

Sustainable Procurement Policy

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1. Introduction

At Glenveagh Properties plc (“the Group”), our “Building Better” strategy places sustainability at the heart of our mission to create sustainable, high-quality homes throughout Ireland. To align with this, we are committed to procuring goods and services in a manner that is sustainable and ethical.

2. Purpose

The purpose of this policy is to provide a framework for our procurement activities with our supply chain partners (including suppliers, sub-contractors and manufacturers), enabling us to make responsible choices that support our sustainability goals.

3. Scope

This policy is applicable to all the Group’s activities, locations, employees and third parties working on behalf of the Group and covers the Group’s activities, resources and business relationships in the upstream and own operations value chain. Furthermore, procurement activities involve any department that sources products and services.

4. Our Supply Chain Impacts, Risks and Opportunities (IROs)

We recognise that our demand for construction materials and services from our upstream value chain can give rise to environmental and social impacts, financial risks and potential business opportunities. Understanding our material IROs allows us to proactively manage risk, foster sustainable innovation and drive responsible sourcing practices across the supply chain. Following our 2024 double materiality assessment (and our 2025 update), our material IROs within our upstream value chain include:

- Our contribution to climate change and air, soil and water pollution from the GHGs (scope 3), non-GHGs and pollutants emitted from activities in our upstream value chain as well as the financial risks associated with these.
- Our use of and contribution to the depletion of non-renewable and renewable raw material resources and fossil fuels, the long-term financial risk associated with this impact as well as the risk from our dependency on these.
- Our impact on resources from not using and/or using circular principles when designing our products and the financial risk associated with this impact, while opportunities may arise from the creation of circular systems including cross-value chain initiatives.
- Water demand due to activities in the upstream value chain can lead to a water scarcity impact.
- Land use change from the extraction of resources, from the demand and use of concrete and aggregates and from the demand and use of timber.
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- Financial risks from:
 - From pass-through of carbon tax increases in our supply chain associated with our GHG emissions.
 - severe weather events affecting our upstream value chain.
 - resource scarcity and/or increased costs
 - cost and availability of waste management services.
- Loss and/or reduction in the quantum of species due to upstream activities fragmenting habitat and dispersal routes as well as a decline in ecosystem services from the same activities and the long-term financial risk associated with these impacts.

- Poor working conditions, and the risk of injury and/or death from a lack of adequate training all of which could negatively impact workers financial and social well-being as well as the long-term financial risks associated with these impacts.
- Inability to get into the workforce or promoted due to disability, gender and being different.
- Violence or harassment at work that results in prolonged absence from/loss of work, which affects a worker in the value chain's physical, mental and financial well-being.
- The risk of child and forced labour and inadequate water and sanitation for workers in the value chain.
- Where activities pollute or threaten water resources and significantly interfere with local communities' ability to access clean drinking water.

5. Our Approach

The Group is committed to integrating sustainability principles into its procurement activities in line with the dynamic and evolving ESG legislation as it pertains to the supply chain.

6. Monitoring

The implementation of this policy is monitored through the following:

Our Sustainability Dashboard is the mechanism that enables us to track progress against these actions. The Sustainability Dashboard is reviewed quarterly at our:

- Environmental and Social Responsibility (ESR) Committee

Annually, supply chain -related IROs are reviewed by our Audit and Risk Committee (ARC) as part of our double materiality assessment process.

7. Stakeholder Interests

We are committed to engaging with stakeholders to better understand our impacts, understand best practice and connect with industry initiatives. As part of our double materiality assessment, we engage with internal and external stakeholders to ensure we are addressing the most material IROs for our business context. We are members of a range of industry groups that drive forward the sustainability agenda. We aim to reflect these broad stakeholder interests in our policy.

8. Accountability and Responsibility

The CEO has overall accountability for the implementation of this policy. Heads of business units are responsible for ensuring this policy is implemented in their area of functional responsibility and for leading by example. The Sustainability Team is responsible for the creation, updating, communication and monitoring of this policy.

9. Approval and Review

This policy is approved by the Environmental and Social Responsibility (ESR) committee. It is reviewed on an annual basis.

10. Communication

This policy is available to stakeholders on our website and on our intranet.



21/11/2025

Stephen Garvey
Chief Executive Officer

Date

Related policies and documents

- Vendor Code of Conduct.
- Health and Safety Policy
- Climate Change Policy
- Human Rights, Anti-Slavery and Human Trafficking Policy
- Anti-Bribery and Corruption Policy.
- Resource Use and Circular Economy Policy.