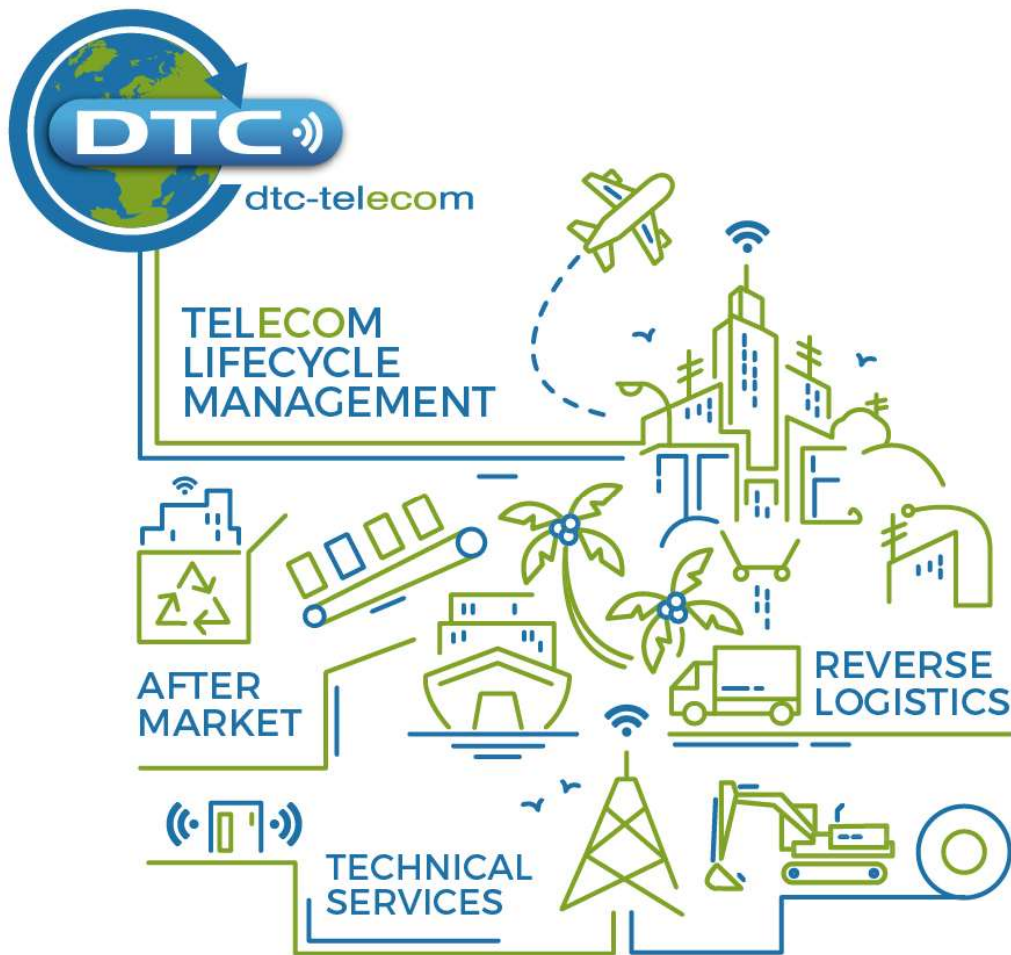




DTC Telecom

A Partner for Telecom Lifecycle Management

Corporate Social Responsibility Report

Year: 2025

(Annual Report: 1 Jan 2025 to 31 Dec 2025)

Report Internal & External Use
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Sustainability In Action

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Foreword



DTC Telecom has been active in the green market for more than 30 years.

Whilst we are not currently required to report under the Corporate Sustainability Reporting Directive (CSRD), we believe that sustainability and corporate responsibility are fundamental to both our business and the wider Telecom Lifecycle industry.

Given our reach and scope, the actions we take matter to our employees, customers, suppliers, and the communities in which we operate. We recognise that we have a responsibility to conduct our business in a way that creates long-term value while supporting sustainable and ethical practices.

The principles of the Circular Economy have been at the heart of DTC from the very beginning. Through recover, reuse, refurbishment, repair, and responsible recycling, we help extend the life of telecommunications equipment and maximise the value of existing resources.

Sustainability is not a separate initiative within DTC; it is embedded in the way we think, the decisions we make, and the services we provide. Quite simply, it is our DNA.

James Norden: Chief Executive Officer



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A partner for your telecom needs ✓

DTC is a Telecom Lifecycle business

Overview

DTC Telecom has over 30 years of experience delivering Telecom Lifecycle Solutions, encompassing Reverse Logistics, Green Product Supply, and Technical Network Services. We help customers maximise asset value, improve operational efficiency, and support sustainability goals through tailored and practical solutions.

