GTT Modern Slavery Statement

This statement is written in accordance with Section 54 of the Modern Slavery Act 2015 and is the slavery and human trafficking statement for GTT - EMEA Ltd. (together with its affiliates, "GTT" or the "Company" or "we") for Financial Year 2023 ending on 31st December 2023 At GTT, we strive to maintain the highest standard of ethical principles and to respect human rights, and we are committed to preventing acts of modern slavery and human trafficking from occurring in connection with our business operations, including our supply chain.

This statement describes specific actions taken by GTT to protect against modern slavery and human trafficking.

The organisation's structure, business, and supply chains

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

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

GTT's supplier management functions contract with its suppliers and vendors and conduct due diligence activities.

Policies

At GTT, we strive to maintain the highest standards of ethical principles and respect for human rights, both within our organisation and by encouraging high standards in our supply chain. GTT has continued taking steps to ensure that modern slavery is not taking place in any part of the organisation's business or supply chains, including by incorporating relevant requirements into our company policies. GTT maintains a **Modern Slavery and Human Rights Policy** which sets forth our position and identifies additional relevant policies.

Our **Supplier Code of Conduct** defines the ethical business practices that our suppliers must adhere to. Our Supplier Code of Conduct outlines the minimum standards expected from our valued suppliers and vendors, including those related to strong environmental, social and governance and ethics practices. We also encourage our suppliers to promote initiatives within their own supply chain that are in line with these principles. Our Supplier Code also:

- Forbids the use of child labour and forced labour
- Forbids human trafficking and modern slavery
- Describes how suppliers should work with us on compliance and enforcement issues

It is our general practice to incorporate the Supplier Code of Conduct into our procurement contracts. We also incorporate ongoing compliance into our procurement decisions. All suppliers are encouraged to report observed illegal or unethical behaviour to GTT Human Resources, GTT Legal or any of GTT's executive officers.

The Company also operates a confidential **Whistleblower Helpline** to facilitate disclosure of unlawful or unethical behavior, including human rights violations, in a confidential environment free from fear of

retaliation. The whistleblower helpline is monitored by the Legal Department and can be accessed at https://www.safecall.co.uk/report/.

Risk assessment, monitoring and due diligence

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

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 has and continues to undertake reviews to ensure that our risk management policies are adequate, and we engage outside counsel for input and assessment regarding our practices.

Training about modern slavery

All GTT employees receive annual training on various compliance topics and are encouraged to report observed illegal or unethical behaviour. Our procurement teams also receive training on sustainable procurement and their role in interacting with suppliers to improve our due diligence.

Management approval

This Modern Slavery Statement relates to the financial year ending 31 December 2023 and has been approved for publication in accordance with Section 54(1) of the Modern Slavery Act 2015 on June 26, 2024, by the board of directors of GTT EMEA.

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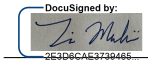

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Timothy Michael Mulieri

Director

GTT EMEA Ltd

Date: 26 June 2024