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GTT ESG REPORT

October 2025

gtt.net





A LETTER FROM OUR CEO

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It is with pride that I present our fourth annual ESG report, marking our continued commitment to long-term value creation. At GTT, we know our success is built on more than just technology — it's built on trust, responsibility and a vision for a sustainable future.

Our Asset-Light Model and ESG

As a B2B technology company, our business model is inherently different from many managed network and security services providers. Our asset-light approach allows us to focus on innovation while minimizing our physical environmental footprint. We recognize that our primary impact and greatest opportunities lie in our ability to:

- Empower our customers with solutions that support their corporate initiatives, including their own ESG targets
- Create an exceptional workplace for our talented employees
- Maintain the highest standards of data privacy, security and ethical conduct

This report outlines how we are integrating environmental, social and governance principles into every facet of our business, ensuring we create value for the stakeholders we serve.

Our Approach to Sustainability

Our mission is to connect people and machines to data and applications anywhere in the world, and we've extended this interconnected approach to our ESG strategy. We've completed a double materiality assessment to identify and prioritize the issues most significant to both our business and our stakeholders. This rigorous process, supported by third-party expertise, ensures our efforts are focused on the most critical areas, including corporate culture, climate change, working conditions and cybersecurity.

Our commitment to responsible business practices has been recognized externally, as demonstrated by our 2024 EcoVadis Silver Medal, which places GTT in the top 15% of companies assessed globally. This achievement acknowledges our strong performance in environmental impact, labor practices, ethics and sustainable procurement.

Our Planet: Reducing Our Environmental Footprint

GTT works actively to reduce our environmental impact, both across our relatively light physical asset footprint and beyond. We have this past year completed an in-depth analysis of our Scope 1, 2 and 3 greenhouse gas (GHG) emissions, and we are committed to greater transparency by aligning our disclosures with the TCFD framework. Looking forward, we will in 2025 look to align with the upcoming California Climate-Related Financial Risk Act (SB 261) and the Climate Corporate Data Accountability Act (SB 253) and continue to work toward our goal to achieve net-zero Scope 1 and Scope 2 emissions by 2035.

Our People: Greater Technology Together

Our people are our greatest strength. We are committed to fostering an inclusive workplace that prioritizes employee well-being, flexible working arrangements and professional development. We regularly engage with our employees through annual surveys, training sessions and town halls to ensure their voices shape our corporate culture. We have also introduced new recognition programs, highlighting customer-first behavior and outstanding achievements. These efforts have led to reduced turnover and a healthier, more productive environment.

We also recognize the critical importance of cybersecurity and data privacy. To protect our customers and our business, we

maintain a host of certifications, including ISO 27001 and SOC 2, and our employees are continually trained to uphold the highest standards of data protection.

Our Conduct: Strengthening Our Governance

Strong governance is the bedrock of our ESG strategy. We have a dedicated ESG Steering Committee that collaborates with leadership and the Governance and Risk Committee of our Board of Directors to shape and oversee our sustainability initiatives. This robust oversight, combined with our transparent reporting and a comprehensive set of policies ensures we operate with integrity and accountability.

Our commitment to ESG is an ongoing journey. We will continue to engage with our stakeholders, including our customers, investors and communities, to ensure our strategy remains aligned with their expectations as we continue to make a meaningful, positive impact.

In Closing

To our employees, thank you for your unwavering commitment and contributions. To our customers, partners and stakeholders, thank you for your continued support. Together, we are building a more resilient, inclusive and sustainable future.

I invite you to explore the pages that follow to learn more about our ESG journey and the progress we've made. We are proud of what we've accomplished, and even more excited about what's next.

Sincerely,



EDWARD MORCHE
Chief Executive Officer and Director
GTT Communications, Inc.





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1.

ABOUT THIS REPORT





BASIS FOR PREPARATION

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This ESG report has been prepared on a consolidated basis, aligned with the scope of GTT’s financial reporting and outlines GTT’s environmental, social and governance performance and initiatives for the reporting period ending 31 December 2024.

It encompasses the Parent Company, GTT Communications, Inc., along with all directly and indirectly controlled subsidiaries. It is intended to provide our stakeholders—including investors, customers, suppliers, employees and partners—with transparent and comprehensive insights into our sustainability strategy, progress and long-term impact.

This report has been prepared in alignment with globally recognized ESG reporting frameworks, including the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-related Financial Disclosures (TCFD), reflecting our commitment to ethical governance, responsible business practices and long-term sustainable value creation. As of 2024, the TCFD has officially concluded its operations, with its disclosure framework now integrated into the IFRS Foundation’s International Sustainability Standards Board (ISSB) standards. GTT will continue to report on the four core pillars of IFRS S2: Governance, Strategy, Risk Management, and Metrics and Targets, similar to TCFD.

In addition to aligning with established sustainability reporting frameworks, GTT has begun implementing selected elements of the European Sustainability Reporting Standards (ESRS) as part of our preparation for compliance with the Corporate Sustainability Reporting Directive (CSRD).

Our CSRD readiness journey began with a strategic evaluation of the sustainability topics most critical to GTT’s long-term success. Although our mandatory reporting timeline of 2026 — covering the 2025 financial year — has been deferred by two years, we are actively laying the groundwork for a smooth transition by enhancing our data collection processes and integrating ESG considerations into core business operations. Implementing the CSRD not only offers a strategic advantage by enhancing transparency but also strengthens stakeholder trust. It further drives operational efficiency, mitigates risks and ensures alignment with global ESG standards.

Unless otherwise specified, the data and information presented in this report reflect GTT’s global operations and are based on internal records, stakeholder engagement and third-party assessments. The depth of reporting on policies, initiatives, metrics and targets may vary depending on the nature of each ESG topic and the extent of GTT’s operational control or influence across the value chain. This report is reviewed and updated annually as part of our ongoing commitment to transparency, accountability and continuous improvement in sustainability performance.





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2.

CONNECT WITH US





GTT AT A GLANCE

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GTT provides a comprehensive portfolio of secure connectivity and managed network services tailored to the evolving needs of global enterprises and wholesale customers. Our solutions include Secure Connect, SD-WAN, advanced security services, global internet, voice and a broad range of connectivity options.

These offerings are backed by a robust suite of professional services and a globally distributed team of sales and support experts, ensuring localized, high-touch service delivery.

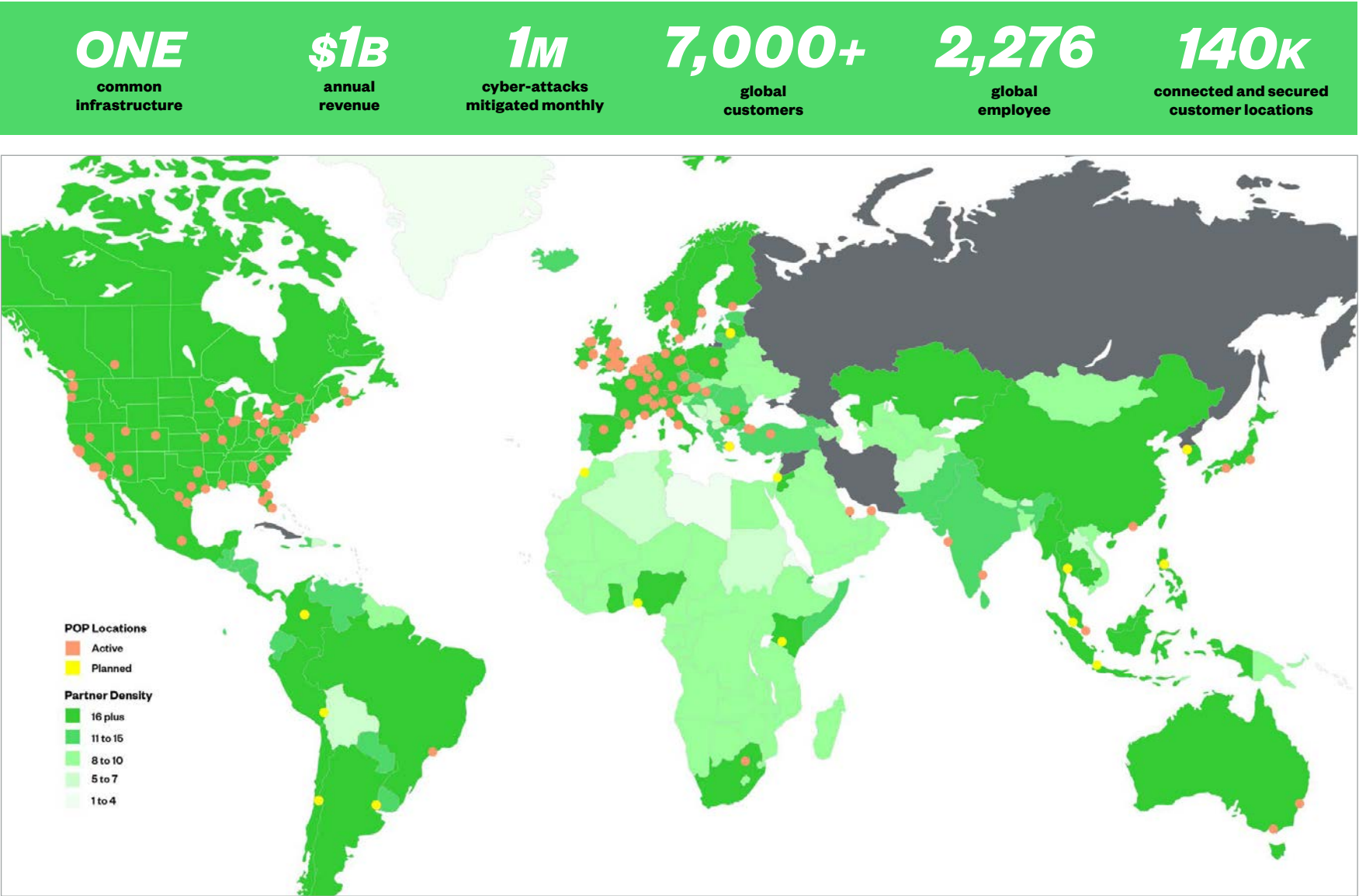
At the heart of our service delivery is GTTEnvision—a unified, cloud-native architecture that enables customers to seamlessly connect, manage and optimize their networks. The GTTEnvision platform comprises three integrated components:

- **GTTEnvisionCORE:** Our global IP backbone and distributed compute infrastructure.
- **GTTEnvisionEDGE:** Virtualized network functions deployed at the edge, delivering agility and performance via GTT-specified hardware.
- **GTTEnvisionDX:** A digital experience layer that provides customers with real-time visibility, control and customization.

With extensive API support and strong interoperability, GTTEnvision offers the flexibility, scalability and integration capabilities needed to simplify operations and accelerate digital transformation. Through this platform, we fulfill our commitment to Greater Technology Together by partnering closely with our customers.

To deliver these services, GTT collaborates with a diverse network of suppliers, including telecommunications carriers, equipment manufacturers, technology providers, professional services firms, outsourcing partners, network engineering specialists and facilities management vendors. This broad supplier ecosystem is essential to maintaining the quality, resilience and scalability of our services.

Our global presence and comprehensive professional services further reinforce our ability to support customers in key markets worldwide.