Clients

We support a global customer base that includes telecommunications operators, OEMs, system integrators, and enterprise customers across multiple markets.

Facilities

UK headquartered, with an authorised treatment facility (ATF) and in-house recycling capability. Our logistics and service centre provides the infrastructure required to support asset recovery, refurbishment, fulfilment, and responsible end-of-life management.



DTC - TELECOM

Green Product

Focuses on the sourcing, supply, purchase, and repair of sustainable telecommunications equipment. This is where we aim to operate within a closed-loop model, extending product life and maximising asset value.



DTC - TELECOM

Sustainable Reverse logistics

Encompasses asset recovery, reverse logistics, and responsible end-of-life management, including onsite recycling services where required.



DTC - TELECOM

Technical & professional services

Delivers a range of value-added solutions, including maximising copper extraction, exchange optimisation projects, build-stage configuration services, product refurbishment & testing, storage and fulfilment, and our latest offering of four-hour onsite support for network assets.

Market overview

The telecommunications sector presents significant opportunities.

Operators are under pressure to reduce costs while continuing to invest in network upgrades and new technologies. There is a growing need to optimise capital investment, improve operational efficiency, and support sustainability goals.

The sustainable green market addresses these challenges by helping operators release value from surplus and redundant equipment.

Through recover, reuse, refurbishment, and redeployment, assets can generate financial returns, reduce waste, and extend their useful life rather than being prematurely recycled.

Market



**DTC Telecom
support some
of the largest
Telecom
operators in the
world**





DTC Telecom

We are committed to helping our customers navigate the evolving Telecom Lifecycle market.

Sustainability matters. DTC supports the creation of stakeholder value by helping customers and partners adopt environmentally and socially responsible practices.

We are equally committed to our people and our planet, maintaining a safe, healthy, and responsible working environment.

Whilst we are not required to report under the Corporate Sustainability Reporting Directive (CSRD), we believe that corporate social responsibility is at the heart of our company, our employees, and the Telecom Lifecycle industry.

Our Commitment

DTC Telecom has been delivering Telecom Lifecycle services for more than 30 years.

Our global reach and operational capability are strengthened by the specialist knowledge and experience of our people.

This combination enables us to support international customers effectively and consistently. We believe in communicating clearly and transparently about our mission and values, which define who we are, what we strive to achieve, and what inspires us every day.

Our mission and values form the foundation of our business and represent the commitment we make to our customers, partners, and employees.



DTC Telecom

People Centric

- We** create an inspiring, inclusive, and engaging workplace where everyone has the opportunity to reach their full potential.
- We** welcome and value different perspectives, recognising that diversity of thought strengthens our business.
- We** trust and respect one another, both professionally and personally.
- We** take pride in our company, challenge ourselves and each other, embrace feedback, and support continuous learning and development.
- We** work collaboratively to deliver positive outcomes for our customers and colleagues alike.

Trusted as a Partner

- We** actively share knowledge and expertise to help meet our customers' evolving needs.
- We** provide smart, practical, and effective solutions that deliver long-term value.
- We** prioritise lasting relationships built on trust, transparency, and mutual respect.
- We** remain focused on our customers' interests, developing a deep understanding of their business, objectives, and challenges.



