



# **GTT RESPONSIBLE BUSINESS REPORT**

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September 2026

[gtt.net](https://gtt.net)

# A LETTER FROM OUR CEO

At GTT, operating responsibly is inseparable from business performance. As a global networking and security as a service provider, the decisions we make around governance, sustainability and how we support people directly shape the long-term value we deliver.

Over the past year, we enhanced our governance, increased reporting transparency and expanded support for our workforce while maintaining strict discipline around our environmental footprint. However, as technology now evolves more rapidly than ever, thanks to the surge in AI, operating responsibly requires an even more dynamic and integrated approach.

To that end, we are evolving our model into a comprehensive Responsible Business framework, built on four core pillars detailed later in this report: Future-Ready Technology, Digital Security and Trust, Customer-Focused Workforce, and Responsible and Accountable Partners.

This framework also reflects GTT’s strategic evolution, building on our heritage as a global connectivity aggregator to become a technology innovator and orchestrator. As we design and bring our own proprietary products to market, we are embedding responsible business principles directly into the development cycle. It further ensures our operations align with European Sustainability Reporting Standards (ESRS) and CSRD requirements, giving our global stakeholders greater visibility into our progress.

This is how we align innovation with accountability.

Thank you to our employees, customers and partners for your continued trust and collaboration. As technology continues to transform how people connect, work and live, we remain committed to leading with purpose.



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

**BASIS FOR PREPARATION**

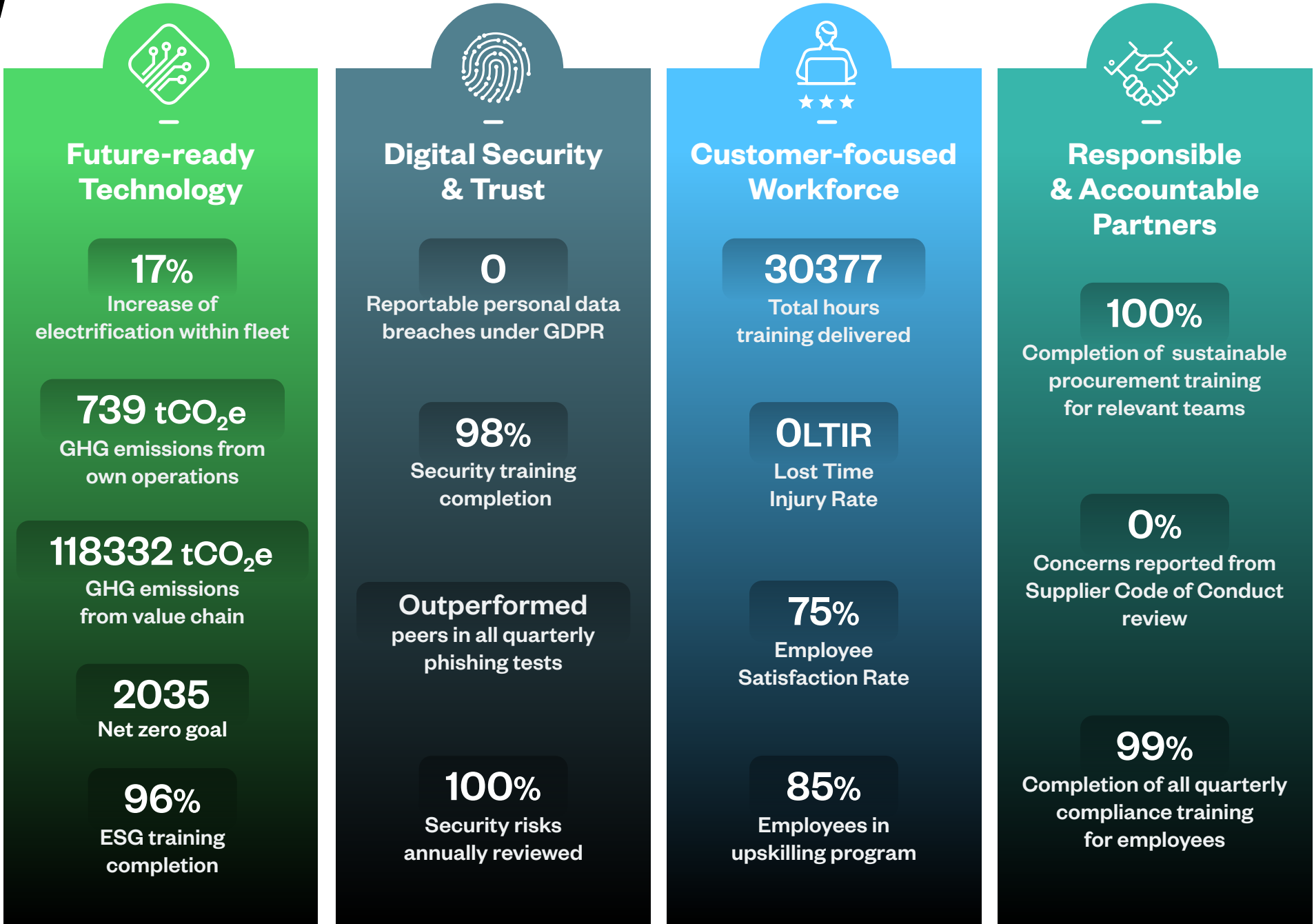
This Responsible Business report has been prepared on a consolidated basis, aligned with the scope of GTT’s financial reporting and outlines our environmental, social and governance performance and initiatives for the reporting period ending 31 December 2025. It highlights our performance across the key impact areas that matter most to our stakeholders and our business.

This report encompasses the Parent Company, GTT Communications, Inc., along with all directly and indirectly controlled subsidiaries. It is intended to provide our stakeholders, including our 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 environmental, social and governance reporting frameworks, including the Sustainability Accounting Standards Board (SASB) and the ISSB’s IFRS S2 Climate related Disclosures Standard, reflecting our commitment to ethical governance, responsible business practices and long-term sustainable value creation.

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 key impact area 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.

**2025 Highlights**



# 1.

## ***ABOUT GTT***



# ABOUT GTT AND VALUE CREATION MODEL

GTT is a leading networking and security services provider for multinational organizations. Our purpose is to reduce the complexity of technology, enabling businesses to focus on their strategic priorities and growth ambitions. We create seamless, secure and intelligent networking experiences that help organizations operate with confidence in an increasingly connected world.

Our mission is to simply and securely connect people, applications, data and intelligent agents, anywhere in the world, through one trusted partner, one platform and one digital experience.

**PURPOSE**

WHY WE EXIST

To reduce the burden of technology – allowing organizations to focus on their bigger picture.

**VISION**

WHAT WE WILL ACHIEVE

To create better, more streamlined networking experiences.

**MISSION**

HOW WE WILL GET THERE

Simply and securely connecting people and agents to data and applications, anywhere in the world. Delivered by one partner with one platform and one digital experience.

Our commitments; adaptive mindset, collective impact and customer ownership, reflect who we are. They set the expectations that fuel our success today and guide the future we are building together.



As we enter a new era shaped by rapid technological innovation and digital transformation, we recognize that GTT’s growth and long-term success depend on our ability to adapt, embrace accountability and work collaboratively in service of our customers. By combining deep technical expertise with a customer-centric approach, we help organizations navigate complexity, accelerate innovation and unlock new opportunities.

## From ESG Reporting to Sustainable Value Creation

As a company, GTT has evolved from primarily focusing on financial reporting and disclosing its environmental, social and governance performance to becoming an organization that delivers tangible, real-world outcomes for its stakeholders. As our business continues to transform, we are increasingly driven by innovation and the development of our own products and solutions in ways we have not previously pursued. This evolution requires us to rethink and realign our approach to sustainability. Rather than viewing ESG solely through a compliance and governance lens, we are embracing a broader role as an active creator of sustainable value, integrating ESG principles into the design, development and delivery of our products, services and business strategy.

Our Responsible Business Report reflects this evolution, demonstrating how responsible business practices are embedded throughout our strategy, operations and culture. By integrating sustainability with operational excellence, customer experience and industry-leading technology, we create long-term economic value while delivering meaningful outcomes for customers, employees, investors, communities and the environment.

Technology-Driven Value Creation  
Through the GTT Envision Platform

At the core of our secure cloud networking portfolio is the GTT Envision platform—a unified, cloud-native architecture that enables customers to seamlessly connect, manage and optimize their global networks. Through enhanced visibility, centralized control and intelligent automation, GTT Envision empowers IT and security teams to improve performance, strengthen resilience and accelerate digital transformation across their organizations.

Together, these capabilities position GTT as a trusted partner, helping customers build secure, agile and sustainable digital foundations for the future.

- **GTT EnvisionCORE:** Our global IP backbone and distributed compute infrastructure, including our Network Function Virtualization Pods, our DDoS Scrubbing Centers, our Gateways to Cloud and Data Center providers, our Session Border Controllers and Network-Based Firewalls.
- **GTT EnvisionEDGE:** Virtualized network functions deployed at the edge, delivering agility and performance via GTT-specified hardware.
- **GTT EnvisionDX:** A digital experience layer that provides customers with real-time visibility, control and customization.

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



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.

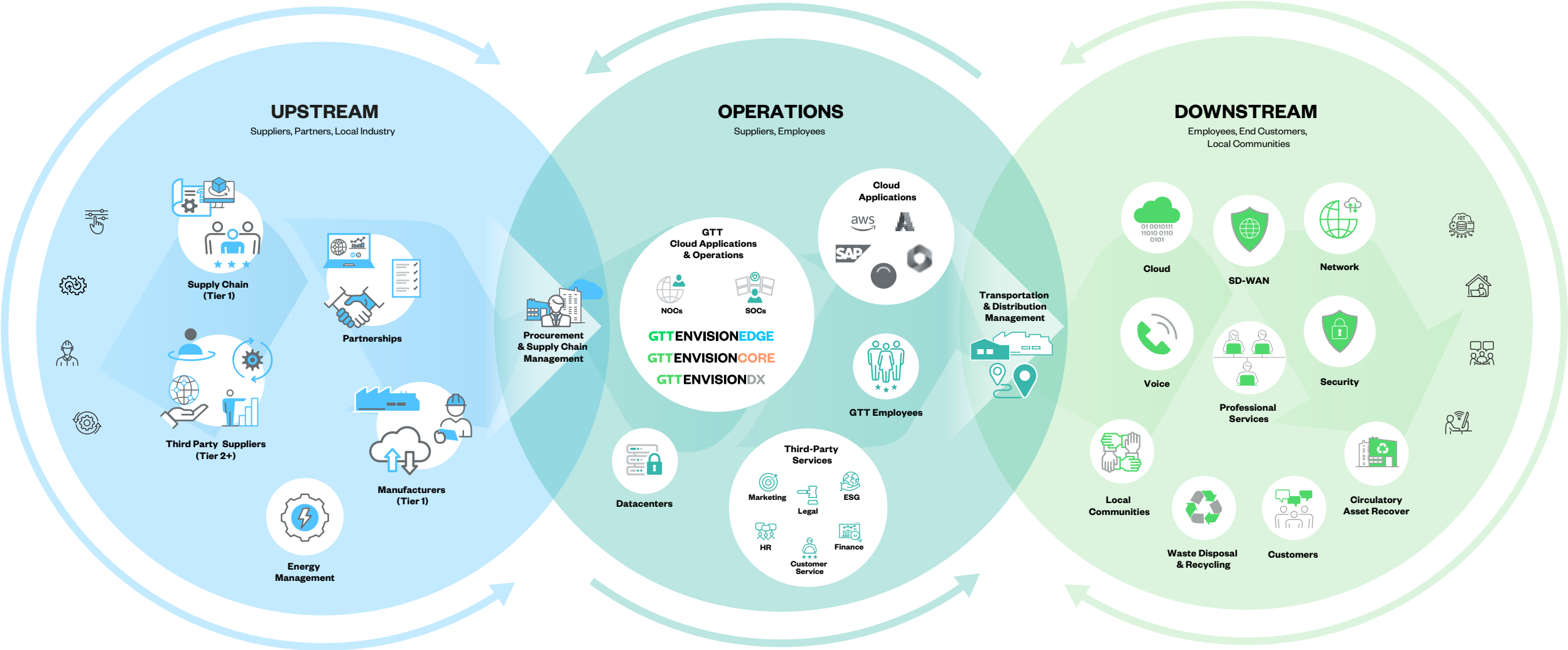
Our global presence and comprehensive professional services further reinforce our ability to support customers in key markets worldwide.

Learn more at [www.gtt.net](http://www.gtt.net).

Our Business Model: Creating Value Responsibly

GTT creates value by delivering secure, cloud centric networking and security services over a global Tier 1 backbone. Our business model helps enterprises modernize responsibly by simplifying connectivity, reducing operational complexity and enabling resilient, future ready digital infrastructure.

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.

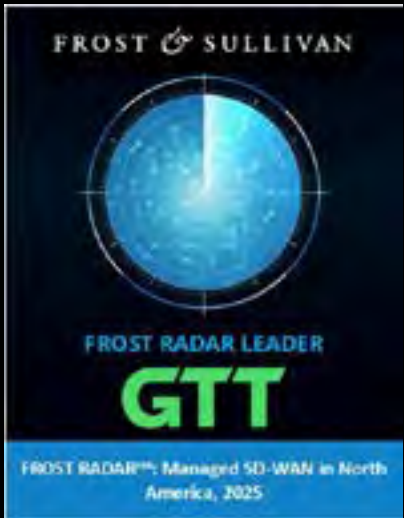
**Internal Operations**

Within our own operations, we are focused on improving energy efficiency and reducing environmental impact. Research and development initiatives, such as infrastructure consolidation, aid how we continuously evolve GTT Envision. We aim to minimize hardware dependency and lower 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 INDUSTRY AWARDS



# 2.

## RESPONSIBLE BUSINESS STRATEGY



## ***TRANSFORMING ESG INTO BUSINESS VALUE***

**GTT is entering a new phase of its growth journey. While transparency, reporting and strong governance remain important foundations, we are increasingly focused on how responsible business practices support the achievement of our strategic objectives and long-term business success.**

This shift is driven by a clearer understanding of our priorities. Our double materiality assessment has enabled us to identify and focus on the issues that matter most to our business and stakeholders, ensuring that resources are directed toward areas where we can deliver the greatest impact.

Our strategy has been developed through a rigorous and collaborative process, combining internal expertise with external benchmarking. Insights from our double materiality assessment were validated against industry peers, sustainability frameworks and external ratings methodologies, while cross-functional engagement ensured ownership and practical implementation across the business. The approach was further refined through external perspectives to help align with evolving stakeholder and investor expectations.

For GTT, responsible business maturity is not only a means of managing risk, but also a driver of operational efficiency, network resilience, innovation and sustainable growth. By embedding these principles into business decision-making, we strengthen our ability to deliver long-term value for customers, employees, investors, partners and the communities we serve.



# OUR APPROACH TO STAKEHOLDER ENGAGEMENT

Stakeholder engagement is central to our Responsible Business strategy. Through ongoing formal and informal interactions with investors, employees, customers, suppliers and communities, we gather insights that shape our material priorities and broaden our sustainability approach. This continual dialogue strengthens risk management, informs decision making and ensures our reporting and long term strategy reflect stakeholder expectations and create value.

We are committed to ongoing engagement with our stakeholders, actively listening to their perspectives to ensure they inform and shape our evolving Responsible Business priorities.

| Stakeholders | Why We Engage                                                                                                                                                                                                                                                                                                                                                                       | How We Engaged in 2025                                                                                                                                                                                                                                                                                                                                                                                          | Value created from engagement                                                                                                                                                                                                                                                             |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CUSTOMERS    | <ul style="list-style-type: none"><li>To build trust and value</li><li>To identify opportunities to improve our services</li><li>To respond to customer needs and enable them to achieve goals and targets</li><li>To manage risk in our value chain and collaborate on sustainability-related topics</li></ul>                                                                     | <ul style="list-style-type: none"><li>Customer satisfaction surveys</li><li>Quarterly meetings</li><li>Customer Advisory Boards</li><li>GTT EnvisionDX</li><li>RFI (Request for Information), RFP (Request for Proposal) and deal responses</li><li>Management system certifications; ISO 27001, 20000 and 22301</li></ul>                                                                                      | <ul style="list-style-type: none"><li>Ensured contractual obligations</li><li>Maintained positive relationships</li><li>Supported customers' sustainability goals</li></ul>                                                                                                               |
| EMPLOYEES    | <ul style="list-style-type: none"><li>To enhance employee wellbeing</li><li>To ensure professional development</li><li>To enhance employee satisfaction and retention</li><li>To boost productivity and performance</li><li>To strengthen organizational culture</li></ul>                                                                                                          | <ul style="list-style-type: none"><li>Annual employee engagement survey</li><li>Responsible Business and compliance-driven training for employees</li><li>Mid-year and annual performance reviews</li><li>Global town halls and leadership sessions</li><li>Intranet/newsletter(s)</li><li>Recognition and rewards</li><li>Daily colleague interactions</li><li>Annual Internal Communications Survey</li></ul> | <ul style="list-style-type: none"><li>Skills development</li><li>Healthier organizational culture</li><li>Enhanced customer experience delivered by an engaged workforce</li><li>Provide valuable input to enhancing operations in alignment with Responsible Business strategy</li></ul> |
| SUPPLIERS    | <ul style="list-style-type: none"><li>To manage risk in our supply chain and ensure supply chain resilience</li><li>To measure performance</li><li>To build long-term strategic partnerships</li></ul>                                                                                                                                                                              | <ul style="list-style-type: none"><li>Quarterly business reviews and performance monitoring</li><li>Supplier code of conduct</li><li>Supplier Master Service Agreements (MSA)</li><li>Supplier questionnaires</li></ul>                                                                                                                                                                                         | <ul style="list-style-type: none"><li>Maintained positive relationships</li><li>Improved risk management</li></ul>                                                                                                                                                                        |
| COMMUNITIES  | <ul style="list-style-type: none"><li>To foster strong connections with our local communities where we do business</li><li>To incorporate feedback into key charity initiatives that would benefit our local communities</li></ul>                                                                                                                                                  | <ul style="list-style-type: none"><li>Volunteering</li><li>Digital channels; social media, website</li></ul>                                                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"><li>Long-term impact to communities we engage with:</li><li>Increased employee satisfaction</li><li>Increased uptake of days among employees</li></ul>                                                                                                  |
| INVESTORS    | <ul style="list-style-type: none"><li>To follow developments in corporate governance and sustainability</li><li>To enable mitigation of short- and long-term risks to the business</li><li>To review legal and regulatory requirements, to manage associated risks effectively</li><li>To further inform decision-making</li><li>To support stronger corporate governance</li></ul> | <ul style="list-style-type: none"><li>Governance and Risk Committee meetings</li><li>Board meetings</li><li>Annual Responsible Business report</li><li>Ratings, i.e., EcoVadis, CDP</li></ul>                                                                                                                                                                                                                   | <ul style="list-style-type: none"><li>Strategic alignment</li><li>Better governance and accountability</li><li>Understand how GTT is perceived in comparison to other investments, enabling continuous improvement of social impact and community value creation.</li></ul>               |
| REGULATORS   | <ul style="list-style-type: none"><li>To ensure legal and regulatory compliance</li><li>To build trust and credibility</li><li>To support license to operate</li></ul>                                                                                                                                                                                                              | <ul style="list-style-type: none"><li>Provide transparent and timely disclosures</li></ul>                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"><li>Regulatory compliance and risk reduction</li><li>Improved reporting alignment</li></ul>                                                                                                                                                             |

Double Materiality Assessment

GTT conducted a Double Materiality Assessment in alignment with the European Sustainability Reporting Standards (ESRS), supported by an external consultancy and incorporating input from key stakeholders. The identified material topics underpin our sustainability strategy and inform our environmental, social and governance priorities, guiding long-term value creation.

