



Technology for a sustainable world

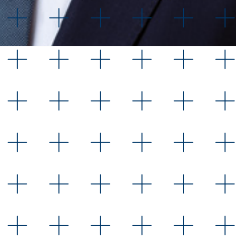
# Ethics charter



**“ We all have  
a responsibility  
to act with  
integrity.”**



# Message from the Chief Executive Officer



Thanks to our spirit of innovation and our passion, we have built up our reputation over decades, **to become a technology leader contributing to the maritime and energy transition.** We innovate to meet global energy requirements, through the transportation of gas resources by sea in a safe, efficient and environmentally responsible way. We support our customers in their energy transition, towards a carbon-free future.

To maintain the trust of our stakeholders and sustainable growth in the long-term, **we must conduct our activities according to the highest ethical and integrity principles,** in line with our mission statement and our basic values.

Each of us, whatever role we play, or entity we belong to, contributes to this commitment through exemplary behaviour in our professional activities.

**The aim of our Ethics Charter is to serve as a practical guide for our everyday conduct.** Please read it carefully and adopt its principles. Do not hesitate to ask questions and seek advice if anything is unclear.

We all have a responsibility to behave with integrity, in accordance with our Ethics Charter, in service of our Group. We're counting on everyone's commitment!

**Jean-Baptiste Choimet**

# SUMMARY

## INTRODUCTION

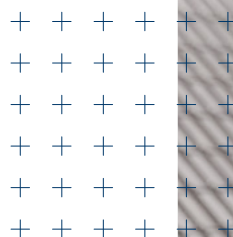
Why have an Ethics Charter?	5
Who is our Ethics Charter for?	
What is its scope of application?	6
How to use our Ethics Charter?	7
How to raise an ethical concern?	8
How to know whether a situation poses an ethical problem?	10

## 1- RESPECTING OUR RULES AND PRINCIPLES OF REFERENCE

Internal rules and principles of reference	13
External rules and principles of reference	13
Human rights and labour standards	14

## 2-PROTECTING OUR EMPLOYEES AND OUR COMMUNITY

Health, safety, quality of life and well-being at work	17
Fair employment practices, equal opportunities	20
Inclusion, non discrimination and promotion of diversity	22
Fighting psychological and sexual harassment and sexist behaviour	24
Protecting the personal data of our employees, customers, suppliers and business partners	26





### ● 3-PROTECTING OUR ASSETS

Quality leadership	29
Intellectual property, know-how, innovations	32
Security and protection of our physical assets	34
Cyber security	36
Confidentiality of information and data security	39
Insider trading, market abuse	42
Transparency and integrity of information, external communications	44
Company image and brand and social media	46

### ● 4-RESPECTING OUR BUSINESS ETHICS

Fighting fraud and corruption	49
Gifts and hospitality	54
Donations, patronage and sponsorship	56
Our rules for working with third parties	58
Conflicts of interest	60
Export controls and international sanctions	62
Fair competition and anti-trust rules	64



### ● 5-DOING BUSINESS RESPONSIBLY

Respecting our commitments for the climate and protecting the environment	67
Respecting our commitments to our stakeholders	69



## Our mission statement

Our mission is to conceive cutting-edge technological solutions for **improved energy efficiency**.

We bring our passion for innovation and **our technical excellence to our customers**, in order to meet their transformation challenges for both today and tomorrow.

The GTT teams are the cornerstone of this mission.

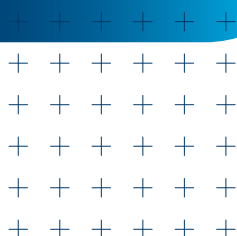
Committed and united, we are determined to **contribute to building a sustainable world**.

## Our values

Our values are at the heart of all our activities, they are the framework for our organisation, our processes and our operations.

- EXCELLENCE
- SAFETY
- INNOVATION
- TRANSPARENCY
- TEAMWORK

## Why have an Ethics Charter?



Our Ethics Charter reiterates the principles and rules for individual and collective conduct **taken from our Mission Statement and our values.**

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Our Ethics Charter specifies the rules and procedures that guide GTT and the entities that it controls (“the Group”) in the performance of its activities **and details its commitments with regard to all internal and external stakeholders.**

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Our Ethics Charter illustrates the behaviour expected from all of us. **It sets out to answer the questions we ask ourselves and to be a guide for the decisions we have to make every day.**

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Nevertheless, no document can consider every situation that might arise. **The golden rule is to talk about it and ask someone. Before you act discuss it with the appropriate people mentioned in the “Your contacts” section on page 7.**

### NOTE

**This Ethics Charter replaces the previous version published in October 2022.**

As the cornerstone of our Ethics & Compliance Program, our Ethics Charter is designed to be updated regularly to take into account changes to the scope of the Group’s activities, legislation and practices, as well as our policies and procedures.

