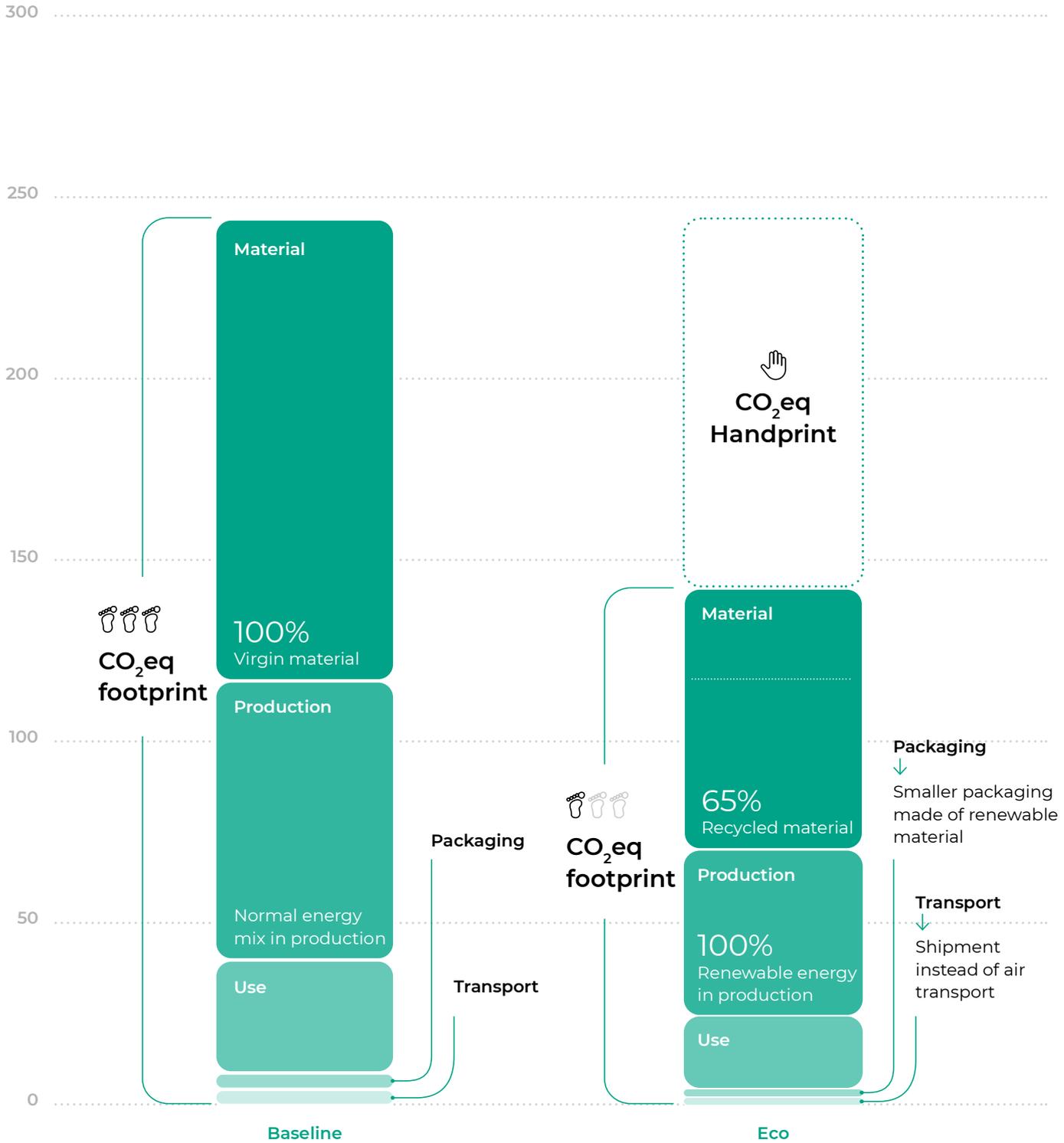
300 ···

250 ···

Material

🤚

**CO$_2$eq
Handprint**

200 ···

👣👣👣

**CO$_2$eq
footprint**

Material

100%
Virgin material

150 ···

Production

Material

Packaging
↓
Smaller packaging
made of renewable
material

65%
Recycled material

100 ···

👣👣👣

**CO$_2$eq
footprint**

Packaging

Production

Transport
↓
Shipment
instead of air
transport

Normal energy
mix in production

100%
Renewable energy
in production

50 ···

Use

Transport

Use

0 ···

Baseline

Eco

49

Impact Report 2024   **Circular IT**group

Lifecycle management and circularity

Our products and services are designed to last longer, be easier to repair, and be fully recyclable, minimising resource use and reducing waste. We strengthen our circular economic approach through IT Asset Disposition (ITAD), refurbishment, upgrades, repair, and recycling. We also promote alternative ownership models, such as leasing and subscriptions to extend product lifespans and reduce environmental impact.

Our website offers a free online tool that estimates the carbon footprint of an organisation's end-user computing environment at the device level. This quick scan raises awareness of IT's environmental impact and encourages action.

1) Choose your product

| Notebook | > | AIO | > | Desktop | > | Monitor | > |
| Printer | > | Server | > | Handheld | > | Network | > |

2) Determine the number.

3) Read off how much CO2 you save.

CO2 emissions

You avoided approximately this amount of CO_2 emissions.

0

Less KG CO2 emissions

image: free online Sustainability Calculator | CITg

50

For a more detailed analysis, we partner with Px3, a leading expert in IT carbon footprint management. Px3's platform generates precise carbon footprint data for specific device models, based on usage, lifespan, and energy consumption. It also calculates related costs.

This data supports organisations in creating sustainable IT strategies aligned with both environmental and business goals, such as extending device lifespans, selecting low-carbon equipment, and improving energy efficiency.

Supporting sustainable IT decisions with Px3

Px3's platform enables IT and procurement teams to compare and rank end-user computing devices based on their carbon footprint before purchasing. This supports informed decision-making, despite the challenges posed by inconsistent carbon reporting among manufacturers. Px3 addresses these challenges by using innovative methods to calculate electricity consumption from real-world usage and by reconstructing and analysing manufacturers' carbon footprint reports. Their model is supported by peer-reviewed academic research.

This approach is essential for future compliance with greenhouse gas reporting regulations. With Px3, we help customers achieve four key goals:

— Lower electricity uses by reducing IT energy demand.
— Extend device lifespans to increase value and reduce environmental impact.
— Choose low-carbon devices with minimal lifecycle emissions.
— Provide data for CSRD reporting to support compliance and sustainability claims.

The Px3 tools also show how much CO_2 and cost can be saved by choosing refurbished over new IT hardware, helping customers meet CSRD obligations and improve sustainability performance.

51

Impact Report 2024 · **Circular IT** group

contents

6. Environmental impact

PX3 calculator

When transporting products from manufacturers to customers, CITg prioritises shipping methods that have a lower carbon footprint, such as ocean freight. By avoiding air transport, we estimate that we can reduce emissions by up to a factor of 50 .

In 2025, we will further translate environmental goals into concrete targets per entity, clearly defining each entity's contribution to the group objectives.

Let's make IT circular

contents

6.2 Pollution (ESRS E2)

Responsible consumption and production

6.1.1   Impacts, risks & opportunities

Impacts

Air pollution in the value chain

Air pollution has a material negative impact on the IT-hardware lifecycle. It is primarily generated in two phases:

Upstream: during raw material extraction and the energy-intensive manufacturing of electronics.

Downstream: during improper disposal or incineration of e-waste, particularly in informal sectors.

Scale: High – the electronics industry contributes significantly to industrial air pollution, especially in regions with limited environmental controls.

Scope: Global – from production hubs in Asia to informal e-waste processing in Africa and Latin America. This impacts workers, local communities, and ecosystems.

Irreversibility: High – toxic pollutants, once released, persist in the atmosphere and are difficult to mitigate.

Likelihood: High – especially in lower-tier suppliers and informal processing chains where emissions control is weak.

Positive impact: By promoting refurbishment and reuse, CITg helps avoid both the industrial emissions associated with new production and the toxic emissions from uncontrolled e-waste burning.

Scale: High – industrial air pollution is strongly linked to production volumes.

Scope: Global – from OEMs to downstream e-waste handlers.

Likelihood: High – every reused device reduces pollution risks in both phases.

Soil pollution in the value chain
Soil contamination arises primarily from:

Upstream: mining for metals such as cobalt, lithium, and gold.

End-of-life: informal or unregulated disposal of e-waste containing heavy metals and persistent organic pollutants.

Scale: High – mining and informal recycling are major global sources of soil degradation.

Scope: Widespread – affecting agricultural land, food systems, and local communities.

Irreversibility: High – remediation of polluted soil is costly and often only partially effective.

Likelihood: High – especially in lower tiers of the chain lacking strong environmental safeguards.

Positive impact through circular sourcing. CITg reduces demand for virgin materials, which helps lower pressure on ecosystems affected by mining operations.

Scale: High – mining is a key driver of soil degradation globally.

Scope: Upstream – mainly raw material extraction.

Likelihood: Moderate – while CITg's influence is indirect, reduced demand contributes to change.

Risks

Pollution-related business risks
CITg may face environmental and reputational risks linked to pollution incidents, especially in parts of the supply chain we do not directly control.

Impact: Regulatory fines, remediation costs, reputational damage, and customer loss.

Risk sources: Use of non-compliant recycling partners, insufficient oversight of downstream waste handlers, or incidents tied to informal processing.

Risk scenario: A pollution incident (e.g., an e-waste dump) associated with a supplier becomes public and damages CITg's credibility.

Likelihood: Low to medium – proper due diligence and partner controls significantly reduce this risk.

Opportunities

Pollution prevention as a growth lever
- Scaling circular business models reduces pollution impacts and supports compliance with tightening environmental regulations.
- Development of advanced recycling technologies supports operational efficiency and reduces environmental liabilities.
- Stronger environmental performance builds trust with stakeholders, including customers, governments, and investors.
- Public procurement and enterprise customers increasingly favour suppliers with proven pollution prevention strategies.
- Strategic partnerships around conservation and resource recovery open doors to innovation and co-investment.

6.2.2 Goals, results, policies & actions

Goals
We don't produce any products ourselves. The greatest source of pollution is caused by the transportation of goods from suppliers and from packaging waste.

Transportation & distribution
Increase the size of inbound shipments by 50%, thereby reducing the need for packaging materials.

Packaging reduction
- Going from 100% shipment of individual packed new devises to enter our DaaS service, to a 95% shipment of dealer pack in 2030.
- The packaging for our main products should be made with over 90% of recycled or responsibly sourced materials (e.g. FSC certified fibre packaging).
- Eliminate all plastic packaging by 2025.

Other waste reduction
- Reduce the percentage of waste destined for landfill of supplied IT material waste.
- Avoid hazardous or radioactive waste.

contents

Results

Transportation & distribution
- Transportation of goods from suppliers: 1,822 tCO$_2$e
- Distribution of goods to customers: 375 tCO$_2$e.
- Transportation counts for 4.8%* of all emissions.