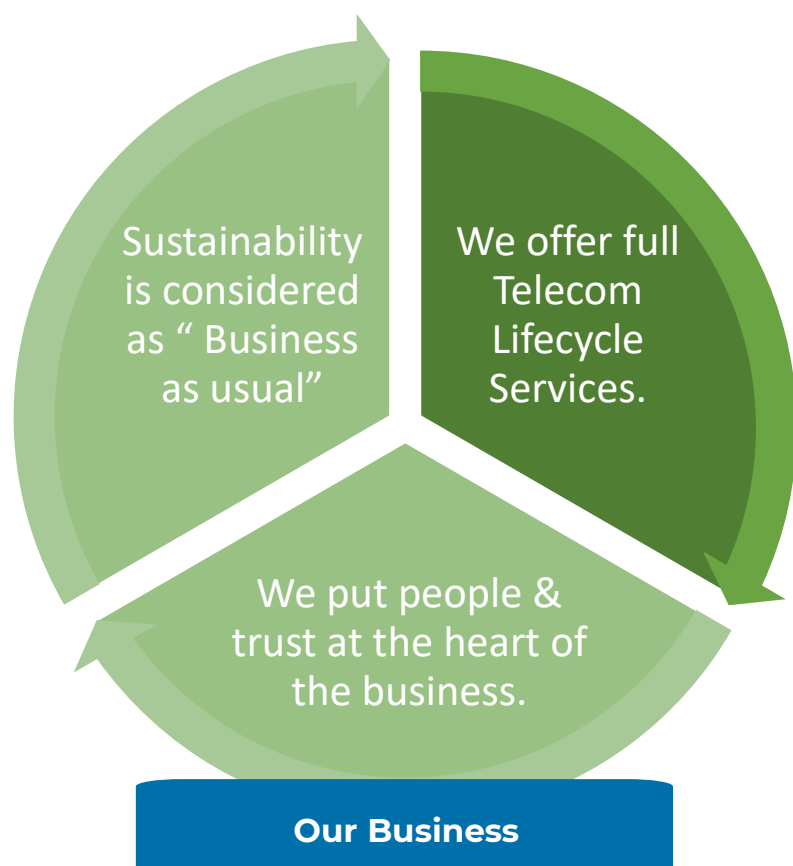
Our Values

Sustainable Solutions

- We** provide sustainable Telecom Lifecycle solutions for an evolving industry.
- We** champion the reuse, repair, refurbishment, and redeployment of telecommunications equipment, with recycling considered only as a last resort. This reflects our commitment to a closed-loop circular economy.
- We** see sustainable solutions not as an initiative, but as part of our everyday business and the way we create long-term value for our customers, partners, and the environment.



DTC Telecom



Our Mission

"We are a trusted partner for our clients with a solutions-driven approach.

We provide them with smart effective solutions so that they can succeed in their ambitions".



“Our Core beliefs”



Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights.

2. Make sure that they are not complicit in human rights abuses

Labour

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

4. The elimination of all forms of forced and compulsory labour.

5. The effective abolition of child labour.

6. The elimination of discrimination in respect of employment and occupation.

Environment

7. Businesses should support a precautionary approach to environmental challenges.

8. Undertake initiatives to promote greater environmental responsibility.

9. Encourage the development and diffusion of environmentally friendly technologies.

UN Global Compact Principles

Anti-Corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

The UN Global Compact (UNGC) provides a framework for businesses committed to aligning their operations and strategies with ten universally recognised principles covering human rights, labour standards, environmental responsibility, and anti-corruption.

By embracing these **Ten principles**, we strive to conduct our business responsibly, ethically, and sustainably, while creating long-term value for our employees, customers, suppliers, and wider stakeholders.

Sustainable Development Goals

“Business as Usual” ✓



Sustainability and the Circular Economy have been at the heart of our business for the past 30 years—it is simply how we operate.

The United Nations Sustainable Development Goals (SDGs) provide a valuable framework for understanding and guiding our responsibilities towards society, the environment, and future generations.

The topics covered in this CSR Report reflect our ongoing commitment to sustainable development and highlight the progress we continue to make on our journey towards creating long-term environmental, social, and economic value.



“Supporting the SDGs”

Sustainability

Sustainability and the circular economy have been central to our business for more than 30 years.

Through our Telecom Lifecycle model, we support critical telecommunications infrastructure while extending product life, promoting reuse over recycling and reducing unnecessary waste.

By maximising the value of existing assets and reducing demand for new equipment, we help our customers achieve both environmental and commercial benefits whilst contributing to a lower carbon future.



People

Putting people at the heart of our business is one of our core values.

We are committed to creating an inclusive, supportive and engaging workplace where everyone is treated fairly, given opportunities to develop, and encouraged to reach their full potential.

Through employee wellbeing, training, equality and responsible employment practices, we strive to build a positive working environment for all.



Trust

We recognise that trust is earned through our actions. We are committed to operating with integrity, transparency and accountability in all aspects of our business.

Through strong governance, ethical business practices and responsible decision-making, we aim to be a trusted partner for our customers, suppliers, employees and wider stakeholders.