# Who is our Ethics Charter for? What is its scope of application?

## The Ethics Charter applies to all entities in the Group, in France and abroad.

It is integrated, where applicable, into the Internal Regulations and handbooks of each entity in the Group.

## The Ethics Charter applies to all employees (permanent and temporary), and executive and corporate officers of the Group.

## The Ethics Charter also applies to anyone seconded from an outside company to a Group entity.

### AS A GROUP EMPLOYEE, YOU MUST:

- **Understand the subjects covered** in the Ethics Charter and comply with the policies and procedures set out within your entity.
- **Follow the training and awareness-raising programmes** set up by the Group or your entity on the subjects covered in the Ethics Charter.
- **Seek advice** if you have questions about any subject addressed in the Ethics Charter.

### IF YOU ARE A MANAGER, TEAM LEADER, OR EXECUTIVE, YOU MUST:

- **Have an in-depth knowledge of** the subjects addressed in the Ethics Charter, the Group's policies and procedures and those set out by your entity, and promote, through exemplary behaviour, a culture of ethics and integrity.
- **Pro-actively identify and alert**, when needed, risks of non-compliance.
- **Create a working environment of trust** that encourages your employees to share their concerns with regard to ethics and compliance, listen to their accounts and provide appropriate responses.



## SUPPLIERS AND PARTNERS

The Group favours suppliers and business partners who share values and ethical principles similar to those expressed in this Ethics Charter, as set out in their "Supplier and Partner Code of Conduct".

This code sets out the rules and principles on human rights, working conditions, respect for the environment and business integrity, which suppliers and partners of the Group are expected to respect.



# How to use our Ethics Charter

## THE ETHICS CHARTER IS DIVIDED INTO 6 CHAPTERS

Introduction

Respecting our rules and principles of reference

Protecting our employees and our Group community

Protecting our assets

Respecting our business ethics

Doing business responsibly

- **Each chapter has several sections** that specify the ethical rules we must respect and the conduct expected of all of us, detailing what we should and should not do.
- **It mentions our policies and procedures** to which we can refer, as well as the resources available for further information.



### YOUR CONTACTS

**For any questions relating to the Ethics Charter, if you have any doubts or queries that could raise an ethical issue, do not hesitate to contact the appropriate people:** your line management, the Group Compliance Officer, the Group's Ethics & Compliance Division/ Department or your entity's Compliance contact, the Human Resources Division/Department of the Group or of your entity.

→ The Ethics Charter and its translations are available on the **websites** and **Intranet** of the Group entities

# How to raise an ethical concern?

## COLLECTING AND PROCESSING REPORTS

### BASIC PRINCIPLES

The Group encourages speaking up and fosters a culture of dialogue where our employees and other external stakeholders can express their concerns and report situations that are contrary to the values or the Ethics Charter.

#### If in doubt, speak out!

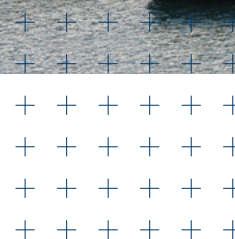
We recognise that it is not always easy to share your concerns, but talking gives us the chance to put things right if necessary, and to ensure that we respect our commitments.

#### The Group protects whistleblowers who make a report in good faith,

i.e. based on information that is as complete, honest and accurate as possible,

even if the suspicions are found to have been wrong. On the other hand, false or bad faith accusations may result in penalties.

**Any retaliatory measures, direct or indirect, against an employee** who has made a report in good faith, even if their suspicions are found to have been wrong, or against employees who participate with good faith and transparency in internal investigations following a report, will not be tolerated and may give rise to penalties which may go as far as termination of the employment contract in accordance with the applicable law.



### NOTE

Within the EU, whistleblowers can also use external channels to file an alert (legal, administrative or other competent authorities listed in the appended local procedures for collecting and processing alerts).

**The Group encourages its employees and other external stakeholders to use the internal reporting channels, as this enables the quick and effective implementation of corrective measures, in strict confidentiality.**



## MAKING A REPORT

**There are different actions you can take, as you deem most appropriate:**

- Speak to your choice of the appropriate people mentioned in the “Your contacts” section.
- Submit your reports via the dedicated platform, at [GTT.integrityline.fr](https://gtt.integrityline.fr).