OUR PRODUCT PORTFOLIO & PLATFORM

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END TO END SOLUTIONS

CONNECT

Internet Flexible connections to everywhere you need	Cloud Connect Connect directly to leading cloud providers	Voice Optimize communication and collaboration	WAN High performance networking with global reach
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SECURE

SASE Secure your network infrastructure	Managed SD-WAN Optimize applications and network performance	Cloud Security Extend protection across the public cloud	DDoS Protection Prevent malicious traffic from overwhelming your infrastructure
MDR Augment internal resources with our expertise	Secure Remote Access Enable access to any application from anywhere		

SIMPLIFY

Project Management Take ownership of the delivery process	Service Management Optimal proactive service that extends beyond delivery	Program Management Support complex transformation projects	Technical Management Simplify and streamline your complex solutions
Cloud Advisory Services Simplify your digital transformation	Customer Incident Management A dedicated response for incident resolution and critical requests		





OUR BUSINESS MODEL: CREATING VALUE THROUGH INNOVATION & SUSTAINABILITY

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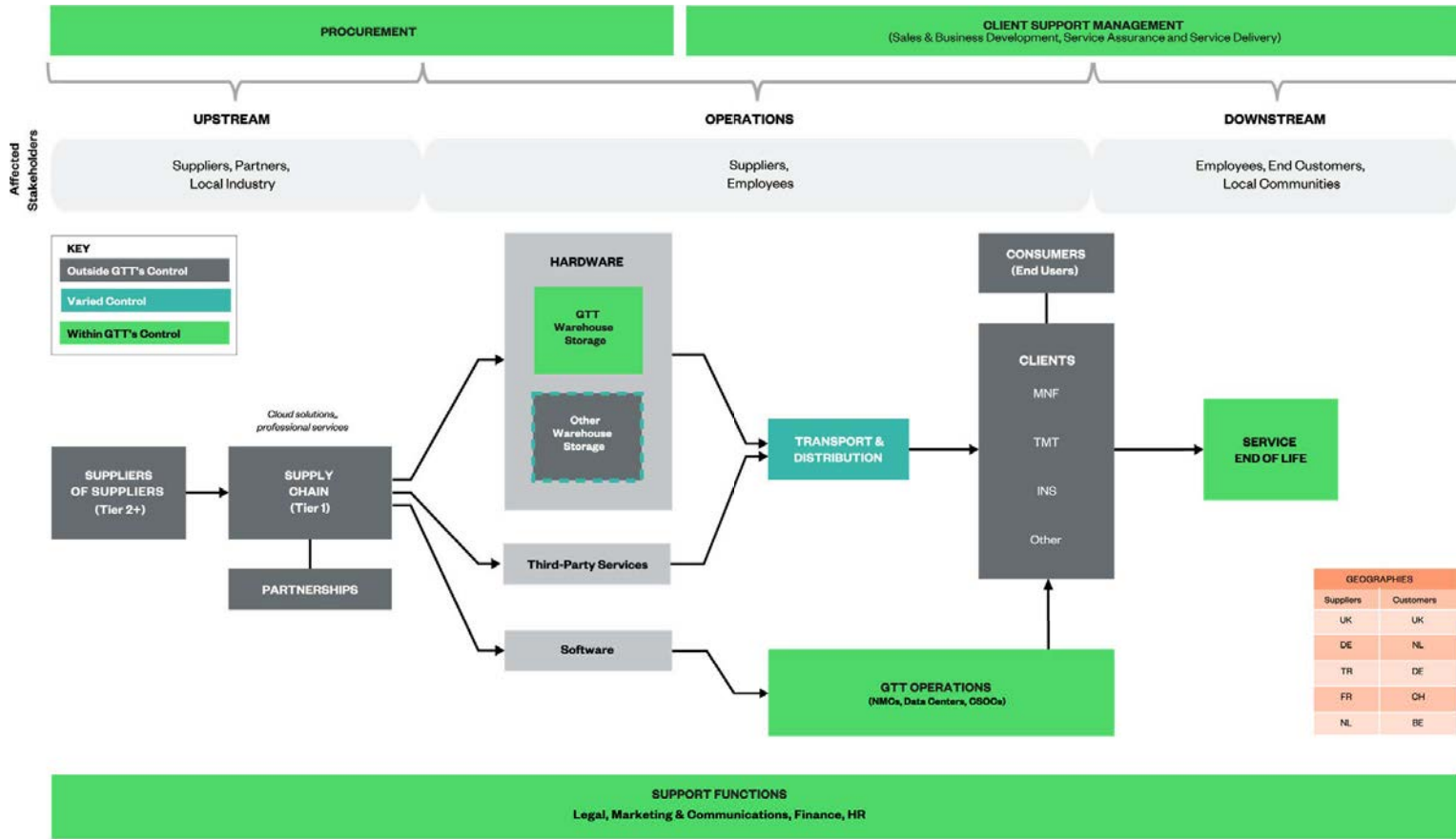
At GTT, we simply and securely connect people and machines to data and applications — anywhere in the world.

We operate as a global provider of managed network and security services, targeting distributed enterprises. Our business model is built on the following pillars:

- **Subscription-Based Services:** We offer recurring, contract-based services for secure cloud networking.
- **GTTEnvision Platform:** Our unified infrastructure integrates networking, security and cloud services, enabling seamless orchestration and management.
- **Tier 1 Global IP Backbone:** Our high-capacity, low-latency network spans 6 continents, delivering reliable, high-performance connectivity at scale.
- **Value-Added Solutions:** We provide advanced services such as Secure Connect (a Secure Access Service Edge framework), SD-WAN and managed firewalls to meet evolving enterprise needs.
- **Revenue Model:** Our income is primarily generated through recurring managed service contracts, professional consulting and platform access.
- **GTT's value chain:** Spans three key areas: upstream, internal operations and downstream.
- **Upstream:** We work closely with a diverse network of suppliers—including telecommunications carriers, equipment manufacturers and professional services firms—to ensure responsible sourcing and service delivery. We require key suppliers to accept our Supplier Code of Conduct to ensure the highest standard of our ethical principles within our supply chain.

- **Internal Operations:** Within our own operations, we are focused on improving energy efficiency and reducing environmental impact. Through initiatives such as infrastructure consolidation and the deployment of our GTTEnvision platform, we aim to minimize hardware dependency and lowering energy consumption. These efforts are monitored to ensure measurable progress and continuous improvement.

- **Downstream:** GTT supports customers globally with sustainable network solutions. We assist with end-of-life equipment management, promote recycling and help minimize environmental footprints through virtualized edge technologies. Our commitment to responsible business practices is reflected in our silver rating from EcoVadis, recognizing our performance in areas such as environmental impact, labor practices and ethics.



Definitions: UK - United Kingdom, DE - Germany, TR - Turkey, FR - France, NL - Netherlands, MNF - Manufacturing, TMT - Technology, Media and Entertainment, and Telecommunications, INS - Insurance





STAKEHOLDER ENGAGEMENT

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Stakeholder engagement is a cornerstone of our ESG strategy. We adopt a collaborative approach that includes both formal and informal interactions with investors, employees, customers, suppliers and communities. These engagements provide valuable insights that inform our materiality assessment and help us identify and prioritize the ESG issues most relevant to our business and stakeholders.

Beyond shaping our materiality process, stakeholder engagement plays a critical role in the development of our broader sustainability strategy. It serves as a direct feedback mechanism on our services, practices and business direction while also offering a platform to communicate progress on our ESG commitments.

This ongoing dialogue enhances our risk management by uncovering emerging concerns and expectations, enabling us to proactively address potential risks and opportunities. The insights we gather directly influence our decision-making, ensuring our ESG reporting aligns with stakeholder priorities and supports our long-term strategic goals.

We are committed to maintaining ongoing engagements and actively listening to our stakeholders, to ensure their voices help shape our evolving ESG priorities.

Stakeholders	Why We Engage	How We Engaged in 2024	Value created from engagement
CUSTOMERS	- To create trust and value - To identify opportunities to improve our services - To respond to customer needs and enable them to achieve goals and targets - To manage risk in our value chain and collaborate on ESG-related topics	- Customer satisfaction surveys - Quarterly meetings - Customer Advisory Boards	- Ensured contractual obligations - Maintained positive relationships - Supported customers' ESG goals
EMPLOYEES	- To enhance employee well-being - To ensure professional development - To enhance employee satisfaction and retention - To boost productivity and performance - To strengthen organizational culture	- Employee engagement survey - ESG and compliance-based training for employees - Mid-year and annual performance reviews - Global town halls and leadership sessions - Intranet/newsletter - Recognition and rewards	- Skill development - Reduced turnover - Healthier organizational culture - Enhanced customer experience delivered by healthier and engaged workforce
SUPPLIERS	- To manage risk in our supply chain and ensure supply chain resilience - To measure sustainability performance - To build long-term strategic partnerships	- Quarterly business reviews and performance monitoring - Supplier code of conduct acknowledgement - Supplier Master Service Agreements (MSA) - Supplier questionnaires	- Maintained positive relationships - Improved risk management
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 - External reports - Digital channels; social media, website	- Long-term impact - Increased employee satisfaction - Uptake of charity days among employees
INVESTORS	- To monitor developments in corporate governance and sustainability - To mitigate short- and long-term risks to the business - To enable review of legal and regulatory requirements - To further inform decision-making - To support stronger corporate governance	- Governance and Risk Committee meetings - Board meetings - Annual ESG report - ESG ratings, i.e., EcoVadis, CDP	- Strategic alignment - Stronger ESG performance - Better governance and accountability
REGULATORS	- To ensure legal and regulatory compliance - To build trust and credibility - To support license to operate	Provide transparent and timely disclosures	- Regulatory compliance and risk reduction - Improved ESG and reporting alignment





OUR ESG APPROACH AND PRIORITY AREAS

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Our approach to double materiality

Understanding stakeholder expectations is central to how we shape our sustainability strategy and reporting. In 2024, GTT conducted a Double Materiality Assessment (DMA) in alignment with the European Sustainability Reporting Standards (ESRS), with insights from our stakeholders. Our DMA was supported by a third-party consultant, and we involved GTT’s financial auditors throughout the process to ensure alignment with reporting standards and to strengthen credibility and trust among investors, regulators and other stakeholders.

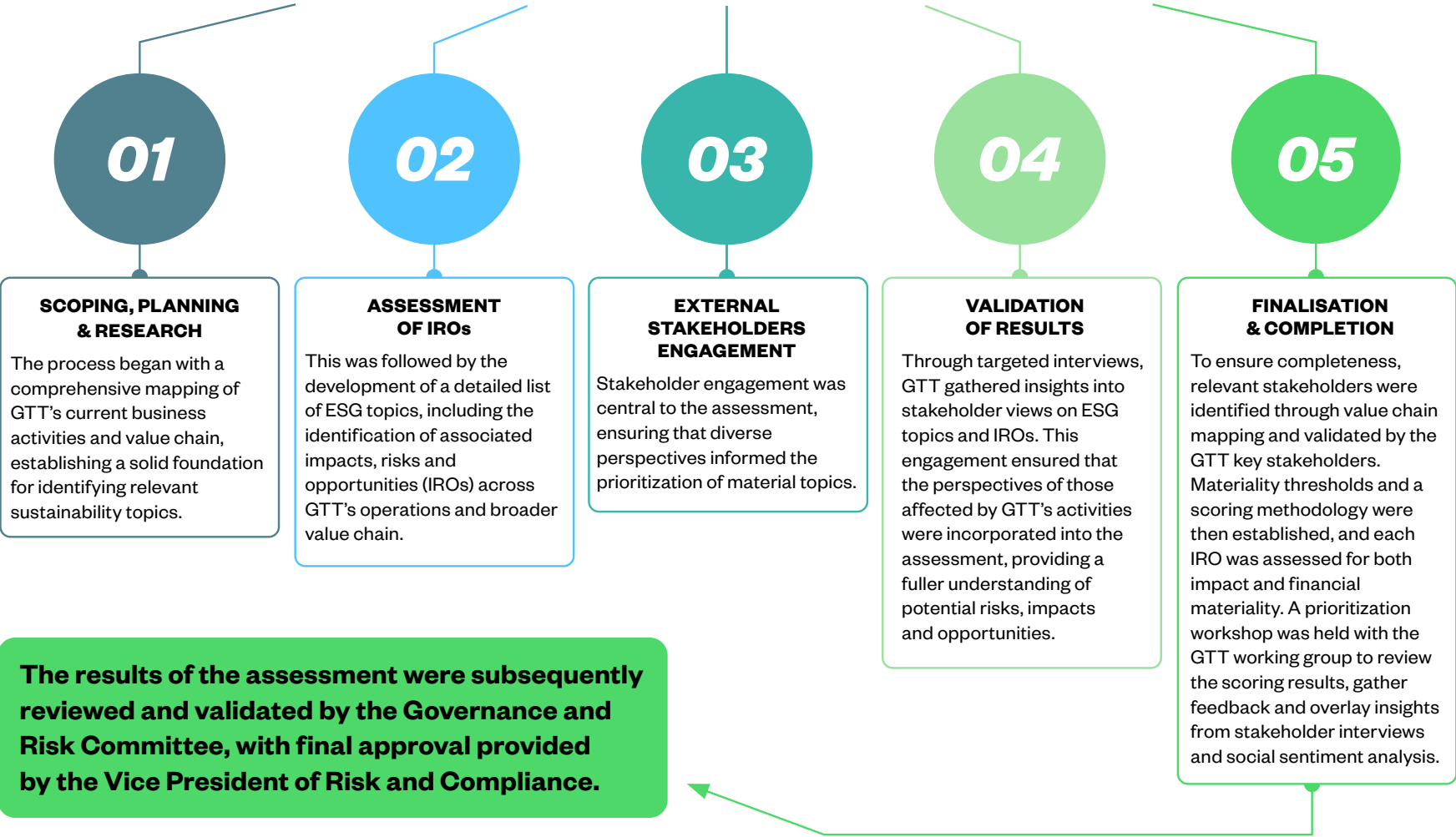
The ESRS, mandated under the Corporate Sustainability Reporting Directive (CSRD), requires companies to disclose sustainability information related to material impacts, risks and opportunities (IROs). These are identified through a materiality assessment that applies the principles of double materiality—considering both impact and financial materiality.