Our Pillars

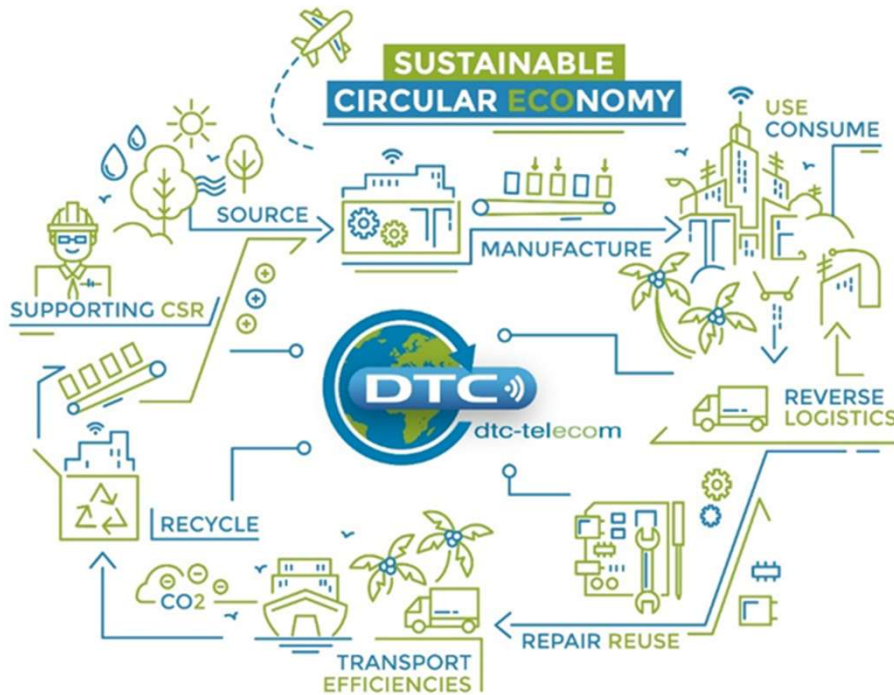
Community

We are committed to making a positive contribution to the communities in which we operate and those connected to our employees.

Whether through local initiatives, charitable support, skills sharing or community engagement, we aim to create lasting value and support sustainable, inclusive communities.



Sustainability Our Circular Economy

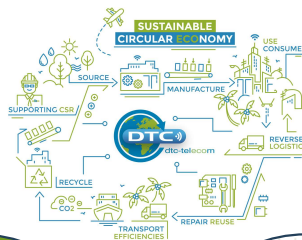


The **Circular Economy** has been at the core of the DTC business model for more than 30 years.

Environmental: By extending the life of telecommunications equipment through reuse, repair and refurbishment, we help reduce the demand for new manufacturing, conserve valuable resources and minimise waste, carbon emissions and environmental impact.

Lifecycle: Effective lifecycle management maximises the value of existing assets, keeping products in use for longer and supporting a more sustainable approach to network infrastructure and technology investment.

The DTC Telecom Lifecycle model combines experience, detailed analysis and long-term planning to deliver commercial, operational and environmental benefits throughout the asset lifecycle.



Circularity & DTC

Circularity

DTC Telecom has a long history of managing surplus assets and end-of-life telecommunications equipment.

We actively promote the reuse of equipment, with recycling considered only as a last resort. This principle forms the foundation of our Telecom Lifecycle model and our commitment to responsible resource management.

Through recovery, refurbishment, repair and redeployment, we seek to extend the lifespan of telecommunications equipment, preserving both value and functionality while reducing unnecessary waste.

This approach aligns with the United Nations Environment Programme's value retention framework, which promotes remanufacturing, refurbishment, repair and reuse as key circular economy activities.

For more than 30 years, DTC has supported the telecommunications lifecycle industry and wider circular economy, helping customers unlock asset value, reduce environmental impact and maximise the productive life of their equipment.

Closed Loop Circular Economy

Our team works with businesses to develop sustainable telecommunications lifecycle solutions, from reverse logistics and asset recovery through to the sourcing of green products and components.

At its core, our Telecom Lifecycle model is founded on the principles of a closed-loop system and resource recovery. Products are used, reused and, where reuse is no longer possible, we seek to maximise value through responsible recycling and material recovery.

Our solutions are designed for longevity, focusing on reuse, refurbishment and repair, while supporting responsible recycling practices that help reduce waste and preserve valuable resources.

Through collaboration and open communication, DTC helps customers identify additional value recovery opportunities while aligning operational practices with sustainable, responsible and ethical outcomes.

Sustainability is in our DNA



Carbon Management & Reduction

Progress to date:

- Replaced all warehouse lighting with LEDs.
- Installed automatic warehouse lighting controls.
- Increased use of hybrid and electric vehicles.
- Implemented workplace energy-saving measures, including switching off lighting when areas are not in use.

Future Objectives:

- Increase the proportion of electric vehicles within the company fleet.
- Reduce avoidable electricity consumption through improved energy management practices.
- Eliminate unnecessary standby power consumption across facilities.
- Achieve a paper-light working environment by 2028.

Key Objectives

People, Quality & Sustainability Objectives

Achievements:

- Maintain a minimum average of 6 hours of learning and development per employee per annum.
- Maintained warranty return rates below 2%, demonstrating that sustainable and refurbished equipment performs to the same quality standards as new equipment.
- Reduced waste to landfill by 10%.

Future Objectives:

- Learning & development – increase to 8 hours / person annually.
- 75% of all Vendors by Value to be covered by Sustainable Purchasing criteria and conditions by 2028.
- Reduce water consumption by 10% by 2028 from the 2023 baseline of 289 m³.



