GTT ESG REPORT

July 2023



gtt.net

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FROM OUR CEO

Dear Stakeholders –

In recent years, we have concentrated relentlessly on transforming our business into a customer-focused, managed services provider with a culture of continuous improvement. We have reshaped our company, investing in ongoing operational enhancements to deliver better customer experiences and implementing processes and systems to enable global performance, all while offering local expertise and personal touch critical to building strong business relationships.

We are passionate about supporting people – and it is that passion that drives our commitment to environmental, social and governance progress across our organization. Not only have we transformed our business, but we have worked to enhance ways that we deliver value to all stakeholders.

In 2022, we conducted a materiality assessment to determine topics most important to GTT and our stakeholders and inform our ESG actions and priorities. From this assessment, climate change was noted among the highest areas of impact, so we doubled down on our efforts to understand our carbon footprint by performing a robust data acquisition process to effectively calculate our greenhouse gas emissions profile, including major scope 3 emissions categories. From this process, we established a net zero goal by 2035 for our Scope 1 and 2 emissions and are working to develop a detailed year-on-year roadmap for our reductions. In addition, we advanced our first climate risk and opportunities analysis in line with the Task Force on Climate-Related Financial Disclosures framework.

We recognize that our team is critical to the success of our ESG program and have worked to better inform our employees on their essential role. As an initial step, we have expanded our communications regarding ESG activities and conducted surveys to collect feedback on our key initiatives. We have also launched an ESG training module for all employees to educate and empower our workforce to support the company in driving positive change.

Our ESG emphasis also extends outside our organization to our partners and communities. Within the area of sustainable procurement, we are working to formalize our partner engagement process beginning with a code of conduct that applies to all suppliers. In addition, we seek to better engage with our communities through our targeted GTT Gives Back campaign that is focused on bringing our global teams together to support children's causes within our areas of operation.

While I am incredibly proud of the tremendous work that has been completed to date, these advances are mere milestones on our longer ESG journey. We recognize that in order to best serve our customers, we must continue to align with their ESG initiatives. We know that to attract and retain the best talent, we need to champion personal reward and growth. And if we want to drive long-term value, we must protect against risk and seize opportunities.

At GTT, we embrace 'making exceptional possible' – a motto that speaks to the heart of what we do, helping our clients achieve their exceptional. This can only happen through the hard work and commitment of our global team. To all our employees, thank you for the talents and contributions you bring to work each and every day. And to all our stakeholders, thank you for your support and partnership.

I welcome you to read more about our ESG commitments and ongoing evolution in the following pages, and look forward to updating you on our progress.

Sincerely,

Ernie Ortega
Chief Executive Officer

1.

CONNECTING WITH US



ABOUT GTT

GTT is a managed network and security services provider to global organizations. We design and deliver solutions that leverage advanced cloud, networking and security technologies. We complement our solutions with a suite of professional services and exceptional sales and support teams in local markets around the world.

We serve thousands of national and multinational companies with a portfolio that includes SD-WAN, security, Internet, voice, and other connectivity options. Our services are uniquely enabled by our leading, global Tier 1 IP backbone, which spans more than 260 cities on six continents. The company culture is built on a customer-first service experience reinforced by our commitment to operational excellence and continuous improvement in our business, environmental, social and governance practices.

OUR MISSION:	We empower business with the networking expertise, technology and security to build a better tomorrow
OUR PURPOSE:	We exist to create better networks, better experiences and better tomorrows
OUR VALUES:	***CURIOUS –*** We proactively look for better ways to support our customers and colleagues ***COLLABORATIVE –*** We build better solutions when we work together ***COMMITTED –*** We stay focused, honor our promises and always deliver ***CONSISTENT –*** We provide a high-quality service and predictable experience, each and every time
OUR BELIEFS:	Our beliefs capture how our mindset and approach set us apart from our competition

OUR BELIEFS

Our beliefs capture how our mindset and approach set us apart from our competition

IT TAKES EXPERTISE TO UNLOCK THE POTENTIAL OF THE NETWORK.

Our expertise is built on years of experience and the right blend of people, insights, and technology to deliver positive transformation.

ADAPTABILITY AND SCALABILITY ARE CRITICAL TO SUCCESS.

Our best-of-breed technology platform and consultative approach mean we can adapt quickly to market trends, changing customer needs, and new technological breakthroughs.

GREAT BUSINESSES ARE BUILT ON GREAT CUSTOMER RELATIONSHIPS.

GREAT RELATIONSHIPS ARE BUILT ON OUTSTANDING EXPERIENCES.

We take pride in delivering an outstanding customer experience. We're accessible, proactive, and accountable, always.

OUR POINTS OF DIFFERENCE

Our points of difference outline the tangible value we bring to our customers through our people, our expertise and our products.

OUR FOCUS IS SOLVING BUSINESS NETWORKING AND SECURITY CHALLENGES FOR OUR CUSTOMERS.

We're laser-focused on removing any roadblocks to your business success.

We listen carefully before developing solutions.

We continue to proactively evolve based on our customer relationships to meet customized requirements.

WE DELIVER A POWERFUL COMBINATION OF GLOBAL REACH ENHANCED BY OUR DEEP LOCAL KNOWLEDGE.

We have local experts around the world with the knowledge and insight to help our customers expand into new markets or technologies.

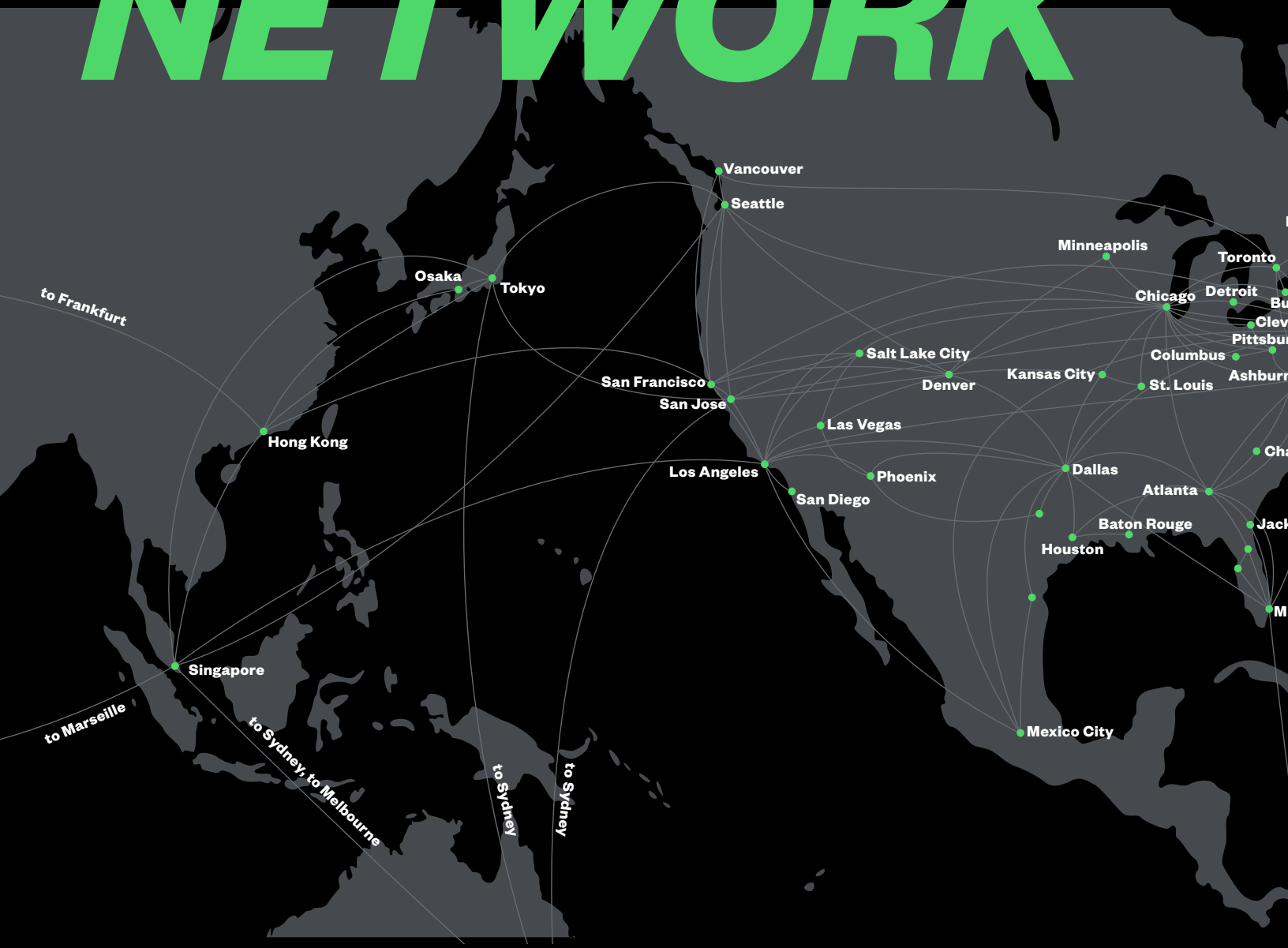
OUR LEADING GLOBAL TIER 1 IP NETWORK IS THE FOUNDATION FOR DELIVERING OUR SUITE OF SERVICES.