The DMA process also enabled us to evaluate the key trends and issues raised by our stakeholders. This analysis helped us determine which topics are most significant and should be publicly reported. The outcome provided a holistic view of our risks, opportunities and responsibilities, ensuring that GTT remains aligned with stakeholder expectations, regulatory requirements and global sustainability goals.

Ultimately, our double materiality approach is designed to support transparent, balanced and meaningful ESG reporting that reflects both internal business priorities and external societal impacts.

Our Assessment Process

GTT applied a structured five-step methodology to conduct its double materiality assessment:





Our materiality assessment result

The double materiality assessment identified the following key areas of focus:

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CORRESPONDING MATERIAL SUB-TOPICS

Climate change adaptation

Climate change mitigation

Energy

Working Conditions

Equal Treatment & Opportunities

Personal Safety of Consumers & End Users

Information-related impacts for consumers & end users

Political Engagement

Corporate Culture

Relationships with Suppliers

CORRESPONDING MATERIAL TOPICS

E1:
Our Planet

S1:
Our People

S4:
Our People

G2:
Our Conduct

Other ESG topics assessed by GTT and not deemed material:

Environmental	Social
E2: Pollution	S2: Workers in the value chain
E3: Water and marine resources	S3: Affected communities
E4: Biodiversity and ecosystems	
E5: Circular economy	





OUR ESG STRATEGY, TARGETS AND RESULTS

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Priority Area	DMA sub-topic	Focus area	Targets	2024 Results and activities	UN SDG
Climate Change	Climate Change Adaptation	Physical climate change effects, Supply chain disruption	- Set greenhouse gas emissions reduction target for 2035, validated by Science Based Targets Initiative - Maintain a C in CDP's climate change assessment	- Planned Science Based Target setting with the Governance & Risk Committee of the Board - Completed GHG accounting - Certified as a C in Climate Change	Goal 7 Goal 13
	Climate Change Mitigation	GHG emissions			
	Energy	Energy management			
Own workforce	Working Conditions	Flexible working, well-being, reward & recognition, health and safety	- Promote health and wellness by hosting a global World Well-being Week annually - Conduct employee satisfaction survey annually	- On-boarded a new EAP provider globally - First Wellness week launched - Annual employee satisfaction survey completed	Goal 3 Goal 4 Goal 5 Goal 8 Goal 10 Goal 16
	Equal Treatment and Opportunities for All	Fair pay			
Consumers and end-users	Personal Safety of Consumers & End Users	Privacy and cyber security	Require 100% of relevant teams to complete annual data protection and privacy training	- Upheld the core principles of data protection rooted in the GDPR and other applicable data protection laws - Maintained various certifications: ISO 27001, ISO 20001, SOC1 and SOC 2 service assurance certifications and PCI compliance	Goal 4 Goal 9 Goal 16
	Information- related impacts	Cyber security (external) and data privacy			
Business conduct	Corporate Culture	Transparency, ESG governance, values, cyber security (internal), quality of service	- Train 100% procurement staff on ESG practices 100% completion rate of Compliance training - ESG Steering committee meetings quarterly - ESG-related policies reviewed and updated annually - Achieve 100% completion of annual cybersecurity training for all employees	- Published third ESG report - Launched Sustainable Procurement Policy 88% of Procurement staff completed Sustainable Procurement training - VP, Risk and Compliance appointed to strengthen ESG governance - ESG SteerCo meeting held twice in 2024 - ESG related policies reviewed, updated and communicated	Goal 4 Goal 8 Goal 10 Goal 16
	Political Engagement	Political instability			
	Management of Relationships with Suppliers	Supply continuity			

Key

Goal 1

No poverty

Goal 2

Zero hunger

Goal 3

Good health & well-being

Goal 4

Quality education

Goal 5

Gender equality

Goal 6

Clean water & sanitation

Goal 7

Affordable & clean energy

Goal 8

Decent work & economic growth

Goal 9

Industry, innovation & infrastructure

Goal 10

Reduced inequalities

Goal 11

Sustainable cities & communities

Goal 12

Responsible consumption & production

Goal 13

Climate action

Goal 14

Life below water

Goal 15

Life on land

Goal 16

Peace, justice & strong institutions

Goal 17

Partnerships for the Goals

GTT's alignment with the United Nations Sustainable Development Goals (SDGs) was guided by relevance to our business activities, value chain, and the outcomes of our double materiality assessment. The SDGs were selected based on their connection to the most material environmental, social and governance topics identified through stakeholder engagement and impact analysis.

These goals have informed GTT's ESG strategy by shaping our focus areas, guiding our sustainability initiatives and influencing the development of key performance indicators. By embedding the SDGs into our strategic planning and operational decision-making, GTT ensures that our sustainability efforts contribute meaningfully to global development priorities while addressing the expectations of our stakeholders.





ESG OVERSIGHT AND GOVERNANCE

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Oversight

Our ESG Program Lead is responsible for driving the development of our ESG program and embedding ESG principles throughout the organization. This role is supported by the Vice President of Risk & Compliance within the Legal team, with executive sponsorship provided by our General Counsel.

The ESG Program Lead works in close partnership with a cross-functional ESG Steering Committee, which plays a pivotal role in shaping our ESG strategy and overseeing the development, execution and evaluation of related initiatives and policies. The committee convenes quarterly and brings together leaders from across the organization to ensure a broad range of perspectives are considered, supporting our continued progress toward achieving our ESG objectives.

GTT’s ESG strategy, initiatives and policies—including broader corporate governance matters—are reviewed quarterly by the Governance and Risk Committee of the Board of Directors, as well as by our senior leadership team. Where appropriate, recommendations for updates or changes are escalated to the full Board for consideration and approval.

Our annual ESG report highlights our performance and progress, serving as a key component of our ESG governance framework. We are working toward obtaining third-party assurance for our reporting within the next two years, recognizing the importance of verified data in enhancing transparency and credibility. To support our efforts, we partner with a specialized climate consultancy firm with expertise in carbon finance, sustainability advisory and environmental solutions. This firm assists GTT with annual carbon accounting and related climate disclosures.

Risk Management

Our leadership teams play an active role in overseeing risk management, with a focus on identifying and mitigating the most significant risks facing our business. Oversight responsibilities rest with our Governance and Risk Committee, which receives quarterly and ad hoc updates on key risk areas—including financial, cybersecurity, legal and regulatory matters, including ESG. The committee monitors both current and emerging risks across strategic, operational and compliance domains.

As previously mentioned, GTT has adopted a Double Materiality Assessment (DMA) framework to identify and evaluate the ESG issues that are most relevant to our business and stakeholders.

Each IRO is assessed using a structured scoring system that considers the scale, scope, likelihood and time horizon of potential impacts or risks. This approach ensures consistency with our traditional risk management practices while enabling a forward-looking view of sustainability-related challenges and opportunities.

Further details in our Double Materiality Assessment section.

Our Policy Overview

GTT has established policies addressing material sustainability topics identified through its double materiality assessment. These policies are designed to prevent, mitigate and remediate associated impacts, risks and opportunities.

Policy	Accountability	Availability
Anti-Harassment and Non-Discrimination Policy	Legal/Human Resources	Corporate Intranet
Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy	General Counsel	Corporate Intranet
Business Code of Conduct	General Counsel/Board	Corporate Website and Intranet
Data Privacy Policy	General Counsel	Corporate Intranet
Employee Privacy Notice	General Counsel	Corporate Intranet
Environmental Policy	VP, Risk and Compliance	Corporate Website and Intranet
Health, Safety and Well-being Policy	SVP, Human Resources	Corporate Website and Intranet
Information Security Policy	CISO/CIO	Corporate Intranet
Insider Trading Compliance Policy	General Counsel	Corporate Intranet
International Trade Compliance Policy	General Counsel	Corporate Intranet
Modern Slavery & Human Rights Policy	General Counsel	Corporate Website and Intranet
Supplier Code of Conduct	SVP, Access Management and Cost of Revenue	Corporate Website and Intranet
Sustainable Procurement Policy	SVP, Access Management and Cost of Revenue	Corporate Website and Intranet
Whistleblower Policy	General Counsel	Corporate Website and Intranet





AWARDS AND RECOGNITION

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EcoVadis

GTT has been awarded a Silver Medal by EcoVadis, placing us in the top 15% of companies assessed globally over the past 12 months. This recognition reflects our performance across key ESG areas, including environmental impact, labor and human rights, ethics and sustainable procurement. It reinforces our commitment to continuous improvement and responsible business practices throughout our value chain.



CDP

GTT is proud to be a CDP discloser, reflecting our commitment to environmental transparency and responsible climate action. In our most recent assessment, we achieved a Level C rating, indicating that we have reached the Awareness level in CDP's scoring framework. This means we have identified key climate-related risks and opportunities and are actively working to improve our data quality, governance and strategic response to environmental challenges.

We view this as a foundational step in our sustainability journey and are committed to advancing toward higher levels of disclosure and performance in future reporting cycles.





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OUR PLANET





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REDUCING OUR ENVIRONMENTAL FOOTPRINT

Our Environmental Policy

We recognize the vital role that all businesses play in protecting the environment and are committed to minimizing the environmental impact of our operations. Our **Environmental Policy** outlines our approach to managing the environmental aspects of our business, setting clear expectations and performance measures to ensure continuous improvement and accountability.

OUR COMMITMENT TO CLIMATE CHANGE

Climate Change

GTT acknowledges its responsibility to reduce the climate-related impacts of its operations and climate action is a focus area for our business as identified during our DMA. GTT remains committed to minimizing resource consumption and associated environmental impacts wherever possible across its asset-light business model.

We also aim to align with the sustainability goals and expectations of our business partners, and recognize the role we play in enabling the decarbonization of their operations. This alignment is not merely a value-add—it is a commercial driver. As sustainability becomes a fundamental expectation in procurement and partnership decisions, our ability to support and reflect our clients' ESG ambitions strengthens our competitive advantage and fosters long-term, purpose-driven relationships.

CLIMATE CHANGE ADAPTATION

Climate-Related Risk and Opportunity Analysis

GTT has conducted a climate-related risk and opportunity assessment aligned with the TCFD framework, in collaboration with its ESG Steering Committee and key stakeholders. This analysis identified both physical and transitional climate risks and opportunities that could impact the business over the short-, medium-, and long-term.

For this purpose, short-term refers to the initial assessment period, medium-term extends to 2035 and long-term projects to 2050. These insights continue to shape GTT's climate strategy and risk management approach.

We recognize that climate change poses significant risks to our operations, supply chain, and long-term resilience. In line with TCFD recommendations, we are strengthening our climate risk management across four key areas:

- Governance
- Strategy
- Risk Management
- Metrics and Targets

Our ongoing initiatives include scenario analysis, greenhouse gas emissions tracking, and the development of climate-related performance indicators to support informed decision-making and enhance transparency.

Managing Physical and Transitional Risks

GTT integrates climate-related risks into its broader risk management framework, reflecting our commitment to responsible governance in the face of environmental challenges.

We are evaluating:

- Physical risks such as extreme weather events and supply chain disruptions
- Transitional risks including regulatory changes, energy and raw material costs, and evolving stakeholder expectations

Business Model Resilience

As a global B2B service and wholesale provider with a relatively light physical asset footprint, GTT has lower direct exposure to many climate-related risks. However, we remain vigilant about potential indirect impacts, such as:

- Supply chain disruptions
- Shifts in customer demand
- Rising carbon costs
- Volatility in material prices

Our flexible operational footprint—including strategically located offices and data centers—enhances our ability to adapt to localized disruptions and maintain continuity.

Commitment to Climate Transparency

To reinforce our commitment to climate transparency, GTT has published a dedicated **TCFD Report** detailing how we identify, assess, and manage climate-related risks and opportunities.

In 2025, we will update this report to comply with the California Climate-Related Financial Risk Act (SB 261), which requires companies with over \$500 million in annual revenue operating in California to disclose climate-related financial risks and mitigation strategies every two years. This ensures our disclosures remain robust, forward-looking, and aligned with evolving regulatory expectations.