During 2025 we improved our measurement capabilities relating to Scope 3. We have restated 2023 and 2024 alongside this.

DTC has actively reduced Scope 1 and Scope 2 emissions through targeted energy efficiency and fleet improvement initiatives.

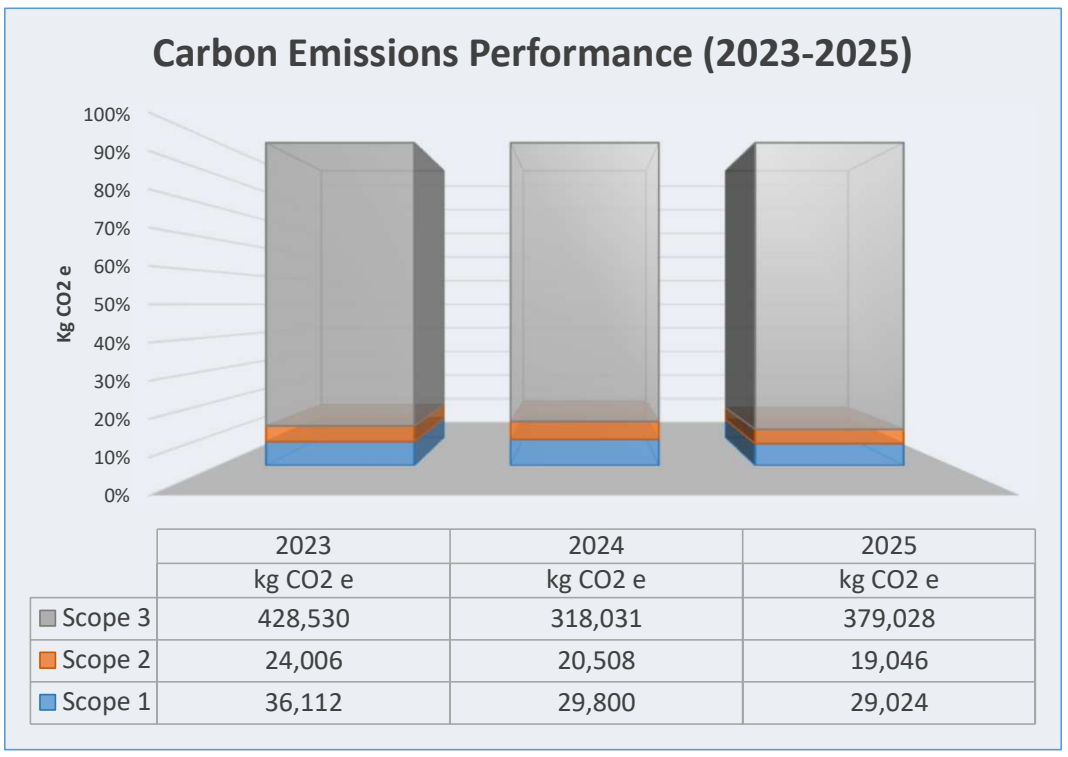
This has been through the investment in advanced lighting, improved windows and insulation and being more mindful of our behaviour.

The company fleet has transitioned entirely to hybrid and electric vehicles, significantly reducing transport-related emissions.

DTC does not fall into the category for advanced SBTi given its size but there are activities and actions that can be taken.

This will be part of the ongoing review process and the carbon management plan.

Net Zero & DTC



- 1 Scope 1, Scope 2 & Scope 3**
Adopted an absolute emissions reduction target through to 2028.
- 2 Scope 3**
Enhanced Scope 3 measurement capabilities and data quality during 2025.



Scope 1, 2 and 3 Target

Target

- Scope 1: Reduce by 20% from 2023 position of 36,012 kg CO₂e by 2028. This is a 7,222 kg CO₂e reduction resulting in a 28,889 kg CO₂e.
- Scope 2: Reduce by 20% from 2023 position of 24,006 kg CO₂e by 2028. This is a 4,801 kg CO₂e reduction resulting in a 19,205 kg CO₂e.
- Scope 3: Reduce by 20% from 2023 position of 428,530 kg CO₂e by 2028. This is a 85,705 kg CO₂e reduction resulting in a 342,824 kg CO₂e.

DTC's emissions reduction targets are aligned with the streamlined SME target validation route.

Green Market, Sustainable Reverse Logistics & Technical Services - www.dtc-telecom.co.uk

Science-Based Emissions Reduction Targets

DTC Commitment

DTC has adopted science-based emissions reduction targets and is aligning its carbon reduction programme with a 1.5°C pathway.