Our global reach and enhanced internet services set us apart.


GTT MAKING
EXCEPTIONAL
POSSIBLE

OUR GLOBAL NETWORK

GTT operates one of the world's largest Tier 1 IP networks. We have strong network supplier relationships, providing diverse access to any location in the world and any application in the cloud.



260+
On-network cities on six continents

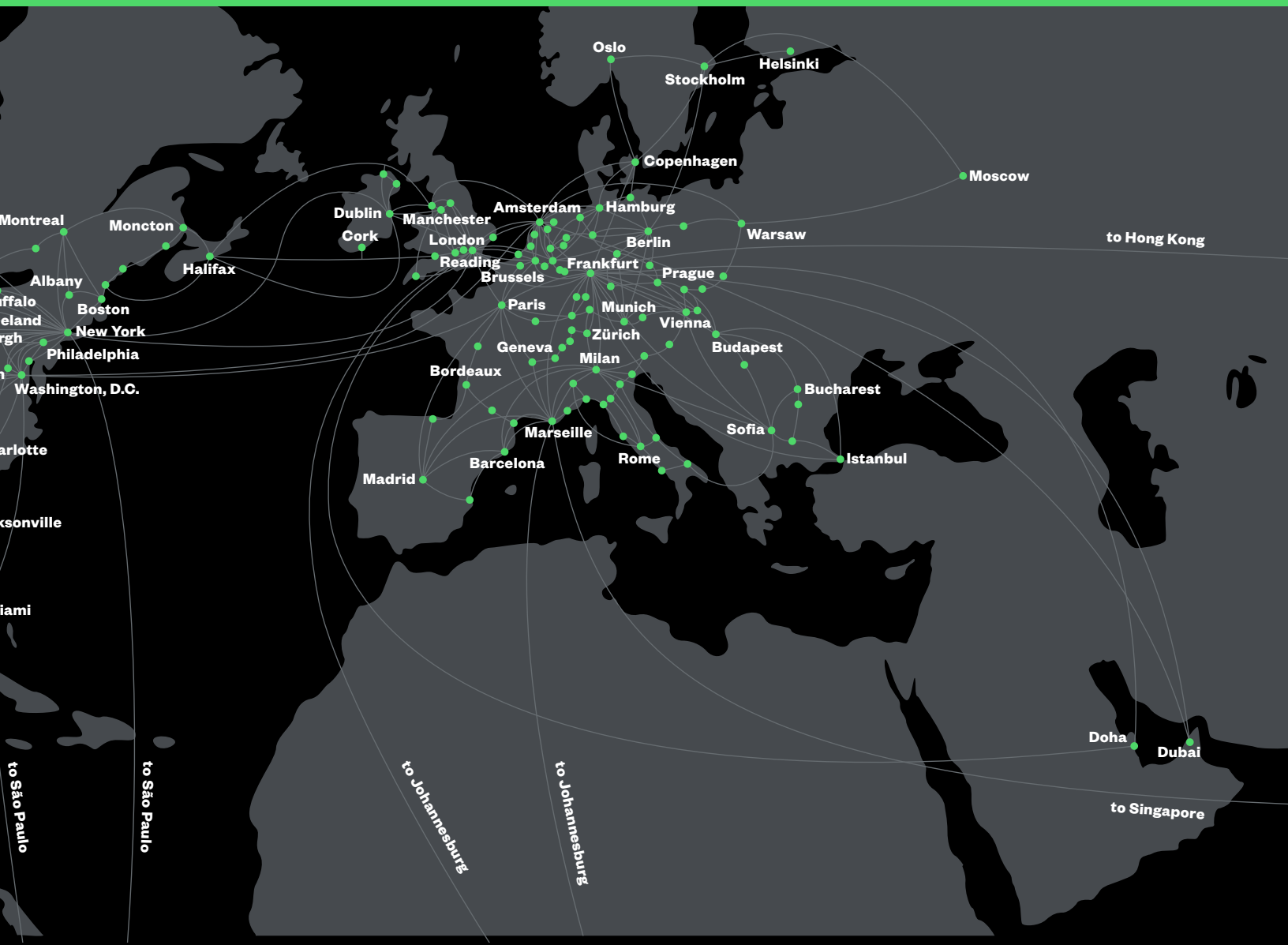
2000+
Directly connected IP networks and cloud providers

600+
Points of Presence

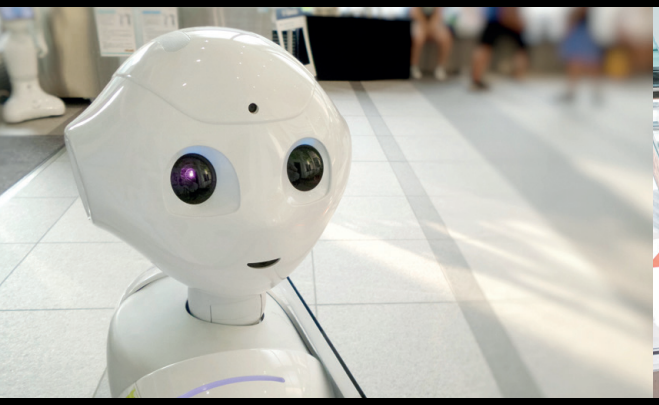
140+
Countries with client services

400
Preferred network partners for best-in-class performance

2000+
Employees



WE ARE TRUSTED BY





8 OF THE TOP 10 TECHNOLOGY FIRMS

9 OF THE TOP 10 TELECOM COMPANIES

5 OF THE TOP 10 HEALTHCARE SERVICE FIRMS

6 OF THE TOP 10 AUTOMOTIVE MANUFACTURERS

6 OF THE TOP 10 GLOBAL BANKS

9 OF THE TOP 10 LARGEST AMERICAN PUBLIC COMPANIES

2022 VISIONARY SPOTLIGHT AWARDS CHANNELVISION
SD-WAN

2022 VISIONARY SPOTLIGHT AWARDS CHANNELVISION
INTERNATIONAL INTERNET SOLUTION

2022 VISIONARY SPOTLIGHT AWARDS CHANNELVISION
MANAGED SERVICE

2022 INTERNET TELEPHONY FRIEND OF THE CHANNEL

THE WORLD'S







LARGEST ORGANIZATIONS

2023 INTERNET TELEPHONY PRODUCT OF THE YEAR

2023 VISIONARY SPOTLIGHT AWARDS CHANNELVISION
SD-WAN

2023 VISIONARY SPOTLIGHT AWARDS CHANNELVISION
MULTI-LOCATION DEPLOYMENT

2023 VISIONARY SPOTLIGHT AWARDS CHANNELVISION
MANAGED SERVICE

2023 VISIONARY SPOTLIGHT AWARDS CHANNELVISION
CYBERSECURITY



ABOUT THIS REPORT

GTT is proud to present our 2022 ESG report, which reflects our continued commitment and progress across key environmental, social and governance (ESG) principles. This report includes information on topics identified through our materiality assessment and aligns with relevant areas for Telecommunications Services as outlined by the Sustainability Accounting Standards Board (SASB). GTT also publishes a standalone **TCFD Report** detailing how we address climate-related risks and opportunities.

Information reported is based on our current practices and expectations around future performance, including statements on our targeted ESG objectives for 2023 and beyond.

All metrics included in this report are for the calendar year 2022, unless otherwise noted.

ESG APPROACH AND OVERSIGHT

Our established ESG Program Lead manages program development and the integration of ESG principles across the organization. This role reports to, and is supported by, GTT's General Counsel, who serves as the ESG Program Executive Sponsor. The ESG Program Lead works closely with a cross-functional ESG Steering Committee that assists in setting the strategy relating to ESG practices and developing, implementing and monitoring initiatives and policies based on that strategy.

In addition, GTT's Operational Risk Committee, established in 2023, comprised of members of the Senior Leadership Team, ESG Program Lead and other functional leaders, identifies significant risks to the business and develops strategies to monitor and manage those risks, including climate change, cybersecurity and regulatory and compliance changes, among other areas of focus.