Waste
In the Netherlands a total of 9,493 tonnes out of 678,125 tonnes (1.14%) of materials could not refurbished, reused or recycled and ended up in landfill or thermal disposal in 2024.

Recycling partners indicate they received no CITg shipments with hazardous waste such Li-on batteries or screens with mercury in 2024.

Laptop screens are shredded in a closed system and then run into a rotary oven where the material is heated. Any mercury is released during the heating process and extracted to a filter installation.

We have strong control over our Weeelabex certification. Waste streams are well separated, and disposal records are properly maintained. We successfully passed the audit in October 2024.

	2023	2024
Hazardous or radioactive waste (Tons)	0	0

Policies & actions
We are committed to reducing pollution through a comprehensive set of strategies embedded in our core ITAD processes. Responsible use and disposal of IT equipment is central to tackling today's environmental challenges.

Lifetime extension
We apply circular principles across the full lifecycle of IT devices, significantly improving resource efficiency and reducing emissions and pollution. See paragraph *6.4 Resource use & Circular economy* for more details.

Circular practices
By collaborating with suppliers who adopt circular design principles and maintaining a circular mindset, we maximise material use. We run take-back programmes to recover value at end of life.

In 2024, subsidiary CTC collected around 341,482 assets and aims to reach 397,440 in 2025. CITg refurbished 97,931 IT and networking devices in the same year.

We also partner with certified recyclers to responsibly manage both e-waste and end-of-life packaging (see e-waste section).

Waste Policy
We prioritise responsible waste management as a key part of our environmental strategy. Following the "reduce, reuse, recycle" principle, we actively seek to minimise waste throughout operations. We collaborate closely with suppliers to promote good waste practices across the supply chain. Our certified recycling partners ensure that e-waste is managed safely and ethically. We select recyclers based on clear criteria, including certification, transparency, and their ability to trace materials further down the supply chain.

Compliance with EU Regulations
Our products comply with the EU's Restriction of Hazardous Substances (RoHS) Directive, ensuring they are free from specified harmful substances. If we discover a product contains unregulated hazardous materials, we immediately stop purchasing it. All products meet CE, RoHS, and REACH standards.

We also comply with the Waste Electrical and Electronic Equipment (WEEE) Directive, supporting the responsible collection and recycling of electronic products to reduce environmental impact and conserve resources.

Sustainable Packaging
We prioritise eco-friendly packaging, using recycled or certified fibres wherever possible as alternatives to plastic, across our entire product portfolio.

Through these combined efforts, we are committed to reduce the environmental impact while making the most of available resources.

CITg is urging its suppliers to enhance their packaging by reducing the use of materials, increasing the incorporation of recycled content, and eliminating plastics. Allwood fibre in our packaging should be recycled (FSC mix) or come from responsibly managed (FSC®) forests, and enough forests have been protected or created to offset the use of virgin wood fibre.

Circular IT group

Impact Report 2024

contents

6.3 Clean water and marine resources (ESRS E3)

Clean water and sanitation

Responsible consumption and production

6.3.1 Impacts, risks & opportunities

Water consumption and pollution in the IT value chain
Significant water use and pollution occur upstream, particularly in the manufacturing phase of electronic equipment. This includes:

- Chip and semiconductor fabrication.
- Circuit board manufacturing.
- Cleaning of components and cooling of machinery.
- Cooling in server assembly and data centres.

These activities require extremely high volumes of ultrapure water and often result in wastewater contaminated with heavy metals, solvents, acids, and other industrial pollutants.

Scale: High – the electronics industry is one of the most water-intensive manufacturing sectors, particularly in chip production.

Scope: Global – water impacts are concentrated in production hubs such as Taiwan, China, and South Korea, affecting local ecosystems and water access for communities.

Irreversibility: Moderate – depletion or contamination of freshwater resources may take years to recover, and in some cases permanently affect agriculture, biodiversity, or drinking water supplies.

Likelihood: High – especially in countries with limited water regulation or monitoring systems. Water risk is material, though often underreported in the IT sector.

Positive impact through circular operations
By promoting reuse and reducing demand for new production, CITg indirectly reduces industrial water use and contamination:

Scale: High – fewer new devices mean less demand for water-intensive manufacturing and less discharge of wastewater.

Scope: Global – particularly relevant in electronics manufacturing and mining regions.

Likelihood: High – every reused or refurbished device reduces upstream water usage and pollution pressure.

Risks

Water-related business risks
CITg may face business continuity and sourcing challenges linked to upstream water stress:

Impact: Delays or increased costs in the sourcing of components and devices, particularly rare or complex parts.

Risk source: Water scarcity or water regulation-related production halts at supplier locations; materials become more expensive due to scarcity.

Risk scenario: Suppliers in water-stressed areas may limit production or shift costs to customers, disrupting availability or affordability of components for refurbishment.

Likelihood: Medium – influenced by climate trends, regional water scarcity, and Critical Raw Material (CRM) dynamics.

Opportunities

Water efficiency as a competitive advantage
- Growing demand for products with low water and pollution footprints opens opportunities for CITg to strengthen its value proposition.
- Eco-design and responsible procurement practices can contribute to reducing the embedded water footprint of refurbished IT products.
- Transparency about supply chain water risks and performance strengthens trust with customers, especially public or ESG-focused buyers.
- Strategic partnerships with OEMs or recyclers to develop water-saving or closed-loop practices can enhance resilience and innovation.

– Increasing regulation on industrial water use may favour circular players like CITg that help reduce total production volumes and related discharges.

6.3.2   Goals, results, policies & actions

Goals

	2023	2024
Water consumed (m³)	2,444	2,084

CITg's operations have a minimal impact on water usage and discharge. As a result, we have not set specific targets for this topic.

Results

Our estimated water consumption in 2024 was 2084 m³. This figure is based primarily on data from our main locations, as we do not own all the buildings and therefore may not have full visibility across all sites.

Policies & actions

To help prevent hazardous materials from entering water sources and to reduce water use across the value chain, we follow these principles:

– **Product and recycling standards:** We sell only CE, RoHS, and REACH-compliant electronic products and work exclusively with certified recycling partners (WEEELABEX and ISO). All remaining hazardous materials in the end-of-life stream are identified and tracked through inflow and outflow reporting. The WEEELABEX and ISO frameworks require strict handling, storage, and disposal protocols, which are regularly communicated to employees.
– **Circular IT solutions:** Our circular IT services promote material reuse, which indirectly reduces water consumption. Although we currently rely on proxy indicators, we plan to introduce concrete water-related targets in the future.
– **Sustainable sourcing:** We prioritise suppliers who actively manage materials and work to reduce water usage in their operations.
– **Monitoring and dialogue:** We track progress using industry benchmarks and regularly engage stakeholders and regulators to stay informed about developments and upcoming water-related regulations.
– **Regulatory compliance:** We ensure full compliance with all applicable environmental regulations.

Impact Report 2024   **Circular IT** group

6.4 Resource use & circular economy (ESRS E5)

Responsible consumption and production

Climate action

This paragraph responds to the disclosure requirements under ESRS E5, covering resource inflows, waste management, and circularity performance.

6.4.1 Impacts, risks & opportunities

Impacts

Resource inflows in the value chain
The production of new IT hardware requires extensive input of virgin raw materials, energy, and water, and takes place mostly upstream in the value chain:

- Raw material extraction (e.g. rare earth metals, plastics, aluminium).
- Energy- and water-intensive manufacturing (e.g. chip and motherboard production).

Scale: Very high: especially in upstream processes for electronic devices, which have a large material and environmental footprint.

Scope: Global: impacts range from depletion of natural resources to biodiversity loss, CO_2 emissions, and social risks in mining regions.

Irreversibility: High: extraction of finite resources is non-renewable.

Likelihood: High: unless reduced through circular procurement, reuse, and improved design.

Positive impact through refurbishment
CITg reduces demand for virgin resources by promoting:

- Reuse and refurbishment of hardware.
- Use of existing components.
- Extended product life through repair and take-back systems.

contents

This leads to reduced mining, lower energy and water usage, and decreased CO_2 emissions.

Scale: High: reusing devices avoids a large share of embedded resource impact.

Scope: Global: affects all upstream production and extraction activities.

Likelihood: High: with growing adoption of refurbished IT.

Resource outflows at end-of-life
After the use phase, IT equipment can either become e-waste or re-enter the system through reuse or recycling. Negative impacts occur when:

- Devices are not designed for reuse.
- Products are discarded without proper separation or recovery.
- End-of-life treatment occurs in informal sectors.

Global e-waste in million tonnes kilograms per year

2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
53,6	55,5	57,4	59,4	61,3	63,3	65,3	67,2	69,2	71,1	72,9	74,7

Source © Statista 2024

Scale: High: electronic waste is the world's fastest-growing waste stream.

Scope: Global: affects waste infrastructure, ecosystems, and resource availability.

Irreversibility: High: valuable materials are often lost when devices are landfilled, incinerated, or improperly dismantled.

Likelihood: High: without proper standards, monitoring, and take-back systems.

Positive impact through circular strategies

CITg reduces outflows and waste by:
- Implementing device-as-a-service and take-back models.
- Encouraging modular design and repairability.
- Collaborating with certified recyclers.

Scale: High: devices are kept in the loop.

Scope: Global: applicable to all customers, partners, and markets.

Likelihood: Medium to high: depends on customer adoption and enforcement with partners.

Risks

Resource scarcity & system inefficiencies
Impact: Higher procurement costs, reputational damage, or limited availability of key components.

Risk source: Scarcity of critical raw materials (CRMs), inefficient take-back processes, or non-compliant third parties.

Risk scenario: Loss of access to key components or increased costs due to market volatility or weak supplier sustainability.

Likelihood: Medium: increases with rising demand and limited recycling infrastructure.

Opportunities
- Scaling the circular economy as a core strategy.
- Growing global interest in low-impact, circular IT solutions.
- EU and national policy support for eco-design, extended producer responsibility (EPR) and right-to-repair.
- Opportunity to differentiate on sustainability performance.
- New service-based business models (e.g. leasing, refurbishment-as-a-service)
- Strengthened stakeholder relationships and alignment with ESG goals.
- Potential access to green finance, sustainable procurement tenders, and innovation subsidies.
- Improved resource resilience through reduced dependence on volatile markets.

6.4.2   Goals, results, policies & actions

Goals
Material recycled.

- 2025: 85%
- 2026: 85%
- 2027: 90%

	2025	2026	2027
Public tenders awarded in which ESG played a significant role.	4	6	7
Media reach within Target Audience (TA)	80% TA	85% TA	90% TA

Percentages of reused or recycled input materials subsidiary Maxicom used in the various components in 2024:

	New (%)	Refurbished (%)
Keyboards	0.24%	99.76%
Batteries	89.29%	10.71%
Laptop Memory	1.20%	98.80%
SSD	51.46%	48.54%
Grand total	2.97%	97.03%

Resource outflows:

	2023		2024	
	kg	%	kg	%
Total weight	749,156	100%	1,559,052	100%
Prepared for reuse	110	0.01%	0	0%
Recycling	546,607	72.96%	1,392,077*	89.28%*
Energy recovery	173,571	23.17%	149,357*	9.58%*
Thermal disposal	25,478	3.40%	15,590*	1.00%*
Landfill disposal	3,243	0.43%	2,182*	0.14%

*We used the average percentage rate of all our recyclers in various countries.