Responsible Business Material Topics:

| Environmental      | Social                         | Governance           |
|--------------------|--------------------------------|----------------------|
| E1: Climate change | S1: Own workforce              | G1: Business conduct |
|                    | S4: Consumers and/or end users |                      |

Responsible Business Topics Evaluated but Not 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            |                                |



# DRIVING IMPACT: OUR STRATEGIC PILLARS

To support our Responsible Business strategy, we have four new strategic pillars “Future-Ready technology, Digital Security and Trust, Customer-Focused Workforce and Responsible and Accountable Partners” that have been developed to reflect how GTT creates value today and in the future.

While this refreshed strategy is firmly focused on forward-looking value creation, it remains grounded in regulatory compliance. Each new pillar has therefore been aligned to the European Sustainability Reporting Standards (ESRS) to support CSRD requirements, specifically covering climate change, consumers and end users, own workforce and governance.



**Strategic Pillar 1**

**Future-ready Technology**

As a Tier 1 network provider, this pillar focuses on resilient networks, sustainable technology, and supporting customer decarbonization. As we expand our innovation and proprietary products, we continue to manage the technology lifecycle responsibly to drive long-term performance, sustainability, and resilience.

**Approach**

We aim to deliver long term value by embedding climate resilience into our day-to-day operations—improving energy supply, delivering cost savings by decarbonization and enabling our customers to meet their environmental commitments.



**Strategic Pillar 2:**

**Digital Security & Trust**

The second pillar, Digital Security and Trust, reflects a focus on cybersecurity and the importance of a secure digital infrastructure. It expands beyond a traditional social lens to address evolving security needs for both customers and employees, recognizing security as a critical enabler of trust and business continuity.

**Approach**

Our organization is committed to safeguarding consumers and end users by embedding robust cybersecurity and data protection measures across all processes, products and services. We recognize that digital security is a fundamental component of social responsibility, directly influencing user safety and trust.



**Strategic Pillar 3**

**Customer-focused Workforce**

Our third pillar focuses on a Customer-Focused Workforce, recognising that our people are central to delivering our Responsible Business strategy. Aligned with GTT’s commitment to customer ownership, this pillar emphasizes employee engagement, empowerment and performance to drive consistent, high-quality outcomes for customers globally.

**Approach**

We attract, develop, promote and retain world-class talent. We support the wellbeing of our employees by creating an inclusive environment where our people can thrive. We empower our teams to deliver exceptional customer experiences.



**Strategic Pillar 4**

**Responsible & Accountable Partners**

The final pillar, Responsible and Accountable Partners, extends our focus across the value chain. It acknowledges the importance of working collaboratively with suppliers and partners to deliver shared value, ensuring that our broader ecosystem contributes to secure, simple and reliable global connectivity.

**Approach**

We will maintain and optimize a responsible, accountable supply chain that raises standards, reduces risk and supports long-term value creation to provide secure, simple global secure cloud networking.

Together, these four pillars form GTT’s refreshed Responsible Business strategy. They not only meet our compliance obligations but also reflect how value is created across the business on a day-to-day basis, providing a clear, consistent narrative that can be effectively communicated to regulators, investors, customers and employees.

# RESPONSIBLE BUSINESS OVERSIGHT

Strong governance is the foundation of GTT's sustainability strategy. Our oversight structure for Responsible Business ensures clear accountability across the Board, Senior Leadership and operational teams so that environmental, social and governance considerations are embedded into strategic decision making, risk management and performance monitoring.

Our Responsible Business function drives the development of our strategy and program and embedding Responsible Business principles throughout the organization. This team is supported by the Vice President of Risk & Compliance within the Legal team, with senior executive sponsorship provided by our Chief Legal Officer.

## Board Oversight and Management Accountability

GTT's Responsible Business 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.

## Responsible Business Steering Committee

The Responsible Business Team works in close partnership with a cross-functional Responsible Business Steering Committee, which plays a pivotal role in shaping our 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 objectives.

## Integration into Strategy and Risk

Responsible Business considerations are incorporated into GTT's strategic planning, enterprise risk management, capital allocation and long term resilience planning. Oversight frameworks emphasize the value of aligning Responsible Business and financial KPIs and integrating sustainability into enterprise wide scenario analysis and decision making.

## Monitoring and KPIs

We monitor performance across our Responsible Business pillars using defined metrics and governance indicators. Clear KPIs and transparent tracking are essential to effective reporting, helping demonstrate progress and strengthen stakeholder trust. Our annual Responsible Business report provides this visibility, highlighting our performance and serving as a core element of our Responsible Business governance framework.



3.



***FUTURE-READY TECHNOLOGY***



**APPROACH:**



We aim to deliver long term value by embedding climate resilience into our day-to-day operations—improving energy supply, delivering cost savings by decarbonization and enabling our customers to meet their environmental commitments.

At GTT, we exist to create better networks, better experiences and better tomorrows. We are committed to conducting our business in an environmentally responsible manner and recognize the impact our operations can have on the planet. We are dedicated to minimizing this impact through sustainable practices and a culture of continuous improvement.

We will work to reduce greenhouse gas emissions across our operations and value chain, increase the use of renewable energy, protect natural resources and support customers in achieving their environmental objectives. Through this approach, we aim to build a more efficient and resilient network and compute infrastructure, strengthen alignment with evolving customer expectations and support sustainable business growth. We also expect to realize operational efficiencies, cost savings and reduced regulatory and business risk over the long term.

Our Future Ready Technology pillar aligns with the GTT commitment of an adaptive mindset by embedding flexibility and resilience into our technological approach. Specifically, we prioritise the development and adoption of innovative, scalable solutions that enable us to respond effectively to evolving climate pressures, while exploring new technologies to improve environmental performance and operational efficiency.



**Future-ready Technology Oversight**

As part of our Responsible Business approach, GTT has established clear governance and accountability for the management of environmental impacts across the organisation. Day-to-day responsibility for the environmental programme sits with the Responsible Business Program Lead, supported by the Responsible Business and Risk Analyst, with input from various teams including the Product and Operations teams. Together, they drive the development and implementation of environmental initiatives, including emissions management, climate strategy and broader sustainability efforts, ensuring alignment with customer needs, service delivery and operational performance.



POLICY FRAMEWORK:

The scope of this policy applies globally across GTT’s operations and includes all employees, subcontractors and suppliers. Oversight and accountability sit with the VP of Risk and Compliance. The disclosures cover the organisation’s approach to climate-related risks, including the assessment of both physical and transition risks across business operations. Relevant Responsible Business information is published on both our corporate website and Atlas, our intranet platform, through dedicated pages that provide accessible and transparent communication for internal and external stakeholders.

| CLIMATE CHANGE AND ENERGY |                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy                    | Objective                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Environmental Policy      | This policy outlines GTT’s commitment to managing and reducing its environmental and waste-related impacts across global operations. It establishes the principles, objectives and performance measures needed to drive continual improvement in environmental performance, prevent pollution, minimise waste generation, promote the reduction, reuse and recycling of materials and improve resource and operational efficiency. |



TARGETS:

The overarching goal of the Future-ready technology pillar is to reduce greenhouse gas emissions, increase renewable energy use and protect natural resources, supported by the following targets and indicators, which collectively contribute to a more sustainable, efficient and resilient business, while enabling customer sustainability goals, driving growth and reducing risk.

| Target                                   | Percentage complete    | Progress                                                                                  |
|------------------------------------------|------------------------|-------------------------------------------------------------------------------------------|
| CLIMATE CHANGE ADAPTATION AND MITIGATION |                        |                                                                                           |
| Set SBT by the end of 2026               | <div><div></div></div> | Third-party consultancy supported the development of our SBT. Validation targeted Q1 2027 |
| Decarbonization plan by end of 2026      | <div><div></div></div> | Third party consultant completed financial quantification of GHG emissions reduction      |
| Net Zero 2035                            | <div><div></div></div> | 21.3% reduction in Scope 1 and 2 GHG emissions*                                           |
| Total Value Chain emissions reduction    | <div><div></div></div> | 29.8% reduction in Scope 3 (value chain) emissions**                                      |

| Target                                            | Percentage complete    | Progress                                                        |
|---------------------------------------------------|------------------------|-----------------------------------------------------------------|
| ENERGY                                            |                        |                                                                 |
| Total fleet electrification across the EU by 2028 | <div><div></div></div> | 7% increase of EVs within fleet and 17% decrease in fleet total |

\*See Page 21 for details of Scope 1 and 2 emissions reductions

\*\*See Page 23 for details of Scope 3 emissions reductions



**PROGRESS:**

# CLIMATE CHANGE ADAPTATION

## Climate-Related Risk and Opportunity Analysis

As part of our Responsible Business approach, GTT is focused on strengthening the resilience of our operations in response to the physical impacts of climate change, supporting service continuity and long-term value creation.

Our approach to climate adaptation is informed by our double materiality assessment and scenario analysis, enabling us to identify and prioritise the physical risks most relevant to our business, including extreme weather events, supply chain disruption and longer-term climate trends.

We mitigate these risks through a combination of operational and strategic measures. Our globally diversified, asset-light model reduces exposure to location-specific disruptions, while established business continuity and disaster recovery plans support the resilience of our network and critical infrastructure. These measures are complemented by ongoing monitoring and risk assessment to ensure preparedness for evolving climate conditions.

Climate adaptation is embedded into how we design and operate our network, including infrastructure planning, supplier engagement and service delivery. This integrated approach ensures that resilience is built into day-to-day operations, rather than managed as a standalone activity.

Scenario analysis further supports our preparedness by testing the resilience of our business under different climate futures and informing investment and operational decisions.

Governance of climate-related risks, including adaptation, is embedded within our enterprise risk management framework, with oversight from the Responsible Business Steering Committee and the Governance and Risk Committee. This ensures that climate resilience remains a core consideration in decision-making across the organisation.

Overall, our approach to climate change adaptation reflects a shift from reactive risk management to proactive resilience; positioning GTT to maintain reliable service delivery, support our customers and respond effectively to a changing climate. Refer to our **Climate-related Financial Disclosure Report**.



# CLIMATE CHANGE MITIGATION

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 seek to align with the UN Sustainable Development Goals (SDGs), set clear sustainability expectations with our business partners and recognize our role in supporting 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’ ambitions strengthens our competitive advantage and fosters long-term, purpose-driven relationships.

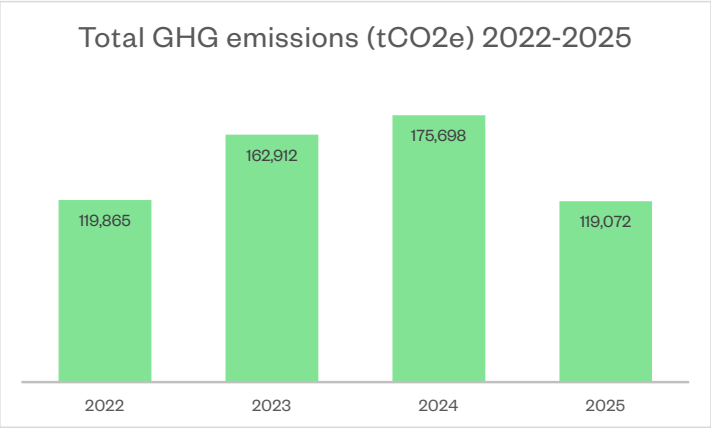
## Understanding Our Carbon Footprint

We conduct an annual review 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 consultant. This process ensures alignment with the GHG Protocol’s Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Standard across our global operations.

| Scope   | Category                          | Status |
|---------|-----------------------------------|--------|
| Scope 1 | Stationary Combustion             | ✓      |
| Scope 1 | Mobile Combustion                 | ✓      |
| Scope 1 | Fugitive Emissions                | ✓      |
| Scope 2 | Electricity                       | ✓      |
| Scope 3 | Purchased Goods and Services      | ✓      |
| Scope 3 | Capital Goods                     | ✓      |
| Scope 3 | Fuel & Energy Activities          | ✓      |
| Scope 3 | Upstream Transport & Distribution | ✓      |
| Scope 3 | Waste                             | ✓      |
| Scope 3 | Business Travel                   | ✓      |
| Scope 3 | Employee Commuting                | ✓      |
| Scope 3 | Upstream Leased Assets            | ✓      |
| Scope 3 | Processing of Sold Products       | x      |
| Scope 3 | Use of Sold Products              | x      |
| Scope 3 | End-of-Life Treatment             | x      |
| Scope 3 | Downstream Leased Assets          | ✓      |
| Scope 3 | Franchises                        | x      |
| Scope 3 | Investments                       | x      |

Total reported greenhouse gas emissions increased between 2022 and 2024, rising from 119,865 tCO<sub>2</sub>e to a peak of 175,698 tCO<sub>2</sub>e. In 2025, reported emissions declined significantly to 119,072 tCO<sub>2</sub>e, marking the first time since the 2022 base year.

We are continuously working to improve the accuracy and reliability of our emissions data by refining our calculation methods and data collection processes. These improvements contributed to the 30% recorded decrease in our total emissions from 2024 to 2025. The accuracy will also support more effective tracking of our progress toward emissions reduction targets in future reporting cycles. In collaboration with industry experts, we are 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.



\*\* 2024 total emissions restated from 176052 tCO<sub>2</sub>e (stated in the 2025 report)

Restatement – Scope 1 Emissions (2024):

Scope 1 emissions for 2024 have been restated from 771 to 417 tCO<sub>2</sub>e, driven by a reduction of mobile combustion emissions following the identification of a data discrepancy in Belgium. Within this correction, mobile combustion emissions were revised from 557 to 203 tCO<sub>2</sub>e.

Scope 1 and Scope 2 GHG emissions

| Scope 1 and Scope 2 Emission Breakdown (tCO <sub>2</sub> e)                                             |       |      |      |       |
|---------------------------------------------------------------------------------------------------------|-------|------|------|-------|
|                                                                                                         | 2022  | 2023 | 2024 | 2025  |
| Scope 1: Direct emission from energy and heat generation at company-owned facilities                    | 310   | 441  | 417  | 333.4 |
| Scope 2 (market-based): Indirect emissions from utility-purchased electricity, steam, heat or cooling*  | n/a   | 516  | 522  | 406   |
| Scope 2 (location-based): Indirect emissions from utility-purchased electricity, steam, heat or cooling | 1,072 | 421  | 420  | 335   |

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

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 (EV) across our European operations. Scope 1 and Scope 2 emissions amounted to 739.4 tCO<sub>e</sub>.

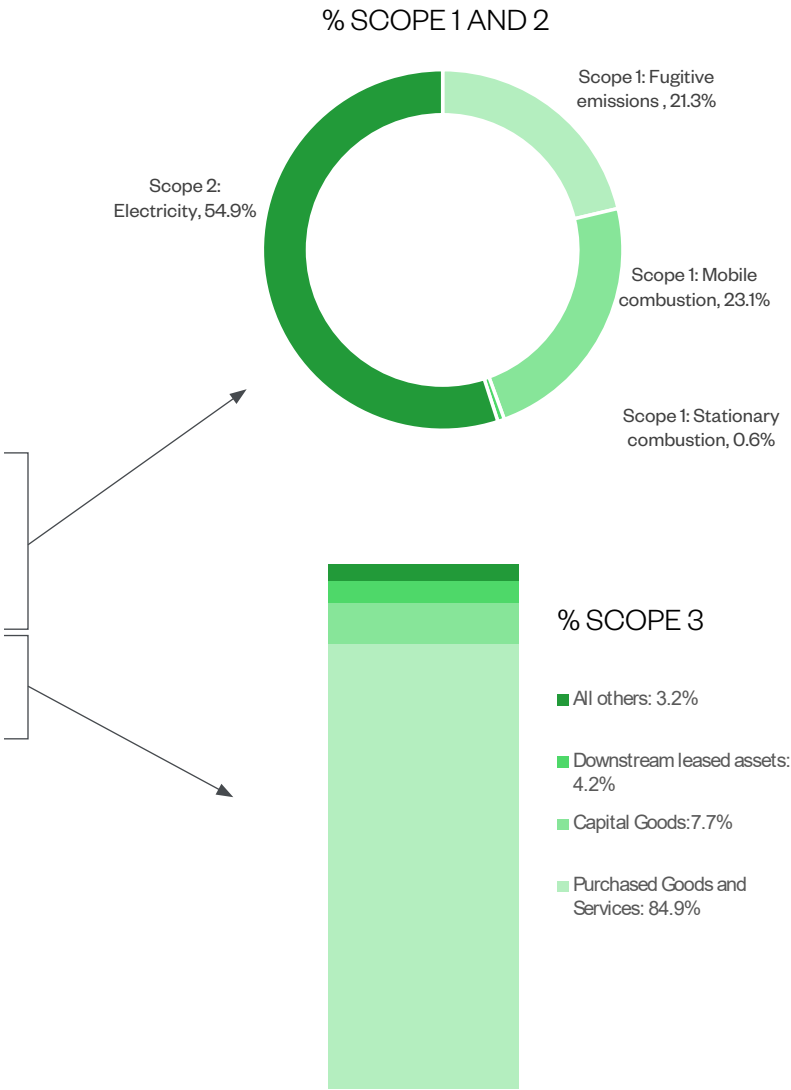
GTT has set an ambitious yet achievable goal to reach net zero Scope 1 and Scope 2 emissions by 2035, underscoring our commitment to reducing emissions within our direct operational control. Due to our continued commitment to improving data quality, GTT was able to record our Scope 1, 2 and 3 emissions with greater accuracy in 2025 than in the previous year. Enhanced data collection processes and a refined methodology provided a complete and reliable emissions profile, which was the primary driver behind these announced changes in reported emissions, with reductions observed across all scopes. Improved data visibility is critical to climate action, enabling more informed decision-making, targeted interventions and stronger organizational accountability.

Scope 1 emissions decreased by 20.1% in 2025 compared to 2024, driven by reductions across fugitive emissions, mobile combustion and stationary combustion sources. Overall, Scope 1 and Scope 2 emissions decreased by 200.24 tCO<sub>2</sub>e year-on-year, with 139.15 tCO<sub>2</sub>e (14.81% of the reduction) attributable to emissions reduction activities and a further 61.09 tCO<sub>2</sub>e (6.50% of the reduction) resulting from improvements in methodology and data quality.

Fugitive emissions decreased by 12.2% due to lower volumes of refrigerant refilled during the year. Mobile combustion emissions decreased by 16.0%, primarily due to lower petrol and diesel vehicle usage in Belgium, although part of the reduction reflects the recalculation of Belgium vehicle emissions following the availability of improved activity data. Stationary combustion emissions decreased by 87.0%, with diesel generator emissions falling by 77.2% as a result of lower diesel consumption at the India site. Gas heating emissions decreased by 87.3%, largely due to the correction of an overestimation in gas consumption data at the Philadelphia site in 2024.