GTT's ESG strategy, initiatives and policies as well as broader corporate governance are also reviewed and assessed by the Governance and Risk Committee of the Board of Directors (Board). Modifications are recommended to the full Board, where deemed necessary or appropriate.

STAKEHOLDER ENGAGEMENT

When assessing our ESG efforts, we apply a collaborative model that includes formal and informal engagement with our employees, customers, suppliers and communities.

We believe that stakeholder engagement serves as a mechanism for direct feedback regarding our services, practices and business strategies and also provides the opportunity to communicate our progress made in support of our ESG initiatives.

Stakeholders	Why We Engage	How We Engage
CUSTOMERS	• To better understand the challenges our customers and their industries face • To identify opportunities to improve our services • To respond to customer needs • To manage risk in our value chain and collaborate on ESG-related topics	• Customer satisfaction surveys • Quarterly meetings • Customer Advisory Boards • Support for ESG objectives
EMPLOYEES	• To guide and identify strategic priorities directly tied to business performance • To sustain a culture of continuous improvement • To understand and communicate topics that are most important to our people	• Annual employee engagement survey • ESG and compliance-based training for employees • Annual performance reviews • Global town halls and leadership sessions • Intranet/Newsletters
SUPPLIERS	• To manage risk in our supply chain • To collaborate on ESG-related topics	• Quarterly business reviews • Supplier code of conduct acknowledgement • Supplier Master Service Agreements (MSA)
COMMUNITIES	• To foster strong connections with our local communities where we do business • To incorporate feedback into key initiatives that would benefit our local communities	• Volunteer opportunities • Participation in industry forums, groups and roundtables
INVESTORS	• To monitor developments in corporate governance and sustainability • To mitigate short and long-term risks to the business	• Governance and Risk Committee meetings • Board meetings • Annual ESG report

MATERIALITY ASSESSMENT

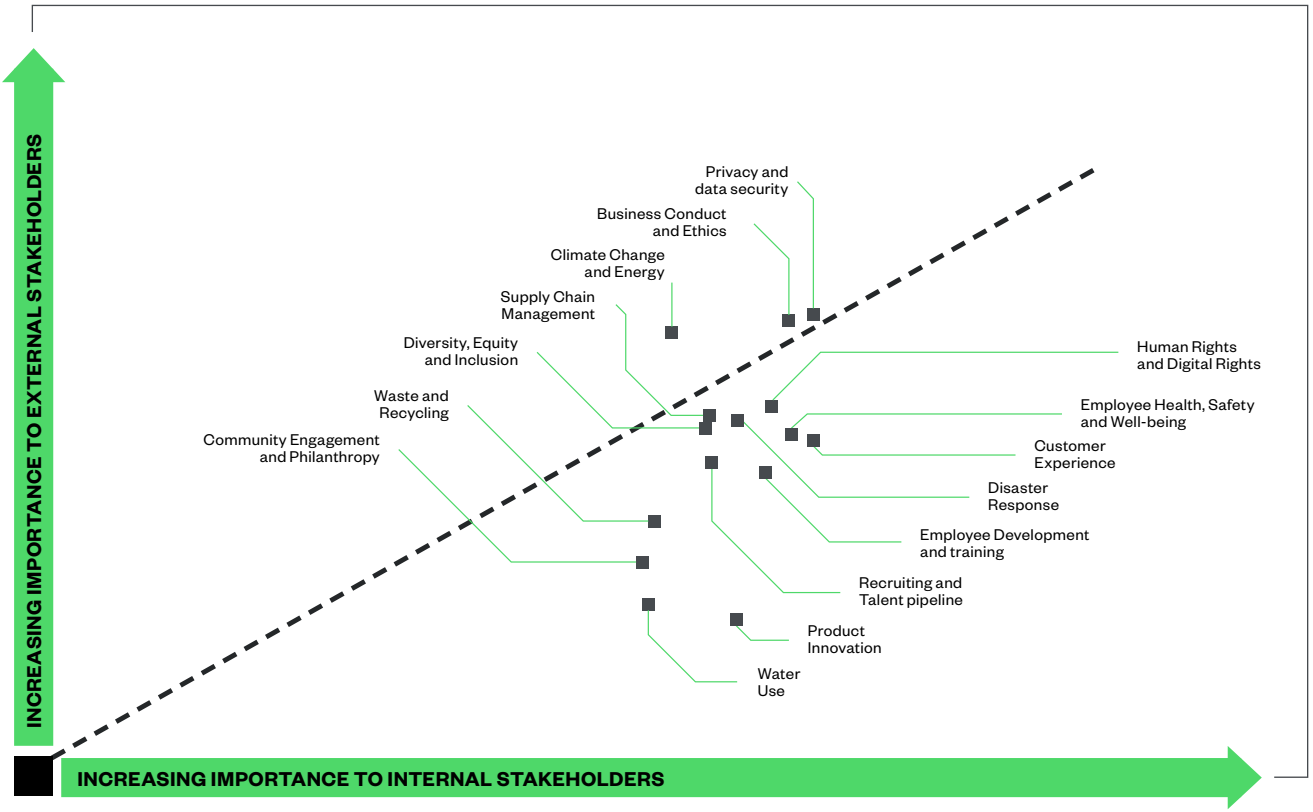
In 2022, we partnered with a third-party consultant to conduct an ESG materiality assessment to identify, understand and prioritize topics based on importance and impact to our company and stakeholders. The results of this assessment help to mitigate risk to our business, recognize opportunities and enable us to drive sustainable, long-term value.

MATERIALITY ASSESSMENT METHODOLOGY

1. **DEFINE –** Stakeholders included company leadership, employees, customers, industry leaders, the investment community and reporting/regulatory bodies
2. **IDENTIFY –** ESG topics scoped and refined based on both quantitative and qualitative data from industry research, peer and customer reporting and leading ESG frameworks
3. **ENGAGE –** Interviews, surveys and/or research of public disclosures conducted to determine importance of topics across stakeholder groups
4. **PRIORITIZE –** Feedback from stakeholder engagement synthesized and converted to a quantitative score with applied weighting and refined based on discussions with ESG Steering Committee and Senior Leadership Team
5. **INTEGRATE –** ESG topics used to inform initial ESG strategic goals based on key areas of development; other material topics are well established and sustained by the company

MATERIALITY ASSESSMENT RESULTS

Our materiality assessment identified privacy and data security, business conduct and ethics, climate change and energy, human rights and digital rights, and customer experience to be the most important topics among stakeholder groups.





OUR ESG STRATEGY

GTT has set strategic goals to address material issues, further advance the company's ESG Program and align with the ambitions of our customers and other stakeholders.

ESG Strategic Goals	Progress to Date
REDUCE CARBON FOOTPRINT	• Collected and calculated Scope 1 and Scope 2 and material Scope 3 GHG emissions • Provided employee training on carbon and climate-related matters • Established a net zero goal by 2035 for Scope 1 and Scope 2 emissions
FORMALIZE COMMUNITY ENGAGEMENT PROGRAM	• Selected 'Children's Charities' as corporate 'passion' area • Formed a Community Engagement Committee
INTEGRATE ESG INTO SUPPLY CHAIN MANAGEMENT	• Educated buyers on core ESG principles • Added ESG requirements into supplier MSAs • Implemented Supplier Code of Conduct
PROMOTE GREATER TRANSPARENCY	• Conducted materiality assessment • Conducted inaugural TCFD analysis
ENHANCE GOVERNANCE PROCESSES	• Reviewed and refreshed key corporate polices • Formalized Operational Risk Committee and Governance and Risk Committee

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

GTT's ESG activities are aligned with the United Nations Sustainable Development Goals. The following goals represent areas where we believe our business can have the greatest positive impact.



2.

EMPOWERING CUSTOMERS AND COMMUNITIES



Strong connections start from the first touch point with our customers and extend to each interaction we have with our local communities across the world. Together, we provide solutions to inspire businesses and societies to advance, succeed and transform.

BUILDING A CUSTOMER-FIRST CULTURE

Our Client Experience (CX) team manages a multitude of programs that enable continuous improvement in each customer experience. We are always ready to adapt as and when circumstances change and go above and beyond to exceed expectations. We also honor our promises and seek operational excellence at every level. It is through these positive experiences that we build trust and foster long-term customer relationships.