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Understanding Our Carbon Footprint

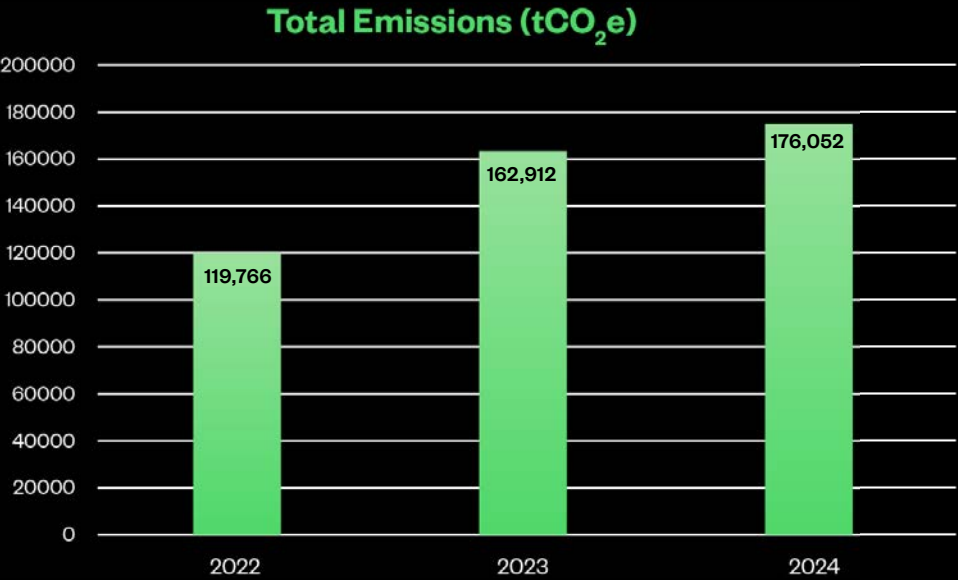
We conduct an annual review and analysis of our Scope 1, Scope 2 and Scope 3 greenhouse gas (GHG) emissions inventory, including emission factors and calculation methodologies, with support from a third-party carbon consultancy firm. This process ensures our practices remain aligned with the GHG Protocol's Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard, across all our global operations.

We are actively working to improve the accuracy and reliability of our emissions data by refining our calculation methods and data collection processes. These enhancements will support more effective tracking of our progress toward emissions reduction targets in future reporting cycles. In collaboration with industry experts, we are also conducting a detailed assessment of our direct (Scope 1 and Scope 2) and indirect (Scope 3) carbon emissions to better understand our overall environmental impact.

2022 total emissions = 119,766 tCO₂e

2023 total emissions = 162,912 tCO₂e

2024 total emissions = 176,052 tCO₂e





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In 2024, GTT’s emissions increased by 7.6% compared to 2023. This rise was driven primarily by an increase in data collection, higher spending on goods and services, and increases in business travel and the volume of products sold. Purchased goods and services remained GTT’s most significant source of emissions, accounting for 88.53% of total emissions, which was closely aligned with the 2023 figure of 89.9%.

Scope 1 and Scope 2 GHG emissions

Our Scope 1 emissions arise from stationary combustion (e.g., generators), mobile combustion (e.g., fuel from vehicles) and fugitive emissions (e.g., refrigerant leaks). Scope 2 emissions are primarily associated with purchased electricity and the use of electric vehicles across our European operations. Scope 1 and Scope 2 emissions amounted to 1,293 tCO₂e (0.73% of total).

GTT has set an ambitious yet achievable goal to reach net zero Scope 1 and Scope 2 emissions by 2035, underscoring our commitment to reducing emissions within our direct operational control. While Scope 3 emissions are not currently included in this target, we anticipate that our net zero ambition may evolve following the validation of our science-based targets, as discussed above.

Our Scope 1 emissions increased from 441 metric tonnes of CO equivalent (MtCO₂e) in 2023 to 771 MtCO₂e in 2024. This rise is due to several factors. In 2024, we expanded our reporting boundaries to include gas-based commercial heating from one of our U.S. office locations for the first time. Additionally, improvements in data quality and collection processes during FY24 enabled more comprehensive reporting across fuel types, distance traveled and electricity consumption. We have since restated our 2023 emissions data for fugitive emissions (from 19 MtCO₂e to 202 MtCO₂e) to reflect the corrected calculation and ensure greater accuracy. GTT has identified and corrected a methodological error in the calculation of fugitive emissions reported for FY23. The error stemmed from the use of an incorrect square meter (SQM) value, which resulted in an underreporting of emissions for that period. In response, we are implementing enhanced data governance measures and strengthening our disclosure processes to prevent future discrepancies and uphold the integrity of our environmental reporting.

Our Scope 2 emissions encompass electricity consumption across all operations, including the charging of company-leased electric vehicles. In 2024, location-based Scope 2 emissions remained largely unchanged, with a slight decrease from 421 MtCO₂e in 2023 to 420 MtCO₂e. Market-based Scope 2 emissions also remained relatively stable, showing an increase from 516 MtCO₂e in 2023 to 522 MtCO₂e in 2024.

Scope 1 and Scope 2 Emission Breakdown (Mt CO ₂ e)			
	2022	2023	2024
Scope 1: Direct emission from energy and heat generation at company-owned facilities	310	441	771
Scope 2 (market-based): Indirect emissions from utility-purchased electricity, steam, heat or cooling*	n/a	516	522
Scope 2 (location-based): Indirect emissions from utility-purchased electricity, steam, heat or cooling*	1,072	421	420

* Market-based method reflects emissions associated with the choices a consumer makes regarding its electricity supplier or product.





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Scope 3 GHG emissions

GTT’s Scope 3 inventory includes emissions resulting from activities associated with assets not owned or controlled by GTT, but which have an indirect and significant impact on its value chain.

We have screened all Scope 3 categories that have been deemed most material to our business operations and expanded the coverage of GHG inventory for consideration of SBTi alignment in future. Indirect emissions associated with GTT’s upstream and downstream value chain include emissions resulting from purchased goods and services, fuel- and energy-related activities, upstream transportation and distribution, waste generated in operations, business travel, employee commuting, upstream leased assets, use of sold products and end-of-life treatment of sold products. Within our Scope 3 footprint, Category 1 — Purchased goods and services remained GTT’s most significant source of emissions, accounting for 88.53% of total emissions — closely aligned with the 2023 figure of 89.9%.

Our Scope 3 footprint represents 99.27% of our full value chain emissions. Although, as a service provider, we do not design or manufacture the products we sell to customers, we will continue to evaluate the most effective emissions reductions pathways for our business, including our Scope 3 emissions, with consideration for timing, costs and feasibility.

The increase in end-of-life emissions, although significant in relative percentage terms, remains minimal in absolute terms. This change is driven by a combination of factors, including variations in the volume of products sold and an updated emission factor for waste treatment.

By contrast, upstream transportation and distribution emissions saw the greatest relative decline, driven by reduced expenditure on freight and courier services throughout 2024.

Scope 3 Emission Breakdown (Mt CO ₂ e)			
Upstream (Mt CO ₂ e)		2022	2023
Category 1 – Purchased goods and services		106,656	146,372
Category 2 – Fuel and energy related activities (market-based)		Not calculated	251
Category 4 – Upstream Transportation and Distribution		583	393
Category 5 – Waste generated in operations		Not calculated	46
Category 6 – Business travel		712	1,346
Category 7 – Employee commuting		1,181	1,429
Category 9 – Upstream leased assets			44
Downstream (Mt CO ₂ e)			
Category 9 – Downstream Transportation and Distribution		583	Not calculated
Category 11 – Direct use of sold products		8,768	12,073
Category 12 – End of life treatment		Not calculated	1
Total Scope 3 Emissions (location-based)		118,483	161,955

GHG intensity based on net revenue

Intensity (tCO ₂ e per million USD of revenue)*		
Metric	2023	2024
Scope 1 and Scope 2	0.7	1.3
Scope 3	150.9	171.3
All Scopes (1, 2 and 3)	151.6	172.6

Note: Emission intensities are calculated using total company revenue due to the absence of scope-specific revenue attribution. As such, these values provide a high-level comparison and may not reflect the true carbon efficiency of individual emission scopes. GHG intensity is GTT’s greenhouse gas (GHG) emissions relative to its financial performance.





ENERGY MANAGEMENT

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Energy management is a strategic focus in GTT’s ESG efforts, essential to reducing our environmental footprint and supporting global climate goals. We plan to optimize energy use by consolidating infrastructure and reducing our reliance on hardware. Ongoing monitoring and the identification of continuous improvement efforts for future implementation are central to our approach, as we work toward lowering our carbon footprint and enabling a future aligned with a low-carbon economy.

WASTE MANAGEMENT

As a telecommunications provider, we recognize our responsibility to manage the environmental impact of waste generated across our operations, infrastructure, and supply chain.

While waste management was not identified as a material topic during our materiality assessment, GTT nonetheless reviewed its practices to ensure compliance and uphold responsible environmental stewardship.

Across our global operations, we are committed to minimizing our total waste footprint through recycling programs and the strategic reuse of hardware wherever feasible. Our waste management strategy prioritizes the reduction of electronic waste (e-waste), the promotion of responsible disposal practices, and the maximization of recycling and reuse.

We partner with certified recycling providers to ensure that obsolete network equipment, devices, and office electronics are responsibly processed in full compliance with local environmental regulations. Whenever feasible, we prioritize material reuse—whether as intact units or salvaged components—to conserve energy and significantly reduce landfill waste.

Devices that are no longer usable, such as outdated computers, printers, and network hardware, are responsibly recycled.

Through annual employee awareness training, we aim to foster a culture of environmental responsibility and contribute to a more sustainable and resilient digital infrastructure.





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OUR PEOPLE





COMMITTED TO OUR EMPLOYEES

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Our people are the driving force behind our progress. Their expertise, creativity, and commitment enable us to meet our goals and deliver meaningful impact—across our business and through every initiative we undertake.

The material topics identified in ESRS S1 that are relevant to GTT include working conditions, and equal treatment and opportunities. GTT is committed to fostering a supportive and inclusive workplace by prioritizing flexible work arrangements, employee well-being, fair and competitive compensation, meaningful recognition and a strong focus on health and safety.



WORKING CONDITIONS

Empowering flexibility in the workplace

GTT’s flexible work arrangements are designed to support work-life balance, enhance productivity and accommodate the diverse personal and professional needs of our global workforce.

While our office locations remain open to encourage in-person collaboration and team engagement, we also offer remote and hybrid work models where roles allow. These models are intended to promote employee well-being, reduce stress and improve overall job satisfaction and engagement.

Our Remote Working Policy reflects our dedication to creating a supportive and adaptable workplace. It aims to enhance employee motivation, performance and productivity while also contributing to our environmental sustainability goals by reducing emissions associated with daily commuting. By embracing flexible work practices, GTT not only supports its people but also advances its broader ESG objectives.

Ensuring Health, Safety and Well-being

Policies and Expectations

Due to the nature of our business and low risk environment we operate in, work-related injuries are rare. In 2024, we recorded zero occupational fatalities among our employees.

Our **Health, Safety and Well-being Policy**—also available in the primary languages spoken by GTT employees worldwide—sets out clear expectations for workplace safety and promotes a culture of ownership, commitment and compliance among employees, contractors and subcontractors where applicable.

Health and Safety Risk Assessments

All our leased offices—excluding managed offices—have health and safety risk assessments. These assessments, conducted every three years, aim to identify site-specific issues, anticipate risks associated with operational changes and empower employees to take corrective action.

In addition, safety risk assessments, such as fire alarm testing, are carried out across all offices by building management as part of our lease agreements or through our routine maintenance programs.

We track all risks identified in both internal and external health and safety reports using a centralized platform, ensuring timely mitigation. This approach supports regulatory compliance and provides clear evidence of our ongoing progress in health and safety management.

Management, Training and Reporting

All office locations are equipped with safety equipment, including fire and evacuation alarms and illuminated exit signs, which are regularly tested and maintained, and employees are trained on topics such as fire safety and first aid.

To support workplace safety, volunteer employees designated as fire marshals and first aiders are provided with targeted training in areas such as fire safety, first aid and emergency response protocols. We also ensure that all team members are well-versed in our incident reporting protocols.

All workplace incidents and near misses must be reported through our automated Workday system, enabling timely documentation and response. Each safety event is promptly investigated to identify root causes and implement corrective actions, helping to prevent recurrence and continuously improve our safety practices.

In 2024, GTT reported a Lost Time Incident Rate (LTIR) and Lost Time Injury (LTI) frequency rate of zero per 200,000 hours worked, and we will continue to create awareness on reporting of incidents and near misses.





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Promoting Mental Health and 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.

Our Global Employee Assistance Services Program has 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.