**Whichever reporting channel you choose, the information transmitted will be handled with confidentiality.**

**If your report is not eligible according to our procedure for collecting and processing reports,** we will redirect you to the appropriate department or service, with your prior agreement, always maintaining the confidentiality of your identity.

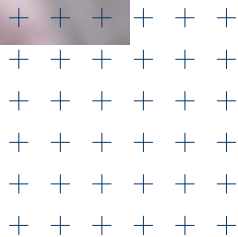
### ✓ DO

- **Ask for help** and never deal with an unethical situation alone.
- **Don't hesitate** to talk to someone you trust.
- As a team manager, **promote a climate of trust** and invite your employees to share their ethical concerns.
- Ensure that any ethical problem is handled in accordance with the Group's internal policies, even if it does not specifically regard your duties.
- **Promote the process for reporting ethics incidents**, no matter which channel is used: [GTT.integrityline.fr](https://gtt.integrityline.fr) platform or others.

### ✗ DO NOT

- **Ignore or neglect a problem** or ethical issue, even if it does not directly relate to your missions.
- **Think that an ethical problem can resolve on its own.**
- **Conceal information** that should be the subject of an alert.

# How to know whether a situation poses an ethical problem?



Does this action/decision comply with the applicable laws, our Ethics Charter, our procedures and instructions?

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Was it taken in good faith, outside any personal interest?

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Could I discuss it openly with a colleague or family member?

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What would happen if this action/decision were published on the Intranet or externally in the press or on social media?

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Would it be deemed appropriate in a few years?

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Could it have a negative impact on the Group or its stakeholders or other people?

## FIND OUT MORE

For more information, see our "Procedure for collection and processing reports".

## YOUR CONTACTS

If you have any queries about the answer to one of these questions, seek advice from the appropriate people: your manager, the Group Compliance Officer, the Group's Ethics & Compliance Division/Department or your entity's Compliance contact, the Human Resources Division/Department of the Group or of your entity.





## IN PRACTICE

**I have just witnessed an action that I think breaches our Ethics Charter, but I'm not sure. I'm reluctant to talk about it because I don't know what to do. Who can I turn to for advice?**

→ We are encouraged to use our judgement to determine the best course of action, but sometimes we might be faced with ethical dilemmas and have doubts or need advice to better understand what to do. Don't hesitate to contact one of the appropriate people mentioned in the "Your contacts" section on the opposite page.

**My line manager said that he was going to resolve delivery delays at any price, and that this would remain strictly between him and our supplier. I'm not comfortable with what he said, and perhaps I misunderstood. I feel nervous about raising the matter with him directly. Should I report this situation and talk about it?**

→ If a situation makes you feel uncomfortable, you should talk about it and not keep it to yourself. You can tell one of the appropriate people mentioned in the "Your contacts" section on the opposite page. The situation

can then be assessed and follow-up actions determined, such as requesting additional information, approaching the supplier to clarify certain points, or implementing corrective and preventive actions as applicable.

**What happens when an alert is triggered?**

→ When an alert is triggered, and when it has met the eligibility conditions, it is reviewed by the Ethics Committee, which decides how to proceed and which investigations to carry out. The investigation which is then carried out remains confidential and protects all parties concerned.