CUSTOMER OUTREACH AND FEEDBACK

Customer feedback is powerful information that provides GTT crucial insights into customer satisfaction and areas of improvement. Real-time surveys help us to determine service experience for specific incidents or requests across regular touchpoints of the customer journey, while relationship surveys provide insight from key customer contacts on their overall perception of GTT with the aim to improve collaboration, communication and processes.

The CX council is the hub of GTT's customer experience feedback program, bringing together key individuals across the company to review end-to-end experience and identify changes to drive greater organizational alignment and positive customer outcomes. In addition, the Voice of Customer (VoC) Champions program seeks to create a culture of ownership by enabling and empowering this group to suggest process improvements to enhance the customer experience.

GTT also conducts global in-person and virtual Customer Advisory Boards across various regions globally throughout the year and every year. These curated events include executive-level representation with select strategic customers to review our product roadmap and gather detailed customer information on our services and programs with the aim to improve customer experience.

HELPING CUSTOMERS REACH THEIR ESG GOALS

We recognize that to be a trusted, longstanding business partner, we must do our part to help our customers achieve their ESG commitments and goals. This involves understanding specific challenges and priorities and ensuring our ESG program aligns with their objectives.

In support of these efforts, we continue to:

1. **IDENTIFY** areas of growing importance to our customers through discussions, surveys and publicly available information
2. **STRENGTHEN** our ESG-related policies, commitments and oversight mechanisms
3. **INFORM** our employees of their role in advancing our ESG programs
4. **ADVANCE** high-value ESG initiatives and measure progress and impact
5. **INCREASE** transparency and alignment with leading ESG standards and frameworks

> Our goal is to not only meet our customers' expectations, but to exceed them. By understanding needs and building strong relationships, we can provide solutions to drive their success, and ultimately, our own."

SANDRO LATTUCA
CUSTOMER SUCCESS MANAGER, GTT

SECURING OUR NETWORKS AND BUSINESS

We take every measure to protect the integrity of our digital infrastructure.

Cybersecurity Oversight

Our global Chief Information Security Officer (CISO) is responsible for our cyber security program and leads a team of highly skilled individuals tasked with securing GTT against cyberattack. Global policies and procedures are in place and adhere to the highest standards of cyber preparedness as guided by ISO 27001.

To strengthen the skills of our workforce, we provide mandatory advanced training for our employees that include phishing simulations, password hygiene, incident response seminars and substantial onboarding for all new employees.

GTT's cyber security team holds status updates each quarter for our Board of Directors and Senior Leadership Team to keep them abreast of any incidents within the company. These status updates include monthly security incident reports and bi-annual presentations by the security team. Our security team is also overseen by the Governance and Risk Committee of the Board.

Information Technology Service Management

Two of GTT's network operations centers are certified to ISO 20000, a global standard for an information technology service management (ITSM) system, which draws strongly on the best practices described within the IT Infrastructure Library (ITIL) framework. The ITSM standard enables GTT to ensure that our processes are aligned both with the needs of the business and with international best practice.

Security Certifications

GTT's three network operations centers (NOCs) – representing 100% of our NOCs – are certified to ISO 27001, an international standard viewed as a benchmark by most organization and security professional. The standard contains core security controls and focuses on the entire information security stack, including core elements of people, process, organization and technology. It also has specific controls around physical security, which relate to physical access to assets that have information stored on them, or that can be used to access the information itself.

GTT uses a continuous security improvement approach to all information security objectives, including identification, grading, control and maintenance of risks. We regularly perform information security risk assessments and are audited by independent third parties against the ISO 27001 standard to ensure that high standards are maintained. The most recent audit was conducted in February 2023 and identified no material security risks.

Customer Security

GTT adheres to the globally accepted Payment Card Industry Data Security Standard (PCI DSS), which applies to all entities involved in payment card processing, including service providers. GTT's PCI DSS Attestation of Compliance reflects successful demonstration of exceptional security practices to secure cardholder data as attested by a qualified third-party security assessor.

In addition, GTT holds Service Organization Control – SOC1 and SOC 2 – service assurance certifications as provided by independent third-party auditors against a defined control framework for select services. A SOC1 report is specifically intended to meet the needs of customers who require assurance on the effectiveness of the controls at GTT as a service organization. Our SOC 2 audit report provides detailed information and assurance about security, availability, processing integrity and confidentiality controls, based on compliance with the American Institute of Certified Public Accountants (AICPA) Trust Services Criteria (TSC). SOC 1 pertains to our Managed Hosting and Virtual Data Centre (VDC) services, while our SOC 2 includes our SD-WAN and SIP Trunking services.

MAINTAINING BUSINESS CONTINUITY

With thousands of businesses served by GTT's global network, we are tasked with keeping the network running 24 hours a day, seven days a week. Our tried and tested business continuity plans enable us to be prepared for any potential impact to our network or operations.

We operate our global network from multiple operational centers worldwide, which have full resiliency and failover capability between locations, and remote working capabilities are provided for critical function employees in all regions. In addition, we have standardized response procedures, ensuring single, consistent customer management systems and global process owners.

Our Business Continuity and Corporate Security teams continually monitor emerging situations, particularly concerning compliance with evolving central government and local authority measures. We do our utmost to prioritize the requirements of critical service providers during crisis scenarios and have successfully helped our customers respond to events, including fire, flood and service failure. We also collaborate closely with our key partners to manage and minimize any potential impact on the maintenance and delivery of client services.

SPOTLIGHT:

GTT COMBATS CYBERATTACKS

In 2023, GTT expanded our network of scrubbing centers in partnership with Corero Network Security. Scrubbing centers receive network traffic and remove any malicious traffic that may be associated with a DDoS attack to ensure only safe traffic is delivered to its intended destination.

The center in Spain is the latest addition to GTT's global DDoS protection platform, which includes 10 scrubbing centers across Europe, North America and Asia-Pacific. The GTT platform uses next-generation DDoS technology to detect and filter out malicious traffic and complex threats in the network core in real time.

"Protecting our networks and businesses against cybersecurity attacks is not just a matter of technology – it requires constant vigilance. By implementing strong policies and procedures, educating our employees and taking proactive steps to stay ahead of the latest threats, we can work towards a safer, more secure digital experience.

DAVE FRASER
VP, SECURITY, GTT

We perform quarterly stress tests to our business continuity plan by simulating our response to a designed crisis scenario. Each test is followed with an audit report to highlight areas of improvement for future scenarios, helping us to ensure that we have the right resources, systems, process and people in place.

Our NOC and SOC operations at our primary Bulgarian location are certified to ISO 22301, the Business Continuity Management System.

SAFEGUARDING CUSTOMER PRIVACY

Our data privacy framework ensures compliance with current privacy and data protection laws and encourages best practices when handling data. We comply with all applicable privacy laws, including General Data Protection Regulation (GDPR) as well as the Privacy and Electronic Communications Directive (ePrivacy Directive), and follow strict country-specific telecommunication legislation. By further implementing detailed policies, procedures, and processes that are compliant with the most rigorous industry accepted data security standards, we are fully committed to providing compliant, multi-jurisdictional, segregated and secure solutions for all our customers.

Mandatory training in data privacy compliance is required of all GTT employees.

CLOSING THE DIGITAL DIVIDE

The internet is a vital means to help businesses stay connected, allowing us to overcome physical distances, share information instantaneously and drive further collaboration through a collection of networks.

As the need for connectivity continues to grow, so does the digital divide that leaves significant portions of the population without access to quality connectivity. GTT owns and operates one of the leading Tier 1 IP networks in the world – providing the scalability, security and reach that our customers rely on to remain globally connected.

Given our leadership position, we are committed to working to address and expand network access and reliability, and are working to create partnerships that will bring higher speed and more reliable internet services to remote and underserved communities.



SPOTLIGHT :

HELPING RURAL COMMUNITIES PARTICIPATE IN THE DIGITAL ECONOMY

At GTT, we understand the importance of a modern broadband infrastructure that allows communities everywhere to participate in the digital economy. In 2022, GTT worked with Caliber Financial Services to bring high-speed internet service for the first time to families and businesses at the Otoe-Missouria Reservation in rural north central Oklahoma.

The solution GTT and Caliber deployed for the Otoe-Missouria tribe enables students on the reservation to connect to the internet and the cloud more reliably and securely while giving businesses the capability to connect to customers and suppliers faster.

John Shotton, Otoe-Missouria Tribal Chairman, expressed gratitude for the work provided by GTT and Caliber to elevate the quality of life and boost economic development on the reservation.