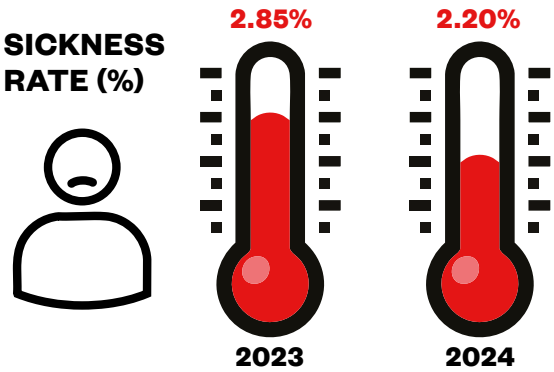
Local and firm-wide wellness programs are also made available to employees, including employee-led wellness groups (refer to Spotlight section), as well as access to Calm, a sleep and meditation application designed to improve relaxation and focus.

In addition, The Green Room—our internal employee newsletter—serves as a platform to celebrate and share positive stories from across the organization, fostering a sense of connection and recognition. To further highlight exceptional contributions, the GriTT program was established to recognize individuals and teams who exemplify the core values that drive our success: Resilience, Integrity, Tenacity and Teamwork. This initiative not only reinforces our cultural values but also promotes a workplace where excellence and dedication are acknowledged and celebrated. In 2025, GTT also launched the CX Champion Recognition Program, to shine the spotlight on the individuals and teams who live and breathe customer excellence every day.

We are also committed to supporting the holistic well-being of our employees. Our dedicated Employee Wellness Team compiles and shares monthly well-being newsletters, each focused on a specific theme, to guide and empower employees on their personal wellness journeys. These newsletters provide practical resources and insights on topics such as mental health, burnout prevention, work-life balance and other key areas of well-being.

In 2024, we proudly hosted our first World Well-being Week, centered around the eight dimensions of wellness: emotional, spiritual, intellectual, physical, environmental, financial, social and occupational. The week featured a variety of interactive sessions and resources, including collaborations with our Employee Assistance Program (EAP) and our wellness partner, Calm, to promote mindfulness, resilience and overall mental health.

Sickness rate is a key workforce well-being indicator that reflects the proportion of employees absent from work due to illness over a defined period. For reporting purposes, GTT measures sickness rate across its global workforce from January 1 to December 31, 2024.



SPOTLIGHT : WELL-BEING IN ACTION AT GTT



SM Energy Collective

In 2024, our Service Management North team in the UK launched a dynamic engagement program—powered by people, fueled by fun and focused on wellness—marking a vibrant and inspiring chapter in their journey. Through a series of creative and inclusive monthly initiatives, the team cultivated a strong sense of community, collaboration and holistic well-being. Each month featured a unique theme designed to promote physical health, mental wellness, team connection and personal growth, reinforcing our commitment to a supportive and engaging workplace culture.

Looking ahead to 2025, the team is excited to build on this momentum. The goal is to further embed well-being and inclusivity into the workplace culture, creating an environment where everyone can thrive.



WeCare

The WeCare Employee Wellness Group in the UK is a dedicated initiative focused on enhancing employee well-being across multiple dimensions. The program addresses key areas that influence overall health and happiness, including role expectations, stress management, workplace environment, physical activity, nutrition and mental well-being.

The WeCare group meets quarterly, with themes that explore different aspects of wellness. These sessions provide a platform for open dialogue, shared learning and practical strategies to support personal and professional well-being.

The WeCare initiative has delivered a range of meaningful benefits to GTT employees.



Happy Coaches

GTT Belgium continues to demonstrate strong alignment with GTT's global ESG priorities, with a particular emphasis on the “S”—Social—pillar. At the heart of this commitment are the award-winning Happy Coaches, who champion well-being, employee engagement and a positive workplace culture within the GTT Belgium office. As advocates for health, happiness and team spirit, the Happy Coaches have led a variety of initiatives that not only foster team cohesion but also contribute to meaningful causes. Their efforts have included team-building activities linked to charitable fundraising, supporting global initiatives aimed at reducing poverty and inequality. Through these actions, GTT Belgium reinforces its dedication to social responsibility and community impact.



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Contribution to Communities

While GTT operates on a global scale, we remain deeply rooted in the local communities where we live and work. Across our international footprint, we contribute to community well-being through local employment, fair and competitive compensation, tax contributions, capital investments and partnerships with local suppliers—delivering both direct and indirect economic value.

Beyond our economic footprint, GTT fosters a culture of active citizenship and social responsibility. Our employees regularly engage in community initiatives, sponsor local causes and volunteer their time to support the issues that matter most to them. To support this commitment, GTT provides every employee with two paid volunteer days annually, empowering them to give back and strengthen the social fabric of their communities.

In 2024, employees collectively logged 669.5 volunteer days, highlighting the meaningful impact of our shared commitment to community engagement.

GTT employees across Europe and North America participated in a wide range of charitable initiatives—from fundraising walks and food bank volunteering to environmental clean-ups and health-focused campaigns. These efforts reflect our ongoing dedication to community welfare, health equity and global solidarity.

These initiatives reflect GTT’s:

Commitment to SDGs

Aligns with UN Sustainable Development Goals (e.g., Good Health & Well-being, Zero Hunger, Reduced Inequalities).

Employee Engagement

Demonstrates a culture of purpose-driven work and social responsibility.

Community Investment

Shows tangible contributions to local and global communities through both financial and volunteer support.

SPOTLIGHT :

Making a Difference: GTT’s Global Volunteer and Charity Efforts

Children & Health-Focused Initiatives

- **Portugal Sales Kick-off Meeting:** Supported Make-a-Wish Portugal through a charity fun run, contributing to the well-being of children with critical illnesses.
- **UK (Nottingham):** Hiked 9 miles for Rainbows Hospice, aiding children and young people with terminal conditions.
- **Denmark:** Collected bottles and cleaned public spaces to support the Danmarks Indsamling charity, promoting nutrition and health for children in impoverished regions.

Cancer Research & Awareness

- **France:** Participated in Une Jonquille contre le cancer, walking 245 km to support the Curie Institute’s cancer research.
- **Netherlands:** Completed a 12 km City Pier Night Walk for the Dutch Cancer Foundation, raising €500.

Poverty Alleviation & Food Security

- **Belgium:** The Happy Coaches team raised over €1000 for Oxfam through a carwash and a 25 km trail walk in the Ardennes.

- **USA (Austin, TX):** Volunteered at the Central Texas Food Bank, sorting 1,700 bags of potatoes to support food distribution across 21 counties.

Animal Welfare

- **Bulgaria:** As part of our volunteering/charity initiatives, employees based in Bulgaria partnered with the nonprofit organization 1500 Dogs to support local dog shelters. Activities included donating food and supplies, walking the dogs and assisting shelter staff. This program promotes animal welfare and strengthens community ties through meaningful employee engagement.

Some of the charities GTT supports globally





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Employee Growth and Development

We have a robust onboarding program where new hires are enrolled on their first working day in e-learning classes that provided a high-level overview of GTT, including topics such as GTT values, functions, systems, HR programs, products and services, etc.

We continue working on enhancing career pathways to empower our workforce by taking ownership of their career development. All GTT job profiles are tied to a list of core competencies required to perform and excel at every position across business, individual, management, leadership and functional criteria.

At GTT, we are committed to fostering a culture of continuous learning and professional development. Employees have access to our competency frameworks, which outline the skills and behaviors required for every role across the organization. This transparency empowers our employees to understand expectations, identify growth opportunities and proactively plan their career path. We offer a wide variety of learning paths per skills to support knowledge attainment. Some examples include MS Excel, Presentation Skills, Communication Skills, among others.

As part of our annual performance and development cycle, employees work with their managers to set personalized goals focused on skill enhancement and job performance. All employees are encouraged to provide feedback on their progress, while managers conduct semi-annual performance and career development reviews.

To promote productive review sessions, all managers are provided with the opportunity to attend a variety of e-learning or live training sessions that teach best practices to conduct successful review sessions and how to provide effective feedback.

We offer the opportunity for internal mentoring via the GTT Mentoring Program that teach best practices on a variety of topics depending on the employee's needs and career aspirations. GTT's Mentoring Program facilitates knowledge sharing and professional guidance. This program fosters reciprocal, collaborative relationships—typically between senior and junior employees—focused on the mentee's growth, learning and long-term development. Mentorships may be short- or long-term, with mentors offering insights, constructive feedback and support based on their experience.

These initiatives reflect GTT's commitment to building a skilled, engaged and future-ready workforce.

Training and Development

At GTT, we recognize that continuous learning is essential to driving performance, innovation and long-term success. Our commitment to employee development is reflected in a robust portfolio of both mandatory and voluntary training programs designed to support career growth and skill enhancement across all levels of the organization.

For employees who want to increase their knowledge and validate their technical skills, GTT offers a certification reimbursement program as part of their job role. Certifications include, but are not limited to, Technical Certification, Financial Acumen Certification and Project Management.

GTT employees completed various e-learning courses. These courses covered a wide range of topics, including *Developing Your Strengths*, *How to Receive Feedback*, *Building Relationships*, *The Cycle of Continuous Improvement*, *Managing Change* and *Adaptability Skills*, among others. In 2024, 93% of our workforce participated in self-development training.

In 2025, GTT introduced a dedicated learning path on Artificial Intelligence for our Product and Technology teams, reflecting our commitment to staying ahead in emerging technologies. While designed with technical roles in mind, this training is available to all employees across the organization, promoting broad awareness and understanding of AI.

The program covers key topics such as:

- The evolving risks associated with AI technologies
- How AI is reshaping business models and industry practices
- Practical guidance on AI prompt writing and responsible usage

This initiative supports our strategic focus on innovation, ethical technology adoption and workforce readiness in a rapidly changing digital landscape.

We also place a strong emphasis on leadership development, equipping new managers, senior leaders and individual contributors with the tools and capabilities needed to lead effectively and drive meaningful business transformation.

Indicators	Metrics	2022	2023	2024
Employees trained	Percentage employees in upskilling/reskilling program*	86%	92%	93%
E-learning	E-learning training completed	29,789	43,398	29,607
\$	Average expenses on training per full-time equivalent (FTE)	\$208	\$219	\$222

Note: Excluded from the report: Contractors; Employees on leave





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Over the past few years, GTT has undertaken a transformative journey to redefine our HR strategy, with a strong focus on investing in people development. A key milestone in this evolution has been the establishment of a robust Talent Management function, including a dedicated Talent Development team committed to designing and delivering global learning and development initiatives.

A cornerstone of our strategy has been the launch of foundational learning programs, which include:

- **Comprehensive E-Learning Platform:** Rolled out and promoted a platform offering access to over 80,000 e-learning courses.
- **New Hire Onboarding Program:** A suite of e-learning modules providing an overview of GTT's operations, culture and values.
- **Role-Based Learning Paths:** Developed approximately 200 tailored learning paths aligned with job profiles and required competencies.
- **Leadership Development Programs:** Curated e-learning tracks for five distinct management levels to support leadership growth across the organization.

In 2023, we significantly expanded our offerings by introducing over 30 new learning paths focused on skill-specific development. This expansion, along with the completion of programs initiated in 2022, resulted in a substantial increase in engagement—culminating in 43,398 completed e-learning courses, up from 29,789 in 2022.

In 2024, our focus shifted toward enhancing existing programs, developing additional skill-based learning paths and broadening our classroom training portfolio, particularly in management and leadership. As major new e-learning initiatives were not launched during this period, the number of completed courses slightly declined to 29,607—reflecting a strategic pivot toward program depth and quality.

Benefits

Eligible employees receive a range of benefits that are specific to each country's local practices and legislation. These may include pension plans, paid time off, charity leave, parental leave, insurance coverage, access to employee assistance programs and others.

At GTT, we are committed to fostering a supportive and inspiring work environment that prioritizes employee well-being and personal growth. As part of this commitment, we offer a sabbatical program that enables employees to take an extended break from work for purposes such as continuing education, travel, volunteering or pursuing personal projects. Our Sabbatical Policy allows eligible employees to take up to six months of unpaid leave, based on their tenure with the company.

To further support the mental and well-being of our workforce, GTT provides access to a range of resources, including Employee Assistance Programs (EAP) for employees and their families. We have also partnered with Calm, a leading mental wellness app, to help employees manage stress, improve sleep and enhance overall quality of life.





EQUAL TREATMENT AND OPPORTUNITIES FOR ALL

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Employee Survey

We value the voices of our employees and actively encourage open communication across the organization. Through a variety of engagement channels, including surveys and company events, we gather meaningful feedback that informs our decisions and actions. This input helps us proactively address both current and potential impacts on our workforce, ensuring that our people remain at the heart of our strategy.