Scope 2 emissions decreased by 22.2% year-on-year. Purchased electricity emissions fell by 23.6%, primarily due to lower electricity consumption across the business, particularly at the Cagliari and Munich sites. Although emissions associated with electricity used for EV charging increased by 84.3%, driven by higher EV electricity consumption in Belgium, the Netherlands and Spain as part of fleet electrification efforts, the overall reduction in purchased electricity consumption more than offset this increase.

| Total 2025 Emissions: 119,072 t CO <sub>2</sub> e                                                            |                                 |                |                    |
|--------------------------------------------------------------------------------------------------------------|---------------------------------|----------------|--------------------|
|                                                                                                              | Emissions (t CO <sub>2</sub> e) | % of emissions | % change from 2024 |
| <b>Scope 1:</b> Direct emission from energy use at facilities operated by GTT                                | 333.4                           | 0.3%           | -20.1%             |
| <b>Scope 2 (market-based):</b> Indirect emissions from utility-purchased electricity, steam, heat or cooling | 406                             | 0.3%           | -22.2%             |
| <b>Scope 3 (location-based):</b> Indirect emissions from peripheral activities related to the company        | 118,332.3                       | 99.4%          | -29.8%             |
| <b>Total</b>                                                                                                 | <b>119,071.7</b>                | <b>100%</b>    | <b>-29.7%</b>      |



Scope 3 GHG emissions

GTT's Scope 3 inventory captures emissions from activities not directly owned or controlled by the Company, but which have a material impact across its value chain.

We have identified and prioritised the most relevant Scope 3 categories and expanded our GHG inventory to align with Science Based Targets initiative (SBTi) expectations. These indirect emissions include those from purchased goods and services, capital goods, fuel- and energy-related activities, upstream and downstream transportation and distribution, operational waste, business travel, employee commuting and both upstream and downstream leased assets.

| Scope 3 - GHG emissions (tCO <sub>2</sub> e)       |         |         |         |         |
|----------------------------------------------------|---------|---------|---------|---------|
|                                                    | 2022    | 2023    | 2024    | 2025    |
| Scope 3 Purchased Goods and Services               | 106,656 | 146,372 | 155,860 | 100,487 |
| Scope 3 Capital Goods                              | -       | -       | -       | 9,163   |
| Scope 3 Fuel and energy related activities         | -       | 251     | 323     | 180     |
| Scope 3 Upstream transportation and distribution   | 583     | 393     | 83      | 9       |
| Scope 3 Operational waste                          | -       | 46      | 38      | 35      |
| Scope 3 Business travel                            | 712     | 1,346   | 2,668   | 2,119   |
| Scope 3 Employee commuting                         | 1,181   | 1,429   | 1,389   | 1,351   |
| Scope 3 Upstream leased assets                     | -       | 44      | 92      | 38      |
| Scope 3 Downstream transportation and distribution | 583     | -       | -       | -       |
| Scope 3 Downstream Leased assets                   | -       | -       | -       | 4,950   |
| Scope 3 Use of sold products                       | 8,768   | 12,073  | 14,300  | -       |
| Scope 3 End of life of Sold Products               | -       | 1       | 6       | -       |
| Total Scope 3 emissions                            | 118,483 | 16.1955 | 174,759 | 118,332 |

Within our Scope 3 footprint, Category 1 — Purchased Goods and Services remains the most significant source of emissions, though reported emissions in this category decreased by 35.3% in 2025 following the adoption of a revised methodology in collaboration with our third-party consultant. The updated approach applies a more accurate allocation of emission factors, resulting in lower reported emissions despite continued operational activity and spend levels.



Across other categories, several notable trends were observed. Capital goods emissions increased by 97.2%, driven by higher expenditure in 2025, while downstream leased assets emissions rose by 24.9% due to increased electricity consumption across leased equipment.

Reductions were observed in upstream leased assets, which decreased by 59.0% and upstream transportation and distribution, which recorded the largest relative decline at 89.5%. These reductions were primarily driven by lower electricity consumption and reduced freight expenditure compared with 2024.

Business travel emissions decreased by 20.6%, mainly due to shorter travel distances, while fuel- and energy-related activities declined by 24.1%, reflecting reductions in both Scope 1 and Scope 2 emissions.

Employee commuting emissions remained relatively stable, decreasing by 2.7%, while emissions from waste generated in operations declined by 5.9%, representing only a modest reduction in absolute terms.

Our Scope 3 footprint continues to represent the vast majority of our total emissions, reflecting the nature of our business as a service provider that does not manufacture the products it sells. While this limits direct control over certain emissions sources, we remain committed to evaluating effective decarbonization pathways across our value chain, taking into account feasibility, cost and evolving regulatory and customer expectations.

As categorized in the GHG Protocol's Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Standard

2025 Scope 3 Emissions Categories

GTT has implemented several reclassifications to improve the accuracy and alignment of its Scope 3 emissions reporting. In 2024, emissions associated with capital goods were not included in the footprint; these have since been recalculated and incorporated and are now fully reflected in the 2025 reporting boundary.

In addition, emissions previously attributed to the use of sold products and end-of-life treatment of sold products have been reclassified to downstream leased assets, as GTT does not sell products but instead leases them. These updates ensure a more accurate representation of the company’s value chain emissions and better alignment with the underlying business model.

In 2025, we made significant progress in reducing the carbon intensity of our business, lowering total emissions intensity to 119 tCO<sub>2</sub>e per million USD of revenue, compared to 172 tCO<sub>2</sub>e in 2024 and 152 tCO<sub>2</sub>e in 2023.

The improvement was largely driven by a reduction in Scope 3 emissions intensity, which decreased from 171 tCO<sub>2</sub>e per million USD of revenue in 2024 to 118 tCO<sub>2</sub>e in 2025. At the same time, Scope 1 and 2 emissions intensity decreased from 0.9 to 0.7 tCO<sub>2</sub>e per million USD of revenue, demonstrating ongoing efficiency gains across our operations.

These results highlight the positive impact of our efforts to strengthen emissions management across both our operations and value chain, supporting our commitment to a lower-carbon future.

GHG intensity based on net revenue

| Intensity (tCO <sub>2</sub> e per million USD of revenue) |      |      |      |
|-----------------------------------------------------------|------|------|------|
|                                                           | 2023 | 2024 | 2025 |
| Scope 1 and 2                                             | 0.9  | 0.9* | 0.7  |
| Scope 3                                                   | 150  | 171  | 118  |
| Total                                                     | 152  | 172  | 119  |

\* Emission intensity has been restated from 1.3 (in 2025 report) due to the restatement of Scope 1 emissions (see note on Page 20)

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

## Energy Management

Energy management is a strategic focus in GTT's Responsible Business efforts, essential to reducing our environmental footprint and supporting global climate goals. We plan to optimize energy use by consolidating infrastructure, reducing our reliance on hardware and decreasing our Point of Presence (PoP) footprint where appropriate to improve network efficiency. Ongoing monitoring and the identification of continuous improvement opportunities for future implementation are central to our approach as we work to lower our carbon footprint and drive more sustainable operations.

GTT is planning to establish a robust renewable energy target, beginning with a comprehensive due diligence exercise to assess the renewable energy profile of its office portfolio. This exercise has shown that approximately 55% of GTT's office energy consumption is currently sourced from renewable energy, providing a strong foundation for further progress. Building on this baseline, GTT is evaluating opportunities to increase renewable energy adoption through procurement strategies, supplier engagement and energy sourcing improvements.

## Fleet Management

Fleet decarbonization remains a key lever in reducing GTT's Scope 1 and Scope 2 emissions. During the reporting period, GTT achieved a 17% reduction in fleet size, alongside a 17% increase in the adoption of EVs. These actions directly contribute to lowering fuel consumption and associated emissions while supporting the transition to cleaner energy sources.

## Waste Management

As part of our Responsible Business approach, GTT is committed to managing the environmental impact of waste generated across our operations and value chain.

Although waste was not identified as a material topic in our double materiality assessment, we maintain robust waste management practices that support compliance and responsible environmental stewardship.

We focus on minimising waste through recycling programmes, the reuse of hardware and the responsible management of electronic waste (e-waste). Wherever possible, equipment is redeployed or components are recovered to extend asset life and reduce landfill disposal.

We partner with certified recycling providers to ensure obsolete equipment is processed in compliance with local regulations and support accredited recycling schemes through the reporting and payment of applicable environmental and recycling fees.



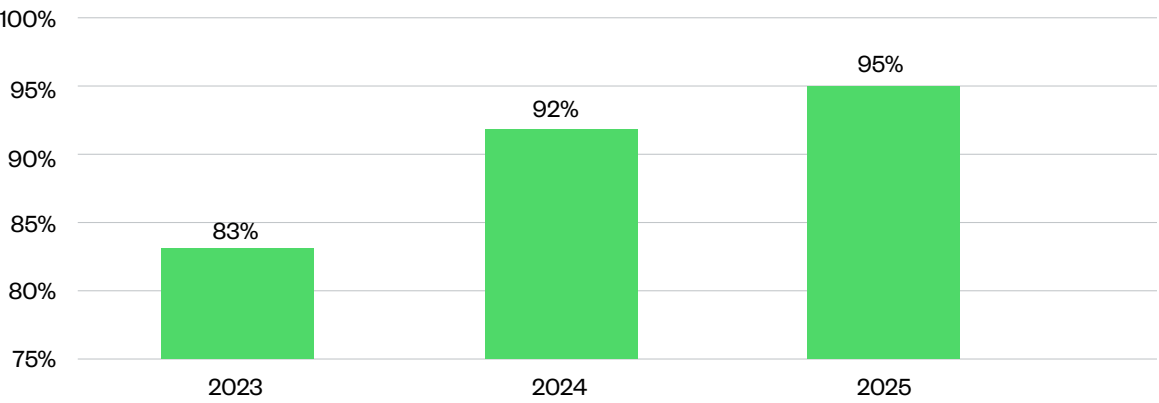
TRAINING:

Responsible Business Awareness Training

Responsible Business training at GTT is evolving from a compliance-focused exercise to a value-driven programme that demonstrates the link between sustainability and business performance. Employees are being equipped to understand how activities such as emissions reduction, supply chain resilience and employee wellbeing not only meet regulatory requirements but also support cost efficiency, revenue growth and risk reduction. This approach helps embed responsible business into day-to-day decision-making, positioning it as a core driver of long-term business value rather than a standalone obligation.

In 2025, 95% of GTT employees, excluding contractors and employees on leave, completed the Responsible Business awareness training, up from 92% in 2024, successfully meeting our target. This reflects our ongoing commitment to fostering a culture of sustainability and ensuring that Responsible Business principles are embedded across our global workforce.

Responsible Business Training Completion



WHAT’S NEXT?

Looking ahead, GTT will build on its current progress by formalising its science-based targets for greenhouse gas emissions reduction by the end of 2026, ensuring alignment with SBTi requirements and best practice industry frameworks.

In parallel, the company is evaluating the potential to set a dedicated renewable energy target, building on its existing baseline to further increase the share of renewable energy across its operations, which will also aid in the Scope 2 reduction target.

GTT is also advancing the development of a comprehensive decarbonization roadmap, informed by ongoing costing and scenario analysis work, to identify practical and financially viable pathways for reducing Scope 1, Scope 2 and Scope 3 emissions. This roadmap will prioritise high-impact levers, including energy sourcing, operational efficiency and supplier engagement, enabling GTT to transition toward a lower carbon business model while supporting long-term resilience and sustainable growth.



SPOTLIGHT :  
PRODUCT INNOVATION

Reducing Customer On-Site Hardware Dependency Through Virtualization



GTT EnvisionEDGE device is designed to support multiple networking, security and compute services within a single edge solution deployed to customer premises. By virtualizing functions, this capability may allow customers to consolidate the number of individual devices required at each site. Fewer deployed devices can lower overall energy use, simplify maintenance, reduce truck rolls and reduce material consumption and end of life waste. Optimising network design for energy efficiency also delivers clear business benefits by lowering power costs and improving operational efficiency.

GTT further supports responsible end of life equipment management, helping to ensure devices are handled appropriately when decommissioned.

GTT EnvisionEDGE device is designed with the capability to enable incremental installation of new and upgraded technologies, allowing enhancements to be deployed remotely without the need for physical hardware replacement. This approach eliminates the requirement for truck rolls and reduces the need for engineers to visit customer sites, significantly improving operational efficiency for both GTT and its customers. By minimizing on-site interventions, GTT EnvisionEDGE device not only streamlines service delivery and reduces downtime but also contributes to lower carbon emissions associated with transportation and field operations, supporting broader sustainability objectives while delivering a more flexible and scalable solution.

Sustainability considerations extend beyond the device itself. GTT EnvisionEDGE device uses streamlined packaging, primarily cardboard with protective foam inserts, designed to minimize excess materials while ensuring safe transport.

This spotlight highlights how embedding sustainability into product design enables both environmental benefits and long term customer and business value.

# 4.



## SECURE AND INCLUSIVE DIGITAL GROWTH



APPROACH:



Our organization is committed to safeguarding consumers and end users by embedding robust cybersecurity and data protection measures across all processes, products and services. We recognize that digital security is a fundamental component of social responsibility, directly influencing user safety and trust.

Our Approach

We focus on building the security and trust needed to support long-term digital growth. This means strengthening privacy and cybersecurity, protecting data and digital identity and ensuring access is controlled and responsible. We take a proactive approach to identifying and mitigating risks, maintaining transparency and using data and technologies such as AI in an ethical and compliant way. In practice, this is delivered through strong governance, robust access controls, continuous monitoring and adherence to global standards, enabling secure, inclusive and trusted digital services. In line with GTT's commitment to collective impact, security is treated as a shared responsibility. We work across teams and disciplines to strengthen controls, respond to risks and maintain trust - recognising that effective security depends on coordinated action, not isolated effort.



Cyber- and Information Security Oversight

GTT's Information Security Management System (ISMS) and broader cybersecurity framework are overseen by the Security function, led by the VP, Security. The CIO/CISO serves as executive sponsor for the Group's information and cybersecurity programme and is accountable for strengthening GTT's resilience to cyber threats and protecting critical information assets.

Cybersecurity oversight is embedded within GTT's governance structure. At Board level, the Governance and Risk Committee oversees GTT's overall risk profile, including cyber risk. Cybersecurity risk assessments are fully integrated into the enterprise risk management framework, enabling business units to identify, assess and manage risks to their critical assets and operations.

An Information Security Committee, comprising senior representatives from various teams including Operations, IT, Product, Legal, Enterprise Project Management Office (ePMO) and Marketing, meets quarterly to oversee the effectiveness of the cybersecurity programme. The Committee reviews key areas including risk management, penetration testing, compliance metrics, security awareness, incident trends, governance and policy updates and internal and external audit findings.

Data Privacy Oversight

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

Our Data Protection team also operates under the oversight of the Governance and Risk Committee of the Board of Directors.

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.

POLICY FRAMEWORK:

Our Cyber and Information Security policies 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).

All policies are made available to employees via the corporate intranet to ensure transparency, awareness and consistent application across the organisation.

| PERSONAL SAFETY OF CONSUMERS AND END-USERS                  |                                                                                                     |
|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| Policy                                                      | Objective                                                                                           |
| Information Security Policy                                 | Safeguard digital assets, ensure compliance and build stakeholder trust                             |
| Business Continuity Policy                                  | Ensure preparedness and continuity of operations, including regular testing and ISO 22301 alignment |
| Disaster Recovery Plan                                      | Define response to major disruptions affecting critical business operations                         |
| Corporate Security Incident Management & Data Breach Policy | Manage incidents, including containment, mitigation and communication protocols                     |
| Acceptable Use Policy                                       | Define appropriate use of company systems and assets                                                |
| Access Control Policy                                       | Control and restrict access to systems and data                                                     |
| Clear Screen & Desk Policy                                  | Prevent unauthorised access to sensitive information in physical and digital environments           |
| GTT Cloud Security Standard                                 | Ensure secure cloud infrastructure and services                                                     |
| GTT Configurational Standard                                | Ensure secure system configuration practices                                                        |
| Cryptography Use Standard                                   | Govern encryption and cryptographic controls                                                        |
| Log Management Policy                                       | Monitor and manage system logs for security and audit purposes                                      |
| Password Standard                                           | Define password security requirements                                                               |
| Pentest Agreement                                           | Govern penetration testing activities                                                               |
| Remote Access Policy                                        | Secure remote system access                                                                         |
| Mobile Device Management Policy                             | Secure use of mobile devices                                                                        |
| Security Compliance Policy                                  | Ensure adherence to security standards and regulations                                              |

| INFORMATION RELATED IMPACTS FOR CONSUMERS AND END USERS |                                                                                                |
|---------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Policy                                                  | Objective                                                                                      |
| Data Privacy Policy                                     | Ensure compliant, secure handling of personal and sensitive personal data across its lifecycle |
| Retention Policy                                        | Define how long data is stored and when it is deleted                                          |
| Information Classification and Protection Policy        | Classify and protect data based on sensitivity and risk                                        |
| Secure Disposal Policy                                  | Ensure secure destruction of sensitive data and assets                                         |
| Third Party Risk Management Policy                      | Manage data risks associated with external partners and vendors                                |
| Supplier Security Policy                                | Ensure suppliers meet data protection and security requirements                                |

TARGETS:

Below is the set of targets that GTT has been working towards in 2025, along with selected progress indicators demonstrating advancement against its digital security and trust objectives.

The overarching goal of this pillar is to ensure complete containment of threat – protecting data, systems, and customer environments—with zero lateral movement, supported by the following targets and indicators, which collectively strengthen security resilience and trust.

| Target                                                                   | Percentage complete | Progress                                                     |
|--------------------------------------------------------------------------|---------------------|--------------------------------------------------------------|
| PERSONAL SAFETY OF CONSUMERS AND END USERS                               |                     |                                                              |
| 100% employee completion of annual mandatory Security Awareness training | <div></div>         | 98% completion in 2025                                       |
| Successfully maintain security certifications                            | <div></div>         | 100% successfully maintained                                 |
| Annual assessment of certification scope on emerging risks               | <div></div>         | Annual assessment completed                                  |
| All critical vendors with security assessments completed                 | <div></div>         | 100% of critical vendors with security assessments completed |
| All security risks annually reviewed                                     | <div></div>         | 100% security risks annually reviewed                        |

| Target                                                                                                   | Percentage complete | Progress                                                                 |
|----------------------------------------------------------------------------------------------------------|---------------------|--------------------------------------------------------------------------|
| INFORMATION-RELATED IMPACTS FOR CONSUMERS AND END USERS                                                  |                     |                                                                          |
| 100% employee completion of annual data privacy training                                                 | <div></div>         | 99% completion in 2025                                                   |
| Monthly phishing assessments – outperforming industry peers consistently                                 | <div></div>         | Monthly assessments completed, consistently outperforming industry peers |
| 0 reportable personal data breaches under the General Data Protection Regulation recorded                | <div></div>         | 0 reportable personal data breaches under GDPR in 2025                   |
| Data Subject Access Requests (DSARs) to be fulfilled within the applicable regulatory response deadline. | <div></div>         | 98% DSARs fulfilled within 30 days and 100% fulfilled within 90 days     |
| 100% business units covered by a formal, group-wide data privacy policy                                  | <div></div>         | 100% business units covered by a formal, group-wide data privacy policy  |

**PROGRESS:**

# **PERSONAL SAFETY OF CONSUMERS AND END USERS**

This sub-topic focuses on protecting consumers and end users from harm that may affect their safety, wellbeing, or ability to reliably access services. It examines whether a company’s products, services, or operations could cause or contribute to harm, including through service disruption, insecurity, system failures, or cyberattacks that impact the availability and integrity of critical services.