"Broadband services are a vitally important lifeline for our schools, businesses, healthcare services and all other aspects of community life that rely on a modern telecommunications infrastructure," – **John Shotton**



GIVING BACK

While our organization has significant global reach, we believe in creating local benefit. Through our employment opportunities, wages, taxes, capital investments and vendor contracts, we provide significant direct and indirect economic benefits to the communities where we operate. In addition, individuals and teams at our office locations are active in the community, providing sponsorships and contributing time to local causes.

In 2022, GTT began formalizing our community giving and engagement programs by seeking feedback from employees on areas they would be most interested in supporting at a company-wide level. Based on survey results, children's charities was selected as GTT's passion area for more targeted employee volunteerism.

To propel our activities, a Community Engagement Committee was established to create a framework for global volunteerism and increase local volunteer opportunities for our employees. In addition, the company recently held a Global Community Engagement Week to inspire employees and promote individual and team volunteering through keynote sessions and employee testimonials. Starting in mid-2022, GTT began offering employees two days of paid leave annually for involvement in charitable initiatives, with more than 370 volunteer days logged by employees in recent months.

"Through volunteering, we have the opportunity to learn new skills, build relationships and gain a deeper appreciation for many communities we serve. It's truly inspiring to see thepositive impact we can have when our teams come together to make a difference."

HAYDEN MALE
DIRECTOR OF TALENT ACQUISITION, GTT

3.

FURTHERING OUR COMMITMENT TO SUSTAINABILITY



As a global network provider, we seek to understand climate related-risks to our business, manage the environmental impact of our products, services and operations and continually improve our environmental performance and operating methods.

MITIGATING IMPACTS OF CLIMATE CHANGE

In 2022, GTT conducted a Task Force on Climate-Related Financial Disclosures (TCFD) analysis to identify climate-related risks and opportunities most impactful to the business.

Scenario Alignment

While analyzing climate-related risks and opportunities relevant to GTT operations, a scenario analysis was conducted utilizing two Representative Concentration Pathways (RCPs) identified by the Intergovernmental Panel on Climate Change (IPCC). These scenarios, deemed the "Green Scenario" and the "Red Scenario" in our analysis , were selected to highlight the difference in expected climate responses if the world adopts an approach of aggressive climate mitigation or climate inaction:

Green Scenario RCP 2.6 | Mitigation Scenario: RCP 2.6 is likely to keep global temperature rise below 2°C by 2100. In this warming scenario, carbon dioxide emissions start declining immediately and reach zero by 2100, methane emissions are halved by 2100 and negative carbon dioxide emissions average 2 gigatons per year.

Red Scenario RCP 8.5 | Adaptation Scenario: In RCP 8.5, emissions continue to rise, and warming is estimated to reach 4.3°C by 2100. This is commonly viewed as either a "worst-case" or "inaction" scenario.

In each scenario, both physical and transition climate risks were analyzed, as well as climate opportunities. For each risk and opportunity, expected outcomes in the Green and Red Scenarios were assessed and an appropriate time horizon was determined based on assumed timing of potential impact to the business.

In our analysis, GTT defines "short-term" as 2022 (the year of GTT's initial climate risk analysis), "medium-term" as 2035 and "long-term" as 2050.

PHYSICAL RISK

Risk Type	Potential Business Impact	Risk Mitigation	Time Horizon
SUPPLY CHAIN DISRUPTION	GTT's direct operations, as well as those of its customers and suppliers, can be influenced by climate factors either through increased resilience or disruption of key resource cycles.	GTT resource reliance is primarily indirect; supply chain disruption is expected to be more of an impact in the medium- to long-term.	Medium-, long-term
EXTREME WEATHER EVENTS	Increased extreme weather events could impact and cause disruption to GTT's physical operations and leased storage in data centers.	GTT is well diversified geographically, minimizing the risk that a single-point failure tied to extreme weather events could significantly impair GTT's functional ability.	Medium-, long-term
HEAT STRESS	Rising temperatures could create safety concerns and productivity loss for GTT employees, specifically in regions where high levels of heat stress are predicted.	GTT offices and data centers are located in regions with minimal expected heat stress; this risk is more likely to be felt indirectly by GTT.	Long-term
WATER STRESS	Significant change in precipitation patterns could heighten flood risk at GTT office locations and points of presence, but droughts are not projected to have as strong an impact.	GTT is not a large consumer of water and offices and data centers are located in regions unlikely to be significantly impacted by water stress.	Long-term

TRANSITION RISK

Risk Type	Potential Business Impact	Risk Mitigation	Time Horizon
ELECTRICITY COSTS	The introduction of renewable electricity sources could lower GTT's expenses by diversifying energy supply. However, should electricity demand exceed supply or grid capacity, costs could rise significantly.	Most GTT operations are leased rather than owned; securing a greater mix of renewables in consumed electricity over time maybe considered, in step with market availability.	Short-, medium, long-term
CUSTOMER DEMAND	Customer demand for sustainability-related requirements continues to increase, creating additional barriers to business.	The company is actively addressing climate-related matters and continues to strengthen its ESG programs and reporting.	Short-, medium -, long-term
REGULATORY AND INVESTOR PRESSURE	Rapid expansion of climate-related reporting and investor requirements has the potential to increase strategic integration, disclosures and associated expenses.	GTT continues to enhance its ESG data tracking, monitoring and internal reporting capabilities to increase preparedness.	Short-, medium-term
RAW MATERIAL COSTS	A more limited supply of raw materials may lead to price increases; the establishment of secondary markets may reduce prices.	GTT has reduced its reliance on copper as a raw material having switched to fiber-based router procurement, protecting against a potential surge in copper prices as the metal most in demand for electrification.	Medium-, long-term
CARBON PRICING	Increased carbon pricing will likely yield a modest increase on GTT's operating expenses; however, carbon pricing mechanisms felt upstream of GTT may be passed on to the company through higher electricity prices and raw material costs.	GTT maintains an asset-light model with a limited GHG emissions footprint.	Medium-, long-term

OPPORTUNITIES

Opportunity Type	Opportunity	Time Horizon
BRAND REPUTATION	GTT's perception as a sustainable, climate-conscious brand could positively increase brand reputation and potentially lower its cost of capital.	Short, medium-, long-term
ACCESS TO MARKETS	The telecommunications industry is a core driver behind the expansion of green technology solutions; GTT could see major expansion of its customer base.	Short, medium-, long-term
TAX INCENTIVES	GTT has access to potential tax credits and incentives, supported by governments globally that are driving innovative and low-carbon technology development.	Short, medium-, long-term

As an asset-light, business-to-business enterprise with a diversified global footprint, GTT is well-insulated from the majority of climate risks assessed during the scenario analysis. Few risks may have a direct impact on day-to-day operations, such as supply chain disruption and customer demand. Most risks will manifest upstream in carbon pricing and raw material costs, exposing GTT to potential pass-through costs.

GTT's global operations are minimally susceptible to physical climate risks given the nature of its business. The company has optionality in its data center and office space that would allow for business continuity when faced with both chronic and acute physical risks, including heat stress, water stress, and extreme weather events.

Risk Management

GTT is dedicated to identifying, assessing, prioritizing, monitoring and mitigating risks across our business, and the management of climate risk is integrated to GTT's overall operational risk strategy.

Additional information on our approach to climate-related risk is available in our **TCFD Report**.

REDUCING OUR ENVIRONMENTAL FOOTPRINT

We recognize that all companies have a role to play in minimizing impacts on the environment. While our asset-light business model inherently reduces our greenhouse gas emissions (GHG) and waste and water consumption, our Environmental Policy defines our commitment to managing those aspects of our business that can affect the environment and defining measures to review our performance.

Understanding Our Emissions Profile

In 2022, GTT began a comprehensive data acquisition process to determine our baseline Scope 1, 2 and 3 GHG footprint across our global operations. Through our established processes, we are better positioned to track and analyze our footprint and execute reduction initiatives.

Our Scope 1 emissions represent emissions generated from GTT facilities including, offices, data centers and network operations, and our Scope 2 emissions represent emissions associated with electricity consumed at our global office locations.

We have also screened all Scope 3 categories that have been deemed most material to our business operations. Indirect emissions associated with GTT's upstream and downstream value chain include emissions resulting from purchased goods and services, fuel and energy-related activities, business travel, employee commuting and use of sold products.

Setting an Emissions Reduction Target

In line with stakeholder expectations, GTT has confirmed its ambition to reach net zero by 2035 for Scope 1 and Scope 2 emissions. During 2023, we will develop a detailed year-on-year roadmap for advancing towards this ambition, considering energy efficiency, fleet electrification and renewable energy procurement as potential paths to meet our target.