At the subsidiary's Maxicom, iUsed and CTG* we refurbished:

# Devices	2023	2024
Computing	46,047	34,010
Networking	26,962	39,555

*Only devices counted for which are prepared for end-users (NGO's) Resultsv
Material recycled: 1,392,077 kg.

Ecovadis Platinum

In 2024, our NEG organisation achieved a Platinum EcoVadis rating for the second year in a row, placing us in the top 1% of companies in the sector. This recognition enhances credibility and supports access to new customers and tenders.

Waste

In 2024 CITg companies generated a total of 1,559,052 kg of e-waste.

Preparing for re-use: In 2024, 0% (0 kg) of e-waste generated by CITg was prepared for re-use by our recycling partners. Preparing for re-use refers to recovery operations in which products or components that have become waste are checked, cleaned, or repaired so that they can be used again without any further pre-processing

Recycling

From all e-waste delivered to recycling partners, 89.28% (1,392,077 kg) were recycled. Recycling is defined as "any recovery operation by which waste materials are reprocessed into products, materials or substances, whether for the original or other purposes".

Other recovery operations: From the delivered e-waste, recycling partners managed to utilise 9.58% (149,357 kg) for energy recovery.

Thermal disposal: 1.00% (15,590 kg) of e-waste was disposed of through thermal methods.

Landfill: Recycling partners indicate that 2,182 kg accounting for 0.14% of CITg e-waste, was not recycled or re-used and ended up in landfills.

Resource use optimisation

70% of net turnover derives from products and services that leverage the transition to a circular economy through circular business models such as pay-per-use, sharing or repairing services.

Policies & actions

Circularity support
Our vision is to make IT fully circular. We apply the 9R framework (Kirchherr, Hekkert, and Denise, 2017), a widely used circularity model that prioritises reuse, repair, and recycling over disposal. We are convinced that close collaboration with suppliers, customers, and consumers will enable us to become a fully circular company by 2040.

Circular opportunities

	STRATEGIES	OPPORTUNITIES	SUPPORT
Smarter product use	R0. Refuse	Change IT hardware policy to extent life cycle	Product life cycle extension DaaS
	R1. Rethink	Another vendor, more eco-friendly product	Leased, refurbished or used product vs. new
	R2. Reduce	Keep asset longer or start with DaaS	We extent product lifetime & offer DaaS
Extend lifespan of product	R3 Reuse	Device used by other staff member / location	Refurbish and provide device to another user
	R4 Repair	Asset can be repaired	We repair, upgrade and refurbish locally
	R5 Refurbish	Can asset be take-back and be re-sold	We offer ITAD, refurbish & re-sell device
	R6 Remanufacture	Can parts be harvested and used again	We reuse parts in devices for second life
	R7 Repurpose	Sell, donate or give-away devices	We wipe data & find 2nd life (social purpose)
Use waste as a resource	R8 Recycle	Can raw materials be recovered with high yield	E-waste partner to recycle critical material
	R9 Recover	Safely incinerate rest-stream to energy	Partners to safely incinerate & recover energy

10R-model van J. Cramer

67

Impact Report 2024 Circular IT group

The 10R framework helps us and our customers identify ways to reduce environmental impact and transition from a linear to a circular economy. The earlier in the product life cycle we apply these circular strategies, the more effective and less resource-intensive the outcome.

R0 Refuse by efficient resource utilisation:
– Create or modify the IT hardware policy so that it supports circular economy principles.
– Prolong the IT hardware lifecycle policy to 4, 5, or even 10 years.
– Our DaaS solutions help customers use less devices more efficiently, preventing over-purchasing or leaving assets unused.
– Smarter product use.

R1 Rethink with flexibility and scalability:
– Re-evaluate the vendor landscape and consider more sustainable products.
– Consider green IT leasing moving from significant upfront Capital Expenditures (CapEx) to ongoing Operating Expenditures (OpEx).
– Choose solutions that can be customised and expanded as needed, for example, we offer a mix of new- and refurbished devices that are all clean, pre-configured and ready to use.

R2 Reduce e-waste and use of critical raw material:
– DaaS realises product lifetime extension and more efficient utilisation of product generating less e-waste and mining.
– Give used products a second /extended lifetime instead of discarding them.

R3 Reuse with Product Lifecycle Management:
– We ensure that devices are properly managed and can be reused in- and outside an organisation. This conserves resources and ensures people have the right devices.
– Consider: can the existing asset be reused by another staff member or be used in another location? Can it be accessorised with a keyboard, mouse, or screen?

R4 Repair, upgrade & update:
– We extend the lifespan of IT devices by keeping them up to date and repairing them when needed, reducing the need for replacements and lowering environmental impact.
– Where possible, we replace components like batteries or memory, and we offer remote monitoring and maintenance.

R5 Refurbish

– At the end of a DaaS subscription, devices are collected, graded, and high-quality units are refurbished for resale or donation, giving them a second life.

R6 Remanufacture

– We reuse parts from discarded products to create new devices with the same function and purpose.

R7 Repurpose

– When a device reaches the end of its life, we securely erase or destroy data before reusing parts to create new products with different functions.

R8 Recycle

– We work with certified e-waste partners to recover valuable materials and critical raw materials from discarded devices. These partners, certified to WEEELABEX standards, ensure proper collection, handling, and recycling of electrical equipment.

Impact Report 2024   ⊚ **Circular IT** group

Let's make IT circular

6. Environmental impact

Circular model

LINEAR FLOW

Linear inflow → No Lifetime extension → Linear outflow

CIRCULAR FLOW

Lifetime extension

NARROW THE LOOP
Use recycled sources

SLOW THE LOOP
Use longer

Circular inflow

Circular outflow

Lifetime extension

CLOSE THE LOOP
Use waste as a resource

PRODUCT DESIGN

% of virgin material Refused (R0)

% use of mono material (recyclable); Rethink (R1)

% of size packaging Reduced (R2)

FUNCTIONAL USE

Nr of product Reused (R3)

Nr of product Repaired (R4)

Nr of product Refurbished (R5)

Nr of product Remanufactured (R6)

Nr of product Repurposed (R7)

END-OF-LIFE

% of material Recycled (R8)

% of material Recovered (R9)

R9 Recover
– For items that cannot be recycled, we ensure they are disposed of in an environmentally responsible way, including energy recovery through safe incineration.

Supporting Customers
To help companies measure and improve circularity, we offer tools and KPIs that assess their current performance and guide strategic decision-making. This circular model provides a clear framework to evaluate and track progress toward circularity goals.

In 2024, we launched an advanced version of the Circular IT calculator for laptops to support 50% of our customers with relevant circularity data. This helps them make informed, sustainable IT purchasing decisions and support their CSRD reporting.

Raising Awareness
Many people are unaware that laptops can be recycled or do not realize the environmental benefits. CITg is committed to raising awareness by sharing its expertise through customer conversations, social media, and events.

– Website developments in 2024; introducing new circular services with lower threshold for entry, launching the new partner portal to give IT resellers and partners easy access to our computing and networking, server and storage portfolio.
– Events, showcasing our approach to diverse end-users across sectors at congresses and conferences.
– Blogs, sharing best practices to lower adoption barriers through trust and expertise.
– Social media, providing relevant updates for target audiences and engaging with audiences across the globe on LinkedIn.
– Advertising, promoting circular IT propositions in industry related media and through digital and display advertising.
– Education, offering workshops, masterclasses, and tutorials to build knowledge on circular IT solutions, coach students and enable traineeships.
– Participate in research projects in partnership with various universities and public institutes.

71

Impact Report 2024 **Circular IT** group

contents

7. Social impact

Let's make IT circular

7.1 Our people (ESRS S1)

Decent work and economic growth

Reduced inequalities

This section corresponds with ESRS S1 – Own Workforce.

7.1.1 Impacts, risks & opportunities)

Impacts

Employment and the inclusion of people with disabilities
CITg creates a positive impact by offering meaningful work opportunities for people with disabilities. This includes inclusive hiring practices, adapted roles (e.g. in refurbishment or logistics), and accessible workplaces.

Scale: Moderate: directly impacts individuals' ability to participate in the workforce and achieve independence.

Scope: Internal: primarily affects employees with disabilities, with broader effects on team dynamics and inclusive culture.

Irreversibility: High: positive inclusion fosters long-term resilience; exclusion causes lasting harm.

Positive impact: Inclusive roles, policies, and adaptations help tap into underused talent, improve diversity, and reinforce our inclusive brand.

Workplace safety and measures against violence and harassment
Maintaining a safe, respectful workplace is essential. Harm can result from inaction or inappropriate behaviour, including verbal, physical, or psychological abuse.

Scale: Significant: directly affects employee wellbeing, satisfaction, and retention.

Scope: Company-wide: especially important in operational teams working closely together.

Irreversibility: High: psychological harm and loss of trust are hard to reverse.

Positive impact: Clear policies, training, and safe reporting mechanisms support a culture of respect and safety.

Diversity
Diverse teams strengthen innovation, culture, and performance. Lack of diversity limits access to talent and undermines resilience.

Scale: Moderate: the direct number of impacted individuals may be smaller, but the organisational effect is substantial.

Scope: Internal: affects recruitment, promotions, collaboration, and decision-making.

Irreversibility: Partial: missed opportunities can't be recovered easily, but culture can evolve with leadership commitment.

Positive impact: Proactive diversity efforts support inclusion, talent development and innovation across departments.

Social dialogue
Social dialogue strengthens engagement, trust, and shared decision-making. In smaller teams, the impact of structured employee feedback is even more significant.

Scale: Moderate: affects all employees, but especially those in logistics, technical or refurbishment roles.

Scope: Internal: influences retention, job satisfaction and operational efficiency.

Irreversibility: Reversible: can be improved through clear channels for feedback and participation.

Positive impact: Social dialogue reduces conflict, enhances motivation, and fosters smarter decisions.

Risks
Exclusion of people with disabilities

Impact: Missed talent, legal risk, and reputational damage.

Risk sources: Inaccessible tools or spaces, lack of awareness, or unconscious bias.

Risk scenario: Continued barriers reduce access and increase turnover; non-compliance damages reputation as an inclusive employer.

Workplace violence and harassment
Impact: Physical or psychological harm, reduced morale, and potential legal liability.

Risk sources: Lack of clear policies or trusted reporting channels; failure of leadership to act.

Risk scenario: Harassment goes unreported, leading to a toxic work environment, public exposure, and brand damage.

Lack of diversity
Impact: Homogeneity limits innovation, weakens employer brands, and reduces market adaptability.

Risk sources: Bias in hiring/promotion, absence of Diversity, Equity and Inclusion (DEI) targets or awareness.

Risk scenario: Stakeholders or investors raise concerns about representation and inclusion.

Let's make IT circular

Opportunities

Social dialogue
- Improves decision-making and reduces inefficiencies.
- Enhances employee engagement, retention, and performance.
- Lowers recruitment, onboarding, and conflict-related costs.
- Builds trust and strengthens company resilience.