**Security Management Systems and Certifications**

GTT maintains a resilient cybersecurity and IT service management framework designed to protect critical assets, support business continuity and manage enterprise risk across its global operations. Our structured internal and external audit program provides independent assurance on the effectiveness, maturity and regulatory compliance of our systems, while driving continuous improvement through root cause analysis and timely remediation of identified issues.

Our Headquarters and key Operations Centers are certified to ISO 27001, the globally recognized standard for information security management. Our primary Operation Centre is certified to ISO 22301, the business continuity standards and are subject to annual audits by an accredited certification body. Additional reviews also evaluate alignment with additional industry standards, including System and Organization Controls (SOC) and the Payment Card Industry Data Security Standard (PCI DSS). We conduct annual reassessments of certification scope to ensure continued alignment with evolving business activities, risk profiles and regulatory requirements.

In addition, our primary Operations Center is certified to ISO 20000, aligning our service management processes with the IT Infrastructure Library (ITIL) framework and international best practices. This certification supports consistent, high-quality service delivery and operational efficiency across our network.

**Internal audits**

The Internal Audit function continues to plan and execute audits with sufficient frequency to ensure ongoing compliance with key standards, including ISO 27001, ISO 22301, ISO 20000, PCI DSS and SOC 1 & SOC 2. Over the past year, the team has enhanced its audit program to drive higher compliance rates and support the expansion of these standards across multiple programs within the organization.

A key improvement was the introduction of a structured split between compliance-focused and technical audits. This enabled a 25% increase in audits year-to-date compared to the previous year, while also allowing for deeper, more targeted reviews in high-risk areas. This approach supported the continued extension of ISO 27001 and ISO 22301 coverage through the GTT Headquarters in Virginia and contributed to a successful certification outcome.

In parallel, GTT continues to mature its internal processes, with a strong focus on strengthening security and business continuity frameworks to keep pace with rapid technological advancements.

**Business Continuity and Operational Resilience**

At GTT, ensuring the continuity of our global operations remains a top priority. We operate a global network supported by multiple 24/7 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 operation center preparedness and responsiveness.

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 the successful deployment of 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 responsible business strategy, we aim to protect stakeholder interests, ensure service reliability and uphold trust in our operations, regardless of the challenge.

**Action and Controls**

Our cybersecurity framework combines preventive controls, continuous monitoring and supplier level safeguards to protect data, systems and users. We employ layered incident prevention measures such as endpoint hardening, multi factor authentication, secure configuration baselines and regular vulnerability scanning. Our real time monitoring systems provide continuous detection and alerting across critical applications, enabling rapid response to anomalous activity. To protect user safety, we maintain strict data security controls, including encryption in transit and at rest, role based access management and routine penetration testing to validate system resilience. Where third-party suppliers are involved, we instill control through contractual requirements, third-party risk assessments, and ongoing compliance reviews to ensure partners meet our cybersecurity standards.

Incident Management and Remediation

Our incident management approach ensures that any disruption, security event, or user reported issue is handled quickly, transparently and in line with established governance processes. We maintain structured incident reporting and escalation procedures that define clear roles, response time lines and decision pathways, enabling rapid mobilisation of technical and leadership teams when an event occurs, including the engagement of the crisis management team where appropriate.

When incidents affect users or services, we follow defined containment, remediation and compensation approaches that can include corrective technical actions, service restoration, clear communication of impacts. Where an incident highlights a control failure, we conduct lessons learned reviews as part of quarterly Information security committee meetings to identify root causes, strengthen controls and prevent recurrence. Insights from these meetings feed directly into our continuous improvement cycle, ensuring our cybersecurity posture evolves with emerging risks.

Security Risk Assessments

GTT adopts a proactive, risk-based approach to cybersecurity, going beyond compliance with standards such as ISO/IEC 27001, PCI DSS and SOC 2 Type 2 to strengthen operational resilience.

Risks are reported directly to Senior Leadership and the GTT Board of Directors where a significant risk is identified as part of the Governance and Risk Committee meetings, ensuring strong oversight and accountability.

These assessments drive continuous improvement, enabling GTT to address emerging threats, enhance its control environment and maintain alignment with industry best practices.

We carry out structured risk assessments in line with ISO 22301 and ISO 27001 requirements to identify and prioritize threats to business continuity and information security. ISO 27001 guides our evaluation of risks to data confidentiality, integrity and availability, supported by defined risk treatment plans. ISO 22301 ensures we assess operation centre vulnerabilities and recovery needs so critical services remain resilient during disruption. Together, these standards create a consistent, proactive approach that strengthens safeguards and supports continuous improvement.



# INFORMATION-RELATED IMPACTS FOR CONSUMERS AND END USERS

This sub-topic focuses on how a company manages information related to consumers and end users, particularly the risks and impacts associated with data misuse, inadequate data governance, lack of transparency and the loss of confidentiality, ultimately centring on issues of trust, privacy and individuals' rights over their information.

## Data Privacy and Protection

GTT is committed to protecting the personal data of its customers and end-users by ensuring that all data is collected, processed, stored and handled in a secure, transparent and responsible manner. We adhere to applicable data protection regulations, including the General Data Protection Regulation (GDPR) and local equivalents and maintains technical and organisational measures to prevent unauthorized access, misuse, or data breaches. This progress is evidenced by zero recorded reportable personal data breaches under GDPR in 2025.

Personal data is processed strictly in line with defined purposes, with data minimisation principles applied to ensure only the necessary information is collected and retained. Through continuous monitoring, governance and control frameworks, GTT safeguards the confidentiality, integrity and availability of personal data across its operations.

The company applies a risk-based approach to data protection, implementing appropriate security controls such as access restrictions, encryption, secure system configurations and continuous monitoring to prevent unauthorized access, loss, or misuse of data. These controls are supported by established internal policies and standards aligned with applicable data protection regulations.

## Risks and impact identification

GTT applies a structured and proactive approach to identifying and assessing information-related risks across Data Protection Impact Assessments (DPIAs) are conducted for high-risk processing activities and consideration of vulnerable or high-risk user groups. This approach is governed by defined accountability structures and subject to periodic review to ensure continuous improvement.

Key risks include potential data breaches or unauthorized access to customer information, which could result in harm to individuals' privacy rights, financial security, or trust. These risks are mitigated through robust incident response frameworks, continuous monitoring and mandatory privacy and security training for employees. Risks related to misuse or over-collection of personal data are addressed through comprehensive privacy policies aligned with the principles of data minimization and purpose limitation, supported by defined data retention schedules, detailed data mapping inventories and ongoing awareness programs.

To enhance transparency and user understanding, GTT provides Privacy Data Sheets for selected products, outlining key information such as data categories processed, purposes, storage conditions and retention periods. The company also addresses risks associated with misleading marketing or unclear disclosures by implementing clear consent mechanisms, maintaining "do not contact" registers and ensuring accessible unsubscribe options in all communications.

Through these measures, GTT seeks to minimize adverse impacts on individuals and ensure responsible, transparent and compliant data handling practices in line with applicable data protection regulations.

## Data Subject Access Requests (DSARs)

GTT is committed to upholding the privacy rights of its employees, customers and other stakeholders. During FY2025, the Company maintained robust and scalable processes to manage Data Subject Access Requests (DSARs) in full alignment with the General Data Protection Regulation (GDPR). All requests were systematically logged, assessed and fulfilled within applicable regulatory timeframes.

Performance against internal KPIs remained strong, with 98% of DSARs fulfilled within 30 days and 100% completed within 90 days. These results reflect the effectiveness of GTT's rights management framework, as well as its ongoing commitment to transparency, accountability and the timely handling of data subject requests.

## Group-wide Data Privacy Policy Coverage

GTT operates under a comprehensive, group-wide data privacy framework designed to ensure consistent and high standards of data protection across all operations. During the reporting period, 100% of business units were covered by a formal data privacy policy, reinforcing a unified and harmonized approach to compliance. This framework supports effective governance, aligns with GDPR and other applicable regulatory requirements and promotes a strong culture of data protection across the organization. Ongoing monitoring and periodic updates ensure continued alignment with evolving regulatory expectations and operational risks.

Incident Response

To strengthen operational resilience, GTT maintains comprehensive incident response procedures to effectively detect, respond to and mitigate potential security incidents. Regular privacy and cybersecurity training programs are provided to employees to promote awareness and ensure that data protection responsibilities are understood and consistently applied. Access to personal data is limited to authorized personnel on a need-to-know basis and activities are monitored to detect and address potential risks in a timely manner.

In addition, GTT embeds data protection principles into its processes and systems, including data minimization, purpose limitation and defined retention periods, supported by structured data mapping and governance practices. Through these measures, GTT aims to safeguard personal data, maintain customer trust and ensure responsible and compliant data handling across its operations.

Data Breach Response Plan

In the event of a security incident involving personal data, GTT follows internal protocols governed by its Corporate Security Incident Management Policy and Personal Data Breach Procedure. The Company is committed to complying with all applicable regulatory breach notification requirements and to working collaboratively with clients to effectively manage and resolve incidents in a timely manner.

GTT maintains a structured and controlled approach to managing personal data breaches, ensuring that all incidents are handled promptly, confidentially and in compliance with applicable legal, regulatory and contractual obligations. The Personal Data Breach Procedure applies across all systems, environments and third parties handling personal or confidential data. Incidents are managed by authorized personnel and the dedicated Incident Response Team throughout the full lifecycle - from identification and containment to remediation and post-incident review, ensuring a consistent, secure and well-documented response.

This structured approach supports transparency, accountability and swift remediation, while enabling continuous improvement through lessons learned. It forms an integral part of GTT’s broader Crisis Management framework, reinforcing the Company’s commitment to resilience, stakeholder trust and responsible data protection practices.



TRAINING:

Information Security and Privacy Awareness Training

GTT has implemented a comprehensive, organisation-wide cybersecurity and data privacy awareness programme to strengthen its security posture and empower employees to effectively manage evolving digital risks. This multi-layered initiative ensures that employees are continuously educated, assessed and equipped to identify and respond to potential threats.

All employees are required to complete mandatory quarterly training covering core cybersecurity and data privacy topics, with a strong focus on social engineering risks and regulatory compliance.

The programme is further supported by targeted initiatives, including incident response workshops, security onboarding for all new hires and dedicated quarterly data privacy training. To drive accountability and embed a culture of vigilance, training completion and performance in phishing simulations are integrated into year-end performance evaluations. This structured approach fosters consistent employee engagement and reinforces a strong culture of security, responsibility and trust across the organisation.

| Indicator                                                 | 2023 | 2024 | 2025 |
|-----------------------------------------------------------|------|------|------|
| % Employees completed the mandatory Security training     | 98%  | 99%  | 98%  |
| % Employees completed the mandatory Data Privacy training | 98%* | 99%* | 99%  |

\* 2023 and 2024 Data Privacy Training was part of the Security training and multiple campaigns throughout the year.

Strengthening Protection Through Phishing Simulations

Phishing simulations play a critical role in protecting personal and corporate data by strengthening awareness of common social engineering tactics and reducing the likelihood of sensitive information being disclosed to malicious actors. By regularly testing and educating employees, these assessments build a strong human layer of defence, helping individuals recognise suspicious emails, links and requests before engaging with them. At GTT, the continued investment in phishing assessments has delivered measurable success. This reflects not only increased employee vigilance, but ultimately safeguards both corporate and personal data from evolving cyber threats.

WHAT’S NEXT?

As digital demand continues to grow, we are focusing on the next generation of network optimization to strengthen both performance and sustainability. Traffic is increasing significantly faster than gains in energy efficiency, placing pressure on operators to manage rising energy use and associated costs. To address this, we are exploring advanced AI capabilities that can intelligently identify and filter non optimized or unnecessary network traffic.

Distributed AI solutions enable more efficient data flows - reducing bandwidth demands, lowering energy consumption and improving overall network performance. This approach directly supports customer priorities around efficiency and sustainability, while reinforcing our broader commitment to secure, responsible and resilient digital growth.

In terms of data privacy, GTT continues to strengthen its data protection framework through the ongoing enhancement of governance, controls and awareness initiatives. Future priorities include further maturing its privacy risk management processes, including expanded use of Data Protection Impact Assessments (DPIAs) and enhanced risk monitoring across evolving products, services and technologies. GTT also plans to continue refining its data mapping capabilities and improving visibility over data flows to support more effective decision-making and compliance.

In parallel, GTT is focused on advancing employee awareness through regular and updated privacy and cybersecurity training programs, as well as strengthening third-party risk management practices to ensure consistent data protection standards across its supply chain. Enhancements to transparency measures, including updates to Privacy Data Sheets and customer communications, are also envisaged to further support informed customer engagement.

Through these ongoing initiatives, GTT aims to continuously improve its data protection posture, respond to emerging risks and maintain alignment with evolving regulatory expectations and industry best practices.



SPOTLIGHT :  
RESPONSIBLE AI

Human expertise with AI-driven capabilities

At GTT, we are committed to using artificial intelligence (AI) in a way that supports innovation while maintaining trust, accountability and ethical and secure standards. We recognize both the opportunities AI presents and the responsibility to manage its risks appropriately. Our AI initiatives are focused on augmenting employee capabilities, improving operational efficiency, enhancing customer experience and supporting responsible business growth.

We are committed to maintaining sovereignty and control over our AI capabilities through the use of our own GPU hardware and in-house infrastructure, ensuring greater security, governance and alignment with our ethical and operational standards.

To support responsible scaling of AI across the organization, we are establishing consistent architectural and data management standards that enable innovation while protecting company data, ensuring compliance with GTT policies and maintaining effective oversight of AI solutions throughout their lifecycle.

Our approach combines human expertise with AI-driven capabilities to deliver positive outcomes for our customers, employees and all stakeholders. Where AI supports recommendations, classifications or decision making appropriately authorized employees retain accountability for final decisions.

With all AI, use cases are subject to governance review, risk assessment, data protection evaluation and business sponsorship before progressing into development and deployment. This includes focusing on beneficial use, maintaining accountability for AI-driven outcomes, promoting fairness by identifying and mitigating potential bias and being transparent about how AI is used within our business. AI solutions are expected to operate within approved and centrally governed platforms to support security, resilience, cost management and consistency of controls across the organization.

Looking ahead, GTT is continuing to strengthen its Responsible AI capabilities. The Internal Audit function is preparing to adopt ISO 42001, the Artificial Intelligence Management System standard, which will support a more structured and consistent approach to AI governance, risk management and control assurance across the organization. At the direction of our Governance and Risk Committee we are also dimensioning an AI top risk for ongoing monitoring and Board-level visibility. This risk will be co-owned by our Chief Product and Technology Officer and our Chief Legal Officer.

As AI technologies continue to develop, GTT will continue to enhance its approach to ensure that AI is used responsibly, supports trust and delivers long-term value for our stakeholders.

5.



**CUSTOMER-FOCUSED  
WORKFORCE**



APPROACH:



We attract, develop, promote and retain world-class talent; create an inclusive environment where our people can thrive; empower teams to deliver exceptional customer experiences; and support the wellbeing of our employees.

Our Approach

By prioritising employee wellbeing and equipping our people with the skills, tools and autonomy to succeed, we empower our teams to deliver exceptional customer experiences. This approach supports our GTT commitments to building an adaptive, accountable workforce that collaborates effectively to drive positive customer outcomes. Through a continued focus on inclusion, capability development and employee engagement, we enable our people to perform at their best while contributing to long-term value creation for our customers, stakeholders and business.



Human Resources Oversight

At GTT, Human Resources (HR) oversight is led by the Chief People Officer, who oversees the development and implementation of people strategies aligned with the company’s business objectives.

The HR function operates under a structured governance framework that ensures compliance with employment regulations while promoting a culture of inclusion, wellbeing and high performance.

Regular reporting to executive leadership includes key workforce metrics such as attrition, engagement scores and diversity representation, enabling proactive and data-driven decision-making.

In addition, GTT conducts periodic employee surveys to assess the effectiveness of its HR practices and identify opportunities for continuous improvement. Through strong leadership by the Chief People Officer, GTT is committed to fostering a supportive, equitable and resilient workplace that drives both employee satisfaction and sustainable business performance.



POLICY FRAMEWORK:

All HR policies are available to employees via the corporate intranet, ensuring transparency, accessibility, and consistent understanding across the organisation.

| EQUAL TREATMENT AND OPPORTUNITIES                  |                                                                                                  |
|----------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Policy                                             | Objective                                                                                        |
| Anti-harassment and Non-discrimination Policy      | Establish a safe, inclusive culture where all individuals are treated with dignity and respect   |
| Disciplinary Policy                                | Provide a clear and consistent framework for managing employee conduct and addressing misconduct |
| Recruitment Policy                                 | Ensure a fair, transparent and values-aligned recruitment process for all candidates             |
| Employee Referral Policy                           | Encourage internal referrals to support talent acquisition and organisational growth             |
| Global Hire Policy                                 | Standardise hiring practices across regions to ensure consistency and fairness                   |
| Internal Mobility, Transfers and Promotions Policy | Promote equal access to career progression and internal opportunities                            |

| WORKING CONDITIONS                     |                                                                                                              |
|----------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Policy                                 | Objective                                                                                                    |
| Modern Slavery and Human Rights Policy | Uphold high ethical standards and respect for human rights across operations and supply chain                |
| Remote Working Policy                  | Enable flexible working arrangements while maintaining productivity, wellbeing and operational effectiveness |
| Health and Safety Policy               | Ensure a safe and healthy working environment for all employees                                              |
| Global Performance Assessment Policy   | Provide a structured approach to evaluating employee performance and development                             |
| Quarterly Salary Review Policy         | Enable regular and fair review of employee compensation                                                      |
| Succession Planning Policy             | Support long-term workforce planning and leadership continuity through structured talent development         |

TARGETS:

Below is the set of targets that GTT has been working towards in 2025, along with selected progress indicators demonstrating advancement against its customer-focused workforce objectives.