Our Scope 3 emissions are outside the scope of our current target. Within our Scope 3 footprint, Category 11 – Use of Sold Products reflects approximately 98% of our value chain emissions. Although, as a service provider, we do not design or manufacture the products we sell to customers, we will explore options to influence Scope 3 reductions across our value chain.

> "We recognize that our customers depend on us to provide products and services that not only meet their unique needs, but also support them in their environmental and carbon reduction goals. That's why we work to integrate sustainable practices into every aspect of our operations, and continuously seek out new ways to measure and reduce our environmental impact. Together with our customers, we can create a better tomorrow for generations to come.
>
> ***TOM MAJOR***
> ***VP OF SOLUTIONS CONSULTING, GTT***

2022 Emissions Profile

Scope 1, 2 & 3 Emissions (Mt CO2e)	
Total Scope 1	310
Total Scope 2	1,072
Total Scope 3	8,878,005
Total Emissions	8,879,387
Scope 3 Emission Breakdown (Mt CO2e)	
Upstream (Mt CO2e)	
Category 1 – Purchased goods and services	106,656
Category 4 – Upstream Transportation and Distribution	583
Category 6 – Business travel	712
Category 7 – Employee commuting	1,181
Downstream (Mt CO2e)	
Category 9 – Downstream Transportation and Distribution	583
Category 11 – Use of sold products	8,768,290

Conserving Energy

Reducing our GHG emissions profile begins with energy conservation, and we have taken initial steps to reduce our consumption across our operations.

With many employees now working remotely, we have consolidated our office locations to improve office-based efficiency of energy and space. Since 2019, we have decreased our office count by more than 25 locations and are continuing to evaluate our square footage and physical location needs. We also encourage the use of video, web and audio-conferencing capabilities where possible to reduce travel requirements.



Reducing Water Consumption

Reducing water consumption is critical to the preservation of our natural environment. Although we consume minimal water at our office locations, we aim to better understand our water usage and identify areas of potential improvement.

Minimizing Waste

We look to minimize our waste generation and promote best practices across our organization.

Reusing materials – either as whole units or as separate parts – is the best way to minimize energy emissions and reduce the amount of waste sent to landfills. At our office locations, we focus on reusing and recycling office equipment, where possible. Computers that no longer meet our basic requirements, but are still useable, are refurbished and donated to local charities. Remaining outdated computers, printers and network equipment are recycled if no longer usable.

When customer equipment or parts cannot be reused, we work to ensure appropriate disposal. For equipment that is returned to the company, we work with third-party waste management organizations to recycle and/or properly dispose of equipment. Additionally, we adhere to strict laws on waste management across our locations in the European Union.

We also promote green practices to reduce waste in the workplace, including encouraging employees to embrace smart printing functions, utilize e-business cards and take advantage of accessible recycling bins and reusable drink options.

Supporting Biodiversity

Through our multi-year partnership with Tree-Nation, we have helped to support reforestation efforts worldwide. Donations made by the company and voluntary contributions from our employees since inception have contributed to the planting of approximately 6,300 trees, totaling nearly 3 hectares of reforested land across Madagascar, Colombia, Brazil and Kenya.

Engaging Employees

GTT offers all employees an ESG overview and training course through its learning and development platform. In addition to broader ESG topics, the training specifically addresses pillars of environmental stewardship, including resource conservation, GHG emissions and climate-risk management. The training also educates employees on best practices and ways they can reduce their personal impacts on the environment. Since the launch of the training in early 2023, approximately 83% of GTT employees have completed the course.





4.

ENHANCING OUR CORPORATE CULTURE

Our team is essential to our operational excellence, and we are committed to rewarding, engaging and supporting our employees to unlock their full potential. Through our actions, we are fostering a culture of collaboration, inclusion and communication.

SUPPORTING OUR EMPLOYEES

Across our workforce we recognize and reward our talent and provide the resources individuals need to succeed personally and professionally. Our region-specific handbooks outline our policies, programs and available benefits are made available to all employees.

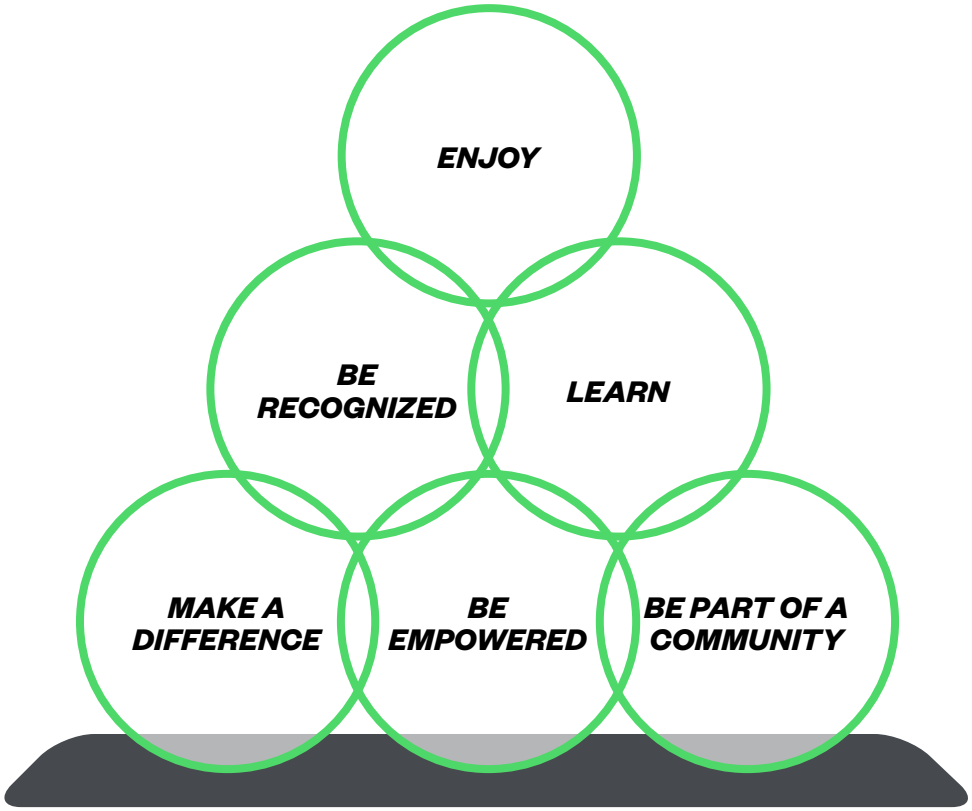
Compensation

Every employee is offered competitive compensation and is eligible for a variable incentive tied to both corporate goals and individual performance metrics. Employees also receive overtime pay, where applicable.

Benefits

Eligible employees are provided benefits in line with country-specific customs and regulations. These include pension, life insurance, disability insurance, holiday entitlement, employee assistance programs and medical insurance. For instance, U.S-based employees are eligible for comprehensive medical, dental and vision coverage as well as a retirement plan. Other benefits may include paid time off (PTO), parental leave and allowances in the form of parking and transportation supports, meal arrangements or childcare vouchers.

New in 2022, GTT implemented a sabbatical policy that provides all employees with up to six months of unpaid leave based on tenure. In addition, seniority awards provide special time off for employees upon achievement of milestone service anniversaries.



SPOTLIGHT :

PEDAL POWER

In March 2022, our UK offices joined forces with Cycle Solutions, a leading cycle-to-work scheme provider. This government-backed initiative enables employees to obtain discounted bike and/or cycling accessories for office commuting to promote healthier lifestyles and environmental benefit.

"Cycle-to-work is a game changer. It helps me stay fit and energized and is better for the environment. It also allows me to skip the traffic and provides a great range of options. It's a small change that can have a big impact on my health and the environment."

Tim Hopkins VP,
Human Resources, GTT



FLEXIBLE WORK ARRANGEMENTS

We provide employees the flexibility to choose a work format that accommodates their unique needs and circumstances. While our global office locations are available to those who wish to collaborate in person, employees are also allowed to participate in fully remote and hybrid work models when jobs allow.

"Creating a culture of support, empowerment and growth for employees is not only the right thing to do – it is the smart thing to do. When we invest in our employees as individuals, we are also investing in the long-term success and sustainability of our business."

– **Emanuela Fadda, Associate General Counsel, Legal, GTT**

DEVELOPING OUR TALENT

We seek to build the best workforce by training and developing our employees and creating advancement opportunities.

Building Competency

All GTT job descriptions are tied to a list of core competencies required to perform and excel at every position across business, individual, management, leadership and functional criteria.

GTT employees are able to access any competency frameworks for all positions globally, allowing our employees to understand the competencies required for all positions and inform on skills needed to best prepare for career advancement. Job openings are made available for GTT employees as well as the general public.