As a small and medium-sized enterprise, DTC is committed to reducing Scope 1 and Scope 2 emissions whilst continuing to improve the measurement and reduction of Scope 3 emissions.

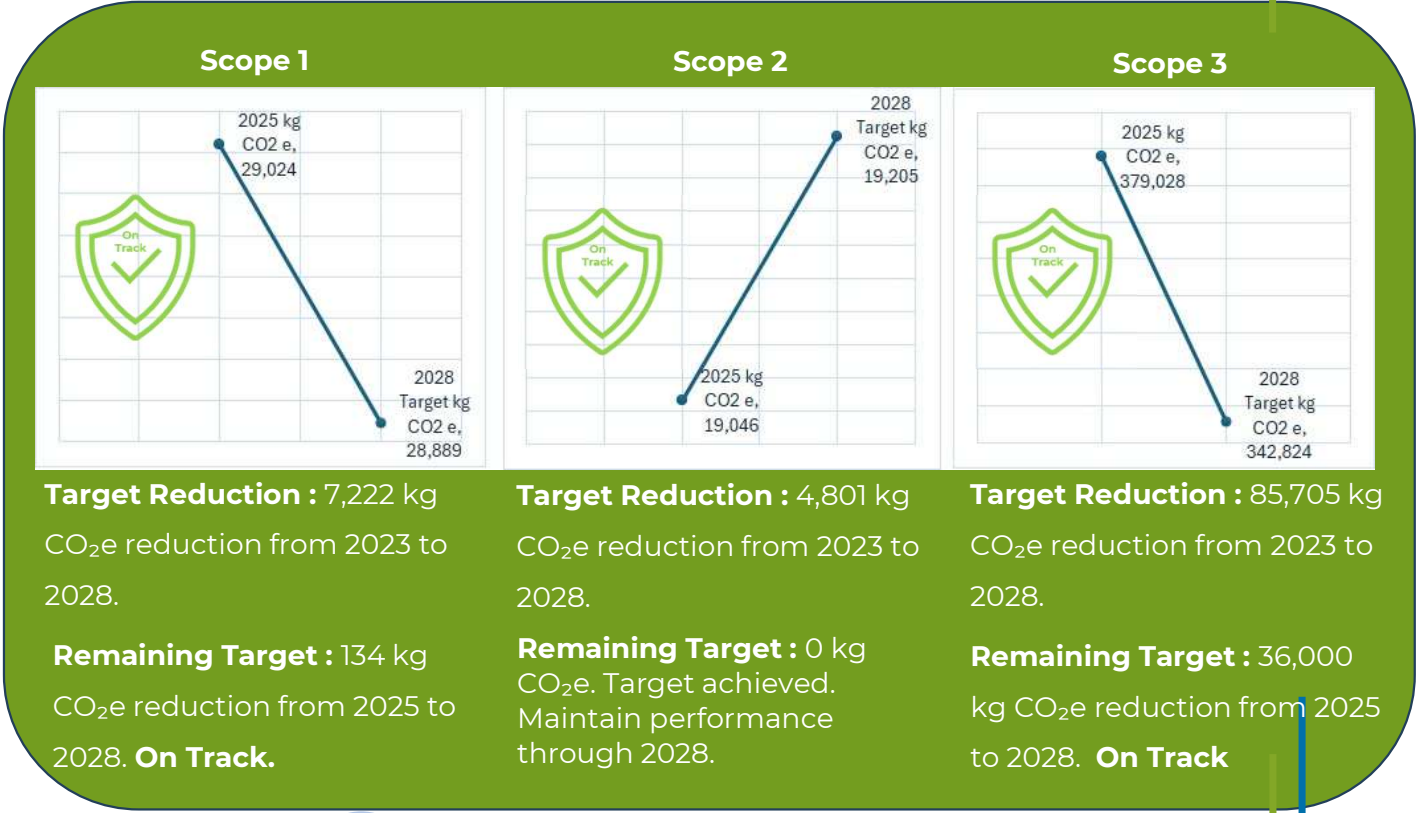
Carbon reduction targets aligned with a 1.5°C pathway

Progress Against 2028 Carbon Reduction Targets

Carbon Reduction

Target: Achieve a 20% absolute reduction in Scope 1, Scope 2 and Scope 3 emissions by 2028 against a 2023 baseline

Scope	Baseline Year	Target Reduction	Target CO ₂ e Reduction (kg)	Target Year
Scope 1	2023	-20%	-7222 kg CO ₂ e	2028
Scope 2	2023	-20%	-4,801 kg CO ₂ e	2028
Scope 3	2023	-20%	-85,705 kg CO ₂ e	2028

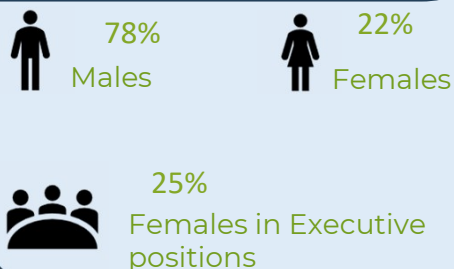




People

DTC is a people-centred organisation that seeks to provide a safe, inclusive and supportive environment where individuals can develop and reach their full potential.