The overarching goal of this pillar is to reduce customer churn by delivering outstanding customer experience and strengthening ownership across teams, supported by the following targets and indicators, which collectively contribute to achieving this outcome.

| Target                                                                | Percentage complete    | Progress                                           |
|-----------------------------------------------------------------------|------------------------|----------------------------------------------------|
| EQUAL TREATMENT AND OPPORTUNITIES                                     |                        |                                                    |
| 100% of workforce received performance and career development reviews | <div><div></div></div> | 90% workforce received performance reviews in 2025 |
| Upskilling employees to become highly skilled talent                  | <div><div></div></div> | 85% of employees in upskilling programs            |

| Target                                           | Percentage complete    | Progress                                               |
|--------------------------------------------------|------------------------|--------------------------------------------------------|
| WORKING CONDITIONS                               |                        |                                                        |
| 75% of employees to complete satisfaction survey | <div><div></div></div> | 75% of employees completed satisfaction survey in 2025 |
| 0 LTIR (Lost-time incident rate)                 | <div><div></div></div> | 0 LTIR per 200,000 hours worked in 2025                |

**PROGRESS:**

# **EQUAL TREATMENT AND OPPORTUNITIES**

**We focus on ensuring fairness, access and equity across the entire employee lifecycle. This includes creating an environment where everyone has equal access to opportunities, whether in recruitment, development, promotion, or reward and is treated fairly and respectfully regardless of background. We are committed to eliminating bias, promoting diversity and inclusion and embedding equitable practices that enable all employees to contribute, grow and succeed within the organisation.**

**Providing Equal Opportunity and Inclusive Recruitment**

GTT’s recruitment practices are designed to ensure fairness, consistency and alignment with our values, commitments and customer focused workforce strategy. Recruitment is governed through a structured, skills and values based hiring framework developed in collaboration with the Talent Management team and hiring managers and informed by insights from the Skills Advisory Board.

Recruitment is primarily delivered through direct sourcing, internal mobility and employee referrals, reducing reliance on external agencies and supporting transparent, equitable access to roles.

Recruitment performance and fairness are monitored through a combination of operational, capability and experience based metrics, including:

- Time to hire and hiring efficiency across regions and functions
- Source of hire and reduction in agency dependency
- Candidate engagement and interview experience feedback via new starter surveys
- Hiring manager capability development through structured interview training
- Use of assessments as part of a balanced, skills based evaluation process

These measures support compliance expectations while enabling a shift towards value creation, workforce agility and positive candidate experience.

Other positive controls impacting the business include strong candidate experience outcomes, with over 90% of new starters rating their engagement and interview experience as “Very Good” or “Excellent.” In addition, hiring manager capability has been significantly strengthened through targeted training focused on behavioural interviewing techniques and structured decision-making, supporting more consistent and effective talent-selection.

These outcomes contributed to an adaptive, accountable workforce capable of delivering trusted customer experiences while reinforcing equal opportunity and inclusive employment practices.

**Advancing Diversity and Inclusion within the Workforce**

At GTT, we recognise that diversity and inclusion are fundamental to driving innovation, agility and sustainable long-term success. We are committed to building an inclusive workforce that reflects a broad range of backgrounds, experiences and perspectives, enabling us to better serve our customers and the communities in which we operate, while fostering a culture grounded in collaboration, empathy and creativity.

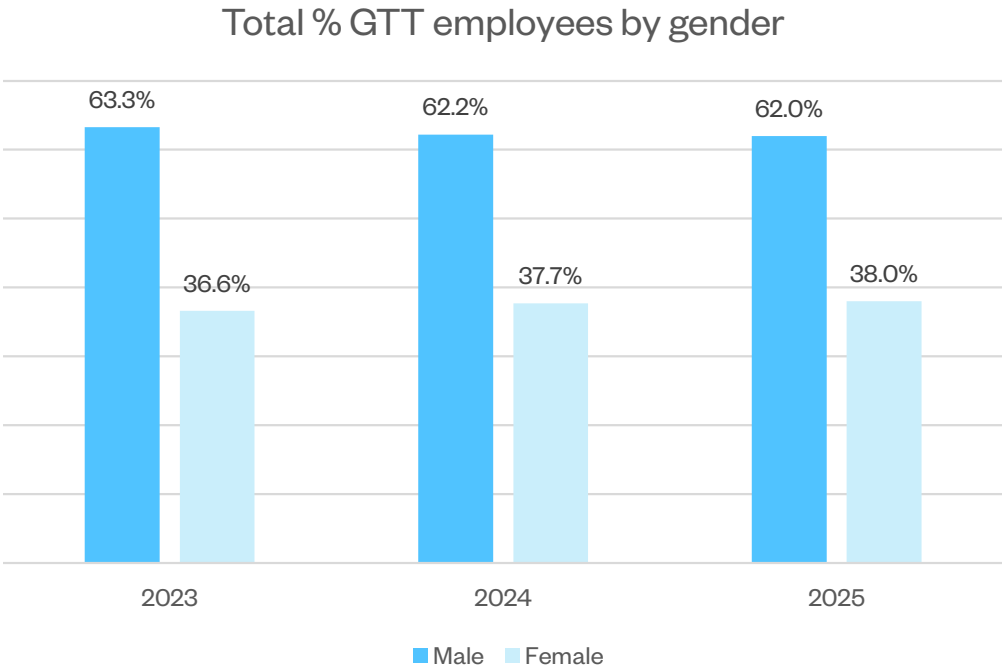
We foster an inclusive workplace where every employee is treated with respect and feels safe and valued. Our approach is underpinned by our Anti-Harassment and Non-Discrimination Policy, which reinforces a zero-tolerance stance toward any form of unlawful discrimination or harassment. All reported violations are treated with the utmost seriousness and may result in disciplinary action, up to and including termination of employment.

To support accountability and transparency, we maintain grievance mechanisms that enable employees to raise concerns confidentially and without fear of reprisal. Concerns may be reported directly to Human Resources or anonymously via our confidential ethics helpline and online reporting platform, Safecall and all cases are addressed promptly, with strict adherence to confidentiality and fairness.

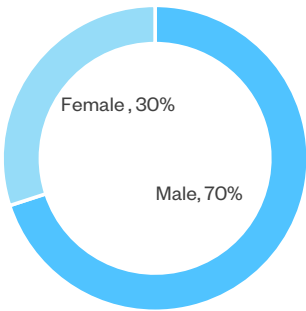
In 2025, no fines or penalties related to discrimination were recorded and no human rights incidents involving our workforce were identified. These outcomes reflect our continued commitment to fostering a respectful, inclusive and ethically responsible workplace. We remain dedicated to complying with all applicable laws and regulations, while continuously strengthening our diversity, equity and inclusion practices.

**Gender Representation and Leadership Diversity**

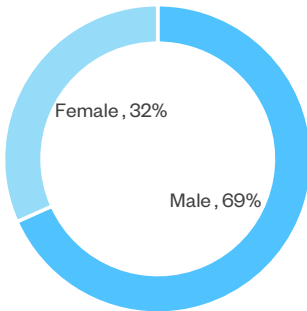
Gender representation has remained relatively consistent, with a modest improvement in female representation from 37.7% in 2024 to 38.0% in 2025. Positive progress is also evident at leadership level, where female representation has increased from 32% to 33% over the same period. While this reflects steady momentum, the overall balance indicates continued focus is needed to further improve representation and ensure equitable progression into leadership roles.



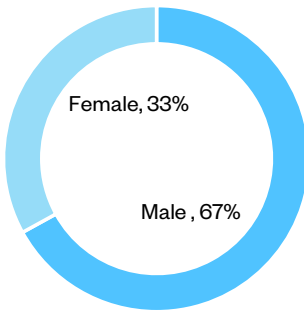
2023 Leadership roles (beginning at manager)



2024 Leadership roles (beginning at manager)



2025 Leadership roles (beginning at manager)



Achieved An Equal Or Increased Representation Of Women Across All Levels Of Employment At GTT Between 2024 And 2025

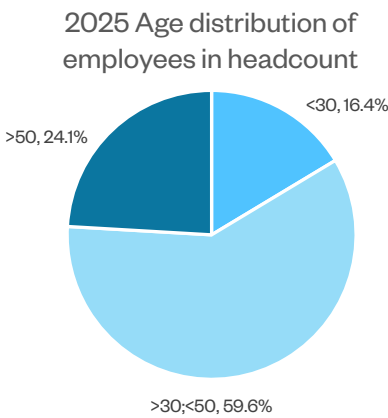
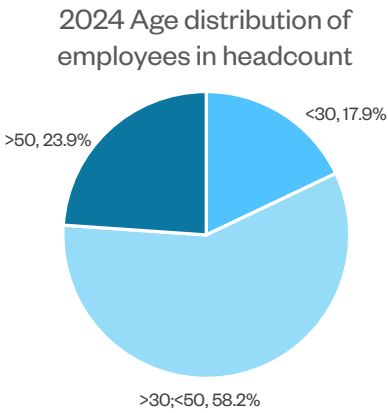
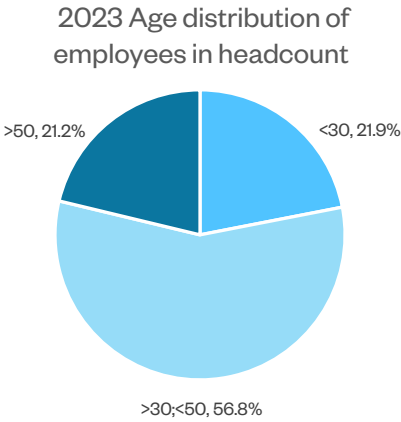
| Employment Level        | Unit   | Female statistics 2024 | Female statistics 2025 |
|-------------------------|--------|------------------------|------------------------|
| Top executive positions | %      | 20%                    | 33%                    |
| Senior leadership team  | number | 2                      | 3                      |
| SVP                     | number | 5                      | 6                      |
| VP                      | number | 7                      | 7                      |
| Director                | number | 37                     | 41                     |
| Senior manager          | number | 23                     | 25                     |
| Manager                 | number | 60                     | 60                     |
| Team lead               | number | 15                     | 16                     |
| Female promotions       | %      | 37%                    | 40%                    |
| Total number of women   | number | 858                    | 862                    |

Age Distribution Profile

GTT’s workforce reflects a balanced age distribution, supporting a diverse range of perspectives, skills and experience levels across the organization. The company monitors age demographics to ensure inclusive workforce planning and to promote equitable opportunities for development, progression and engagement at all career stages.

The workforce remains broadly stable, with the majority of employees consistently within the 30–50 age group, increasing slightly to 59.6% in 2025. There is a gradual shift toward a more experienced workforce, reflected in the increase in employees aged over 50 (from 21.2% in 2023 to 24.1% in 2025), alongside a decline in those under 30. This trend suggests strong retention and workforce maturity, while also highlighting an opportunity to further strengthen early-career talent pipelines to support long-term sustainability.

| Age Distribution of Employees in Headcount * | 2023  | 2024  | 2025  |
|----------------------------------------------|-------|-------|-------|
| <30                                          | 22.0% | 17.9% | 16.4% |
| >30;<50                                      | 56.8% | 58.2% | 59.6% |
| >50                                          | 21.2% | 23.9% | 24.0% |
| TOTAL                                        | 100%  | 100%  | 100%  |



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

Geographic distribution as at 31/12/2025

GTT employed 2,274 permanent employees across 22 countries at the end of 2025, reflecting a stable workforce compared to 2024 (2,276 employees). Our workforce remains concentrated in Bulgaria, the United States and India, which together account for approximately 77% of total employees. This geographic footprint supports our global operating model while enabling access to key talent hubs and regional expertise.

| Country             | 2025 employees | % of Workforce |
|---------------------|----------------|----------------|
| Bulgaria            | 729            | 32%            |
| United States       | 669            | 29%            |
| India               | 352            | 15%            |
| United Kingdom      | 190            | 8%             |
| All Other Countries | 334            | 15%            |
| Total               | 2274           | 100%           |

Note: Permanent employees, excluding contractors.

Equal Pay and Pay Equity

GTT is committed to ensuring pay equity across the organisation, with a clear focus on fairness and consistency. Compensation is based on merit, role and performance, with no discrimination on the basis of gender, age, or other personal characteristics. We are committed to equal pay for equal work, supported by structured review processes that help identify and address any disparities. This approach reinforces a fair and inclusive workplace where all employees are recognised and rewarded based on their contribution.

**Anti-Discrimination and Harassment**

GTT is committed to maintaining a workplace free from discrimination, harassment and unfair treatment, supported by our Anti-Harassment and Non-Discrimination Policy. This policy establishes a clear framework for fostering a culture where all individuals are treated with dignity and respect, applies globally to all employees and representatives and is overseen by Human Resources and Legal functions. Our zero-tolerance approach is reinforced through mandatory training, clear reporting channels and defined disciplinary processes under the Disciplinary Policy. Together, these measures ensure that concerns can be raised safely and addressed promptly, embedding accountability and respect across the organisation.

**Accessibility and Inclusion**

GTT is committed to creating an inclusive and accessible environment, ensuring employees are supported throughout the entire employment lifecycle. We adhere to relevant legislation and promote equal access for individuals with diverse needs and abilities across our global operations. Accessibility is embedded within our people practices, from fair and transparent hiring under our Recruitment Policy and Procedure and Global Hire Policy, to enabling career development through our Internal Mobility, Transfers and Promotions Policy.

We are committed to making reasonable adjustments during recruitment and throughout employment, supported by flexible working arrangements under our Remote Working Policy, which helps accommodate a range of needs and working styles. Our approach is centred on removing barriers, supporting individual requirements and ensuring all employees have equitable access to opportunities.

Through these measures, we aim to foster an environment where everyone can fully participate, contribute and thrive.



## WORKING CONDITIONS

**Creating an environment where people thrive is central to building a customer-focused workforce. This includes the day-to-day employee experience, wellbeing and labour practices that shape how work is performed. This section focuses on the quality, safety and fairness of the working environment, ensuring employees are treated with respect, kept safe, fairly compensated and supported to perform at their best every day. Ultimately, a positive and responsible working environment underpins the ability to deliver consistent, high-quality outcomes for customers.**

Aligned to our broader approach to attracting, developing and retaining world-class talent, we prioritise employee wellbeing, fair and flexible working practices and respect for labour and human rights. We strive to create a culture where individuals feel valued, supported and able to perform at their best, underpinned by strong health and safety standards, inclusive workplace practices and access to the resources and flexibility needed to balance professional and personal responsibilities. By investing in the overall employee experience, we empower our teams to deliver exceptional customer outcomes while sustaining a resilient and high-performing workforce.

### Fair Pay and Benefits

GTT's approach to fair pay is supported by structured compensation practices designed to promote consistency, competitiveness and transparency. The Quarterly Salary Review Policy enables regular review of employee compensation, with decisions informed by performance, contribution, market data, internal equity, business performance, available budget and leadership approval.

The process reinforces GTT's pay-for-performance philosophy by recognizing employees who deliver strong contributions to the business and demonstrate GTT's Commitments: Adaptive Mindset, Collective Impact and Customer Ownership. It also supports fair and competitive compensation outcomes by providing a consistent governance framework for salary decisions and timely recognition of sustained performance.

Employees receive a range of benefits that are specific to each country's local practices and legislation. These may include paid time off, charity leave, parental leave, 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.

Ensuring Health, Safety and Wellbeing

Health and Safety Risk Assessments

All leased office locations, excluding managed office sites where GTT does not have operational control and facilities are managed by a third party on its behalf, are subject to health and safety risk assessments. These assessments are conducted to identify, evaluate and mitigate workplace hazards that could impact employees, contractors and other stakeholders. These assessments are undertaken at least every three years and more frequently where local regulatory requirements apply, to identify site-specific risks, evaluate the effectiveness of mitigation measures and proactively manage potential hazards resulting from operational developments or changes. Where issues are identified, root cause analyses are performed and appropriate corrective actions are implemented to address the underlying causes and reduce the likelihood of recurrence.

In addition, safety risk assessments, such as fire alarm and emergency lighting testing, are carried out across our 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. Significant risks are prioritised based on their likelihood and potential impact, with appropriate controls implemented to reduce exposure and prevent incidents. This approach supports regulatory compliance and provides clear evidence of our ongoing progress in health and safety management.

Management and Reporting

Our office locations are equipped with essential safety infrastructure, including fire detection and evacuation alarm systems and clearly illuminated exit signage, which are routinely tested and maintained to ensure operational effectiveness. Across the organization, designated employee volunteers may act as fire marshals and first aiders. Where applicable, these individuals receive training on key safety topics, including fire safety and first aid, to support workplace preparedness and employee awareness.

GTT supports the health, safety and well-being of remote employees through ergonomic workstation guidance, mental health support programmes, flexible working arrangements and regular well-being check-ins. Employees are provided with the tools, resources and support needed to maintain a safe and healthy working environment while working remotely.

GTT encourages a proactive safety culture in which all employees are expected to report workplace incidents and near misses through the Workday system, enabling timely documentation, escalation and response. Each reported event is thoroughly investigated to identify root causes and implement corrective actions, supporting continuous improvement and the prevention of recurrence.

In 2025, 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.



Promoting Mental Health and Well-Being

We recognise that mental health and wellbeing are critical to enabling our people to perform at their best and sustain long-term engagement. We are committed to fostering a supportive and inclusive environment where employees feel empowered to prioritise their wellbeing and seek support when needed. Our approach includes providing access to wellbeing resources, promoting awareness through communications and encouraging open dialogue to reduce stigma around mental health. By embedding wellbeing into our culture and leadership practices, we aim to create a resilient, engaged workforce that is equipped to deliver exceptional outcomes for our customers while maintaining a healthy and balanced work environment.

Our Global Employee Assistance Programme (EAP) provides a comprehensive range of wellbeing services, including short-term counselling, mindfulness programmes, wellness coaching and work-life consultations. Employees also have access to enhanced support for mental health concerns such as anxiety and depression.

In addition, we offer a range of local and organisation-wide wellbeing initiatives, including employee-led wellness groups, as well as access to a leading sleep and meditation application designed to support relaxation, focus and overall mental wellbeing.

*The Green Room*, our internal employee newsletter, serves as a

platform to celebrate and share positive stories from across the organisation, fostering a strong sense of connection and recognition. To highlight exceptional contributions, the GTT Commitment Awards recognise individuals and teams who embody our core commitments and play a critical role in driving our business forward. In 2025, we further strengthened our recognition framework with the launch of the CX Champion Recognition Programme, which celebrates those who consistently demonstrate excellence in delivering outstanding customer experiences. Together, these initiatives reinforce our values and cultivate a culture where achievement and impact are recognised and celebrated.

We are committed to supporting the holistic wellbeing of our employees, recognising that physical, mental and emotional health are essential to individual and organisational performance. Our dedicated Employee Wellness Team plays a key role in this effort by curating and sharing monthly wellbeing newsletters, each centred on a specific theme to guide and empower employees on their personal wellness journeys. These newsletters provide practical tools, resources and insights on topics such as mental health, burnout prevention and work-life balance, helping to build awareness and resilience across our workforce. Through these initiatives, we aim to foster a supportive culture where wellbeing is prioritised and our people are equipped to thrive both professionally and personally.

We also hosted our annual World Wellbeing Week, providing a

dedicated opportunity for employees to reflect, recharge and reconnect. The week encourages participation in activities designed to build resilience, promote balance and strengthen our sense of community. It features a range of interactive sessions and resources, delivered in collaboration with our Employee Assistance Programme (EAP) and wellbeing partner, Calm, to support mindfulness, resilience and overall mental health. These initiatives not only benefit individual wellbeing, but also enhance how our people support their teams, serve our customers and contribute to our broader organisational purpose.

