

Sustainable Procurement Policy

Introduction

At GTT, embedding sustainable procurement practices enables us to deepen relationships with our supply chain partners, drive the long-term sustainability of these relationships, and better manage our own regulatory and reputational risks.

Regulations and frameworks the business must comply with or refers to as part of its sustainable procurement practices include:

- Key regulations
- Frameworks e.g. OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Scope and purpose of this Policy

This Sustainable Procurement Policy outlines the principles and standards that we require our business and supply chain to meet. It applies to all aspects of our operations, including procurement, distribution, and business relationships. The Policy encompasses our supply chain globally and extends to all employees, contractors, suppliers, partners, and stakeholders associated with the company – referred to as our 'supply chain partners' in this policy.

We expect our suppliers to use this Policy as a guidance tool to help demonstrate compliance to it through their continuous improvement activity. We will monitor and measure progress of this through our regular business and supplier review process.

Commitment

At GTT, we are committed to robust and sustainable procurement processes. These processes allow GTT to balance cost and quality considerations, uphold human rights, minimize environmental impacts, and promote ethical business conduct. This section outlines the commitments for our employees and supply chain partners to adhere to:

Human Rights

- **Respect and Protection:** We respect and uphold the human rights of all individuals, including workers, communities, and stakeholders affected by our operations and supply chain activities. We expect our supply chain partners and employees to uphold practices that prevent and address human rights violations in all aspects of our business.
- **Labor Rights:** We uphold the rights of workers, including fair wages, safe working conditions, freedom of association, and the prohibition of forced labour, child labour, and discrimination in any form. Our supply chain partners are expected to adhere to the same labour rights standards.
- **Health and Safety:** We require safe and healthy work environments for all employees and supply chain partners with steps taken to prevent injuries, regular health and safety worker training, and implementation of management and reporting systems to monitor performance.

- **Equal Opportunity:** We are committed to supporting, developing and promoting diversity and equality in our own operations and our supply chain activities. We uphold that all workers have the right to employment on an equal basis regardless of race, national or ethnic origin, disability, age, sex, gender, sexual orientation, transgender identity or religion and beliefs. Supply chain partners must adhere to the same standards.

Environmental Sustainability

- **Environmental Protection:** We are committed to minimizing our environmental impact throughout our supply chain. This includes working with supply chain partners, to reduce resource consumption, minimize waste generation, implement circular economy opportunities and promote sustainable practices such as renewable energy use and carbon footprint reduction, where possible. These commitments extend to unnecessary Deforestation and the Loss of natural Habitats.
- **Decarbonization:** We recognize the importance of limiting global warming to 1.5 degrees and decarbonizing our operations. Supply chain emissions are a significant source of our company's overall emissions, and our supply chain partners can play a key role in helping to reduce our emissions.
- **Physical climate risks:** The impacts of more extreme and frequent weather events can create more disruption in our operations and supply chains. We want to work with supply chain partners taking this into consideration and working to make their business more resilient to the impact of climate hazards.

Ethical Business

- **Anti-bribery and Corruption:** We comply with all applicable anti-bribery and corruption legislation and regulation and ensure that employees act responsibly and ethically at all times when conducting business. Supply chain partners must adhere to the same standards.
- **Conflict Minerals:** We will not knowingly purchase conflict minerals (such as in, tungsten, tantalum and gold.) that originate in conditions of armed conflict and human rights abuses. We comply with all applicable laws, regulations and reporting requirements concerning conflict minerals.

Requirements

- Compliance with all applicable regulations and local laws.
- GTT subscribes and report to other mandatory requirements or preferred processes e.g. targets, completing annual questionnaires reporting requirements such as EcoVadis or CDP and encourage our suppliers to do the same.

Implementation

Supplier Agreement: GTT incorporates our Supplier Code of Conduct into all Master Service Agreements or similar master contracting vehicles.

Training and Awareness: We provide training and awareness programs to ensure that all employees and relevant stakeholders understand their roles and responsibilities in upholding our responsible sourcing practices.

Grievance Mechanisms: We maintain accessible and effective grievance mechanisms for employees, suppliers, and other stakeholders to raise concerns or complaints. We commit to addressing and resolving grievances promptly and fairly. Any grievance can be reported to Human Resources or Legal or contact the GTT Helpline at www.safecall.co.uk/report.

Communication and public disclosure of the policy

This Sustainable Procurement Policy will be communicated to all employees, contractors, suppliers, partners, and stakeholders associated with GTT, via our website.

Related policies

This policy should be read in conjunction with:

- Supplier Code of Conduct

Administration and monitoring of the policy

We are committed to continuous improvement in our performance. We regularly review and update our policies, practices, and procedures to reflect evolving legal requirements, international standards, best practices, and stakeholder expectations.

Date: February 2026