Inclusive employment
- Enables faster hiring for specific roles.
- Stabilises teams and reduces onboarding costs.
- Attracts sustainability-minded customers and partners.
- May offer financial benefits (e.g. subsidies, ESG-linked finance).
- Supports a fair, purpose-driven employer reputation.

Safe & respected workplaces
- Avoids reputational and legal costs.
- Increases productivity and morale.
- Builds employer attractiveness and customer trust.
- Supports operational continuity and reduces team disruption.

Diversity
- Leads to faster innovation and better alignment with diverse customers.
- Improves investor perception and access to ESG-linked tenders.
- Reduces hiring costs and increases retention.
- Strengthens long-term organisational adaptability.

Impact Report 2024 **Circular IT** group

7.1.3 Employment and working conditions

Goals

CITg is committed to providing fair, safe, and inclusive working conditions for all employees. The following goals outline our key commitments and targets for the coming years:

- Ensure compliance with local labour laws; 100% of employees adhere to the hours determined by the local labour laws.
- Ensure a maximum employee turnover of 10%.
- Guarantee payment of fair wages, meeting or exceeding minimum wage standards for 100% of employees.
- Higher Social Return on investment (SROI).
- PSO level (Prestatieladder Socialer Ondernemen).
    - 2024: aspirant level NEG.
    - 2025: aspirant level NEG.
    - 2026: level 1 NEG.
    - 2027: level 1 NEG.

Results

In 2024, we successfully attracted and retained staff, resulting in a turnover rate of 5%, well below the 10% target.

	2023	2024
Employee turnover (%)	18	5

PSO level 2024: aspirant level NEG.

For the materiality analysis we conducted in 2024, we asked all staff to fill out a survey, rating what sustainability or ESG issues they considered most important for CITg to address. 73 employees filled out the survey. We used the results for our DMA (see chapter 5).

Policies & actions

Employee Manual

CITg has an employee manual to support new and existing colleagues with essential information and guidelines. It outlines how we operate and includes (references to) policies on health & safety, working conditions, career development, and ethics & compliance.

contents

Group-wide Policies
We have developed several policies, including:

– Whistleblower policy.
– Undesired Behaviour policy.
– Policy on Theft, fraud, and corruption.
– Information security policy.
– Health & safety policy.

Our policies cover working hours, side jobs, employee satisfaction, pay and bonuses, holidays, expense reimbursement, and sick leave.

Employee engagement
Employees actively contributed to process improvements, fostering a culture of continuous improvement and quality awareness.

Pension plan
Based on feedback from employees and candidates, we will introduce a pension plan by the end of Q2 2025.

7.1.4 Training and development

Goals
To enhance employee performance, boost engagement and support internal mobility CITg sets the following goals for training & skills development in 2025-2027.

– 100% of employees reviewed in performance review cycle every year or every other year.
– 100% of employees with system access join the annual Information Security training.

Results
In 2024, all managers completed training on the performance review cycle. All required forms and job profiles are in place.

	2023	2024
% employees reviewed in performance review cycle	60%	70%
% employees with system access that joined Information Security training	-	54%

Policies & actions

Performance reviews
All employees are entitled to annual performance reviews and lifelong learning opportunities. In 2024 we implemented a new group-wide system for performance reviews in 2024, and we trained all managers. This enabled us to align the reviews across the group.
Career advancement

CITg offers a variety of opportunities for career advancement. Individuals can specialise in different areas, such as repair, refurbishment, or recycling. Employees without specific education are trained in-house to refurbish hardware.

7.1.5   Diversity, equity, and inclusion

Goals
CITg encourages diversity in hiring, leadership, and team formation since it helps build resilience, innovation, and fair opportunities.

– Ensure equal opportunities in pay and treatment for all employees.
– Gender balanced workforce at all levels relative to the IT industry.
– Hire at least 5% of employees with a distance to the labour market.

contents

Results

	2023	2024
Total number of board members ()	4	2
Number of women on the board (#)	0	0
Gender diversity of the board (%)	0	0
Total number of employees in executive management (FTE)	9	9
Total number of women in executive management	0	0
% of women in the workforce (FTE)	25%	28%
Male earnings (€ per hour)	21	21.65
Female earnings (€ per hour)	14	14.45
Unadjusted gender pay gap (%)	32.3	31.4
% of employees with a distance to the labour market	3%	5%

Policies & actions

We are committed to creating a workplace where everyone feels comfortable and safe. We prohibit discrimination and all forms of employee harassment based on, but not limited to, race, colour, religion, sex, national origin, age, disability, or status in any group protected by law. Diversity, equity and inclusion, as well as discrimination are all part of our undesired behaviour policy, which we introduced in 2024. This policy also includes a complaint procedure and actions.

Any incidents that relate to this will be investigated as quickly and thoroughly as possible. The management team will take appropriate corrective action. Disciplinary action will be taken against any employee who engages in unwanted behaviour or gives rise to it. In the worst case, this could lead to dismissal.

Besides that, CITg has a confidential officer and a Whistleblower policy with a remediation procedure in place to enable all employees to report (suspected) wrongdoing or irregularities in a good and safe manner.

contents

To ensure fair compensation, all employees are paid based on a consistent salary structure aligned with their role, experience, and education. Salaries are benchmarked against the average for similar positions within the company.

Through inclusive hiring practices, workplace adaptations, and offering roles suited for various abilities, CITg enables meaningful employment for people with a distance to the labour market.

Collective bargaining
CITg respects the rights of freedom of association and collective bargaining:

- We respect the right of workers to form unions in a free and democratic way.
- We do not discriminate against workers because of trade union membership
- We respect workers' right to collective bargaining.
- We shall not prevent workers' representatives from having access to workers in the workplace or from interacting with them.

7.1.6 Health and safety

Goals
To create a workplace culture where everyone feels comfortable and safe, we defined the following goals:

- Promote work-life balance by allowing employees (where possible) to work from home one or more days per week (average 20%).
- Aim for zero incidents or accidents.
- Conduct biannual safety and health training sessions.
- Sick leave rate/ absenteeism under 4%.
- Zero data breaches involve employee privacy.

Results

	2023	2024
Work-related injuries (#)	0	2
Days lost due to injury (#)	137	0
Work-related fatalities (#)	0	0
Accident rate (#)	0	3.1
Absenteeism (CITg)	2.8%	3.3%
# Data breaches involving employee privacy	0	0

'We had 2 cases of work-related injuries in 2024 but they didn't result in any days lost due to injury/ absenteeism

Policies & actions

Employee privacy
CITg is committed to protecting employee privacy. All personal data is handled fairly, transparently, and in compliance with applicable local data protection laws. Confidential information is never shared with external parties without proper authorisation or legal obligation.

To protect company, employee, and customer data, we have a robust management system, strict information security policies, and technical safeguards. Access is restricted to authorised personnel only. Security measures include data encryption, intrusion detection, surveillance cameras at all locations, and access monitoring. All staff and visitors are subject to these protocols.

We regularly review and update policies to meet current industry standards.

Absenteeism procedure
In 2024 we developed an absenteeism procedure for the group.

Safety & health training
In 2024, 55% of employees conducted safety and health training sessions covering various topics including safety & environment, CO_2 emissions reduction, managing hazardous materials, and noise safety training.

contents

7.2 Workers in the value chain: fair and safe work (ESRS S2)

Decent work and economic growth

Responsible consumption and production

This section corresponds with ESRS S1 – Own Workforce.

7.2.1 Impacts, risks & opportunities

Impacts

Reduced demand for manufacturing jobs in the linear IT sector
The core principle of the circular IT industry, prolonging product lifespans, reduces the need for newly manufactured IT hardware. This may lead to job loss or underemployment in traditional electronics manufacturing sectors.

Scale: Global: especially in regions dependent on IT hardware production.

Scope: Indirect: affects jobs in production, assembly, and logistics for new IT components, often outside Europe.

Irreversibility: Moderate: job losses may be permanent but can be offset by the growth of circular roles.

Positive impact: CITg helps re-balance this shift by creating new jobs in repair, refurbishment, testing, logistics and resale. We actively support workforce transitions by offering training and roles to individuals distanced from the labour market.

contents

Hidden social costs in the production of new IT equipment
Low-cost electronics often carry a hidden social burden, including exploitative labour practices in regions with limited regulatory oversight.

Scale: High: the issue affects entire tiers of supply chains, from raw material extraction to final assembly.

Scope: Global: particularly impacts vulnerable workers in low-income countries (e.g. miners, factory workers).

Irreversibility: High: if not addressed; exploitative practices become entrenched and systemic.

Positive impact: By extending product lifespans and reducing the need for new electronics, CITg actively lowers demand for high-risk production. We prioritise ethically sourced components and make responsible choices accessible to consumers through affordable, warrantied refurbished products.

Risks

Human rights violations in the upstream supply chain
Impact: Exposure to unethical labour practices, legal non-compliance, reputational harm.

Root causes: Weak enforcement of labour standards, lack of transparency, and the fragmented structure of electronics supply chains.

Common risks:
- Unfair wages or excessive working hours.
- Unsafe or degrading working conditions.
- Child labour, forced labour, or bonded labour.
- Risk scenario: Without effective due diligence, CITg could become indirectly linked to abuses, undermining stakeholder trust and eligibility for ESG procurement.

Opportunities
– Reducing social harm through circular practices.
– Reduced dependency on new electronics helps mitigate labour exploitation in high-risk regions.
– Shorter supply chains for refurbished devices make traceability more feasible and impactful.
– Ethical sourcing policies and partnerships strengthen our positioning as responsible actors in IT.
– Consumer education on social costs and transparency builds trust and supports conscious purchasing decisions.
– Job creation through refurbishment and reverse logistics.
– Growth in refurbishment and reuse drives local job creation in repair, quality control, logistics, and customer service.
– These jobs often require technical or semi-skilled labour, opening pathways for upskilling, inclusion, and stable employment.
– Opportunities to develop training pipelines and inclusive hiring for disadvantaged workers or NEETs (Not in Education, Employment or Training).
– Responsible supplier engagement.
– Implementing due diligence mechanisms, supplier codes of conduct, and audits improves supply chain transparency.
– Collaborations with third parties (e.g. certification bodies, Non-Governmental Organisations (NGOs) can enhance traceability in complex value chains.
– Supports compliance with emerging regulations (e.g. EU Corporate Sustainability Due Diligence Directive).

7.2.2 Goals, results, policies, and actions

Goals
To ensure decent working conditions in the upstream value chain, we defined the following goals:

	2025	2026	2027
% of certified suppliers (RBA or other recognised rating)	75%	80%	90%
% of suppliers that signed our code of conduct	15%	20%	25%
% of % management & procurement trained on CoC and sustainable procurement	100%	100%	100%

Results

Through partnerships with Close the Gap and Digital For Youth, we enabled over 28,000 devices to reach schools and social initiatives, improving digital access from Belgium to Kenya. These donations reduce digital inequality and extend the useful life of IT hardware, supporting SDG 4 and SDG 12.