We aim to reduce and prevent inequality by not discriminating on gender, gender identity, sexual orientation, age, ethnicity, religion or education.



Learning & Development

Learning and development is integral to the success of DTC.

We seek to develop and promote internally foremost, for the organisation to develop as the individual develops.

Compliance training remains an important component of our ongoing business success and risk management framework.



Average learning & development per employee: 6 hours (2025)

Continued learning for all staff

People & Social Responsibility

Diversity & Inclusion

We recognise the importance of being diverse.

Diversity brings a broader range of perspectives, experiences and ideas, helping to improve decision-making, innovation and organisational learning

All employees have the opportunity to contribute to and help shape the DTC culture.

Social Responsibility

1

Employee Health & Safety.

Employee health and safety is fundamental to the business. DTC maintains ISO 45001 certification, provides regular health and safety training and actively engages employees through monthly Safety Action Group (SAG) meetings.

2

Working Conditions.

DTC maintains appropriate working conditions through documented policies and procedures, monthly management reviews, external audits and employee Safety Action Group (SAG) meetings.

3

Social Dialogue.

Employees are encouraged to participate in company decision-making through Safety Action Group meetings, regular company briefings and day-to-day engagement with management.

4

Career Management & Training.

DTC prioritises internal development and career progression. Where possible, vacancies are filled internally, including progression into management and director-level roles.

5

Child labour, forced labour & human trafficking.

All employees receive Modern Slavery awareness training. DTC does not engage with suppliers where concerns regarding modern slavery, forced labour or human trafficking have been identified.

6

Discrimination and Harassment

DTC does not tolerate discrimination, harassment or bullying in any form and promotes an inclusive working environment for all employees.

How we Deliver

1. Our Pillars (CSR p11),
2. Social Responsibility (CSR p18)
3. H&S Policy
4. ISO 45001
5. Training & Development
6. Employee participation
7. Active management

Governance

Governance, business ethics and regulatory compliance are fundamental to DTC's operations. We provide awareness and compliance training across key business, ethical and health & safety topics. DTC maintains certification to ISO 9001, ISO 14001 and ISO 45001 standards. We also hold a waste processing licence and are active members of relevant industry trade bodies.

To ensure ongoing compliance, our policies and procedures are constantly updated to reflect new and amended laws and regulations. The Company has policies covering ethics, anti-bribery & corruption, human trafficking and child labour. Staff are trained on these areas.

Information security and data protection are critical to the business. Staff receive training in the appropriate handling of personal data and their responsibilities under applicable data protection legislation.

DTC is certified to Cyber Essentials Plus, providing independent verification of key cyber security controls and information security practices.

We have a Whistleblower procedure in place for stakeholders to report on corruption, bribery and anti-competitive practices.

Reporting

No governance-related incidents, breaches or whistleblowing cases were reported during the reporting period.

No incidents relating to discrimination, forced labour, child labour or human rights violations were recorded during the reporting period.

No incidents relating to water discharge or chemical spills were recorded during the reporting period.





Sustainable Procurement

Delivering our services requires a diverse global supplier network that supports customers with quality equipment and solutions. To support responsible sourcing, DTC has implemented a Supplier Code of Conduct that outlines our expectations of suppliers, partners and subcontractors and supports a supply chain aligned with our values.

The Code

The DTC Telecom Supplier Code of Conduct outlines our expectations for suppliers and partners, and their subcontractors, in the areas of ethical practice, human rights, health and safety, environmental responsibility and management systems.

It is integrated into our onboarding. This can include face to face visits, background checks and compliance.

Engagement

To optimise the effectiveness of our responsible sourcing strategy, we segment our supplier engagement activities based on contribution to our supplier spend, supplier size and ESG Risk profile.

Our target is to cover 75% of our purchasing by 2028.

For suppliers that fall into the small to medium business size category and do not have the total resources needed, DTC looks for length of business, trade body memberships, accreditations held, local representation and ownership structure.

Commitment

We look for strong management practices regardless of supplier size, location or operating model. Another code element central to our responsible sourcing efforts is the expectation that suppliers share our commitment to environmental sustainability and minimize adverse impacts on communities and the planet. We expect suppliers to operate responsibly, demonstrate sound management practices and share our commitment to environmental, social and ethical standards

Double Materiality

Material risks and opportunities are generally derived from the impacts and dependencies on natural, human and social resources.