Sickness rate is a key workforce wellbeing 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, 2025.

|                   | 2023 | 2024 | 2025 |
|-------------------|------|------|------|
| Sickness rate (%) | 2.9% | 2.2% | 3.4% |

Working Hours and Flexibility

GTT is committed to fair and responsible working hours and overtime practices that support employee wellbeing, productivity and compliance with applicable labour regulations. The company maintains clear policies governing standard working hours, rest periods and overtime, ensuring that any additional hours worked are appropriately managed, monitored and compensated in line with local legal requirements. Managers are encouraged to promote balanced workloads and respect personal time, while employees have access to flexible working arrangements where operationally feasible. GTT aims to prevent excessive workloads, reduce fatigue-related risks and foster a healthy work–life balance across its global workforce.

GTT supports flexible working arrangements, including remote, hybrid and flexible scheduling options, to enhance employee wellbeing, engagement and productivity, in line with the Remote Working Policy. These arrangements are designed to accommodate diverse employee needs while maintaining operational effectiveness and collaboration across teams. Employees are encouraged to work with their managers to adopt flexible approaches that balance business requirements with personal responsibilities. By enabling greater autonomy and promoting work–life balance, GTT fosters an inclusive and adaptable workplace that supports employee satisfaction and long-term performance.

A range of initiatives are promoted to support employee wellbeing and encourage a balanced approach to work and personal life, contributing to sustainable performance. These include encouraging regular breaks, promoting the use of annual leave and fostering a culture where employees can disconnect outside of working hours. Managers are actively encouraged to model balanced working behaviours and to support their teams in managing workloads effectively. Through these initiatives, GTT aims to create an environment where employees feel supported in balancing their professional and personal commitments.

Labor Relations

Employee Representation and Collective Bargaining

GTT respects employees’ rights to freedom of association and collective bargaining, in accordance with applicable local laws and regulations, including the U.S. National Labor Relations Act (NLRA) and equivalent legislation in other jurisdictions. We recognize the role of trade unions, works councils and employee representative bodies and we engage with them in good faith on matters affecting our workforce.

We comply with all relevant legal and contractual obligations relating to collective bargaining agreements (CBAs), including consultation requirements associated with operational changes. These agreements support fair and transparent working conditions across applicable parts of our workforce.

Beyond formal representation frameworks, we promote open dialogue between employees and management through multiple engagement channels. Employees represented by elected representatives have structured opportunities to provide input on workplace matters, supporting a collaborative and inclusive working environment.

To further strengthen employee engagement and wellbeing, GTT maintains Management–Worker Health and Safety Committees, which facilitate ongoing collaboration on occupational health and safety priorities across the organization.

| Collective Bargaining                                         | 2023 | 2024 | 2025 |
|---------------------------------------------------------------|------|------|------|
| Total % employees covered by collective bargaining agreements | 6.5% | 6.6% | 6.2% |
| Formally elected Employee Representatives                     | 4.6% | 4.4% | 4.1% |

The countries that have elected representatives are Netherlands and Germany.

Employee Engagement

An annual employee survey is conducted to gather honest and constructive feedback, with responses collected on an anonymous basis to encourage openness and transparency. This survey provides an important opportunity for employees to share their thoughts and experiences on a range of topics, including workplace culture, communication, leadership and training. The feedback received plays a vital role in helping the organization understand areas of strength as well as opportunities for improvement. Insights from the survey are carefully reviewed and used to inform targeted actions that enhance employee engagement, strengthen organizational practices and support a positive and inclusive work environment.

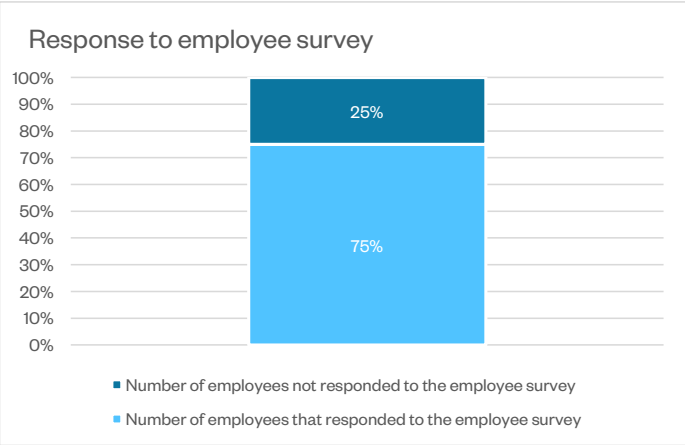
| Employee satisfaction                                              | 2023 | 2024 | 2025 |
|--------------------------------------------------------------------|------|------|------|
| Employees at GTT treat each other with respect                     | 85%  | 86%  | 85%  |
| Satisfied with the workplace flexibility offered                   | 95%  | 95%  | 95%  |
| Balance work life and personal life while working at GTT           | 79%  | 81%  | 80%  |
| Can voice a contrary opinion without fear of negative consequences | 79%  | 79%  | 76%  |

Employees most frequently highlight flexibility, including remote work and work–life balance, as a key positive, alongside strong appreciation for colleagues, team spirit and a supportive environment. Additionally, employees value the ability to work from home, as well as autonomy and ownership in their roles.

In addition to the surveys, we actively promote open and continuous social dialogue across the organization, ensuring that employee perspectives inform decision-making and shape our workplace culture. This is supported through regular engagement mechanisms, including training sessions and company-wide town halls, which provide structured opportunities for employees to share feedback and engage directly with leadership.

In addition, we have introduced employee recognition programmes that celebrate customer-focused behaviours and outstanding individual and team achievements. These initiatives reinforce our values and contribute to a culture of appreciation and accountability.

Through these efforts, we have strengthened avenues for employee engagement, supported a more inclusive and collaborative work environment and contributed to improved retention and overall workforce wellbeing. Average employee turnover improved from 12.4% in 2024 to 12% in 2025.



Grievance Mechanisms & Dispute Resolution

GTT is committed to maintaining high standards of business conduct and ethics across all operations. We encourage employees, officers, directors and third parties to raise concerns in good faith regarding our business practices.

Concerns may include, but are not limited to:

- Suspected breaches of the Code of Business Conduct and Ethics
- Violations of company policies or procedures
- Irregularities in accounting, internal controls, auditing matters, or potential financial misreporting
- Suspected legal violations or fraudulent activities

Whistleblowing

Concerns related to ethics, legal violations, or misconduct can be reported through GTT’s whistleblowing channels. Reports can be made confidentially and without fear of retaliation. Country-specific whistleblower contacts and reporting channels are available on the intranet.

Grievances

Workplace-related concerns or complaints can be raised through Human Resources. Grievances are submitted to HR through the channels outlined in the Disciplinary Policy available on the intranet. Employees are encouraged to raise concerns promptly to ensure they are addressed fairly, appropriately and confidentially.

Disciplinary Approach

GTT operates across multiple countries and jurisdictions and disciplinary processes are managed in accordance with applicable local labour laws, regulations and country-specific requirements. Disciplinary matters are handled in a fair and proportionate manner, taking into account the specific circumstances of each case. HR provides guidance and oversight throughout the process to ensure consistency and compliance. The Disciplinary Policy, available on the intranet, outlines the applicable processes and provides relevant HR contacts by country.

Protecting Human Rights

At GTT, respect for human rights is a fundamental principle underpinning our operations and corporate culture. We are committed to upholding the rights and freedoms of all individuals in line with the Universal Declaration of Human Rights, with these principles embedded in our core values and **Code of Business Conduct and Ethics**.

Our approach is further reinforced through our **Modern Slavery and Human Rights Policy**, which clearly sets out our zero-tolerance stance on issues such as child labour, forced labour and human trafficking. Through these frameworks, we seek to ensure that our business practices and supply chains reflect the highest standards of ethical conduct and responsibility.

TRAINING:

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, Artificial Intelligence, Customer Service, Time Management, Sales, Negotiation skills, among others. In 2025, 85% of our workforce participated in upskilling programs.

GTT introduced a dedicated learning path on Artificial Intelligence for our Product and Technology teams in 2025, 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:

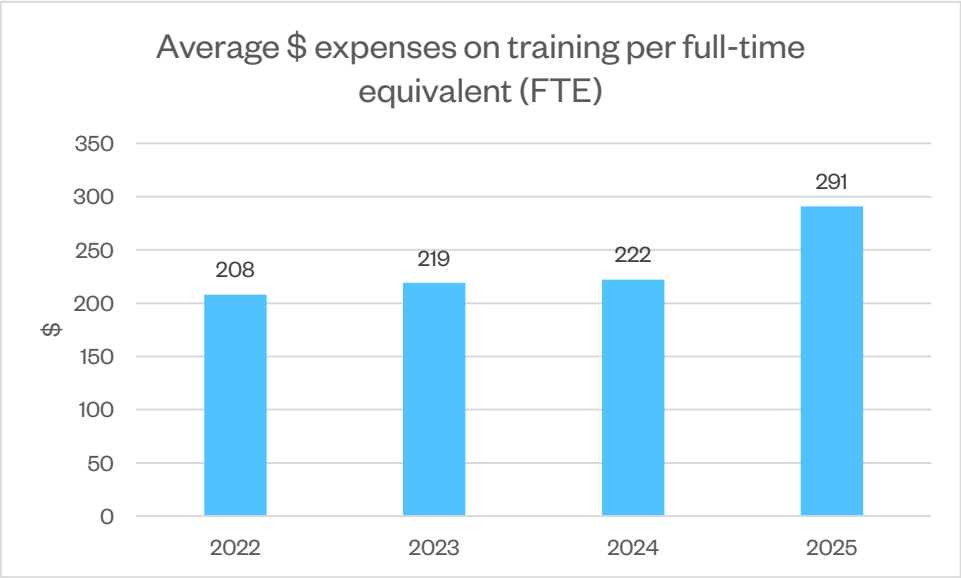
- The evolving risks associated with AI technologies
- How AI is reshaping business models and industry practices
- Practical guidance on GenAI prompt writing and responsible usage

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                                                                     | 2023   | 2024   | 2025   |
|-------------------|-----------------------------------------------------------------------------|--------|--------|--------|
| Employees trained | Percentage employees in upskilling/reskilling program*                      | 92%    | 93%    | 85%    |
| Internal hires    | % Internal hires (out of total hires for vacancies) (excluding contractors) | 23.2%  | 8.4%   | 27.6%  |
| E-learning        | E-learning training completed                                               | 43,398 | 29,607 | 20,525 |
| Live trainings    | Live training completed                                                     | 2,724  | 2,820  | 4,489  |
| \$                | Average expenses on training per full-time equivalent (FTE)                 | \$219  | \$222  | \$291  |

\* Excluded from the report: Contractors; Employees on leave

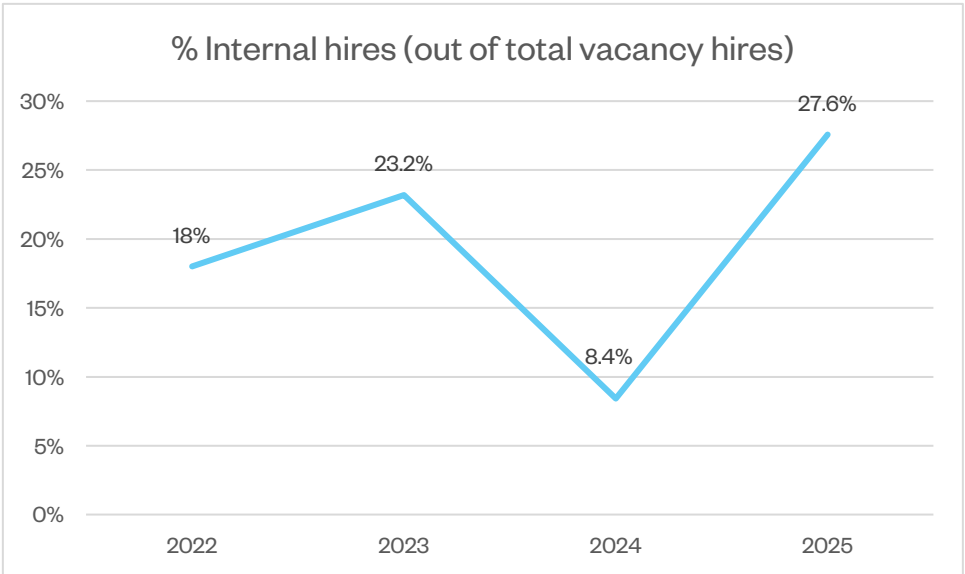
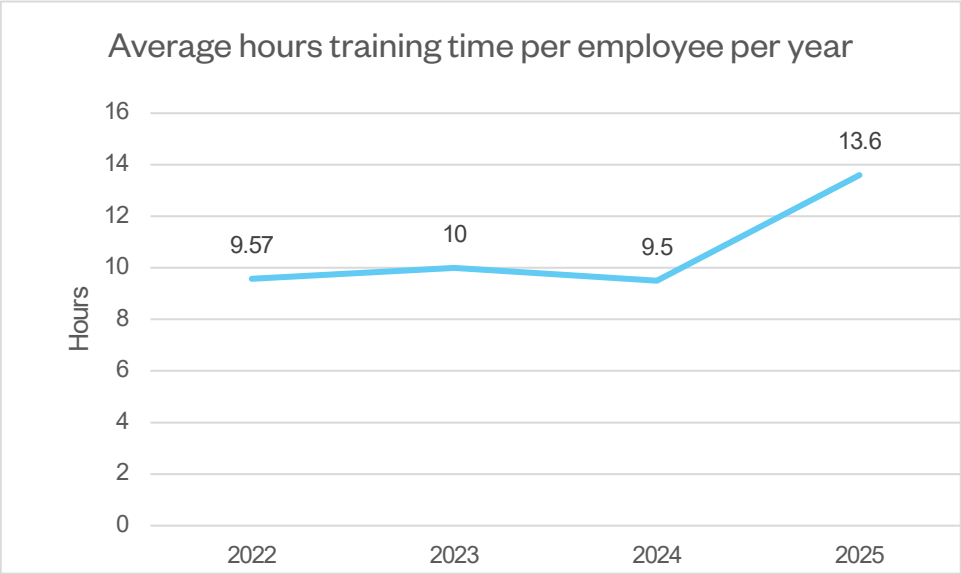


Over the past few years, GTT has undertaken a transformative journey to redefine our HR strategy, with a strong focus on investing in people development. A key milestone in this evolution has been the establishment of a robust Talent Management function, including a dedicated Talent Development team 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 25,000 e-learning courses.
- New Hire Onboarding Program: A suite of e-learning modules and a live class providing an overview of GTT’s operations, culture and values.
- Leadership Development Programs: Curated e-learning tracks for six distinct management levels to support leadership growth across the organization.

In 2025, 20,525 e-learning courses were completed, illustrating a more targeted and focused approach to training. This prioritises relevant, high impact learning aligned to business needs, ensuring employees engage with meaningful content that supports both individual development and organisational priorities. In addition to the e-learning courses, GTT employees completed 4489 live classes with a total of 21,572 training hours. The topics include Customer Service, Business English, Sales, Negotiation skills, Leadership, Coaching, among others.



Career Development and Advancement

GTT is committed to fostering a culture of continuous learning, skills development and career progression, enabling employees to reach their full potential and supporting a future-ready workforce. All new employees participate in a structured onboarding programme commencing on their first day. This includes e-learning modules that provide a comprehensive overview of the organization, covering GTT's values and commitments, business functions, systems, HR programmes and products and services. This approach ensures consistent integration into the organization and alignment with our corporate culture from the outset. In addition, within the first months of employment, new hires take part in a live class, covering a general overview of GTT. This course provides the option to ask specific questions about the company and better understand the company as well as gives the opportunity to collaborate with other employees in GTT.

To support ongoing development, GTT offers a broad range of learning opportunities aligned to key skill areas, including technical, digital and professional competencies (e.g., data analysis, communication and presentation skills). These learning pathways are designed to support both role-specific capability building and broader career advancement. As part of our annual goal setting process managers collaborate with their employees to set goals, aligned with their departments and GTT's objectives. Progress is reviewed in the mid-year performance review process.

Managers can explore a variety of internal resources, courses and HR-led training programs to enhance their leadership skills.

GTT also promotes knowledge sharing and professional growth through its internal Mentoring Programme, which connects employees across levels and functions. The programme supports both short- and long-term mentoring relationships, fostering collaborative learning, career guidance and leadership development. Mentors provide insights, constructive feedback and support aligned to the mentee's development goals. GTT currently have 78 active mentors. These initiatives reflect GTT's commitment to developing a skilled, engaged, and adaptable workforce, while supporting employee employability, internal mobility, and long-term career growth.

|                       | 2023 | 2024 | 2025 |
|-----------------------|------|------|------|
| Number of new mentees | 37   | 17   | 29   |



SPOTLIGHT :  
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 our communities through local employment, fair and competitive compensation, tax contributions 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 2025, employees collectively logged 661 volunteer days, highlighting the meaningful impact of our shared commitment to community engagement.

|                                | 2022 | 2023 | 2024  | 2025 |
|--------------------------------|------|------|-------|------|
| Employee volunteer days logged | 370* | 618  | 669.5 | 661  |

\*Programme launched mid-2022

GTT employees 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.

WHAT’S NEXT?

In 2026, GTT is launching a refreshed Employee Value Proposition (EVP) to better articulate the experience and opportunities available to employees across the organization. The EVP brings together the key elements of working at GTT, including meaningful career development, flexible learning opportunities, wellbeing support, inclusive leadership and the ability to make a tangible impact for customers and colleagues.

The initiative is designed to strengthen attraction and retention efforts, improve employee engagement and provide a consistent framework for communicating what employees can expect from GTT and what GTT expects in return as part of a high-performance, value-driven culture.

The rollout of LinkedIn Learning has exceeded expectations in terms of uptake in early 2026, demonstrating strong engagement across the organisation. Building on this momentum, the planned launch of an AI fluency training programme will provide structured development pathways, alongside a continued focus on empowering employees to take ownership of their career progression. In Q1 2026, LinkedIn Learning uptake was strong, with employees completing over 800 courses, watching more than 16,000 learning videos, spending over 900 hours learning and participating in more than 250 AI-powered learning conversations. That’s considering the platform was released in mid-February and this progress was achieved for less than 2 months. Going forward, there is a clear focus on continuing to build on this momentum and further increasing engagement with learning opportunities across the organisation.

Job Architecture and Career Framework

In 2026, we are undertaking a comprehensive revision of our current job architecture and developing an enhanced global framework. GTT’s global job architecture provides standardized role definitions and job levels. This framework enhances transparency, supports equitable and market-aligned compensation and enables clear career progression, while strengthening governance across people practices. The refreshed framework will further strengthen transparency, reinforce fair and comparable role structures and empower employees with clearer career pathways across the organization.



SPOTLIGHT :  
CLOSING THE DIGITAL DIVIDE  
THROUGH SKILLS-BASED VOLUNTEERING

Empowering the Next Generation of Telecommunications Talent in Bulgaria

At GTT, closing the digital divide goes beyond connectivity; it means investing in people. Through sustained partnerships with leading educational institutions in Bulgaria, GTT employees volunteer their time and expertise to help students develop practical digital and telecommunications skills, improving employability and strengthening the future talent pipeline.