	2023	2024
% of certified suppliers (RBA or other recognised rating)	NM*%	NM*%
% of suppliers that signed our code of conduct	NM*%	NM*%
% of management & procurement trained on CoC and sustainable procurement	-	100%

(NM Not measured; in measurement as o to begin inf 2025., Rresult overfor 2023 and 2024 not standardiszed/. As of 2025 in proces of measurement is in progress.)

Policies & actions

Although we do not develop or manufacture products ourselves, we take responsibility for potential impacts on workers in our value chain.

CITg believes sustainable procurement can positively influence labour and social conditions upstream. In regions where human rights and labour laws are not well enforced, it is the responsibility of manufacturers and brand owners to uphold these standards. That is why we have implemented the following policy:

Responsible Procurement – Progress in 2024

In 2024, we introduced a new group-wide Supplier Code of Conduct. This Code outlines clear standards for ethical, responsible, and sustainable business practices that all smaller suppliers must meet.

All IT hardware suppliers without a formal RBA commitment or third-party certifications and ESG ratings such as EcoVadis, B Corp, MSCI, Sustainalytics, Refinitiv, and KnowTheChain are now required to sign this Code as part of our purchasing process. We use these insights to advise customers on more sustainable options.

To support implementation, all management and procurement staff completed training on sustainable procurement, child labour, modern slavery, and human trafficking. These training courses are now part of our regular programme and will be repeated twice a year.

Impact Report 2024 ⓒ **Circular IT** group

7.3 Affected communities (ESRS S3)

Quality education

Reduced inequalities

Sustainable cities and communities

Responsible consumption and production

Our donation and inclusion programmes help reduce the digital divide, aligning with ESRS S3 – Affected Communities.

7.3.1 Impacts, risks & opportunities

Impacts

Improved digital access and inclusion
The use of refurbished IT products significantly increases access to digital tools for individuals, schools, healthcare providers, and non-profit organisations, especially those with limited resources.

How the impact occurs: By extending the life of IT devices, we make technology affordable and accessible for those unable to afford new equipment.

Scale: Regional to international – benefits are felt locally (e.g., schools, households) but applicable globally.

Scope: Affects students, low-income families, local service providers, and NGOs.

Irreversibility: High: once digital literacy and access are in place; opportunities compound over time.

contents

Positive impact: Affordable, warrantied refurbished IT enables social participation, remote learning, telehealth, and digital inclusion across vulnerable groups.

Local job creation and economic development
Circular IT business models generate local employment opportunities in repair, logistics, testing, configuration, and customer service.

How the impact occurs: Through decentralised operations across Europe and partnerships with local refurbishers and logistics providers.

Scale/Scope: Regional, especially impactful in areas with higher unemployment or limited access to skilled jobs.

Positive impact: By investing in local value chains, CITg contributes to resilient communities and inclusive economic growth.

Technology reliability and trust in reused goods
Although refurbished IT is cost-effective, perceived, or actual quality concerns can negatively affect trust and user experience.

How the impact occurs: Lower-quality refurbishment or insufficient vendor transparency may result in early product failure or dissatisfaction.

Scale: Moderate: depends on product type, user expectations, and available after-sales support.

Reversibility: Medium: poor experiences may lead to d about refurbished IT.

CITg's response: We prioritise genuine parts, close collaboration with OEMs, and consistent product testing. Our products come with 2 to 6-year warranties (6 year based only if combined with Circular Workplace), tailored to customer needs and product type, ensuring reliability and trust.

Potential overreliance on technology
Digital access also has unintended societal impacts, such as screen overuse or reduced in-person interaction.

How the impact occurs: Prolonged exposure to digital devices, especially among young people or in isolated regions.

Scale/Scope: Localised: affects specific demographics (e.g. youth).

Reversibility: Medium: can be mitigated through education and digital well-being awareness.

CITg's position: While we don't directly influence usage patterns, we support responsible tech use through partnerships and awareness campaigns (e.g. with schools or non-profits).

Risks

Digital divide and inequality
Impact: Exclusion of individuals or communities from digital education, services, or work due to cost or lack of access to devices.

Risk sources: High hardware prices, lack of distribution infrastructure, limited digital literacy.

Risk scenario: If refurbished IT is not effectively distributed or supported, vulnerable groups may continue to fall behind, deepening social divides.

CITg's role: We actively work with NGOs and governments to bridge the digital divide, supplying affordable, high-quality IT to schools, charities, and underserved communities.

Opportunities

Promoting digital equity
- Enable access to education, employment, and public services by making IT devices available at lower costs.
- Empower marginalised groups, including women, girls, people with disabilities, and elderly individuals.
- Enhance inclusion by supporting community centres, libraries, and educators with affordable and reliable devices.

Strengthening community resilience
- Job creation in repair and reverse logistics supports local economies.
- Support for NGOs and schools extends their reach and impact, especially in digital learning and healthcare.
- Circular awareness increases public engagement with sustainability and responsible consumption.

Building consumer trust in circular products
- Clear communication, warranties, and transparency about product history can shift perception and normalise circular consumption.
- Long-term customer satisfaction helps create loyalty, referrals, and community ambassadors for circular IT.

7.3.2   Goals, results, policies, & actions

Goals

To increase the access to affordable IT asset by giving IT asset a second life and to decrease digital inequality by providing refurbished IT products, we set the following goals:

	2025	2026	2027
Number of laptops going to schools / NGOs	41,000	43,000	45,000
Value of the hardware donated to good causes (IT Donations)	€ 250,000	€ 280,000	€ 310,000

Results

	2023	2024
Number of laptops going to schools/ NGOs	40,000	38,000
Value of the hardware donated to good causes (IT Donations)	€ 325,000	€120,423,00

In 2024, Close the Gap shipped a total of 29,285 devices sourced from CITg. Of these, 23,269 devices were sent to Kenya for the East African Community (EAC) region, 14,236 from Belgium and 9,033 from the Netherlands. Additionally, 2,928 devices supported projects in the Benelux, split between 1,494 in Belgium and 1,434 in the Netherlands.

Digital for Youth distributed another 2,578 devices within Belgium during the same period.

While the total number of devices appears slightly lower than in 2023, this is likely due to timing differences in incoming volumes, such as shipments occurring just before or after year-end, rather than a structural decline.

Policies & actions

Bridging the digital gap
CITg is committed to promoting digital inclusion and creating social impact through responsible IT lifecycle services. By refurbishing used IT equipment and partnering with like-minded organisations, we help make technology accessible to underserved communities, support digital literacy, and enable sustainable development.

Affordable refurbished devices
Through our ITAD process, we refurbish laptops, desktops, tablets, and smartphones. This makes quality IT hardware available at affordable prices for individuals and organisations with limited budgets.

Donations
We collaborate with partners such as Close the Gap, Digital for Youth, and Laptop desk to donate or subsidise refurbished devices. We also encourage our customers to contribute by donating their written-off equipment, which we securely process and repurpose for educational and social use.

ITdonations Foundation
Through our ITdonations Foundation, customers can donate the residual value of their decommissioned IT assets to a charity of their choice. We manage the collection, data wiping (certified to NIST 800 and Blancco standards), asset registration, valuation, and reporting. In 2024, this initiative resulted in €120,423 in donations to various charitable causes.

CTG Circular & Close the Gap
Our B-Corp certified subsidiary CTG Circular works closely with Close the Gap to bridge the digital divide in both Europe (mainly Belgium and the Netherlands) and developing countries (mainly in Africa). Together, we process over 100,000 devices annually, of which around 32,849 were prepared in 2024 for educational and social projects worldwide. Devices are selected and refurbished based on rigorous quality and data security standards.

Digital literacy support
We support digital literacy by collaborating with local educational institutions and non-profits to deliver training and skill-building programmes. Our subsidiary CTG Circular provides the necessary services and technical support to make these programmes possible.

Impact Report 2024 **Circular IT** group

Job training and inclusion
To address the digital skills gap and support inclusive employment, we offer internships and job training programmes, especially for individuals with a distance to the labour market, within our IT refurbishment operations.

Data security & privacy
All data is securely erased from refurbished devices using certified standards (NIST 800, Blancco), ensuring compliance with European Union (EU) data protection laws, and protecting the privacy of previous users.

Measuring Social Impact
We continuously collect and analyse data on the impact of our digital inclusion efforts, enabling transparent reporting and data-driven decision-making.

7.4 Consumer trust and safe IT (ESRS S4)

Quality education

Reduced Inequalities

Responsible consumption and production

Climate Action

This chapter addresses ESRS S4 requirements related to consumer safety, privacy, and sustainable consumption.

Most of our subsidiaries are in the business-to-business industry. iUsed & RefurbishedDirect offer refurbished products directly to consumers.

7.4.1 Impacts, risks and opportunities

Impacts

Increased access to affordable IT
CITg subsidiaries like iUsed and RefurbishedDirect provide high-quality refurbished IT directly to consumers, contributing to digital inclusion.

How the impact occurs: By refurbishing and redistributing IT devices at lower cost, donating equipment, and supporting digital literacy programmes.

Scale: Large and long-term: more devices and outreach mean broader social benefits.

Scope: Benefits underserved communities, students, low-income households, non-profits, and public institutions.

contents

Irreversibility: High: once people gain access and digital skills, the impact on education and employment can be lasting.

Positive impact: CITg bridges the digital divide by providing affordable, reliable IT that supports education, work, and social participation.

Product quality, warranties, and consumer protection
Maintaining quality standards is essential to building consumer trust in circular IT products.

How the impact occurs: Inconsistent refurbishment, short warranty periods, or lack of customer service can erode confidence.

Scale: Localised: directly affects individual customers and households.

Reversibility: High: with strong after-sales service, clear communication, and dependable warranties.

CITg's response: We ensure 2–6-year warranties, quality control, and responsive support. Devices are tested, certified, and reliable, helping consumers make informed, secure choices.

Reduced environmental impact through consumer choices
When consumers choose refurbished IT, they support circular economy goals and help reduce ecological burdens.

How the impact occurs: By extending product lifespans, avoiding raw material extraction, and minimising e-waste.

Scale/Scope: Global environmental benefit: every reused device avoids the emissions and resource use of producing a new one.

Positive impact: CITg empowers consumers to lower their carbon footprint, use resources efficiently, and reduce waste.

Irreversibility: Medium: benefits depend on sustained behaviour and circular infrastructure, but choices made today have a compounding impact.

Responsible and transparent marketing
Trust is strengthened through truthful communication about refurbished products, environmental benefits, and social impact.

How the impact occurs: Through product labelling, sustainability claims, advertising, and customer engagement.

Scale: High: affects perception of the refurbished IT sector and consumer behaviour at large.

Scope: Customers, regulators, partners, and public opinion.

Irreversibility: Positive reputations are long-lasting if earned honestly; damage from greenwashing or deceptive claims is harder to repair.

CITg's approach: We align messaging with actions, prioritising transparency and impact-driven communication to build trust and inspire responsible consumption.

Risks

Privacy breaches and data security
A key consumer risk is residual data or software vulnerabilities in reused devices.

How the risk occurs: If devices are not properly wiped or contain pre-installed, privacy-invading software.

Scale: Potentially severe: can affect many users and damage the company's reputation.