In 2023, we are focusing on further supporting skill development and utilizing the Workday Skills Cloud to enrich our employee journey with upskilling and internal mobility by identifying skills gaps, matching employees with opportunities and suggesting additional skills based on job history and education.

Feedback Mechanisms

We encourage a culture of constructive feedback from leaders, team members and wider teams. Feedback, like improvement, should be continuous and achievement should be recognized as it occurs.

Our employee review process is based on competency frameworks. Each year, employees work with their managers to set goals for skill development and job performance, with 100% of our workforce offered quarterly check-ins as well as annual reviews on performance and career development.

To promote productive review sessions, all managers are provided with training, including GTT Mentoring and Coaching Programs, that teaches best practices to conduct successful review sessions.

Training and Development

GTT offers mandatory and voluntary training and development initiatives to promote career advancement for all employees. In 2022, GTT employees completed a total of 29,789 E-Learning Training sessions and 3,817 instructor-led training sessions with titles including: Continuous Quality Improvement, Opportunities and Ways to Learn, Developing Your Strengths and Getting Customer Feedback, among others. GTT offers five leadership development trainings, including trainings for new managers, senior business leaders as well as individual contributors. In addition, GTT offers excel learning paths for beginning, intermediate and advanced participants.

Our Progress

Our annual employee engagement survey promotes open feedback to drive positive change. In 2023, more than 1,500 employees participated in the survey, representing 79% of our workforce.

96%

of respondents agree that they feel they have a good working relationship with their colleagues

93%

of respondents agree that manager/employee communication is effective

85%

of respondents agree that employees treat each other with respect

81%

of employees feel they are empowered by their leadership

ENSURING HEALTH AND SAFETY

While physical safety is a relatively low risk given our office-based environment, we remain committed to promoting the health and safety of our workforce and all those who visit our locations, including our customers.

Policies and Expectations

Our Health and Safety Policy, which is offered in major languages spoken by GTT employees, outlines our basic expectations for workplace safety and encourages ownership, commitment and compliance by all employees as well as contractors and subcontractors in appropriate circumstances. Information about our health and safety resources and policy changes are actively communicated to all employees through centralized communication channels. In addition, each GTT location has its own set of specific policies and training requirements, designed to meet the unique needs of each office locale.

Health and Safety Risk Assessments

In 2022, 41% of our offices conducted health and safety risk assessments, including all of our most highly populated locations. The goal of these assessments is to identify site-specific issues, anticipate health and safety risks related to a change of operations and to educate and empower employees to take corrective actions. Safety risk assessments, including fire alarm testing, are also completed for all offices by building management as part of our lease agreements.

Management, Training and Reporting

All office locations are equipped with proper safety equipment, including fire and evacuation alarms and illuminated exit signs, and employees are trained on topics such as fire safety, first aid and optimal workstation elements. We also ensure all employees are familiar with our accident reporting process. Every incident and near miss is required to be reported through our automated Workday system, and safety events are promptly investigated to determine their cause and prevent re-occurrence. In 2022, GTT reported a Lost Time Incident Rate (LTIR) and Lost Time Injury (LTI) frequency rate of zero per 200,000 hours worked.

PROMOTING MENTAL HEALTH & WELL-BEING

At GTT, we have long prioritized the overall well-being of our employees with a heightened focus on mental health in recent years. In 2022, we launched a Global Employee Assistance Services Program with core features including short-term counseling, mindfulness programming, wellness coaching and work-life consultations. Employees also have access to extended support for anxiety and depression.

Given the absence of social connections that happen naturally in shared workplaces, we are purposeful about creating points contact in our global, remote landscape. New in 2022, a Staying Connected week was introduced to bring awareness of, and create new connection opportunities for employees and leaders. Connection opportunities included a series of daily online posts, videos and leadership training opportunities, among other opportunities to reach individuals across geographies.

Local and firm-wide wellness programs are also made available to employees, including employee-led wellness groups, as well as access to Calm, a sleep and meditation application designed to improve relaxation and focus. In addition, The Green Room employee newsletter enables the sharing of positive employee stories firm-wide, and a monthly Cheers for Peers initiative aims to promote peer-to-peer recognition of exceptional performance.

SPOTLIGHT :

BELGIUM TEAM EARNS CORPORATE WELL-BEING AWARD

In May 2023, GTT's Belgium team was awarded the Corporate Well-being Award by ZigZagHR, a community of HR professionals in Belgium. The award recognized the team's five-step model to promote employee health, education, employee engagement, well-being and networking at a local level.

ADVANCING DIVERSITY AND INCLUSION

We believe in the power of diversity and inclusion to drive innovation and business agility. Our collective workforce is naturally diverse given our global operations, and we continue to explore ways to ensure our workforce is reflective of the customers and communities we serve.

Currently, women represent approximately 37% of our global workforce and over 22% of our senior leadership team. Additionally, women comprise approximately 30% of all leadership roles beginning at the manager level.

Our ability to attract and retain a diverse workforce is dependent on providing a workplace where all feel safe and welcome. As outlined in our Anti-harassment and Non-discrimination Policy, we are committed to providing a work environment that is free of unlawful discrimination or harassment of any kind. Acts of discrimination, including harassment, are not tolerated and are subject to disciplinary actions up to and including termination of employment.

COUNTRY	EMPLOYEE COUNT
Austria	4
Belgium	25
Brazil	3
Bulgaria	703
Canada	13
Czechia	25
Denmark	13
Finland	4
France	24
Germany	56
Hong Kong	1
India	313
Ireland	5
Italy	47
Netherlands	45
Russian Federation	2
Spain	27
Sweden	13
Switzerland	15
United Kingdom	181
United States of America	578
TOTAL	**2097**

In support of women across the organization, GTT provided sponsorship opportunities for 51 female leaders across our global locations to attend the WomenTech Global Conference, an event that brings together more than 100,000 women in tech through an interactive platform designed to foster innovation, leadership development, professional growth and mentorship.

This provided an opportunity for female employees to join forces and create a professional network that can be used to benefit their career progression as well as a culture of inclusivity.

Feedback from Our WomenTech Global Conference Participants



Providing Equal Opportunity

GTT is firmly committed to providing equal opportunity in all aspects of employment. We comply with applicable national disability laws including the Americans with Disabilities Act and provide reasonable accommodation for employees with disabilities.

GTT's policy is to recruit, hire and promote for all positions in a non-discriminatory manner in accordance with federal, state and local laws and an equal opportunity statement is included in all job postings. More information about our commitment to Equal Opportunity Employment can be found in our Anti-harassment and non-discrimination policy.

> By harnessing the skills, perspectives and creativity of women in tech, we can develop more innovative solutions, better serve our customers and achieve far greater success."

AMY MCKISSOCK
SVP SALES OPERATIONS, GTT

SPOTLIGHT :
CULTIVATING COLLABORATION

We firmly believe in the power of inclusion and collaboration. In 2022, we launched Know-How clubs, a company-wide initiative to bring people together through personal interests and hobbies. Our clubs – ranging from dogs to martial arts to books – encourage employees to take a break from day-to-day tasks and build new relationships with colleagues.

In 2022, 23 clubs were formed with over 180 participants across geographies.

5.

PROMOTING GOOD GOVERNANCE



Across our organization, we seek to maintain the highest standard of ethics and promote a culture of integrity and transparency. Our governance principles are demonstrated through an expansive suite of polices, practices and procedures, which help to inform and support the essential work we do each day and provide a catalyst for better business.

ENSURING STRONG LEADERSHIP

Effective governance begins with engagement and accountability at the highest levels of our organization. Our Board of Directors brings substantial knowledge from the telecommunications industry and corporate finance, coupled with seasoned governance experience to support the company's strategy. The Board, as well as its subcommittees for Audit, Compensation and Governance & Risk, oversees the strategic direction of our business and advises our Senior Leadership Team.

Our **Board of Directors** is comprised on the following experienced individuals:

Tony Abate	**Executive Chairman**
Ernest Ortega	**CEO & Director**
Sherman Edmiston II	**Director**
Wayne Rehberger	**Director**
James Parker	**Director**
Adam Malin	**Director**
Alexander Grau	**Director**
Beau Harbour	**Director**
Jon Lin	**Director**

Our **Senior Leadership Team** is responsible for the day-to-day operations and management of the company and is committed to delivering on our strategic initiatives. The Senior Leadership Team also represents diverse and complementary skills reflective of our global reach.

