Sustainable Procurement Policy

06/2026

1. Context

SNCB has adopted a sustainable procurement policy (hereinafter referred to as the "Policy") to place environmental, social and ethical considerations at the heart of its purchasing and consumption practices.

The Policy aims to:

- reduce the ongoing negative impacts of its purchases;
- meet its sustainability obligations and commitments; and
- engage its suppliers in an approach which focuses on sustainability and due diligence.

2. Objectives

The Policy pursues the following ESG and sustainability objectives.

Climate change	**Reducing carbon footprint** (GHG emissions reduction)
Pollution	**Protecting ecosystems** (water, air, soil, biodiversity)
Circular economy	**Preserving natural resources** (ecodesign, reuse, reparation, recycling)
People	**Ensuring rights & safety for all** (human rights, working conditions, health & safety, accessibility)
Ethical Business	**Developing responsible supply chain** (ethics, due diligence, transparency)

3. Approval

The Policy was approved on 2 September 2025 by the Management Committee and the Executive Committee of SNCB.

The Policy enters into force on that date for an indefinite period. It may be revised in order to

continue to align in the future with SNCB's strategy, its commitments and obligations, as well as developments in sustainable procurement.

4. Scope

This Policy applies to all purchases made by SNCB.

Every new contract must comply with it, regardless of the type (goods, services, works), the amount, the duration, the procedure and the requester (internal customer).

For SNCB staff members, "Annex 1", "Annex 2" and "Annex 3" complement this Policy and provide further operational details.

5. Implementation

The Policy consists of 2 steps:

(1) Assess the sustainable impact of the purchase

Depending on the item (product category) and the volume (annual value) of the purchase to be made, it is classified into one of four impact levels: low (A), medium (B), high (C) or critical (D).

↳ **Details:** Annex 1 “Method for assessing sustainable impact”

(2) Apply sustainability requirements

The sustainability requirements are applied proportionately, depending on the level of the purchase’s sustainable impact. Therefore:

- Impact level “Low” provides for minimum requirements;
- Each higher impact level provides for stricter requirements.

↳ **Details:** Annex 2 “Sustainability requirements”

6. References

The Policy is based on and refers to the following items:

Legislation

- CSDDD “Corporate Social Due Diligence Directive” (Directive (EU) 2024/1760);
- CSRD “Corporate Social Reporting Directive” (EU Directive 2022/2464);
- EU taxonomy (EU Regulation 2020/852);

Internal documents

- Public Service Contract 2023–2032 (mainly Article 103 “Sustainable procurement”);
- Supplier Code of Conduct
- Code of Conduct for Ethical Business
- Human Rights – Due Diligence Policy

Other

- ISO 20400 “Sustainable procurement — Guidance”;
- EcoVadis (suppliers’ due diligence);
- GHG Protocol (standard for reporting greenhouse gas emissions)