Scope: Directly impacts prior device owners (data remnants) and new users (data collection risks).

Irreversibility: High: once privacy is compromised, the consequences (e.g. identity theft or data leaks) are difficult to undo.

CITg's mitigation: We use certified data erasure (e.g. Blancco), comply with data protection laws, and implement robust quality checks to ensure consumer safety and trust.

Opportunities

Lower-cost access to technology
Benefit: Makes IT affordable for individuals, families, and small organisations with limited budgets.

Value: Supports inclusive education, digital participation, and personal development.

Sustainability and ethical consumption
Benefit: Buying refurbished supports resource efficiency, waste reduction, and lower carbon footprints.

Value: Helps consumers align purchases with values, contributing to a more sustainable world.

Brand loyalty and circular advocacy
Benefit: Providing trustworthy products and experiences helps foster long-term customer relationships.

Value: Satisfied consumers often become ambassadors for circular IT, accelerating societal transition.

7.4.2 Goals, results, policies & actions

Goals
Building and maintaining consumer trust is essential to CITg's success. In line with ESRS S4, we aim to ensure that our products, services, and practices are safe, reliable, and aligned with our sustainability commitments.

Core Business Impact

CITg's core business is centred on helping customers reduce their environmental footprint by extending the life of IT products, improving resource efficiency, and reducing waste. Our objective is to increase the turnover of our consumer brands, RefurbishedDirect and iUsed, by 10% annually to scale this positive impact.

	2025	2026	2027
% Turnover growth RefurbishedDirect	7%	10%	10%
% Turnover growth iUsed	7%	10%	10%
Trustpilot rating Refurbished Direct	>4.7	>4.7	>4.7
Trustpilot rating iUsed	>4.7	>4.7	>4.7

99

Impact Report 2024   Circular IT group

Results

	2023	2024
% Turnover growth RefurbishedDirect &	7%	53%
% Turnover growth iUsed	7%	10%
# Trustpilot reviews Refurbished Direct	12,000	14,000
# Trustpilot reviews iUsed	1,000	2,000
Trustpilot rating Refurbished Direct	4,7	4,7
Trustpilot rating iUsed	4,6	4,7

For our business-to-business customers, we conduct customer satisfaction research early 2025.

Overall, our customers are satisfied with our service. We are aware of those who have given lower ratings and maintain ongoing dialogue with them. Several improvement actions have already been implemented by our service delivery team.

Policies & actions

Sustainable consumption and product responsibility
CITg is committed to promoting sustainable consumption by extending the lifecycle of IT hardware through reuse, refurbishment, and responsible recycling. Our goal is to minimise electronic waste and empower customers to make informed, environmentally conscious choices.

Environmental standards and responsible recycling
We have established robust policies and procedures supported by internationally recognised certifications:

Impact Report 2024 **Circular IT** group

contents

– **WEEELABEX:** CITg is certified for responsible management of WEEE, covering safe collection, transport, storage, and treatment.
– **ISO 14001:** Confirms our structured approach to environmental management and our commitment to continuous improvement.
– **ISO 9001:** Ensures consistent quality across our operations and high levels of customer satisfaction.
– **Blancco data wiping:** All devices are data-wiped using Blancco software, compliant with NIST 800 standards, to ensure secure and irreversible erasure of personal data.
– **ISO 27001:** Our information security management system protects customer data throughout the lifecycle of each asset.
– **EcoVadis Platinum certification:** medal signifies that a company has achieved the highest level of recognition for its sustainability performance.

Customer data privacy
We comply with all applicable data protection regulations, ensuring that customer data is collected, stored, and processed only for legitimate business purposes and protected against unauthorised access. Our approach integrates privacy protection into all stages of the ITAD process.

Product responsibility
CITg ensures that all products meet safety and quality standards. Customers are provided with clear, accurate information about product specifications, supported by fair and transparent warranty and return policies.

Consumer protection and engagement
The consumer brands, iUsed and RefurbishedDirect, reflect our commitment to product transparency and customer support:

– Both brands are accredited by the web shop Trustmark, ensuring compliance with high consumer protection standards.
– Products are covered by a 24- to 36-month carry-in warranty and a 30-day money-back guarantee.
– Customers are given 15 days to register the product and an additional 15 days to return or exchange it.
– Each brand provides comprehensive information on returns, recalls, and contact details via their website.
– Customer satisfaction is reflected in consistently high Trustpilot ratings: iUsed scores 4.7 (12,000+ reviews), and RefurbishedDirect scores 4.6 (1,000+ reviews).

101

Impact Report 2024 ⓐ **Circular IT** group

contents

8. Governance & business conduct

Let's make IT circular

contents

8.1 Key Governance impacts, risks & opportunities

Decent work and economic growth

Peace, justice, and strong institutions

Partnerships for the goals

Strong governance is the backbone of sustainable value creation.
At CITg we recognise that ethical business conduct, transparency, and accountability are essential not only for regulatory compliance but also for building long-term stakeholder trust. Governance directly influences our impact on society and the environment and supports progress toward SDG 8, 16, and 17.

This chapter aligns with ESRS G1 (Governance) and G2 (Business Conduct), covering ethics, anti-corruption, and policy frameworks.

contents

8.1.1 Governance impacts

Protection of whistleblowers
Ensuring a safe environment for speaking up supports ethical behaviour and transparency throughout the value chain.

How the impact occurs: When employees or stakeholders feel secure in reporting unethical or illegal conduct, without fear of retaliation.

Scale: High: enables early detection of fraud, safety violations, discrimination, and other critical issues.

Scope: Builds internal trust and encourages external partners and suppliers to adopt similar practices, amplifying positive impact across the value chain.

Irreversibility: Failure to protect whistleblowers can result in irreversible damage, such as legal action, reputational loss, or harm to individuals.

Positive impact: We work with certified third-party auditors to assess our supply chain and ensure ethical working conditions and human rights compliance. This strengthens trust and promotes a culture of accountability and openness, both internally and externally.

Anti-corruption and anti-bribery
A strong stance against corruption helps safeguard integrity, protect stakeholders, and ensure fair competition.

How the impact occurs: Corruption may arise through bribery, kickbacks, or undue influence in procurement, contracting, or international business.

Scale: High: corruption can lead to severe legal, financial, and reputational consequences, undermining business continuity and stakeholder confidence.

Scope: Risks exist within CITg and across the supply chain, especially in regions with weak regulatory enforcement or differing business norms.

Irreversibility: Corruption scandals are difficult to recover from; even isolated incidents can affect long-term trust.

CITg's response: We uphold a zero-tolerance approach. All employees receive annual training on anti-corruption and anti-bribery and are empowered to report concerns through safe channels. Our supplier certification process includes third-party audits to verify ethical conduct and compliance.

Positive impact: Fostering a culture of integrity helps build resilience, trust, and long-term value for all stakeholders.

8.1.2   Governance risks

Complexity: Implementing consistent governance structures across diverse subsidiaries and operations requires alignment, time, and coordination.

Cost: Maintaining high governance standards necessitates investment in compliance systems, training, audits, and reporting.

Change resistance: Introducing new group-wide policies and controls can trigger internal resistance or delay in adoption.

Evolving standards: Governance expectations, particularly in ESG and IT, are rapidly evolving, requiring continuous adaptation.

Data protection risk: While we are fully GDPR-compliant, the risk of data breaches remains a reputational concern, necessitating robust digital governance and IT security.

8.1.3   Governance opportunities

Operational efficiency: Strong governance frameworks streamline decision-making, clarify roles, and reduce internal conflicts.

Investor and stakeholder trust: A mature governance system enhances credibility and attractiveness to investors, partners, and customers.

Compliance cost avoidance: Proactive governance lowers the risk of fines, lawsuits, or reputational loss due to regulatory violations.

Group-wide alignment: Coordinated governance drives synergies, knowledge-sharing, and integrated risk management across the group.

Data as a trust asset: Demonstrated commitment to data protection and cybersecurity builds competitive advantage and strengthens consumer trust.

Impact Report 2024   Circular **IT** group

Let's make IT circular
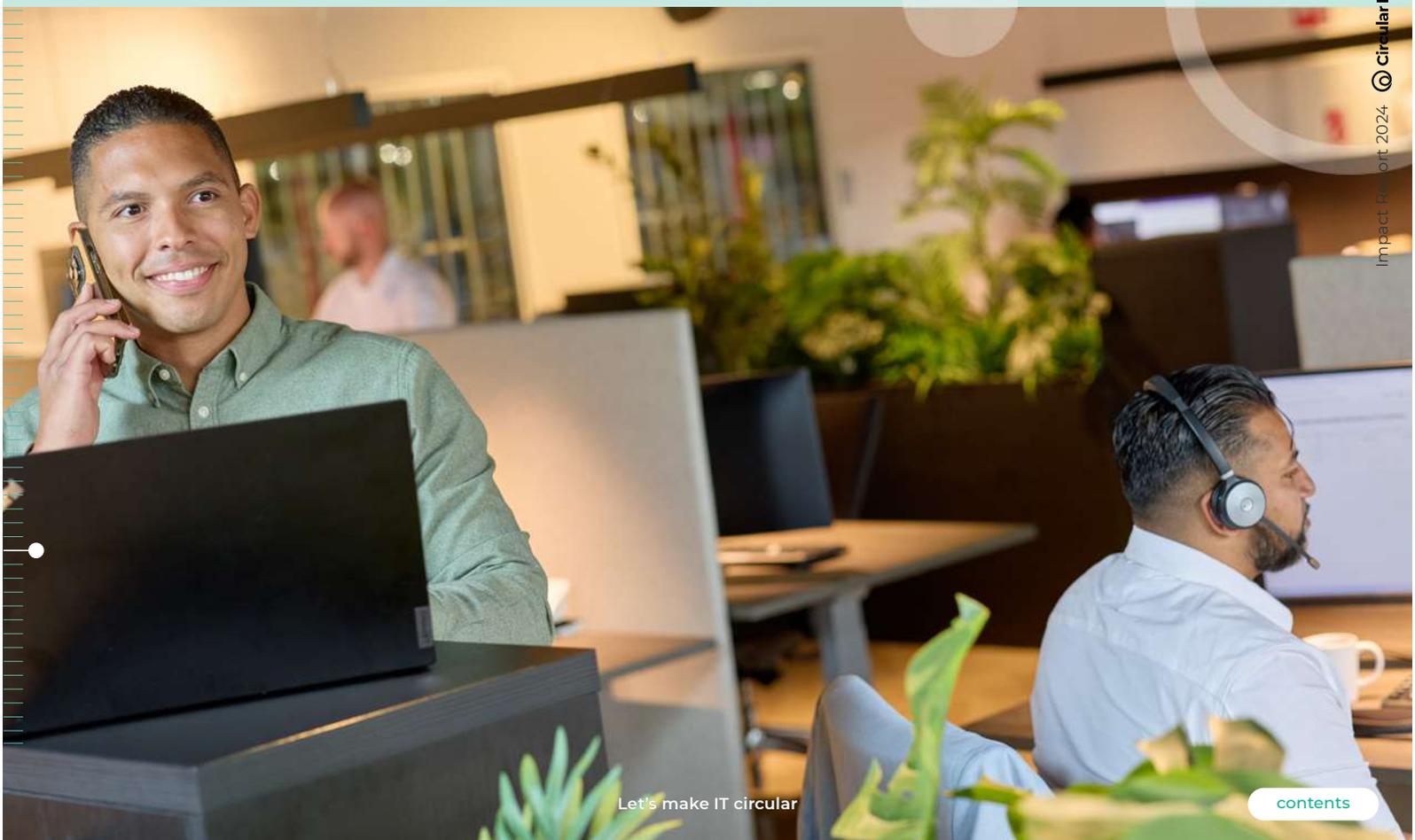
8.2 Governance structure

CITg is structured to ensure oversight, responsibility, and control across our decentralised organisation. Our governance framework includes:

- **Supervisory Board and CEO:** Oversight and strategic direction.
- **Management Team:** Operational leadership and ESG integration.
- **QHSE Manager & HR director:** Coordination of ESG objectives, data collection and compliance across entities.
- **Entity-level Leads:** Responsible for local implementation and reporting.