Ernie Ortega	**Chief Executive Officer**
Johan Broekhuysen	**Chief Financial Officer**
George Kuzmanovski	**Interim Chief Operating Officer**
Lisa Cool	**Chief Marketing Officer and Chief of Staff for the Executive Office**
Frederique Arnold	**Senior Vice President, Human Resources**
Jim Delis	**President, Americas Division**
Tom Homer	**President, Europe Division**
Douglass Maynard	**General Counsel**
Todd Kiehn	**Senior Vice President of Strategy & Product**

ESTABLISHING EXPECTATIONS FOR CONDUCT

At GTT, obeying the law, both in letter and in spirit, is the foundation on which our ethical standards are built. Our Code of Business Conduct and Ethics outlines expectations for all GTT employees, officers and directors and seeks to ensure that we are acting ethically in all business dealings and relationships.

Our GTT Code of Business Conduct and Ethics is supplemented by additional global and country-specific policies and guidelines to address a wide range of business practices and issues applicable to our employees including corruption, bribery, conflict of interest, fraud, money laundering, and information security and specific approval procedures for sensitive transactions such as gifts and travel. As part of the GTT Code of Business Conduct and Ethics , all employees are also provided with guidance on competitive behavior and appropriate interactions with competitors.

Given the importance of these documents and continued changes in global regulations, the latest versions of our policies are made available each year to our team. GTT employees and contractors with access to our platforms and resources are required to review and acknowledge relevant policies as part of this annual update. In 2022, 100% of active employees acknowledged our GTT Code of Business Conduct and Ethics, as well as our Anti-Bribery, Anti-Corruption and Anti-Competitive practices.

In addition, we offer online courses in Workday with practical guidelines and examples for those looking to better understand the essence of the content and acquire additional practical knowledge on the topics.

As a company that is built on the foundation of ethical standards, we maintain a **Safecall** ethics helpline and website, which is available to all GTT employees and monitored by the GTT legal department, allowing for anonymous reporting of violations or suspected violations at any time. GTT does not allow retaliation for reports of misconduct made in good faith. All good faith reports are investigated. In 2022 we had zero identified incident reports.

Note: Inactive employees accounted for approximately 3% of the workforce due to parental or long-term leave.

PROTECTING HUMAN RIGHTS

Our Approach to Human Rights and expectations for conduct are in line with the Universal Declaration of Human Rights and supported by our values and GTT Code of Business Conduct and Ethics. Additional commitments around human rights, including child and forced labor are disclosed in our Modern Slavery Policy.

All employees receive annual training on various compliance topics, including human rights issues, and are required to report observed human rights violations directly to management or through our ethics helpline.

LABOR RELATIONS

GTT recognizes the rights to collective agreements and work councils in line with country-specific requirements, including the U.S. National Labor Relations Act (NLRA). Globally, just over 100 employees, representing about 5% of our workforce, are covered by formal collective bargaining agreements. In addition, approximately 150 employees are covered by formally-elected Employee Representatives.

We adhere to collective agreements concerning working conditions. Our employees covered by formally-elected Employee Representatives also have Management-Worker Health and Safety Committees in place.

CREATING SUSTAINABLE PARTNERSHIPS

Our community of partners and suppliers allows us to deliver excellent service and results to our customers. We work with partners from around the globe and seek those who share in our commitment to deter wrongdoing across our supply chain.

Expectations

Our Expectations for Business Partners Statement sets out the minimum standards expected from our valued suppliers and vendors, including ensuring safety requirements for products and services; providing safe and healthy work environments; meeting environmental compliance requirements; and protecting against child labor, forced labor and human trafficking.

In 2023, we communicated our Supplier Code of Conduct to all active network suppliers with 100% of active network suppliers expressing no issue with the expectations presented. In addition, the qualification and on-boarding processes for new suppliers have been updated to include clauses related to compliance with applicable environmental, labor and human rights laws.

Upon recent assessment of our top network suppliers, accounting for 80% of our spend, approximately 86% report on ESG programs and/or have mechanisms in place to address concerns of misconduct.

Management

Our Supplier Management Policy outlines the roles, responsibilities, controls and KPI activity to effectively establish, manage and maintain supplier management for our core products. GTT conducts Quarterly Business Reviews (QBR) with third-party suppliers, at minimum, to ensure adherence with GTT standards, operations procedures and contract obligations

In addition, we perform an evaluation of the key services of corporate suppliers, followed up with a risk assessment. For suppliers with access to Personal Identifiable Information (PII) data, the risk assessments determine the level of access or type of data that might be shared with suppliers. All risks identified for multi-service suppliers are aggregated, which allows GTT to identify those suppliers that present the higher risk to the business from an information security perspective.

GTT monitors the attack surface of these higher risk supplier pro-actively, utilizing a third-party tool that allows GTT to understand and act swiftly on any threat identified.

Training

We require annual training on sustainable procurement topics for all our employees involved in third-party purchasing. The training is designed to educate our employees on supply chain risks including environmental and human rights issues as well as key considerations when evaluating business partners. In 2023, we achieved a 100% training completion rate.

"The strength of our supply chain is only as good as its weakest link. By ensuring strong supplier management and sustainable procurement practices, we are paving the way for a stronger, more resilient business."
– **Michael Montreuil, Director of Supply Chain and Logistics, GTT**



MANAGING ENTERPRISE RISK

Our dedicated Operational Risk Committee is committed to identifying areas of operational risk to the business and developing effective strategies to monitor and manage those risks across topics including cybersecurity, finance, operations, regulatory and compliance, business continuity and climate change.

Members will meet on at least a quarterly basis and include representatives of the Senior Leadership Team and as well as from sales, vendor management, service delivery, platform operations and ESG. This committee provides regular updates on the status of operational risk and recommendations to the Board as well as relevant Board committees.

"Enterprise risk management requires a deep understanding of the evolving technology landscape, operations and regulatory environment and broader ESG landscape. Our priority is to adapt quickly and mitigate risks to best protect our business and ensure the trust of our valued customers."
– James Karimi, Chief Information and Security Officer and Chair of GTT's Operational Risk Committee



SUPPORTING NET NEUTRALITY

GTT supports net neutrality and complies with EU net neutrality legislation. We provide our customers with reliable, fast and secure connectivity and also ensure that our services are impartial, without bias and uphold all aspects of Regulation EU 2015/2120, requiring the safeguarding of open internet access.

We believe that end-users have the right to access and distribute information and content irrespective of user location, content or equipment. We provide our services without discrimination, restriction or interference. In instances where we must take reasonable traffic management measures, we affirm that our actions are proportionate to the situation and based on upholding service quality, not commercial considerations. We continue to monitor changes in legislation to ensure compliance while providing impartial high-quality services for our customers.







APPENDIX

SASB INDEX

TELECOMMUNICATION SERVICES

Topic	Code	Accounting Metric	2022 Disclosure
Environmental Footprint of Operations	**TC-TL-130a.1**	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	See Section 3: Furthering Our Commitment to Sustainability
Data Privacy	**TC-TL-220a.1**	Description of policies and practices relating to behavioral advertising and customer privacy	Discussion in Safeguarding Customer Privacy **GTT Privacy Notice**
Data Privacy	**TC-TL-220a.2**	Number of customers whose information is used for secondary purposes	Not applicable
Data Privacy	**TC-TL-220a.3**	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Not applicable
Data Privacy	**TC-TL-220a.4**	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure	Not disclosed
Data Security	**TC-TL-230a.1**	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	Discussion in Securing Our Networks and Business
Data Security	**TC-TL-230a.2**	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion in Securing Our Networks and Business
Product End of-life Management	**TC-TL-440a.1**	(1) Materials recovered through take back programs, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled	Discussion in Minimizing Waste
Competitive Behavior & Open Internet	**TC-TL-520a.1**	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Zero
Competitive Behavior & Open Internet	**TC-TL-520a.2**	Average actual sustained download speed of (1) owned and commercially-associated content and (2) non-associated content	Not disclosed
Competitive Behavior & Open Internet	**TC-TL-520a.3**	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices	Discussion in Supporting Net Neutrality
Managing Systemic Risks from Technology Disruptions	**TC-TL-550a.1**	(1) System average interruption frequency and (2) customer average interruption duration	Not disclosed
Managing Systemic Risks from Technology Disruptions	**TC-TL-550a.2**	Discussion of systems to provide unimpeded service during service interruptions	Discussion in Maintaining Business Continuity

Activity Metrics		
Number of wireless subscribers	**TC-TL-000.A**	10,784
Number of wireline subscribers	**TC-TL-000.B**	26,866
Number of broadband subscribers	**TC-TL-000.C**	59,927
Network traffic	**TC-TL-000.D**	226,000 petabytes

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