

GTT Supplier Code of Conduct

Purpose and Scope

At GTT, we hold ourselves accountable to a high standard of business conduct and ethics, and we seek suppliers who share in our commitments and assist in deterring wrongdoing across our supply chain. We also encourage our suppliers to promote initiatives within their own supply chain that are in line with these principles.

All suppliers are encouraged to report observed illegal or unethical behavior to GTT Human Resources, GTT Legal or any of GTT's executive officers. The company also maintains an Ethics and Compliance Helpline for anonymous reporting of violations or suspected violations that can be accessed at <https://www.safecall.co.uk/report/>.

GTT Values:

GTT is committed to operating within a framework of ethical and professional standards, laws, regulations, internal policies, and the following core values:

- Curious: We proactively look for better ways to support customers and colleagues
- Collaborative: We build better solutions when we work together
- Committed: We stay focused, honor our promises, and always deliver
- Consistent: We are a trusted partner to customers

Code of Conduct

Compliance with this Code of Conduct, Laws, and Regulations

Suppliers shall comply with applicable local and international laws, rules and regulations and are expected to comply with this Code of Conduct. This includes, but is not limited to, laws related to labor, health and safety, environmental protection, and anti-corruption. To the extent any applicable law or regulation is more restrictive than this Code, such law or regulation shall govern.

Conflict of Interest

GTT is committed to identifying and addressing real and potential conflicts of interests that may arise in the conduct of its business before accepting, commencing, or continuing services. Suppliers must avoid engaging in any activity that would create an actual or apparent conflict of interest regarding their provision of products or services to GTT.

If a supplier becomes aware of an actual or potential conflict of interest that may impact its work for or with GTT or otherwise, the supplier must notify GTT immediately. Depending on the circumstances, suppliers may be required to put in place appropriate measures to manage the conflict of interest or sensitive situation.

Competition, Fair Dealing and Gifts

GTT seeks to compete in a fair and honest manner and expects the same of its suppliers. GTT does not tolerate anti-competitive behavior in any form and seeks competitive advantages through superior performance rather than through unethical or illegal business practices.

Suppliers must not provide gifts intended to improperly influence any person's business judgement or that might create the appearance of undue influence.

Bribery and Corruption

GTT does not tolerate corruption or bribery in any form and expects its suppliers not to engage in any form of illegal or inappropriate activity, including corruption, extortion, embezzlement, or bribery, regardless of the country in which the supplier provides services to GTT. Suppliers are expected to comply with international anti-bribery and corruption standards. Soliciting, accepting, offering, promising, paying bribes, or making other improper payments, including facilitation payments, is strictly prohibited, whether directly or through any third party.

Money Laundering

GTT does not tolerate economic crime, including money laundering and terrorist financing activities.

Suppliers shall not provide any service or enter into any arrangement that facilitates or may constitute GTT being involved directly or indirectly in economic crime, including money laundering activities. Suppliers shall not channel any funds to, or support, illegal activities (e.g., terrorism, tax evasion, fraud).

Insider Trading

GTT does not tolerate trading on, or the inappropriate disclosure of, inside information.

Suppliers shall not engage in insider trading, insider dealing or inappropriate procurement or disclosure of inside information regardless of whether the information was obtained while working for or with GTT.

Sanctions and Export Controls

GTT does not conduct activities nor assist any other party in violating applicable economic sanctions or export control laws and regulations.

Suppliers shall comply with applicable economic sanctions and export control laws and regulations and avoid doing anything that would position themselves or GTT in violation of applicable economic sanctions and export controls.

Hiring, Employment Practices and Wages

GTT is committed to providing equal employment opportunities for all.

Suppliers shall not discriminate against any individual in their employment practices. This includes discrimination based on race, ethnicity, color, age, gender, gender identity or expression, sexual orientation, political beliefs, citizenship, national origin, religion, disability, parental status, economic/class status, veteran status, or any other protected status or characteristic that is not related to the individual's merit or the inherent requirements of the position sought.

GTT is committed to compliance with applicable wage, hour and overtime laws and regulations.

Suppliers shall set working hours, wages and overtime pay in compliance with applicable laws and regulations in the country or countries in which they operate. Suppliers shall pay at least the applicable minimum wage. While it is understood that overtime may be required, GTT expects suppliers to carry out operations in ways that limit overtime to a level that promotes humane and productive working conditions.

Suppliers are fully responsible for the quality, performance, behavior, supervision, and protection of their personnel. GTT retains the right in its absolute discretion to require the removal of any individual from a GTT job site for any reason.

Human Rights and Child Labor

Human rights are inherent to all human beings regardless of race, sex, nationality, ethnicity, religion, or any other status. Everyone is entitled to these rights, without discrimination. Human rights must be always respected and without exception.

GTT is opposed to and does not tolerate any form of child labor. Suppliers shall not use child labor and shall employ personnel who meet the applicable minimum legal age requirement to work in the country or countries in which they operate. GTT operates in accordance with Child Employment laws with a zero-tolerance stance on the exploitation of children, the deprivation of their natural development or education, as well as any negative impacts physically, mentally, or socially.

Human Trafficking and Modern Slavery

Suppliers shall not engage in or support human trafficking or modern slavery, including forced, bonded, or involuntary labor.

GTT suppliers should reject any form of slavery or human trafficking and monitor their supply chain regularly to identify and mitigate any potential risks.

Health, Safety and Wellbeing

GTT is committed to maintaining a safe and healthy workplace in line with internationally declared human rights and expecting the same commitment from suppliers.