Our annual employee engagement survey serves as a key channel for anonymous feedback, helping us identify opportunities for positive change across the organization. In 2024, 73% of employees participated in the survey, reflecting a decrease from the 79% participation rate in 2023. We continuously analyze employee feedback to strengthen our workplace culture and enhance the overall employee experience. This ongoing process ensures we have a comprehensive approach to reinforcing effective practices, improving communication and refining Human Resources policies. By updating our policies based on employee input, we aim to better understand their needs and drive higher levels of satisfaction across the organization.

Employee satisfaction	2023	2024
Employees at GTT treat each other with respect	85%	86%
Satisfied with the workplace flexibility offered	95%	95%
Balance work life and personal life while working at GTT	79%	81%
Can voice a contrary opinion without fear of negative consequences	79%	79%

Advancing Diversity and Inclusion

At GTT, we believe that diversity and inclusion are essential drivers of innovation, agility and long-term success. A workforce enriched by a wide range of backgrounds, experiences and perspectives enhances our ability to serve diverse communities and fosters a culture of creativity, empathy and collaboration.

We are committed to cultivating a workplace where every employee feels safe, respected and valued. Our approach is grounded in our Anti-Harassment and Non-Discrimination Policy, which reinforces our zero-tolerance stance on any form of unlawful discrimination or harassment. Violations of this policy are taken seriously and may result in disciplinary action, up to and including termination of employment.

To ensure accountability and transparency, we maintain formal grievance mechanisms that allow employees to report concerns confidentially and without fear of retaliation. Reports can be submitted directly to Human Resources or anonymously through our whistleblower hotline. All incidents are addressed promptly and handled with the utmost care and confidentiality.

In 2024, no fines or penalties related to discrimination were recorded, and no human rights incidents involving our workforce occurred. These outcomes reflect our ongoing efforts to uphold a respectful, inclusive and ethically grounded workplace. We remain fully committed to complying with all applicable laws and regulations while continuously strengthening our diversity, equity and inclusion practices.

Number of own employees by gender (as 31 December 2024)	2023	2024
Male	63.26%	62.21%
Female	36.60%	37.70%
Other	-	-
Not reported	0.14%	0.09%
Total employees	100%	100%

Note:
Due to regulatory restrictions, we cannot collect racial and ethnic diversity data in every country where we operate.

Employees in leadership roles beginning at the manager level	Share 2023	Share 2024
Male	70%	69%
Female	30%	31%
Total employees	100%	100%

Note:
Due to regulatory restrictions, we cannot collect racial and ethnic diversity data in every country where we operate.

Age distribution of employees in headcount (number)*	2023	2024
<30	21.94%	17.94%
30-50	56.82%	58.15%
>50	21.24%	23.91%
Total	100.00%	100.00%

*
Based on headcount for full year, including terminated employees and new hires in the year.

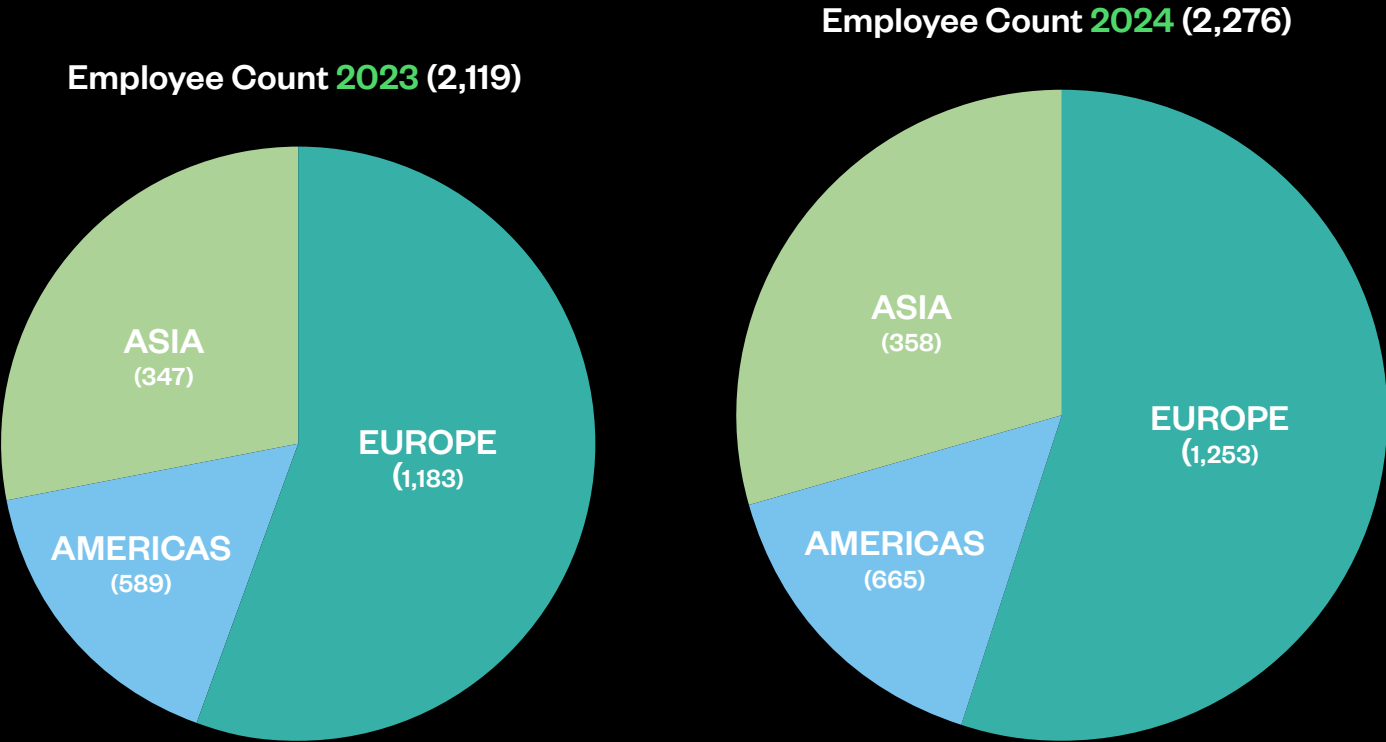




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GLOBAL STAFF PRESENCE [as of December 2024]

2,276 Permanent employees, excluding contractors



Providing Equal Opportunity and Inclusive

Our recruitment practices are designed to be fair, transparent and aligned with GTT's core values and strategic objectives. We uphold these principles through a formal Recruitment Policy and structured interview guides, developed in collaboration with our Talent Management team and hiring managers using the Lexonis platform. These tools are grounded in a standardized competency framework, ensuring consistency and objectivity in candidate evaluation.

By standardizing our recruitment process across the organization, we aim to:

- Enhance the candidate experience
- Promote fairness and equity
- Ensure compliance with regulatory and ethical standards

This approach supports our broader commitment to equal opportunity employment and helps us attract and retain a workforce that reflects the diversity of the communities we serve.





SECURING COMPREHENSIVE SECURITY: FROM INFRASTRUCTURE TO END-USER TRUST

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Cyber Security and Data Privacy

Policies and Expectations

GTT maintains a comprehensive set of global policies and procedures that reflect the best industry standards of cyber preparedness and data protection. These are guided by internationally recognized frameworks, including the ISO/IEC 27001 Information Security Management System (ISMS) and the ISO/IEC 20000 Information Technology Service Management System (ITSM).

The purpose of our cybersecurity and data protection policies is to safeguard GTT's digital assets, ensure compliance with legal and regulatory requirements, and build trust with stakeholders. These policies reflect our strong commitment to respect the human rights of both consumers, internal and external, as well as end-users and manage material impacts, risks and opportunities related to our consumers and end-users.

Our data privacy framework is designed to ensure compliance with evolving global privacy and data protection regulations, while promoting best practices in the responsible handling of personal and sensitive data.

We are firmly committed to upholding applicable privacy laws, including the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Directive (ePrivacy Directive). In addition, we adhere to stringent country-specific telecommunications and data protection legislation, ensuring that our practices meet or exceed local legal requirements.

By implementing detailed policies, procedures and processes that meet the most rigorous industry-accepted data security standards, we are committed to providing compliant, multi-jurisdictional, segregated and secure solutions for all our customers. Our data protection policies cover all aspects of data management, including collection, storage, usage, transfer

and disposal, ensuring comprehensive coverage and security throughout the data life cycle.

Relevant policies are listed below:

Privacy and Data Protection

The following policies govern our approach to privacy, data security and ethical conduct:

- Code of Business Conduct and Ethics
- Whistleblowing Policy
- Business Continuity Policy
- Information Security Policy
- Data Privacy Policy
- Data Breach Policy

Access to Services and Operational Resilience

To ensure uninterrupted access to services and robust response capabilities, we have implemented:

- Business Continuity Policy
- Disaster Recovery Plan

Cybersecurity and Data Privacy Oversight

Our Security team is responsible for the overall information security management system and is led by the Chief Information Security Officer (CISO), who acts as the executive sponsor for our information- and cybersecurity program and is tasked with securing GTT against cyberattacks.

GTT's 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 biannual presentations by the security team.

Our Security team is also overseen by the Governance and Risk Committee of the Board of Directors, who exercises oversight over GTT's aggregated risk profile, including cyber risk. Cyber security risk assessment is an integrated part of GTT's enterprise risk management system, to facilitate the business areas' awareness on cyber security risk to their critical assets and operations.

Our Data Protection team is responsible for ensuring that GTT handles personal and sensitive data responsibly, securely and in compliance with applicable laws and regulations and is led by the SVP, Legal.

Both our Security and Data Protection teams operate under the oversight of the Governance and Risk Committee of the Board of Directors. This committee provides strategic supervision of GTT's overall risk profile, including critical areas such as cybersecurity and data protection.

Cyber and data privacy risks are fully integrated into GTT's Enterprise Risk Management (ERM) framework. This integration ensures that all business units maintain a high level of awareness and preparedness regarding potential threats to their critical assets, operations and the privacy of consumers and end-users. By embedding these risks into our broader risk management processes, we promote a proactive and resilient approach to digital trust and operational continuity.

Security Management Systems and Certifications

GTT is committed to maintaining the best industry standards of cybersecurity and IT service management across our global operations.

We operate a comprehensive internal and external audit program to assess the maturity and effectiveness of our management systems. These audits are conducted regularly and evaluate compliance with applicable legal and regulatory requirements. Findings, including any non-conformities, are addressed through root cause analysis and corrective actions to prevent recurrence.





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Our Operations and Security Centers are certified to ISO 27001 and undergo annual audits by accredited certification bodies. These audits also assess compliance with other key standards, including:

- SOC (Service Organization Controls)
- PCI DSS (Payment Card Industry Data Security Standard)

To ensure the integrity and resilience of our systems, GTT implements a wide range of internal controls, including:

- Access control and 24/7 security monitoring
- Firewalls and content inspection
- Code scanning and penetration testing
- Encryption and independent threat assessments
- Bug bounty programs
- Mandatory cybersecurity training for all employees

We follow a continuous improvement approach to information security, focusing on the identification, evaluation and mitigation of risks across our operations.

Additionally, two of GTT's Network Operations Centers (NOCs) are certified to ISO 20000. This certification, grounded in the IT Infrastructure Library (ITIL) framework, ensures that our service delivery processes are aligned with both business needs and international best practices.

Customer Security

GTT holds Service Organization Control — SOC 1 and SOC 2 — service assurance certifications as provided by independent third-party auditors against a defined control framework for selected services. A SOC 1 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). The SOC 1 scope includes our Managed Hosting and Virtual Data Centre (VDC) services, while SOC 2 includes our SD-WAN and SIP Trunking services.

GTT maintains a strong commitment to service assurance and data protection through internationally recognized certifications. We hold both SOC 1 and SOC 2 reports, issued by independent third-party auditors, which validate the effectiveness of our internal controls for selected services.

- The SOC 1 report is designed to meet the needs of customers who require assurance over the controls relevant to financial reporting. This certification currently covers our Managed Hosting and Virtual Data Centre (VDC) services.
- The SOC 2 report provides detailed assurance on our controls related to security, availability, processing integrity and confidentiality, based on the AICPA Trust Services Criteria (TSC). This certification applies to our SD-WAN and SIP Trunking services, and the scope recently expanded to include Managed Detection and Response Services.

In addition, GTT complies with the globally recognized Payment Card Industry Data Security Standard (PCI DSS), which applies to all entities involved in payment card processing. Our PCI DSS Attestation of Compliance, issued by a qualified third-party assessor, demonstrates our adherence to rigorous security practices for protecting cardholder data.