We are in a transition phase further aligning governance structures across entities and improving transparency on ESG performance at every level.

8.3 Business ethics & culture

Code of Conduct
Our ethical foundation is captured in our Code of Conduct, which guides behaviour on integrity, anti-bribery, compliance, and respect for human rights. Key actions include:

- Clear whistleblower procedures and safe reporting channels.
- Supplier screening for human rights, labour conditions, and ethical practices.
- A strong stance on zero tolerance for corruption, enforced through training and third-party audits.

We foster a culture where doing the right thing is the norm, not the exception.

Data integrity & IT governance
As a group operating in the IT domain, data protection is not just a legal obligation but a reputational pillar. Our governance includes:

- Full GDPR compliance across all entities.
- Regular security audits and penetration tests.
- Use of certified data destruction procedures in our ITAD services.
- Ongoing training in cybersecurity awareness.

Impact Report 2024 **Circular IT** group

contents

We see data as a trust asset. Our commitment to digital responsibility strengthens customer relationships and supports broader societal trust in circular IT solutions.

8.4 Anti-bribery, corruption prevention

We maintain a zero-tolerance approach to bribery, corruption, and unethical conduct. In 2023, we introduced a comprehensive Whistleblower policy and a group policy on Theft, Corruption, and Bribery to proactively prevent misconduct. Additionally, we formalised clear guidelines on the acceptance of business gifts and invitations, which are integrated into our employee manual, legally binding for all staff.

We also take a strong stance against anti-competitive behaviour, such as collusion, price-fixing, and market manipulation. Our Anti-competitive behaviour policy is embedded in the employee manual and contractually upheld to ensure lawful and fair business practices.

We are pleased to report that no incidents of corruption or bribery were recorded in 2024.

8.5 Policies, KPIs, and due diligence

8.5.1 ESG related polices

CITg has developed and implements the following group-wide ESG-related policies:

- Anti-bribery and anti-corruption policy
- Anti-discrimination and equal opportunities policy
- Business travel policy
- Data security and privacy policy
- Diversity, equity, and inclusion policy
- Employee Code of Conduct
- Environmental policy
- ESG / sustainability policy
- Health and safety policy
- Supplier Code of Conduct
- Whistleblowing policy

8.5.2 Governance KPIs

To ensure our ESG-related policies translate into real-world impact, we track a set of governance KPIs aligned with Sustainable Development Goal 16 (Peace, Justice, and Strong Institutions). These indicators help us monitor progress, ensure compliance, and address risks related to corruption, transparency, and employee awareness.

- **Goal:** Substantially reduce corruption and bribery in all their forms
- **KPI:** Number of bribe & corruption incidents

- **Goal:** Ensure public access to information and protect fundamental freedoms.
- **KPI:** Number of cyber security and data breach incidents

- **Goal:** Ensure company-wide awareness and compliance
- **KPI:** Percentage of employees trained anti-corruption and anti-bribery.

8.5.3 Due diligence mechanisms

At CITg, we apply a due diligence approach aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We identify risks, implement mitigation policies, monitor suppliers, and report transparently in our annual ESG reporting.

1. Risk identification and assessment
We proactively identify and assess actual and potential risks related to:

– Human rights.
– Environmental performance.
– Corporate governance.
– Stakeholder concerns.

This enables us to mitigate or prevent risks in a timely and effective manner.

2. Policies and mitigation
– **Ethical sourcing:** We only work with suppliers who adhere to fair labour standards (no child labour, fair wages, safe working conditions).
– **Certification & monitoring:** Major suppliers are assessed on ESG certifications, such as EcoVadis, B Corp, RBA, MSCI, Sustainalytics, Refinitiv, and KnowTheChain.
– **Supplier Code of Conduct:** Suppliers without ESG certification must sign our Supplier Code of Conduct (based on RBA guidelines), which is included in our purchase orders.
– **Waste management:** We follow the principles of Reduce, Reuse, Recycle. We work with certified e-waste processors, selected for transparency and visibility into their downstream partners.
– **EU compliance:** Our products comply with RoHS, REACH, CE marking and the WEEE Directive. We are ISO 14001 certified.
– **Data privacy & information security:**
  · Full GDPR compliance for data protection.
  · Certified data wiping using Blancco software.
  · ISO 27001 certified for information security management.

contents

3. Codes of Conduct and grievance mechanisms
- **Policies** on undesirable behaviour, information security, fraud & corruption (with annual training since 2024), and guidelines for gifts & invitations are documented in our employee manual.
- **External Confidential Advisor** is available for sensitive or anonymous reporting.
- **New incident management system (YouTrack).** Since March 2025, all locations use YouTrack for registering complaints, suggestions, and incidents.

4. Transparency and reporting
- Annual ESG reports.
- Reporting aligned with EU legislation, including the Corporate Sustainability Due Diligence Directive (CSDDD).
- Communication of new policies (e.g. AI policy and revised information security statement since April 2025).

Governance indicators
- Number of data breaches / security incidents:
    - 2022: 0
    - 2023: 2
    - 2024: 5
- **Security awareness:** Since October 2023, employees have followed quarterly online awareness training. Clicking phishing emails triggers a short, mandatory training module.
- 2025 Awareness Programme:
    - Q1: Secure emailing
    - Q2: Privacy / GDPR
    - Q3: Mobile working / business travel
    - Q4: Safe browsing

5. Supplier Assessment
- In 2024, we worked with 127 key suppliers. We ended partnerships with 8. In 2025, 72 of the 119 suppliers in scope have already been reassessed.
- Average score: 7.3.
- Two suppliers scored below 5.5; one relationship was terminated, the other continues under conditions.
- One supplier currently scores below 6.
- Environmental performance was reviewed by supplier; no significant issues identified.
- In 2025, we will complete the full supplier assessment cycle and work towards centralised governance of supplier management.

9. About this report

Let's make IT circular

contents
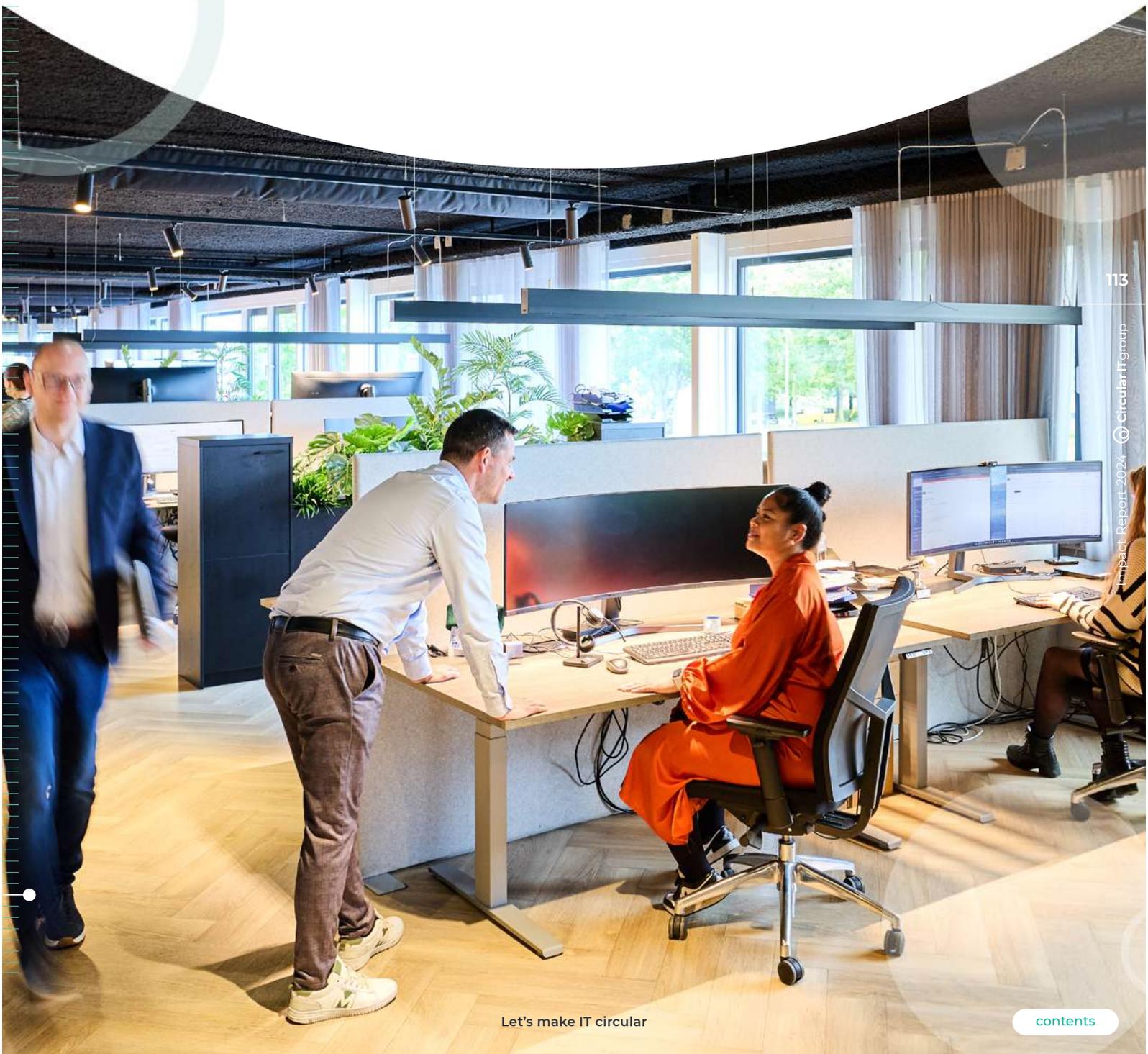
9.1 Reporting scope and methodology

In 2022, the EU adopted the CSRD, which requires companies to report on the impact of their activities on people and the environment. Reporting obligations began in 2024 for large companies. The CSRD is a key element of the EU Green Deal, aiming to improve transparency and standardization in the ESG areas.

