



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 2025 ending on 31st December 2025

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.

We recognise that modern slavery risks evolve over time and commit to continually reviewing and strengthening our approach in line with emerging risks, regulatory expectations, and industry best practices.

The organisation, business, and supply chains

GTT provides a comprehensive portfolio of secure connectivity and managed network services tailored to the evolving needs of global enterprises and wholesale customers. Our solutions include Secure Connect, SD-WAN, advanced security services, global internet, voice and a broad range of connectivity options.

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.

Our supply chain includes vendors operating across multiple jurisdictions, including regions identified internationally as having heightened risks of labour exploitation. GTT recognises that visibility beyond tier-one suppliers remains an area for continued development.

Policies

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.



GTT encourages employees and third parties to report suspected illegal or unethical behaviour through established channels, including GTT Human Resources, Legal, senior management, or our confidential [Whistleblower Helpline](https://www.safecall.co.uk/file-a-report/), which can be accessed at <https://www.safecall.co.uk/file-a-report/>. All reports can be made in confidence and without fear of retaliation.

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

GTT periodically reviews and updates its policies to ensure ongoing alignment with applicable legislation, international standards, and evolving stakeholder expectations.

Risk assessment, due diligence and monitoring

Risk Assessment

GTT adopts a zero-tolerance approach to modern slavery and recognises that no organisation 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 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.

Training content is periodically reviewed to reflect emerging risks and regulatory developments, and completion rates are monitored to ensure appropriate coverage across relevant employee groups.

Effectiveness and Continuous Improvement

GTT recognises the importance of assessing the effectiveness of its actions to address modern slavery risks. During the reporting period, effectiveness was monitored through indicators such as policy adoption, supplier contractual compliance, completion of employee training, use of reporting mechanisms, and procurement-led engagement activities.

GTT is committed to continuous improvement and will continue to enhance its approach by strengthening supplier risk assessment, expanding due diligence processes where appropriate, and improving internal awareness and reporting mechanisms year on year.

Management approval

This Modern Slavery Statement relates to the financial year ending 31 December 2025 and has been approved for publication in accordance with Section 54(1) of the Modern Slavery Act 2015 on May 27, 2026, by the board of directors of GTT EMEA. This statement will be reviewed annually to ensure it remains relevant and responsive to emerging risks and regulatory developments.

Gina Volk

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Director

GTT EMEA Ltd

Date: 27 May 2026