These certifications reflect GTT's ongoing commitment to operational excellence, regulatory compliance and the highest standards of information security.

Information Security and Privacy Awareness Training

To strengthen our cybersecurity posture and empower our workforce, GTT has implemented a comprehensive, organization-wide security and data privacy awareness program. This multi-layered initiative ensures that employees are continuously educated, tested and equipped to recognize and respond to evolving digital threats.

All employees are required to complete mandatory quarterly training covering key cybersecurity and data privacy domains. These sessions place strong emphasis on phishing awareness, social engineering defense and regulatory compliance. In parallel, our security team conducts regular phishing simulations throughout the year to test employee readiness against real-world cyber threats.

The training program also includes:

- Incident response workshops
- Security onboarding for all new hires
- Quarterly data privacy compliance training

To reinforce accountability, completion of mandatory training and performance in phishing simulations are directly linked to employees' end-of-year performance evaluations. This approach ensures a consistent, organization-wide commitment to cybersecurity and data protection, embedding a culture of vigilance, responsibility and trust across all levels of the business.

Security Risk Assessments

GTT adopts a comprehensive and proactive approach to cybersecurity and risk management, extending beyond compliance with internationally recognized standards such as ISO/IEC 27001, PCI DSS and SOC 2 Type 2. Our commitment to maintaining a resilient security posture includes regular engagement with independent, experienced cybersecurity consultants who conduct rigorous assessments of our security maturity.

Each year, we perform an in-depth evaluation of our cybersecurity framework, covering all critical aspects of our infrastructure, policies and practices. The findings from this annual risk assessment are presented directly to GTT's Board of Directors and senior leadership, ensuring executive-level oversight and accountability.

Insights gained from these assessments inform continuous improvements to our security strategy, enabling us to stay ahead of emerging threats and aligned with industry-leading practices.





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Business Continuity and Operational Resilience

At GTT, ensuring the continuity of our global operations remains a top priority. We operate a 24/7 global network supported by multiple operations centers worldwide, each designed with full resiliency and failover capabilities. This infrastructure enables us to maintain uninterrupted service delivery, even in the face of significant disruptions.

Our Business Continuity Management (BCM) framework is built to address a wide range of risks—from cyber threats and natural disasters to supply chain disruptions and geopolitical events. We maintain a comprehensive Business Continuity Plan (BCP) that is regularly reviewed, updated and tested to ensure organizational preparedness and responsiveness.

Key Features of Our Business Continuity Approach

- **Resilient Global Operations**
All operational centers are equipped with failover capabilities and remote working infrastructure for critical personnel across all regions.
- **Standardized Response Protocols**
We employ unified customer management systems and global process ownership to ensure consistent and coordinated responses across geographies.
- **Real-Time Monitoring and Crisis Management**
Our Operations and Corporate Security teams continuously monitor emerging risks, including compliance with evolving government and regulatory directives.
- **Support for Critical Services**
During crisis scenarios, we prioritize the needs of essential service providers and have successfully supported customers through events such as fires, floods and service outages.
- **Collaborative Risk Mitigation**
We work closely with key partners to manage and minimize potential impacts on service delivery and maintenance.

- **Stress Testing**
We conduct annual crisis simulations to test our BCP. Each exercise is followed by an audit report to identify improvement areas and strengthen future responses.
- **Certified Resilience Standards**
Our Network Monitoring Center (NMC) and Security Operations Center (SOC) in Bulgaria are externally audited and certified to the ISO 22301 Business Continuity Management System standard.

To assist with mitigation of our top three identified enterprise risks—Cybersecurity, Geopolitical Events and Operational Resilience, in 2025, we are also building out an enterprise-wide crisis management capability, including off-net communication and alerting capabilities and threat management, along with creation of a crisis management plan to be integrated with approaches outlined above—and which will be tested and reviewed regularly to ensure effectiveness and readiness.

By embedding business continuity and crisis management into our ESG strategy, we aim to protect stakeholder interests, ensure service reliability and uphold trust in our operations—regardless of the challenge.

Data Breach Response Plan

In the event of a security incident involving personal data, GTT adheres to comprehensive internal protocols, including its Corporate Security Incident Management Policy and Personal Data Breach Procedure. We are committed to full compliance with all applicable breach notification obligations and to working collaboratively with clients to address and resolve any incidents. Our response plan encompasses immediate incident evaluation, containment measures, mitigation strategies and clear communication protocols to ensure timely notification of affected individuals and regulatory authorities. This approach ensures transparency, accountability and swift action in managing data breaches, and will be integrated into the Crisis Management capability noted above.





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CORPORATE CULTURE

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Experienced Leadership

GTT’s Board of Directors, its Committees and Senior Leadership Team are responsible for setting and overseeing the company’s ethical standards and business conduct policies. They ensure that integrity, compliance and responsible practices are embedded across operations, regularly reviewing and approving frameworks related to ethics, anti-corruption and stakeholder engagement.

Our Board of Directors bring diverse expertise in the telecommunications industry and corporate finance. Several members have direct experience managing ethics programs. This ensures informed oversight and effective risk management in business conduct matters.

The Board, as well as its subcommittees for Audit, Compensation, and Governance and Risk, oversees the strategic direction of our business and advises our Senior Leadership Team.

Our **Board of Directors** is composed of the following experienced leaders:

Tony Abate	Chairman
Edward Morche	CEO & Director
Adam Malin	Director
Alexander Grau	Director
Beau Harbour	Director
James Parker	Director & Compensation Committee Chair
Jon Lin	Director
Sherman Edmiston III	Director & Governance and Risk Committee Chair
Wayne Rehberger	Director & Audit Committee Chair

Our **Senior Leadership Team** oversees the day-to-day operations of the company and is dedicated to advancing our strategic priorities, including our environmental, social and governance (ESG) commitments. The team brings together a diverse and complementary mix of expertise in technology, networking, sales, finance, law, compliance, HR and governance—reflecting the global scope and complexity of our business.

2024 Senior Leadership Team



EDWARD MORCHE
Chief Executive Officer



FLETCHER KEISTER
Chief Product and Technology Officer



JOAN LOGAN
President, Americas Division



TOM HOMER
President, Europe Division



GEORGE KUZMANOVSKI
Chief Operating Officer



FREDERIQUE ARNOLD
Chief People Officer



MIKE LITTLE
Chief Commercial Officer



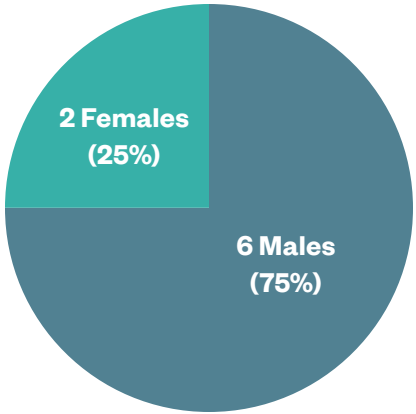
TIM MEDINA
Chief Financial Officer*

* As of Sept 2025, Andrea Genschaw joined GTT as Chief Financial Officer

Managing Enterprise Risk and Compliance

In 2024, GTT invested in an executive-level enterprise lead for at-scale management of Risk and Compliance. Reporting directly to our General Counsel, this role has assumed governing accountability for the company’s enterprise risk portfolio and its process risk management practice and works with senior leaders to further mature and extend GTT’s risk and compliance discipline, including ESG. Our Vice President of Risk and Compliance provides quarterly updates on risk and compliance matters to the Governance and Risk Committee (GRC), and reports to GTT’s senior leadership team as needed. This role also leads the preparation and coordination of GRC meeting agendas and supporting materials. In addition, the VP collaborates closely with the Information Security and Operations teams, as well as other key stakeholders across the enterprise, to ensure a cohesive and proactive approach to risk and compliance management.

2024 Top Management by Gender - 8 Total





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Compliance and Ethics

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 **Corporate Code of Business Conduct and Ethics** is the core of our corporate culture and outlines the ethical principles, values and standards of behavior expected from all employees, executives and third-party partners within a company.

Our GTT Code of Business Conduct and Ethics is reinforced by a comprehensive set of global and country-specific policies and guidelines that address a broad spectrum of business practices. These include critical areas such as anti-corruption, anti-bribery, conflict of interest, fraud prevention, anti-money laundering and information security. The framework also outlines specific approval procedures for sensitive transactions, including the giving and receiving of gifts and travel. Additionally, the Code provides clear guidance on competitive conduct and sets expectations for appropriate interactions with competitors, ensuring that all employees operate with integrity and in full compliance with applicable laws and ethical standards.

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 2024, 98.9% of active employees acknowledged GTT’s Code of Business Conduct and Ethics, along with our policies on Anti-Bribery, Anti-Corruption and Anti-Competitive practices—slightly down from 99.6% in 2023.

As a company grounded in strong ethical principles, GTT maintains a confidential ethics helpline and website through **Safecall**, accessible to all employees, customers, third

parties and the public at any time. Managed by the GTT Legal department, this platform allows for anonymous reporting of any actual or suspected misconduct, and may include, but is not limited to, corruption and bribery, fraud, sexual harassment, public procurement irregularities and environmental protection breaches.

We continue to prioritize ethics and compliance across the organization. To support this, GTT ensures that all employees are given sufficient time and resources to complete mandatory training, including on critical topics such as our **Whistleblower Policy**. This reinforces our culture of integrity and accountability at every level of the business.

The Executive Management and the Board of Directors annually review, and amend when necessary, the Whistleblower Policy and Code of Business Conduct and Ethics.

Whistleblower reports

In 2024, five reports were filed within our Whistleblower system, one of which was a test entry to confirm resolution of a browser issue. Of the four net remaining, all were investigated by our Legal and Audit functions. The Company also took steps in mid-2024 to make its Whistleblower channel more conspicuous on our main and supporting intranet pages to ensure enhanced visibility to associates wishing to use the browser-based, online reporting channel.

Whistleblower status is reviewed quarterly by the Board’s Governance and Risk Committee and by our Audit Committee.

Protecting Human Rights

At GTT, we are firmly committed to upholding the fundamental rights and freedoms of every individual. Our approach to human rights is guided by the principles of the Universal Declaration

of Human Rights and embedded in our core values and Code of Business Conduct and Ethics. These commitments are further detailed in our **Modern Slavery and Human Rights Policy**, which outlines our stance on critical issues such as child labor, forced labor and human trafficking.

All employees receive annual training on human rights as part of our broader Compliance Campaign. This training reinforces awareness of ethical responsibilities and provides clear guidance on how to identify and report potential violations—either directly to management or through our confidential ethics helpline, Safecall. We maintain a zero-tolerance policy for any form of retaliation against individuals who report concerns in good faith.

GTT also extends its human rights expectations to our supply chain. We actively seek to work with suppliers who share our values and uphold ethical labor practices. To support this, we have integrated human rights and anti-slavery requirements into our **Supplier Code of Conduct** and other relevant policies. These measures are part of our ongoing efforts to prevent modern slavery and human trafficking across all areas of our business and supply chain.

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). We comply with local laws and collective bargaining agreements relating to operational changes.

Globally, 144 employees, representing about 6.6% of our workforce, were covered by formal collective bargaining agreements in 2024, compared to 139 employees in 2023. In addition, approximately 97 employees, representing 4.4% of our workforce, were covered by formally elected Employee Representatives in 2024, compared to 98 employees in 2023.





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We adhere to collective agreements that govern working conditions. In addition, employees represented by formally elected Employee Representatives have a voice in workplace matters. Separately, Management-Worker Health and Safety Committees are in place to promote collaboration on health and safety initiatives across the organization.

Collective bargaining	2023	2024
Total percentage employees covered by collective bargaining agreements	6.5%	6.6%
Formally elected Employee Representatives	4.6%	4.4%

Anti-Bribery and Anti-Corruption

GTT's Global Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy and Procedure is designed to familiarize the workforce with Anti-Corruption Laws and Anti-Money Laundering Laws and provide steps to support the Company's compliance under such laws. Anti-Corruption Laws prohibit the Company and GTT personnel from engaging in bribery or other improper transactions. In 2024, GTT invested in an outside counsel assessment of its anti-bribery and anti-corruption practices. No extreme risks or incidents were noted.

GTT has completed implementation on eight of the nine recommendations received, and we continue actively working on the final one—concerning third-party risk management. We expect to implement this solution in 2025.

The policy sets out clear and practical guidelines on the offering and acceptance of gifts and hospitality, ensuring such actions do not create actual or perceived conflicts of interest

or serve to improperly influence business decisions. It promotes transparency, integrity and accountability in all professional interactions, in line with GTT's ethical standards and governance commitments under ESRS G1.