9.2 Alignment with ESRS and CSRD

The CSRD has led to the development of sustainability reporting standards, known as the ESRS. While discussions at EU level about the scope and future of ESRS are ongoing, CITg has already taken steps to align with the CSRD framework. Although we are not yet legally required to comply with CSRD, we began preparing in 2023. We formed an internal ESG project team and partnered with an external consultant to support us in this process (see paragraph 4.3.1). We have started working with the double materiality principle, which covers both:

– **Financial materiality:** how external developments (e.g., raw material scarcity, extreme weather) may pose financial risks to our business.
– **Impact materiality:** how our business activities may affect people and the environment (e.g., biodiversity loss, human rights issues in the supply chain).

In 2023 and 2024 we conducted stakeholder research to define the (sub)topics we need and want to report on. After completing the analysis and reporting, we have our disclosures assured by an external auditor to ensure they meet CSRD requirements.

Even though the omnibus has eased certain short-term obligations, we continue to align our disclosures with ESRS codes in each section of this report, maintaining a level of transparency and thoroughness that goes beyond current legal requirements. In addition, we work in line with the Science Based Targets initiative (SBTi), ensuring that our climate-related goals are consistent with the latest scientific guidance for limiting global warming to 1.5°C.

Impact Report 2024 · **Circular IT** group

9.3 Forward-looking statements

Looking Ahead

Thank you for reading our 2024 impact report and as we close this year's report, we do so with a renewed sense of purpose. The developments of 2024 have made it clear that the future of IT lies in a circular, transparent, and innovation-driven model, one that balances environmental impact, cost efficiency, compliance, and the evolving needs of all stakeholders.

1. Advancing Data transparency and reliability

We will continue to strengthen our commitment to data transparency, ensuring that our measurements and reporting are built on the most accurate and verifiable information available. By adopting advanced methodologies, enhancing data collection, and openly sharing insights with stakeholders, we aim to provide a clear and trustworthy picture of our environmental and economic impact. This transparency will build confidence, enable better decisions, and accelerate the industry's transition to truly sustainable IT models.

2. Driving sustainable behaviour through cost-efficiency

We recognise that cost-efficiency is one of the strongest accelerators for change. By making circular IT solutions not only sustainable, but also financially attractive, we lower the barriers for organisations, partners, and end-users to adopt responsible IT practices. Over the coming years, we will refine our portfolio to maximise both environmental benefits and economic value, ensuring that sustainable behaviour becomes the natural, practical choice for all stakeholders.

3. Innovating for measurable circular performance

We will continue to evolve our products and services to deliver tangible results in circular performance. By integrating new technologies, lifecycle intelligence, and emerging standards, we will further reduce waste, extend device lifecycles, and improve total cost of ownership. From enhancing our Circular Workplace offering to optimising our ITAD, ITAM, and Re-Commerce services, each innovation will be designed to align with stricter regulations and deliver measurable, lasting impact.

These commitments work together to guide us forward, combining transparency, economic viability, and innovation to make IT truly circular and accessible. As the IT landscape continues to shift, our mission remains unchanged: to lead the way in building a cost-efficient, sustainable, and inclusive IT future.

The journey ahead is both challenging and exciting. Together, with our partners, customers, and stakeholders, we can turn today's ambitions into tomorrow's achievements.

For questions or more information, please contact:

Circular IT group
Erwin van der Valk
info@circularitgroup.com
erwin.vandervalk@circualritgroup.com
+31 (0)88 – 990 7500
www.circularitgroup.com

Impact Report 2024 ⓒ **Circular IT group**

Let's make IT circular

contents

Appendices

Appendix A: Glossary of terms

CE	Conformity with European health, safety and environmental protection standards
CIO	Chief Information Officer
CITg	Circular IT group
CO₂	Carbon Dioxide - greenhouse gas, meaning it contributes to the greenhouse effect and global warming by trapping heat in the Earth's atmosphere.
CRM	Critical Raw Materials
CSDDD	Corporate Sustainability Due Diligence Directive
CSRD	The Corporate Sustainability Reporting Directive
DaaS	Device as a Service
ERP system	Enterprise Resource Planning – a centralised database and tools for streamlining operations
ESPR	Ecodesign for Sustainable Product
ESRS	European Sustainability Reporting Standards
EU	European Union
FSC	Forst Stewardship Council - Products carrying the FSC label indicate that they come from responsibly managed forests that provide environmental, social, and economic benefits.
FTE	Full Time Equivalent
FY23	Fiscal year 2023
GHG emissions	Greenhouse Gas emissions
GRI	Global Reporting Initiative
ICT	Information & Communication Technology
ISO	International Standardization Organization
IT	Information Technology
ITAD	IT Asset Disposition
KPI	Key Performance Indicator
NIST	National Institute of Standards and Technology
RBA	Responsible Business Alliance
RoHS	Restriction of Hazardous Substances Directive – EU directive that restricts the use of specific hazardous materials in the manufacture of various types of electronic and electrical equipment
REACH	Registration, Evaluation, Authorization, and Restriction of Chemicals. EU regulation to address the production and use of chemical substances.
SASB	Sustainability Accounting Standards Board
SDG	Sustainable Development Goal
TCFD	Task Force on Climate-related Financial Disclosures. It is a global initiative established to develop voluntary, consistent climate-related financial risk disclosures for use by companies in providing information to their stakeholders.
TCO	Total Cost of Ownership
WEEE	Waste of Electric and Electronic Equipment
WEEELABEX	Waste of Electric and Electronic Equipment Label of Excellence. It is an independent organisation that certifies companies that collect, treat, and recycle waste electrical and electronic equipment (WEEE) in accordance with high environmental standards.

Let's make IT circular

contents

Appendix B: ESRS – DMA overview

Lijst met CSRD ESRS rapportage eisen die relevant zijn voor RFH – volgens vastgestelde DMA 2024 (IRO-2)

Algemeen

Algemene toelichtingen ESRS 2

BP-1	Algemene grondslag voor het opstellen van de duurzaamheidsverklaringen	70
BP-2	Rapportage over specifieke omstandigheden	70
GOV-1	De rol van de bestuurlijke, leidinggevende en toezichthoudende organen	70
GOV-2	Informatie verstrekt aan en omgang met duurzaamheidsthema's door de bestuurlijke, leidinggevende en toezichthoudende organen	70
GOV-3	Integratie van duurzaamheidsprestaties in beloningsregelingen	71
GOV-4	Due-diligenceverklaring	72
GOV-5	Risicobeheersing en interne controles voor duurzaamheidsrapportage	73
SBM-1	Strategie, business model en waardeketen	73
SBM-2	Belangen en opvattingen van stakeholders	74
SBM-3	Materiële impact, risico's en kansen en de wisselwerking daarvan met strategie en bedrijfsmodel	76
IRO-1	Beschrijving van de processen om materiële impact, risico's en kansen in kaart te brengen en te analyseren	78
IRO-2	Rapportage-eisen uit de ESRS opgenomen in het RFH duurzaamheidsverslag	69

Efficiency en standardisering MDR

MDR-P	Beleid aangenomen voor het managen van efficiency en standaardisering	79
MDR-A	Belangrijkste acties 'Efficiency en standaardisering'	80

Data betrouwbaarheid en -veiligheid MDR

MDR-P	Beleid aangenomen voor het managen van data betrouwbaarheid en -veiligheid	82
MDR-A	Maatregelen en middelen wat betreft data betrouwbaarheid en veiligheid	83
MDR-M	Maatstaven voor databetrouwbaarheid en -veiligheid	83
MDR-T	Effectiviteit van beleid en maatregelen monitoren aan de hand van doelen op data betrouwbaarheid en -veiligheid	83

Milieu

Klimaatverandering ESRS E1

E1-1	Transitieplan voor klimaatmitigatie	85
E1-2	Beleid ten aanzien van klimaatmitigatie	85
E1-3	Maatregelen en middelen wat betreft beleid ten aanzien van klimaatverandering	86
E1-4	Doelen inzake klimaatmitigatie	86
E1-5	Energieverbruik en energiemix	87
E1-6	Bruto scope 1, 2, 3 en totale broeikasgasemissies	89

Klimaatmitigatie – sierteeltproducten verhandeld MDR

MDR-P	Beleid aangenomen voor het managen van klimaatmitigatie - sierteeltproducten verhandeld	91
MDR-A	Maatregelen en middelen wat betreft klimaatmitigatie - sierteeltproducten verhandeld	91
MDR-M	Maatstaven voor klimaatmitigatie -sierteeltproducten verhandeld	92
MDR-T	Effectiviteit van beleid en maatregelen monitoren aan de hand van doelen op klimaatmitigatie - sierteeltproducten verhandeld	92

Biodiversiteit en ecosystemen ESRS E4

E4-1	Transitieplan op en meeweging van biodiversiteit en ecosystemen in strategie en businessmodel	93
E4-2	Beleid ten aanzien van biodiversiteit en ecosystemen	95
E4-3	Maatregelen en middelen wat betreft biodiversiteit en ecosystemen	95
E4-4	Doelen wat betreft biodiversiteit en ecosystemen	95

Materiaal gebruik en circulaire economie ESRS E5

E5-1	Beleid materiaalgebruik en circulaire economie	96
E5-2	Activiteiten en middelen materiaalgebruik en circulaire economie	96
E5-3	Doelen materiaalgebruik circulaire economie	97
E5-4	Materiaalinstroom	98
E5-5	Materiaaluitstroom	98

Sociaal

Eigen werknemers ESRS S1

SBM-3	Materiële impact, risico's en kansen en de wisselwerking daarvan met strategie en businessmodel	100
S1-1	Beleid ten aanzien van eigen personeel	101
S1-2	Processen om eigen werknemers en werknemers-vertegenwoordigers te overleggen over impact	101
S1-3	Herstelprocessen voor negatieve impact en kanalen voor eigen werknemers om zorgen kenbaar te maken	102
S1-4	Manieren om risico's te mitigeren en kansen te benutten, en de effectiviteit daarvan	102
S1-5	Doelen om de materiële impact, risico's en kansen te managen	103
S1-6	Kenmerken van de medewerkers van de onderneming	104
S1-7	Kenmerken van medewerkers niet in loondienst onder het eigen personeel van de onderneming	105
S1-8	Cao-dekkingsgraad en sociale dialoog	105
S1-9	Diversiteitsmaatstaven	105
S1-10	Leefbare lonen	105
S1-14	Veiligheids- en gezondheidsmaatstaven	105
S1-17	Incidenten, klachten en ernstige impact op het gebied van mensenrechten	106

Werknemers in de waardeketen ESRS S2

S2-1	Beleid ten aanzien van werknemers in de waardeketen	107

Governance

Samenwerking en belangenbehartiging ESRS G1-5

G1-5	Politieke invloed en belangenbehartiging	109

Weerbare sierteeltsector ESRS G1-1, 3, en 4

G1-1	Beleid ten aanzien van zakelijk gedrag en bedrijfscultuur	111
G1-3	Preventie en opsporing van corruptie of omkoping	112
G1-4	Incidenten van corruptie of omkoping	113

Impact Report 2024 ⊚ **Circular IT** group

Let's make IT circular

contents

Circular IT group

www.circularitgroup.com

Let's make IT circular

contents