“double materiality” broadens the concept of materiality from a sole focus on financial materiality to one that includes a view of your impact on stakeholders and society.

Financial Materiality

This focuses on how sustainability matters may pose either a prospective material risk or opportunity that could affect a company's financial performance and position over the short, medium and long term.

“Outside in”
view



Impact Materiality


“inside out”
view

This focuses on the actual or potential short, medium and long-term impacts on people or the environment that are directly linked to our operations. These impacts can be both positive and negative.



The Corporate Sustainability Reporting Directive (CSRD) proposes that businesses should perform a materiality assessment.

Stakeholder selection

As one of the first steps in our Double Materiality Analysis (DMA), which is a requirement under the CSRD, we performed a stakeholder group selection.

That selection resulted in a top 6 stakeholder groups:

- Shareholders
- Directors
- Our staff
- Clients (existing & prospects)
- Future staff
- Our neighbours

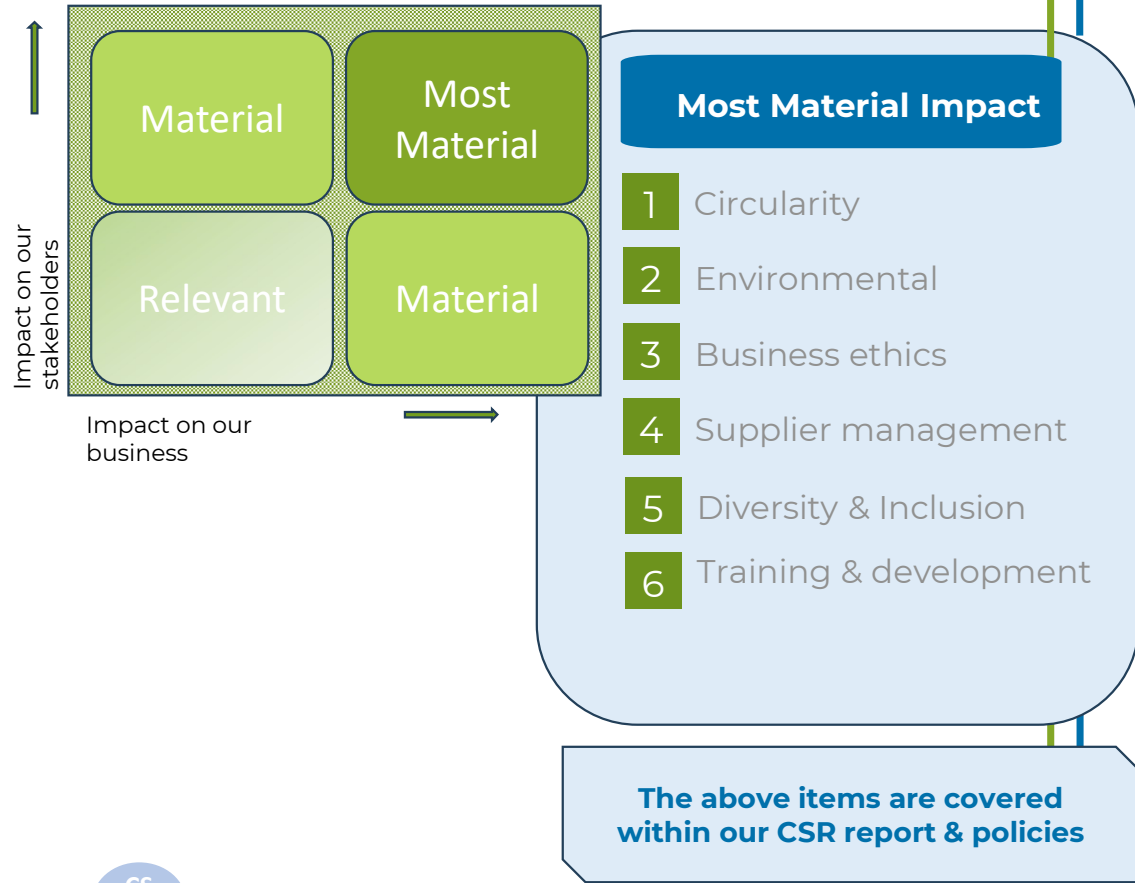
We performed this review and identified factors which we have, or can have, material impact on our environment and people.

These have been identified in Environmental, Social and Governance sections before.

In future years we will provide **additional reporting** in these areas.

We follow the Reporting principles of GRI Standard 2021.

Double Materiality



DTC Telecom



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