Each July, GTT welcomes students from the Technological School of Electronic Systems (TUES) to a two week internship program designed to bridge the gap between academic learning and real world telecommunications operations. In 2025, GTT hosted 10 TUES interns across multiple Service Assurance teams. GTT volunteers from different functions delivered a blend of onsite and virtual training sessions, covering core industry topics such as:

- Introduction to Event and Incident Management
- Ticket lifecycle and operational workflows
- Cisco laboratory sessions, including Routing & Switching, MPLS and Layer 2/3 network scenarios

The program was supported by six GTT employee mentors, who provided guidance, technical instruction and career insights. Mentor testimonials highlight the mutual value of the initiative, students gain applied experience, while employees contribute to developing future digital talent.

GTT’s engagement with TUES extends beyond internships. In their final year, students must complete a technological graduation thesis. GTT employees who participate as internship mentors can also volunteer as Graduation Thesis Advisors, offering practical industry perspectives and technical supervision. In 2025, five GTT employees served as confirmed thesis advisors, helping students apply advanced telecommunications concepts to real-world challenges.

GTT also partners with the Technical University of Sofia, collaborating with the Faculty of Telecommunications to support early engagement initiatives. Through participation in “Freshman Hour,” GTT employees meet first-year students to introduce career pathways in telecommunications and share insights into industry skills and expectations.

6.



***RESPONSIBLE AND  
ACCOUNTABLE PARTNERS***

APPROACH:



We will maintain and optimize a responsible, accountable supply chain that raises standards, reduces risk and supports long-term value creation to provide secure, simple global connectivity.

Our Approach

We aim to build responsibility and accountability within the value chain by setting clear expectations through robust codes of conduct and defined sustainable impact standards that apply to both GTT and its partners. Our approach focuses on reducing risk through strengthened oversight, enhanced security controls and resilience requirements across all operations. We reinforce accountability through internal governance, contractual commitments and ongoing performance management, while working collaboratively with partners to support the decarbonization of our value chain over time.



A value chain that is responsible from sourcing to final outcomes is fundamental to delivering GTT’s commitment to collective impact. By embedding standards for ethical conduct, transparency and resilience across both our own activities and those of our partners, we work to raise performance, reduce operational and reputational risk and drive more sustainable outcomes. This integrated approach enables shared responsibility for environmental and social performance while strengthening the broader ecosystem in which GTT operates. Through strong partnerships, internal leadership and consistent oversight, our value chain becomes a key enabler of scalable, long-term positive impact.



POLICY FRAMEWORK:

The scope applies across the global supply chain and includes all employees, contractors, suppliers, partners and associated stakeholders; accountability sits with the SVP, Access Management and Cost of Revenue; and the policies are available to employees and relevant stakeholders via the corporate website and intranet to ensure accessibility and transparency.

| RELATIONSHIPS WITH SUPPLIERS   |                                                                                                                                                                             |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy                         | Objective                                                                                                                                                                   |
| Supplier Code of Conduct       | Ensure suppliers meet minimum standards across safety, working conditions, environmental compliance and the prevention of child labour, forced labour and human trafficking |
| Sustainable Procurement Policy | Define the principles and standards expected across the business and its global supply chain                                                                                |

| CORPORATE CULTURE                                              |                                                                                                                                              |
|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Policy                                                         | Objective                                                                                                                                    |
| Anti-bribery, Anti-corruption and Anti-Money Laundering Policy | Prevent bribery, corruption and money laundering by setting clear standards for ethical business conduct and compliance with applicable laws |
| Business Code of Conduct                                       | Define the expected standards of behaviour and ethical principles for all employees and representatives of the organisation                  |
| Whistleblower Policy                                           | Provide a safe and confidential mechanism for reporting concerns or misconduct without fear of retaliation                                   |

POLITICAL ENGAGEMENT

| Policy                                 | Objective                                                                                                                                                                                 |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Modern Slavery and Human Rights Policy | Uphold high ethical standards and ensure respect for human rights, including the prevention of modern slavery, forced labour and human trafficking across operations and the supply chain |

Value Chain Oversight

Oversight of our value chain is clearly defined to ensure accountability across both partner engagement and internal conduct. Responsibility for supplier and partner management, including access governance and procurement activities, sits with the Access Management and Supplier Procurement function, led by the SVP, Access Management and Cost of Revenue. This function is responsible for setting expectations, managing supplier relationships and ensuring appropriate controls are in place across our partner ecosystem.

Procurement of corporate goods and services, including hardware, software, technology platforms, professional services and other indirect spend categories, is managed by the Finance Procurement function, led by the Senior Manager, Procurement. Working closely with business stakeholders, the procurement team helps ensure that key suppliers align with GTT’s operational requirements, ethical standards and long-term value creation objectives. A key objective of the function is to establish and maintain robust supplier selection, contract management and procurement governance processes, while embedding business, risk and sustainability considerations into purchasing decisions across the procurement lifecycle.

Together, these functions provide a comprehensive oversight model, ensuring accountability and alignment across both GTT and its wider value chain.

TARGETS:

Below is the set of targets that GTT has been working towards in 2025, along with selected progress indicators demonstrating advancement against its responsible and accountable partner objectives.

The overarching goal of this pillar is to build a value chain characterised by complete trust, integrity and resilience, supported by the following targets and indicators, which collectively strengthen accountability, transparency and long term partner performance.

| Target                                                                          | Percentage complete | Progress                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RELATIONSHIPS WITH SUPPLIERS                                                    |                     |                                                                                                                                                                                                                             |
| 100% completion of sustainable procurement training by network procurement team | <div></div>         | 100% completion rate*                                                                                                                                                                                                       |
| Kick off supplier engagement program by end of 2026                             | <div></div>         | Kicked off in 2025 and list of critical suppliers collected and questionnaire developed                                                                                                                                     |
| 100% Network suppliers that expressed no concern related to Code of Conduct     | <div></div>         | Communicated our Supplier Code of Conduct to all active network suppliers, with 100% of active suppliers expressing no issue with the expectations presented. Supplier Code of conduct now included in supplier onboarding. |
| Improvement of CDP and EcoVadis score                                           | <div></div>         | Maintained a C CDP score and improved EcoVadis score by 2 points                                                                                                                                                            |

\* Only new Procurement employees completed sustainable procurement training in 2025, as the training is rolled out to the entire Procurement team every two years.



PROGRESS:

# RELATIONSHIPS WITH SUPPLIERS

GTT maintains a structured and risk-based approach to supplier management to ensure alignment with its operational, security and ethical standards. Supplier reviews are conducted quarterly with key strategic suppliers. Less critical suppliers are reviewed one to two times per year, while additional reviews may be conducted on an ad hoc basis depending on supplier performance, risk profile, or specific business requirements. These reviews assess performance against contractual obligations, operational procedures and GTT's standards.

In addition, GTT evaluates critical supplier services and conducts associated risk assessments, with a particular focus on suppliers that access or process personal identifiable information (PII). These assessments determine the nature and extent of data access and consolidate risks across multi-service suppliers, enabling GTT to identify and prioritise suppliers that may pose elevated information security risks.

For higher-risk suppliers, GTT proactively monitors their external security posture using specialised third-party tools, allowing for the early identification and mitigation of potential threats. To further strengthen oversight, GTT is enhancing its third-party risk management framework through the implementation of a continuous, risk-based monitoring capability. This approach leverages external data sources to assess evolving risks across multiple dimensions, including compliance, ownership changes and legal or regulatory developments, supporting more informed and timely risk management across the supply chain.

GTT sets clear expectations for all business partners through adherence to our Supplier Code of Conduct, which reflects our commitment to high ethical standards across our value chain. We expect our suppliers to uphold these standards not only within their own operations but throughout their supply chains.

Suppliers are required to comply with all applicable local and international laws, regulations and standards, including those

relating to labour, health and safety, environmental protection and anti-corruption. Where local legislation imposes more stringent requirements than our Code, those higher standards prevail.

To reinforce these expectations, our supplier qualification and onboarding processes have been enhanced to incorporate specific requirements on environmental, labour and human rights compliance.

### Supplier Code of Conduct



Health Safety & Wellbeing



Competition, Fair Dealing/Gifts



Bribery & Corruption



Human Rights & Child Labour



Human Trafficking & Modern Slavery



Harassment, Discrimination/Equal Opportunity



Anti Money Laundering



Hiring, Employment Practices & Wages



Intellectual Property



Freedom of Association & Bargaining



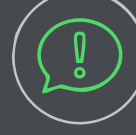
Environmental Stewardship



Confidentiality, Protection & Security



Conflict Minerals



Conflict of Interest



Sanctions & Export Controls

Modern Slavery Within the Supply Chain

Risk Assessment

GTT adopts a zero tolerance approach to modern slavery and recognises that no organization or supply chain is entirely free from risk. While the nature of our services and supplier base may present lower inherent risk than some sectors, we acknowledge that modern slavery risks can arise, particularly within complex, global supply chains and in certain geographic regions. Accordingly, we remain vigilant and proactive in identifying and managing these risks.

Due diligence

For all new suppliers, we review any relevant procurement procedures to address the risk of modern slavery in the new suppliers' businesses or supply chains. For all suppliers, we include contractual obligations in our standard paperwork requiring suppliers to comply with all applicable laws, including laws on modern slavery and human trafficking. GTT expects suppliers to have processes and controls in place to comply with the Supplier Code of Conduct. Where appropriate, GTT may conduct risk-based due diligence to assess its relationship with suppliers, should the need arise. GTT expects suppliers to provide complete and accurate information to facilitate due diligence efforts undertaken by GTT, where requested.

GTT applies a risk based approach to supplier due diligence, prioritising suppliers based on factors such as geography and nature of services provided. Where higher risk indicators are identified, enhanced engagement or additional due diligence may be undertaken.

GTT expects suppliers to cooperate with due diligence activities and to take corrective action where issues are identified. While no confirmed incidents of modern slavery were identified during the reporting period, GTT recognises that the absence of identified cases does not eliminate risk and continues to strengthen its detection and escalation mechanisms.

Monitoring and Remediation

GTT monitors supplier compliance through contractual assurances, ongoing supplier relationships and procurement oversight. Where concerns or non compliance are identified, GTT may engage suppliers to understand root causes and require corrective actions. In cases of serious or unresolved non compliance, GTT reserves the right to reconsider or terminate the supplier relationship in line with contractual terms.



TRAINING:

Sustainable Procurement Training

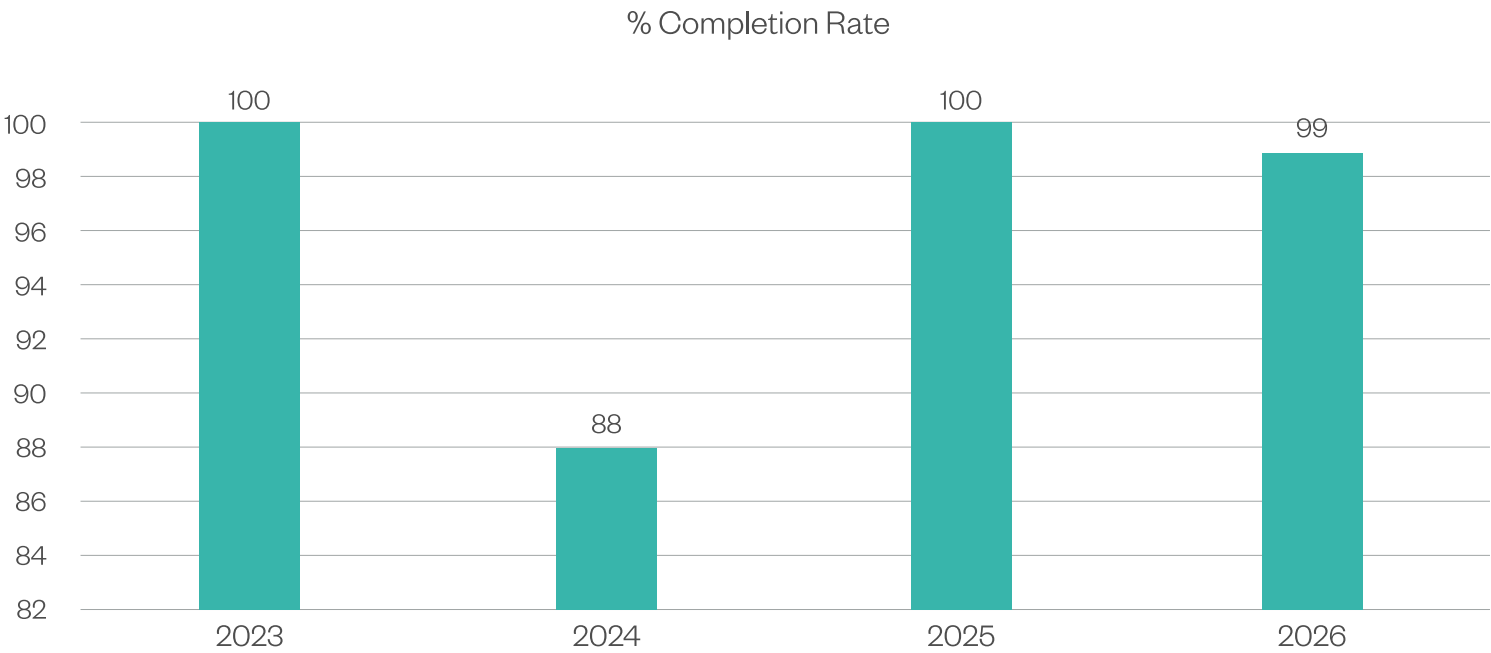
As GTT continues to advance its Responsible Business journey and deepen its understanding of our environmental and social impacts, as well as the strength of our corporate governance practices, we are committed to embedding this awareness across our procurement function.

Employees involved in supplier management and related procurement roles are required to complete sustainable procurement training every two years, while newly appointed procurement professionals must complete the training as part of their onboarding process.

The training is designed to increase awareness of supply chain risks, including environmental, human rights, and ethical considerations, and to equip employees with the knowledge needed to assess and engage with business partners responsibly.

In 2025, we achieved a 100% completion rate among all newly onboarded procurement specialists, reinforcing our commitment to integrating sustainability principles into procurement decision-making and supplier relationships.

Building on this foundation, GTT is preparing to launch a supplier engagement program designed to strengthen collaboration with suppliers on Responsible Business priorities and enhance supply chain transparency. Procurement professionals will receive dedicated training to support the program, communicate environmental, social and governance expectations, and promote continuous improvement across the value chain.



# CORPORATE CULTURE: COMPLIANCE AND ETHICS

## Establishing Expectations for Conduct

At GTT, compliance with applicable laws and regulations forms the foundation of our ethical framework. Our Corporate Code of Business Conduct and Ethics (Code of Conduct) sets out our formal policy commitments to responsible business conduct, including integrity, transparency, accountability and respect for applicable legal and ethical standards. The Code of Conduct applies to all employees, executives and third-party partners and is embedded across our operations.

The Code of Conduct is supported by a comprehensive suite of global and local policies that operationalise our commitments and provide clear guidance on responsible business practices. These policies address key risk areas, including anti-corruption, anti-bribery, conflict of interest, fraud prevention, anti-money laundering, information security and fair competition. They also define approval processes for higher-risk activities, such as gifts, hospitality and travel, ensuring consistent and transparent decision-making across the organisation.

Our policy commitments are reviewed annually to ensure alignment with evolving regulatory requirements and leading practices. All employees and contractors with access to GTT systems are required to review and formally acknowledge relevant policies each year. In 2025, 99% of active employees confirmed their adherence to the **Code of Business Conduct and Ethics** and key supporting policies (2024: 98.9%), demonstrating strong organisational alignment with our ethical standards.

GTT maintains formal mechanisms for seeking guidance and raising concerns related to ethical conduct. Our confidential ethics helpline and online reporting platform, operated by an independent third-party provider (**Safecall**) and overseen by our Legal department, is accessible 24/7 to employees, customers, suppliers and the public. The platform enables individuals to raise concerns anonymously, without fear of retaliation and covers a broad range of issues, including corruption and bribery, fraud, harassment, procurement irregularities and environmental breaches.

We are committed to fostering a speak-up culture where concerns are treated seriously, investigated appropriately and addressed in a fair and timely manner. To support this, all employees receive mandatory training on ethics and compliance topics, including our **Whistleblower Policy** and are given the necessary time and resources to complete this training.

Oversight of our ethical framework is provided by Executive Management and the Board of Directors, who review the **Code of Business Conduct and Ethics** and the **Whistleblower Policy** annually, updating them as required. This ensures that our policy commitments and reporting mechanisms remain effective, relevant and aligned with stakeholder expectations and regulatory developments.

## Whistleblower reports

All whistleblower reports submitted in 2025 were fully investigated by our Legal and Audit functions. The status of whistleblower matters is reviewed on a quarterly basis by both the Board’s Governance and Risk Committee and the Audit Committee.

| Whistleblower Reports | 2023 | 2024 | 2025 |
|-----------------------|------|------|------|
| Number of reports     | 0    | 4    | 6    |

Anti-Bribery and Anti-Corruption

GTT’s Global Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy and Procedure is designed to ensure that all employees understand applicable anti-corruption and anti-money laundering laws and are equipped to comply with them. It strictly prohibits GTT and its personnel from engaging in bribery, corruption, or any other improper or unlawful financial transactions.

GTT’s Anti-Bribery and Anti-Corruption Policy provides clear and practical guidance on the offering and acceptance of gifts, hospitality and other benefits, ensuring such interactions do not create actual or perceived conflicts of interest or improperly influence business decisions. The policy reinforces transparency, integrity and accountability across all professional engagements, in line with GTT’s ethical standards and governance commitments.

Timely reporting of potential or actual breaches of anti-corruption and anti-money laundering laws is essential to maintaining compliance. Employees, officers and directors are encouraged to raise concerns through GTT’s Ethics and Compliance Helpline and online reporting platform (Safecall), which is independently hosted and overseen by the Legal team. Reports can be submitted anonymously, safeguarding confidentiality and protecting individuals from retaliation.

| Corruption and bribery incidents                                             | 2023 | 2024 | 2025 |
|------------------------------------------------------------------------------|------|------|------|
| Number of convictions for violation of anti-corruption and anti-bribery laws | 0    | 0    | 0    |
| Fines for violation of anti-corruption and anti-bribery laws                 | 0    | 0    | 0    |

Business Conduct and Compliance Training

At GTT, we foster a strong culture of ethics and compliance through structured, continuous training programmes. All new employees are required to complete mandatory compliance training as part of their onboarding, aligned with our Code of Business Conduct and Ethics. This training covers key areas including anti-bribery and anti-corruption, anti-harassment and non-discrimination, human rights and information security and data protection.

Each module is designed to provide employees with a clear understanding of GTT’s ethical standards and expectations, the potential consequences of non-compliance and the appropriate channels for raising concerns, including our whistleblower reporting system. Employees are also guided on how to access relevant policies, procedures and supporting resources.

To reinforce a culture of integrity, accountability and continuous awareness, all employees are required to complete refresher training annually and formally acknowledge key policies. Completion rates are closely monitored and any non-compliance is addressed through performance management processes, ensuring consistent adherence to our standards across the organisation.

| Compliance training        | 2023 | 2024 | 2025 |
|----------------------------|------|------|------|
| Annual Compliance Campaign | 100% | 99%  | 99%  |

Excluding contractors and employees on leave



# POLITICAL ENGAGEMENT

Operating across diverse geographies requires a strong understanding of the geopolitical landscape, particularly where supplier options may be limited. In these contexts, robust due diligence and clear expectations are critical to managing risk and upholding standards.

