

GTT MODERN SLAVERY AND HUMAN RIGHTS POLICY

Objective and Scope

At GTT Communications, Inc. (together with its subsidiaries, “GTT” or the “Company”), we strive to maintain the highest standards of ethical principles and to respect human rights, both within our organization and by encouraging high standards in our supply chain. Our expectations for conduct are in line with the Universal Declaration of Human Rights and supported by our values and Code of Business Conduct and Ethics (“Code of Conduct”). GTT is committed to honest and ethical conduct and believes in treating all individuals with dignity and respect.

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

In order to provide our services, we contract with a broad range of suppliers including carriers, telecommunications equipment manufacturers, technology solutions providers, professional services organizations, outsourcing specialists, network engineering vendors and facilities management vendors.

Our Modern Slavery and Human Rights Policy applies to all GTT employees and partners. We also expect our suppliers to respect and adhere to this policy, which is addressed in our Supplier Code of Conduct.

Policy Statement

This policy sets out GTT’s position with respect to modern slavery and human rights and sits alongside our Code of Conduct. All GTT employees review and sign up to our Code of Business Conduct and Ethics on an annual basis. We continually monitor the implementation and adequacy of our Code of Conduct, and periodically report on the results of this process to our Board of Directors. In order to identify and control where our greatest exposure to modern slavery lies, we currently have a number of employee policies in place which in appropriate circumstances we extend to third parties, including suppliers:

- a. **Compliance with Laws, Rules and Regulations:** Obeying the law, both in letter and in spirit, is the foundation on which GTT’s ethical standards are built. All employees, officers and directors should respect and obey all international, country, and local laws, rules, and regulations applicable to the business and operations of the Company.
- b. **Modern Slavery:** GTT will not use forced or involuntary labor and has a zero-tolerance approach towards human trafficking. GTT prohibits the withholding of worker identity or immigration documents. Personal identification and migration documents are kept with the employees in accordance with the relevant local law.
- c. **Equal Opportunity Employment, Non-Discrimination, and Anti-Harassment:** GTT is committed to providing a work environment that is free of unlawful discrimination or

harassment of any kind. GTT is firmly committed to providing equal opportunity in all aspects of employment. The term “harassment” includes harassment based on any category.

- d. **Recruitment:** GTT ensures workers, including those hired by recruiters, are provided with detailed and accurate work agreements or similar work papers, prior to relocation, in cases where the worker must relocate to perform the work, and in a language understood by the worker. GTT permits workers, including migrant workers, to cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with local law or collective agreement.
- e. **Health and Safety:** GTT prioritizes the health and safety of our employees, customers, subcontractors and the communities, which commitment is documented in the Company’s Health, Safety and Wellbeing Policy.
- f. **Working hours:** GTT will comply with the law and industry standards relating to working hours and will ensure that working hours are reasonable.
- g. **Child labor:** GTT does not accept child labor and supports international labor standards for the protection of children’s rights.
- h. **Freedom of Association:** GTT recognizes the rights to collective agreements and works councils
- i. **Reporting any Illegal or Unethical Behavior:** Employees, officers, and directors are encouraged to talk to GTT Human Resources, GTT Legal, or any of GTT’s executive officers about observed illegal or unethical behavior and when in doubt about the best course of action in a particular situation.
- j. **Supplier Code of Conduct:** GTT includes contractual obligations requiring suppliers to comply with applicable human rights laws, rules, and regulations, including those related to modern slavery and human trafficking.

We have a zero-tolerance approach to slavery in any form and are committed to continuing to build on our practices to combat slavery and human trafficking. Although we believe that--due to the nature of our business--the risk of slavery in our supply chain is relatively low compared with other industries, we are not complacent about this risk and are alert to the fact that we have suppliers in geographical areas carrying out work for us that could be susceptible to the exploitation of people.

Grievance and Remediation

All GTT employees receive annual training on various compliance topics and are encouraged to report observed illegal or unethical behavior. The company operates a confidential whistleblower helpline to facilitate disclosure of unlawful or unethical behavior, including human rights violations, in a confidential

environment free from fear of retaliation. Third parties and suppliers can also report any illegal or unethical behavior via the helpline.

The whistleblower helpline is monitored by the Legal Department and can be accessed at <https://www.safecall.co.uk/file-a-report/>.

GTT will annually review and ensure that our risk management policies are adequate.

Effective Date: July 2026