Reporting potential and confirmed violations of Anti-Corruption Laws and Anti-Money Laundering Laws is vital to compliance and can be done via the Ethics and Compliance Helpline and website ("Safecall"), which are monitored by the Legal team.

Employees, officers and directors may anonymously report violations or suspected violations of this policy by contacting the Helpline at www.safecall.co.uk/report. Anti-Bribery, Anti-Corruption and Anti-Money Laundering training are hosted annually for all employees as part of the mandatory Compliance Training.

Corruption and bribery incidents	2023	2024
Number of convictions for violation of anti-corruption and anti-bribery laws	0	0
Fines for violation of anti-corruption and anti-bribery laws	0	0

Business Conduct, Compliance and ESG Awareness Training

At GTT, all new employees undergo mandatory Compliance training as part of their onboarding process. This training is aligned with our Code of Business Conduct and Ethics and covers key topics such as Anti-Bribery and Anti-Corruption, Anti-Harassment and Non-Discrimination, Human Rights, and Information Security and Data Protection.

Each topic provides employees with a clear understanding of the company's ethical standards and expectations, the consequences of non-compliance, and the appropriate channels for reporting concerns—such as the Whistleblower System. Employees are also informed about where to access relevant policies and guidelines.

To reinforce a culture of integrity and accountability, this training is also required annually for all employees, along with formal acknowledgment of the policies. This training is mandatory, and non-completion is addressed assertively through our performance management process. This ensures ongoing awareness and alignment with GTT's commitment to ethical and responsible business practices.

GTT also offers all employees access to an ESG awareness training course through its learning and development platform. The course covers a wide spectrum of ESG topics, with a strong emphasis on core ESG principles, GTT's environmental and social impacts and opportunities, and the material issues that will shape the company's strategic focus moving forward.

In 2024, 92% of GTT employees — excluding contractors and employees on leave — completed the ESG awareness training, up from 83% in 2023, successfully meeting our target. This reflects our ongoing commitment to fostering a culture of sustainability and ensuring that ESG principles are embedded across our global workforce.

Compliance training	2023	2024
Annual Compliance Campaign	100%	99%
ESG Awareness Training	83%	92%

Note* Excluding contractors and employees on leave





POLITICAL ENGAGEMENT

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Political engagement was identified as a material topic during GTT’s double materiality assessment, reflecting its significance both in terms of financial impact and societal relevance.

GTT continuously monitors geopolitical developments, recognizing that volatile political environments—such as conflicts, governance instability or shifts in government—can pose risks to operations, supply chains and strategic planning. We are also implementing a global threat intelligence solution in 2025 and continuously screen our customers and suppliers for sanctions.

CREATING SUSTAINABLE PARTNERSHIPS

Policies and Expectations

GTT is committed to practising fair behavior in our management of suppliers. Our **Supplier Code of Conduct** sets out the minimum standards expected from our valued suppliers and vendors, including ensuring safety requirements for products and services; providing safe and healthy working environments; meeting environmental compliance requirements; and protecting against child labor, forced labor and human trafficking.

GTT also launched a **Sustainable Procurement Policy**, which outlines the principles and standards that we expect our business and supply chain to meet. It applies to all aspects of our operations, including procurement, distribution and business relationships. The Policy encompasses our supply chain globally and extends to all employees, contractors, suppliers, partners and stakeholders associated with the company — referred to as our “supply chain partners” in this policy.

In 2024, we communicated our Supplier Code of Conduct to all active network suppliers, with 100% of active suppliers expressing no issue with the expectations presented. In addition, the qualification and onboarding processes for new suppliers have been updated to include clauses related to compliance with applicable environmental, labor and human rights laws.

Supplier Management

GTT conducts Business Reviews with third-party suppliers, with quarterly frequency mandated for major suppliers. These reviews include a check on supplier 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 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 suppliers proactively, utilizing a third-party tool that allows GTT to understand and act swiftly on any threat identified.

As mentioned above, our risk and compliance function is working with Supplier Management and Information Technology to implement a risk-based, third-party risk management monitoring capability. This solution will use external data capture capabilities to continuously assess and respond to increased risk across monitoring dimensions in our supply chain. Dimensions include overall compliance, ESG, ownership changes, judgments and others.

Sustainable Supplier Management Training

All employees involved in third-party purchasing are required to complete training on sustainable procurement topics every two years. This training aims to raise awareness of supply chain risks, including environmental and human rights concerns, and to highlight key factors to consider when assessing business partners. In 2024, we achieved a 100% completion rate among all newly onboarded procurement specialists.

SUPPORTING NET NEUTRALITY

GTT is committed to upholding the principles of net neutrality and fully complies with the requirements of EU Regulation 2015/2120. We provide fast, secure and reliable connectivity that is impartial and free from bias, ensuring open internet access for all users.

We believe in the fundamental right of end-users to access and share information and content, regardless of their location, the nature of the content or the devices they use. Our services are delivered without discrimination, restriction or interference.

Where traffic management is necessary, we apply measures that are proportionate, transparent and aimed solely at maintaining service quality—never driven by commercial interests. We continuously monitor regulatory developments to ensure ongoing compliance while maintaining the highest standards of service integrity and neutrality.





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Topic	Code	Accounting metric	Unit of measure	2024
Environmental Footprint of Operations	TC-TL-130a.1	(1) Total energy consumed, (2) percentage grid electricity and (3) percentage renewable	GJ % %	(1) Total energy consumed: 3,597,204KWh (12949.9GJ) (2) percentage grid electricity: 100% (3) percentage renewable: 0.27% (non-leased assets)
2024 Disclosure: GTT conducts an annual review of our Scope 1, 2 and 3 greenhouse gas (GHG) inventory, emissions factors and calculations to ensure alignment with the GHG Protocol: A Corporate Accounting and Reporting Standard across our global operations. We continuously seek opportunities, including strategies to optimize energy use, to enhance our calculations and data collection methods to better track progress toward our targets. Our established processes enable us to effectively track and analyze our footprint and implement reduction initiatives. Due to our asset-light business model, GTT leases all office spaces globally and does not own any facilities. Consequently, we have limited control over investments in energy-efficient appliances, LED lighting, high-efficiency HVAC systems and energy-saving office equipment. However, we actively encourage employees to adopt energy-saving practices, such as turning off lights and equipment when not in use and optimizing computer settings.				
Data Privacy	TC-TL-220a.1	Description of policies and practices relating to targeted advertising and customer privacy.	n/a	Refer to section on “Securing Comprehensive Security: From Infrastructure to End-User Trust”
2024 Disclosure: We ensure our customers, GTT website visitors and any other interested parties feel confident about the privacy and security of personal data. Our data privacy framework ensures compliance with current privacy and data protection laws and encourages best practices when handling data. We are committed to complying with all applicable privacy laws, including the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Directive (ePrivacy Directive), and adhere strictly to country-specific telecommunication legislation. Our data protection policies cover all aspects of data management, including collection, storage, usage, transfer and disposal, ensuring comprehensive coverage and security throughout the data life cycle.				
Data Privacy	TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Number	0
2024 Disclosure: GTT generally does not collect or use customer data for secondary purposes. However, customer contact information may be used for marketing activities. Aside from this, customer data remains strictly within its intended scope of use, ensuring compliance with privacy standards and regulatory requirements.				
Data Privacy	TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Presentation currency	0
2024 Disclosure: n/a				
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	Number %	(1) 0 (2) 0 (3) 0
2024 Disclosure: GTT follows an internal lawful request process which takes into account privacy regulations and due process requirements. Any disclosure of customer information is conducted within established legal frameworks, maintaining transparency and safeguarding customer confidentiality while fulfilling legal obligations.				





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Data Security	TC-TL-230a.1	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of customers affected	Number %	(1) 0 (2) 0 (3) 0
2024 Disclosure: n/a				
Data Security	TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	n/a	n/a
2024 Disclosure: We identify and address data security risks through regular risk assessments, proactive monitoring, and adherence to industry standards like ISO 27001 and NIST Cybersecurity Framework. We implement multi-layered security controls, vendor risk assessments and incident response plans to mitigate threats. GTT aligns with ISO 27001:2022 on the enterprise-wide level. The formal certification applies to the information security of GTT Operations and Security Centres in Prague, Sofia, Nottingham and Pune. It also covers activities relating to IT engineering, internal IT, design, delivery and support of network, security and hosting services covering all GTT major services (co-location, Virtual Data Centre Services (VDC), Application Management, Network Management, SD-WAN, Bandwidth, IP VPN, Enterprise Voice, Ethernet, Internet, Managed Security and MDR). GTT undergoes annual SOC 2 audits for its SD-WAN, SIP Trunking and MDR services; and SOC 1 audits for its VDC and Managed Hosting, resulting in the issuance of SOC reports by an independent auditing body. GTT follows CIS Benchmark guidelines for the internal corporate environment and conducts internal audits to assess compliance.				
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	Metric tonnes (t), Percentage (%)	Data not disclosed
2024 Disclosure: 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. 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 globally.				
Competitive Behavior & Open Internet	TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulation	Presentation currency	Zero
2024 Disclosure: GTT's Corporate Code of Business Conduct and Ethics explicitly delineates the Company's expectations of all employees, Directors and Officers regarding Fair Dealing and Anti-Trust Compliance. GTT is successful in this regard and has not experienced any adverse findings relative to anti-competitive behavior or practices.				
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	Megabits per second (Mbps)	Data not disclosed
2024 Disclosure: GTT supports net neutrality and complies with EU net neutrality legislation. We provide our customers with reliable, fast and secure connectivity, and ensure that our services are impartial, without bias, and uphold all aspects of Regulation EU 015/2120, which requires 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.				





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Competitive Behavior & Open Internet	TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero-rating and related practices	n/a	
2024 Disclosure: As noted above, GTT supports net neutrality and complies with EU net neutrality legislation. 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.				
Managing Systemic Risks from Technology Disruptions	TC-TL-550a.1	(1) System average interruption duration, (2) system average interruption frequency, and (3) customer average interruption duration	Minutes, Number	(1) Refer to paragraph on System average interruption duration (2) Refer to paragraph on system average interruption frequency (3) Customer average interruption duration: Scope: Period: Jan/01/2024 – Dec/31/2024 Category: Trouble Ticket (Incidents) Type: All customer incidents, including child. Exclude Master (Platform/Master Tickets) Excludes: Canceled, Duplicate, Duplicate Ticket, Opened in Error, Ticket Opened in Error All Incident Priorities: Volume: 253,691 MTTR: 20.23 hours (1,213.97 minutes) P1 Incidents: Volume: 168,798 MTTR: 9.00 hours (539.85 minutes)
2024 Disclosure: At GTT, ensuring network reliability and service continuity is a top priority. GTT follows industry best practices by classifying and prioritizing the resolution of service disruptions and incidents based on their severity. Our dedicated Network Operations Center (NOC) team monitors the network around the clock and are equipped to respond immediately to any incident. Incidents are classified based on customer and business impact, ensuring that the most critical issues are resolved first (severity-based prioritization). We have clear escalation paths and predefined response playbooks that enable fast decision-making and resolution. We provide timely updates to keep customers informed during outages. While we experience occasional events and incidents, these typically do not result in service disruptions. The metrics disclosed below refer to specifically to full system disruptions, and not degradation or self-recovered events, which are effectively managed through our high availability (HA) and disaster recovery (DR) mechanisms. * System Average Interruption Duration: Approximately 30 minutes * System Average Interruption Frequency: Approximately twice per year Major service disruptions are rare. When they do occur, they tend to be complex but we have demonstrated strong capabilities in restoring core functionality within a short time frame, even if full resolution of the underlying issue may require additional time. It is important to note that, as expected in any complex system, we encounter more frequent minor incidents that may cause limited performance degradation. These events are typically contained and do not result in service outages.				





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Managing Systemic Risks from Technology Disruptions

TC-TL-550a.2

Discussion of systems to provide unimpeded service during service disruptions

n/a

Discussion in “Business Continuity and Operational Resilience”

2024 Disclosure:

We operate our global network from multiple operations centers worldwide and therefore must ensure that the network is running 24 hours a day, seven days a week. Our tested business continuity plans enable us to be prepared for any potential impact on our network or operations. Our operational centers 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 singular consistent customer management systems and global process owners.

Our Operations 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.

We perform stress tests of 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.

The scope of the Business Continuity Management System (ISO 22301) for the GTT Operations Centres in Sofia is the support of the network services covering Network management, SD-WAN, Bandwidth, IP VPN, Ethernet and Internet covering the Network Operation team.