Suppliers shall provide a healthy and safe working environment and shall minimize and respond to health and safety incidents and accidents occurring in the workplace.

GTT expects its suppliers to conform to all applicable health and safety laws, regulations, and to industry codes and provide adequate personal protective equipment where required.

Harassment, Discrimination and Equal Opportunity

GTT aims to promote a working environment in which all individuals can make best use of their skills free from discrimination or harassment and expects the same from its suppliers. GTT suppliers must not tolerate any form of discrimination including but not limited to race, religion, disability, sex, and age. Unfair treatment, harassment, or any form of bullying (verbal, physical or psychological) will not be tolerated at GTT, and suppliers are expected to also abide by and uphold these principles within their own organizations.

Freedom of Association and Collective Bargaining

GTT partners and staff have the right to lawfully form and join organizations of their own choosing and peacefully associate.

Suppliers must comply with applicable laws and regulations governing the legal rights of their employees to join or not to join worker organizations, including trade unions, and the right to collectively bargain, if they choose to be represented.

Environmental Stewardship

GTT is committed to minimizing the direct and indirect environmental impacts of its operations and works to continuously improve its environmental performance. GTT has confirmed its ambition to reach net zero by 2035 for Scope 1 and Scope 2 emissions and disclose our Scope 1, Scope 2, and Scope 3 greenhouse gas (GHG) emissions via CDP. GTT aims to promote a more sustainable supply chain and is working towards proactive engagement to mitigate environmental impacts.

These commitments extend to our supply chain, and we expect our suppliers to conduct their operations in an environmentally responsible way. Suppliers must comply with all applicable environmental laws and regulations. GTT expects suppliers to identify and manage the environmental impacts of their organization, to minimize greenhouse gas emissions and to promote environmental responsibility, effective waste management and efficient use of natural resources. GTT may prioritize suppliers that measure their emissions, water and or waste usage, with special consideration for suppliers that have demonstrated a commitment to reduce these environmental metrics to the best of their ability.

Conflict Minerals

Suppliers must ensure that their sourcing of minerals does not contribute to conflict. This includes:

- **Definition:** Conflict minerals refer to tin, tantalum, tungsten, and gold (3TG), which are extracted from minerals such as cassiterite, columbite-tantalite, and wolframite
- **Regulations:** Suppliers must comply with regulations such as the U.S. Dodd-Frank Act and the EU Conflict Minerals Regulation, which require companies to disclose their use of conflict minerals and ensure they are not financing armed conflict
- **Due Diligence:** We expect suppliers to conduct due diligence on their supply chains to determine the origin of conflict minerals and ensure they are sourced responsibly

Confidentiality, Data Protection and Information Security

GTT respects the privacy and confidentiality of information relating or belonging to its clients, its partners and staff and others with whom it does business. GTT protects personal and other confidential information in all forms.

Our suppliers should not use or disclose any information belonging to us, our existing and prospective customers, other suppliers, employees or other third parties, except as required or authorized by us. Suppliers must manage and process all GTT information which they acquire from GTT in accordance with the pertinent Data Protection legislation.

Suppliers must comply with all applicable information security laws and associated regulatory requirements as well as with GTT's information security policies whenever GTT's confidential and

proprietary information, especially personal information, is collected, stored, processed, disclosed, transferred and/or shared. Suppliers must return or destroy GTT's information when the information is no longer necessary for the performance of Supplier's obligations or at the conclusion of its relationship with GTT.

Suppliers shall ensure their Information Security Program a) includes administrative, technical, and physical safeguards consistent with applicable federal and/or state statutes or regulations, b) indicates appropriate GTT information safeguards, c) describes physical security, change management procedures, and privacy policies, d) protects against unauthorized access and anticipated threats, and e) maintains confidentiality, integrity, availability, and disposal, of GTT information.

GTT is committed to protecting information entrusted to it, as well as physical and IT assets, through the development and implementation of information security controls.

Intellectual Property

GTT is committed to protecting its intellectual property and respecting the valid intellectual property rights of others.

GTT expects suppliers to respect the intellectual property rights of GTT and others. This means, for example, that suppliers shall not use GTT intellectual property in a manner that is not authorized by GTT nor other parties' unlicensed software or technology in support of or in connection with work for or with GTT.

Social Media

GTT is committed to using social media platforms responsibly and being courteous and respectful in its online public communications.

GTT expects suppliers to refrain from disrespectful, unprofessional, harassing, defamatory, discriminatory, and prohibited activity on social media platforms. Suppliers shall not act or speak on behalf of GTT, represent themselves as GTT, or express any views attributable to GTT unless expressly authorized to do so by GTT.

Due Diligence, Monitoring and Reporting

GTT is committed to monitoring compliance against its internal standards and policies.

GTT expects suppliers to have processes and controls in place to comply with this 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 expects suppliers to report any violations of this Code of Conduct promptly. We encourage open communication and will address concerns in a fair and timely manner. Helpline for anonymous reporting of violations or suspected violations that can be accessed at <https://www.safecall.co.uk/report/>.

Agreeing to this Code of Conduct

Suppliers who work for or with GTT and its clients and who are in receipt of this Code agree to:

- adhere to the requirements and expectations set out in this Code;
- provide complete and accurate information to facilitate third party due diligence efforts undertaken by GTT; if required; and
- comply with the applicable laws and regulations in the country or countries where they operate.

Date: May 2025