GTT aligns its human rights approach with the UN Guiding Principles on Business and Human Rights, ensuring we avoid causing or contributing to harm, address impacts where they occur and seek to prevent or mitigate risks linked to our operations and business relationships. Respect for human rights is non-negotiable and embedded across our activities.

We recognize that risks vary by country and we leverage external benchmarks, such as Transparency International's Corruption Perceptions Index, to identify regions where individuals may be more vulnerable to exploitation or marginalization. To mitigate these risks, all employees are required to adhere to our Modern Slavery & Human Rights Policy, complete annual training and uphold our Supplier Code of Conduct. Concerns can be raised confidentially through our whistleblower hotline.

Our approach is grounded in the principles of the Universal Declaration of Human Rights and supported by ongoing monitoring to ensure standards are consistently applied across our global supply chain.

## Our Public Declaration to Global Commitments

GTT is committed to aligning our business practices with the United Nations Sustainable Development Goals (UN SDGs). Our efforts are focused on the areas where we can deliver the most measurable impact, in support of the global scope and ambition of the UN SDGs.

| UNSDG                                                                                                                                  | KPI                                                                                                                 | 2025 GTT Achievements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Climate Action</b><br>                           | 13.2.2: Total GHG emissions per year                                                                                | Due to our continued commitment to improving data quality, GTT was able to record our Scope 1, 2 and 3 emissions with greater accuracy in 2025 than in the previous year. Enhanced data collection processes and a refined methodology provided a more complete and reliable emissions profile, which was the primary driver behind these announced changes in reported emissions, with reductions observed across all scopes. Improved data visibility is critical to climate action, enabling more informed decision-making, targeted interventions and stronger organizational accountability. Year-over-year, GTT reported a 20% reduction in Scope 1 emissions and a 22.2% reduction in Scope 2 emissions, which alongside the data improvements was supported by other initiatives such as overall fleet reduction and increased electrification. We also recognize the importance of responsible consumption across our value chain and have strengthened supply chain management through enhanced due diligence practices. |
|                                                                                                                                        | 13.3: Improve awareness and institutional capacity on climate action                                                | To further support awareness of the need for climate action, GTT delivers annual sustainability training to all employees, achieving a 96% completion rate in 2025. The program outlines the imperative for GTT to act on climate change and empowers employees with practical ways to contribute to the company's sustainability efforts, reinforcing the link between data-driven insights and collective action.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Responsible Consumption and Production</b><br> | 12.6.1: Number of companies publishing sustainability reports                                                       | We continue to strengthen our commitment to transparent sustainability reporting, with 2025 marking the publication of our fourth ESG (Responsible Business) report. This milestone reflects growing maturity in how we disclose our environmental and social impacts, embedding sustainability more firmly within our operations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Quality Education</b><br>                      | 4.4.1: Proportion of youth and adults with information and communications technology (ICT) skills, by type of skill | This commitment is reinforced through initiatives such as GTT's student placement programme in Bulgaria, home to nearly one-third of the company's global workforce. Through a two-week placement opportunity for students from the Technological School of Electronic Systems (TUES), participants gain first-hand experience of telecommunications operations and the practical application of classroom learning in a professional environment. The programme forms part of GTT's commitment to community partnership and skills development, contributing to enhanced ICT literacy and helping prepare the next generation of technology professionals in Bulgaria.                                                                                                                                                                                                                                                                                                                                                            |

## WHAT'S NEXT?

We are developing a new supplier engagement programme to strengthen oversight and performance across our value chain. During 2025, we identified our critical suppliers and defined the key sustainable impact risk areas most relevant to our operations. Building on this, we have designed a structured supplier questionnaire to assess performance against these priorities, covering areas such as environmental impact, labour standards and governance practices. The programme will be progressively rolled out in 2026, with full implementation and initial assessment results expected by the end of the year. This phased approach will enable more targeted engagement, clearer accountability and stronger collaboration with suppliers to drive continuous improvement.



# 7.

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## ***GOVERNANCE PRACTICES***



# OUR LEADERSHIP

Our leadership team plays a critical role in embedding strong governance practices across the organization. GTT’s Board of Directors, its committees and the Senior Leadership Team are responsible for setting and overseeing the company’s ethical standards and business conduct policies, ensuring that integrity, compliance and responsible practices are embedded across all operations. The Board provides oversight of the Responsible Business Strategy and risk, supported by its Audit, Compensation and Governance and Risk Committees, while the Senior Leadership Team is responsible for implementation and performance.

The Board regularly reviews and approves frameworks related to ethics, anti-corruption and stakeholder engagement, reinforcing a strong governance foundation.

Our Board brings diverse expertise in the telecommunications industry and corporate finance, with several members having direct experience in managing ethics programs. This depth of knowledge supports informed oversight, effective risk management and sound strategic guidance to the business. Through ethical leadership, diverse experience and active stakeholder engagement, our leaders foster a culture of integrity, transparency and responsible business conduct.

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

|                      |                                                      |
|----------------------|------------------------------------------------------|
| Tony Abate           | Chairman of the Board                                |
| Edward Morche        | CEO & Director                                       |
| Adam Malin           | Board Director                                       |
| Beau Harbour         | Board Director                                       |
| Blaine Hauser        | Board Director                                       |
| James Parker         | Board Director & Compensation Committee Chair        |
| Jon Lin              | Board Director                                       |
| Sherman Edmiston III | Board Director & Governance and Risk Committee Chair |
| Wayne Rehberger      | Board Director & Audit Committee Chair               |

Our **Senior Leadership Team** is responsible for the effective management of the company’s day-to-day operations and plays a central role in delivering our strategic priorities, including our environmental, social and governance commitments. The team comprises a diverse and complementary mix of expertise across technology, networking, sales, finance, legal, compliance, human resources and governance. This breadth of experience reflects the global scale and complexity of our operations, supporting informed decision-making and enabling the consistent integration of Responsible Business considerations across all areas of the business.

In 2025, GTT’s SLT was as follows:

## 2025 Senior Leadership Team



**EDWARD MORCHE**  
Chief Executive Officer



**ANDREA GENSHAW**  
Chief Financial 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

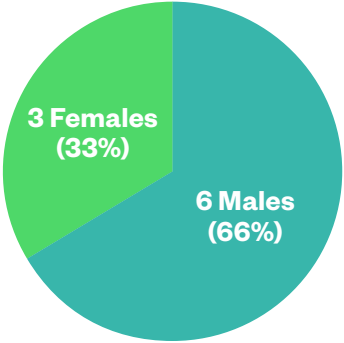


**RYAN MCMANIS**  
Chief Legal Officer



**MIKE LITTLE**  
Chief Commercial Officer

2025 Top Management  
by Gender - 9 Total



# MANAGING ENTERPRISE RISK AND COMPLIANCE

We adopt a proactive and integrated approach to managing enterprise risk and compliance, underpinned by robust governance structures and clear accountability across the organisation. Our risk management framework is designed to identify, assess and mitigate material risks, which includes those related to our Responsible Business factors as outlined in our strategy.

We maintain a comprehensive compliance programme aligned with applicable laws, regulations and industry standards, supported by ongoing monitoring, internal controls and regular training. Senior leadership and the Board provide oversight of key risks, ensuring that emerging Responsible Business-related risks and opportunities are systematically evaluated and embedded into strategic decision-making processes.

# SUPPORTING NET NEUTRALITY

GTT is committed to upholding the principles of net neutrality and ensuring that all lawful data traffic on its global IP network is treated fairly, without discrimination, restriction, or interference. Fully compliant with EU Regulation 2015/2120, the Company delivers fast, secure and reliable connectivity that is impartial and free from bias, enabling open internet access for all users. GTT supports the fundamental right of end-users to access and share information and content regardless of location, device, or content type.

The Company does not block, throttle, or prioritize traffic for commercial advantage and ensures that services are delivered on an equitable basis across its network. Where traffic management is required, measures are applied in a proportionate, transparent and application-agnostic manner, solely to maintain network integrity and service quality. GTT maintains strong governance and compliance oversight, continuously monitoring regulatory developments and evolving best practices to ensure ongoing alignment with legal requirements and industry standards.

Transparency is supported through clear customer communications and service disclosures, while continued investment in network capacity, resilience and low-latency infrastructure reduces the need for intervention. Through these practices, GTT reinforces its commitment to an open internet, supporting digital inclusion, innovation and the free flow of information globally.



APPENDIX: SASB INDEX

| Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Code         | Accounting metric                                                                                                                                                      | Unit of measure       | 2025                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environmental Footprint of Operations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | TC-TL-130a.1 | (1) Total energy consumed,<br>(2) percentage grid electricity and<br>(3) percentage renewable                                                                          | GJ<br>%<br>%          | (1) Total energy consumed: 1,727,263.34KWh (6218.15GJ)<br>(2) percentage grid electricity: 95.04<br>(3) percentage renewable: 4.96% (non-leased assets) |
| <b>2025 Disclosure:</b><br>We conduct an annual review of our Scope 1, Scope 2 and Scope 3 greenhouse gas (GHG) emissions inventory, including emission factors and calculation methodologies, with support from an independent carbon consultancy. This process ensures alignment with the GHG Protocol's Corporate Accounting and Reporting Standard as well as the Corporate Value Chain (Scope 3) Standard across our global operations.<br>While GTT maintains a relatively small carbon footprint, we remain committed to minimizing resource consumption and associated environmental impacts wherever possible within our asset-light business model. Our established processes enable us to effectively track, assess and manage our emissions footprint, while identifying and implementing reduction opportunities where feasible.<br>We are also actively equipping employees with the knowledge and tools to understand how initiatives such as emissions reduction not only support regulatory compliance, but also contribute to cost efficiency, revenue growth and risk mitigation. This approach helps embed responsible business practices into everyday decision-making, positioning sustainability as a key driver of long-term business value rather than a standalone obligation |              |                                                                                                                                                                        |                       |                                                                                                                                                         |
| Data Privacy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | TC-TL-220a.1 | Description of policies and practices relating to targeted advertising and customer privacy.                                                                           | n/a                   | Refer to section on Data Privacy                                                                                                                        |
| <b>2025 Disclosure:</b><br>GTT is committed to ensuring that targeted advertising and customer engagement practices respect individual privacy and comply with applicable data protection laws. Personal data used for marketing purposes is processed in a lawful, transparent and controlled manner, supported by clear consent mechanisms and accessible privacy information.<br>The Company maintains safeguards such as “do not contact” registers, preference management options and unsubscribe links in all communications, enabling individuals to manage their preferences effectively. GTT’s data privacy framework, aligned with GDPR, the ePrivacy Directive and relevant national legislation, governs the responsible use of data across all marketing activities and supports the protection of customer privacy throughout the data lifecycle.                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |                                                                                                                                                                        |                       |                                                                                                                                                         |
| Data Privacy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | TC-TL-220a.2 | Number of customers whose information is used for secondary purposes                                                                                                   | Number                | 0                                                                                                                                                       |
| <b>2025 Disclosure:</b><br>GTT generally does not collect or use customer data for secondary purposes. Customer information is primarily processed within its original, agreed scope; however, limited contact data may be used for marketing activities in line with applicable legal requirements and customer preferences. In all cases, GTT ensures that such processing remains proportionate, transparent and aligned with established privacy standards and regulatory obligations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |              |                                                                                                                                                                        |                       |                                                                                                                                                         |
| Data Privacy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | TC-TL-220a.3 | Total amount of monetary losses as a result of legal proceedings associated with customer privacy                                                                      | Presentation currency | 0                                                                                                                                                       |
| <b>2025 Disclosure:</b><br>n/a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                                                                                                                                                                        |                       |                                                                                                                                                         |
| Data Privacy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | TC-TL-220a.4 | (1) Number of law enforcement requests for customer information,<br>(2) number of customers whose information was requested,<br>(3) percentage resulting in disclosure | Number<br>%           | (1) 0<br>(2) 0<br>(3) 0                                                                                                                                 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |              |                                                                                                                                                        |                                            |                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-------------------------|
| <b>2025 Disclosure:</b><br>GTT follows a structured internal process for handling lawful requests for customer information, ensuring that all disclosures are assessed in line with applicable privacy regulations and due process requirements. Any request for data is carefully reviewed for validity, necessity and legal basis before disclosure.<br>All disclosures are carried out within established legal and regulatory frameworks, ensuring transparency while safeguarding customer confidentiality. Through this approach, GTT balances its legal obligations with its commitment to protecting customer privacy and maintaining trust.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |              |                                                                                                                                                        |                                            |                         |
| <b>Data Security</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | TC-TL-230a.1 | (1) Number of data breaches,<br>(2) percentage that are personal data breaches,<br>(3) number of customers affected                                    | Number<br>%                                | (1) 0<br>(2) 0<br>(3) 0 |
| <b>2025 Disclosure:</b><br>n/a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |              |                                                                                                                                                        |                                            |                         |
| <b>Data Security</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 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                     |
| <b>2025 Disclosure:</b><br>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.<br>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).<br>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.<br>GTT follows CIS Benchmark guidelines for the internal corporate environment and conducts internal audits to assess compliance.                          |              |                                                                                                                                                        |                                            |                         |
| <b>Product End-of-life Management</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | TC-TL-440a.1 | (1) Materials recovered through take-back programs, percentage of recovered materials that were :<br>(2) reused,<br>(3) recycled and<br>(4) landfilled | Metric tonnes<br>(t),<br>Percentage<br>(%) | Data not disclosed      |
| <b>2025 Disclosure:</b><br>As part of our Responsible Business approach, GTT recognises its responsibility to manage the environmental impact of waste generated across our operations, infrastructure and value chain.<br>Although waste was not identified as a material topic in our double materiality assessment, we remain committed to strong practices that ensure regulatory compliance and support environmental stewardship.<br>Across our global operations, we aim to minimise our waste footprint through recycling initiatives and the strategic reuse of hardware. This includes reducing electronic waste (e-waste), promoting responsible disposal and maximising opportunities to reuse and recycle equipment.<br>We work with certified recycling partners to ensure obsolete network equipment, devices and office electronics are processed in line with local regulations. Wherever possible, we prioritise reuse through equipment redeployment or component recovery to conserve resources and reduce landfill waste.<br>End-of-life devices are recycled responsibly, supported by ongoing employee training to raise awareness and embed environmental responsibility in day-to-day operations—helping to build a more sustainable and resilient digital infrastructure. |              |                                                                                                                                                        |                                            |                         |
| <b>Competitive Behavior &amp; Open Internet</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | TC-TL-520a.1 | Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulation                                  | Presentation<br>currency                   | Zero                    |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |              |                                                                                                                                          |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2025 Disclosure:</b><br>GTT's Corporate Code of Business Conduct and Ethics clearly defines expectations for all employees, Directors and Officers regarding fair dealing and compliance with antitrust laws. The Company maintains strong governance and oversight in this area and has not identified any instances of non-compliance or adverse findings related to anti-competitive behaviour or practices during the reporting period.                                                                                                                                                                                                                                                                                                                                                             |              |                                                                                                                                          |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Competitive Behavior &amp; Open Internet</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>2025 Disclosure:</b><br>GTT is committed to upholding net neutrality, ensuring all lawful data traffic on its global IP network is treated fairly, without discrimination, restriction or interference. Compliant with EU Regulation 2015/2120, the Company provides secure, reliable and impartial connectivity, supporting users' rights to access and share content freely, regardless of location, device or content type.<br>GTT does not block, throttle or prioritise traffic for commercial gain. Where traffic management is necessary, it is applied proportionately, transparently and in an application-agnostic manner to maintain network performance and integrity.<br>Strong governance and ongoing monitoring ensure continued compliance with regulations and industry best practice. |              |                                                                                                                                          |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Competitive Behavior &amp; Open Internet</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | TC-TL-520a.3 | Description of risks and opportunities associated with net neutrality, paid peering, zero-rating and related practices                   | n/a                        | Data not disclosed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>2025 Disclosure:</b><br>GTT is committed to upholding net neutrality, ensuring all lawful data traffic on its global IP network is treated fairly, without discrimination, restriction or interference. Compliant with EU Regulation 2015/2120, the Company provides secure, reliable and impartial connectivity, supporting users' rights to access and share content freely, regardless of location, device or content type. We continue to monitor changes in legislation to ensure compliance while providing impartial high-quality services for our customer.                                                                                                                                                                                                                                     |              |                                                                                                                                          |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Managing Systemic Risks from Technology Disruptions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | TC-TL-550a.1 | (1) System average interruption duration,<br>(2) system average interruption frequency and<br>(3) customer average interruption duration | Minutes, Number            | (1) Refer to paragraph on System average interruption duration<br>(2) Refer to paragraph on system average interruption frequency<br>(3) Customer average interruption duration:<br>Scope:<br>Period: Jan/01/2025 – Dec/31/2025<br>Category: Trouble Ticket (Incidents)<br>Type: All customer incidents, including child. Exclude Master (Platform/Master Tickets)<br>Excludes: Cancelled, Duplicate Ticket, Opened in Error, Ticket Opened in Error<br><br>All Incident Priorities:<br>Volume: 252,561<br>MTTR: 14.70 hours (881.90 minutes)<br><br>P1 Incidents:<br>Volume: 183,737<br>MTTR: 9.66 hours (579.62 minutes) |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |              |                                                                               |     |                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-------------------------------------------------------------------------------|-----|----------------------------------------------------------------|
| <p><b>2025 Disclosure:</b></p> <p>At GTT, network reliability and service continuity are critical priorities. Service disruptions are managed using industry best practices, with incidents classified and prioritised by severity and business impact to ensure the most critical issues are addressed first.</p> <p>Our Network Operations Centre (NOC) provides 24/7 monitoring and rapid response to incidents. Defined escalation paths and response playbooks enable swift decision-making and resolution. Throughout any outage, we keep customers informed with timely updates.</p> <p>While occasional events and incidents occur, they rarely lead to service disruptions. The metrics below refer only to full system outages, excluding minor degradations or self-recovered events, which are effectively managed through our high availability (HA) and disaster recovery (DR) capabilities.</p> <p>On average, system interruptions last around 30 minutes and occur approximately twice per year. Major disruptions are rare and typically complex; however, we consistently restore core functionality quickly, even if full resolution takes longer.</p> <p>As expected in complex environments, minor incidents happen more frequently, but these are contained and do not result in service outages.</p> |              |                                                                               |     |                                                                |
| 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” |
| <p><b>2025 Disclosure:</b></p> <p>GTT operates its global network 24/7 from multiple operations centres, supported by robust business continuity plans designed to manage potential disruptions. These centres have built-in resiliency, failover capability and remote working arrangements for critical employees across all regions.</p> <p>Standardised response procedures, supported by unified customer management systems and global process ownership, ensure consistent service delivery. Our Operations and Corporate Security teams actively monitor emerging risks and regulatory requirements, prioritising support for critical services during incidents and working closely with partners to minimise service disruption.</p> <p>We regularly test our business continuity plans through quarterly crisis simulations, with audits identifying improvements to ensure the effectiveness of our resources, systems and processes.</p> <p>GTT’s Business Continuity Management System (ISO 22301) covers network services including Network Management, SD-WAN, Bandwidth, IP VPN, Ethernet and Internet, supported by the Operations Centres in Sofia.</p>                                                                                                                                                   |              |                                                                               |     |                                                                |