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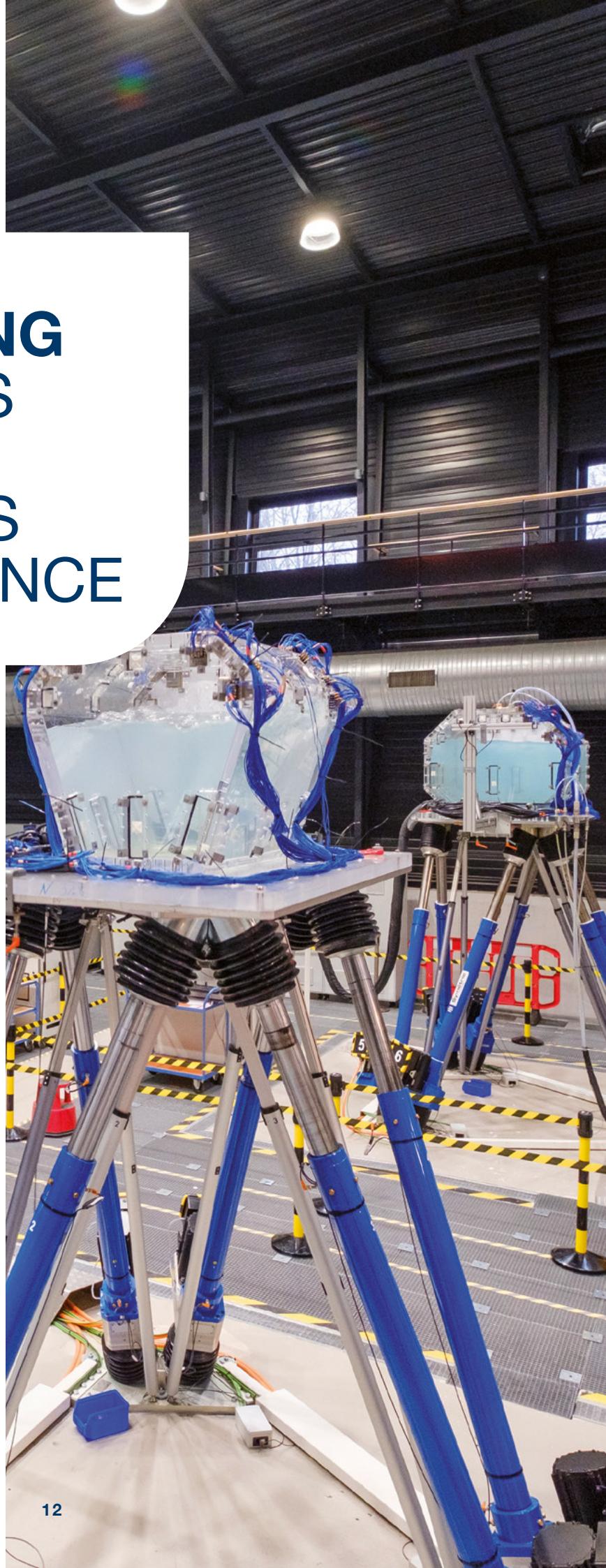
# 1

## RESPECTING OUR RULES AND PRINCIPLES OF REFERENCE

**13**  
Internal rules and  
principles of reference

**13**  
External rules and  
principles of reference

**14**  
Human rights and  
Labour standards





## Internal rules and principles of reference

The cornerstone of our Ethics & Compliance Programme, our Ethics Charter is based on our Mission Statement and on the basic values shared by all companies and employees in the Group.

The result of collaborative work, our Mission Statement expresses our DNA, our vision, our passion. It reflects our commitment to the decarbonisation of our activities and those of our customers, and guides us in the definition and implementation of our mission.

Our values guide us in the performance of our mission and our activities. Whatever our role or entity, we should all strive to embody these values in our everyday behaviour.

Our Ethics Charter forms the basis of our internal thematic procedures, instructions, models, supplier and partner codes of conduct, and other reference documents adopted by the Group for anything regarding ethics and compliance and the rules of conduct that must be respected.

### WHAT HAPPENS IN THE EVENT OF A BREACH OF OUR ETHICS CHARTER?

Respect for laws and regulations, as well as compliance with strong principles of conduct, ensured by the application of our Ethics Charter and the implementation of the Group's procedures, is our individual and collective responsibility. The trust of our stakeholders depends on each one of us, and we are assessed not only on what we do, but also on how we do it.

In the event of a breach of our Ethics Charter, the Group reserves the right to implement measures and sanctions proportional to the seriousness of the offence, which may go as far as dismissal.

#### NOTE

Respect for the rules and principles set out in this Charter is not optional.

## External rules and principles of reference

At any time and place, we are bound not only to respect the laws and rules applicable to the Group's activities, but also to comply with the principles set out in our Ethics Charter.

The Group has reiterated its compliance with the principles set out in the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights

In the context of its approach to sustainable development, the Group has adhered to the principles of the United Nations Global Compact and promotes the 2030 sustainable development goals.

We expect the same commitment from our suppliers and partners in the context of any project carried out with the Group, which is reflected, in particular, by their compliance with our Supplier and Partner Code of Conduct.





# Human rights and labour standards

## BASIC PRINCIPLES

The Group is committed to respecting and protecting internationally recognised social norms, as well as fair labour practices, regardless of the country in question.

We firmly believe that every person should be treated with fairness, dignity and respect regardless of their age, gender, ethnic origin, nationality, religion, disability, marital status, sexual orientation, political opinions, union membership or any other status or characteristic protected by the laws and regulations in force.

The Group respects the right of its employees to form or join unions and to participate in collective negotiation under the applicable laws.

The Group respects the role of social partners, and is committed to transparent communication and negotiation on issues in the collective interest, to giving them the means to carry out their mission, and to not preventing them from playing their role.

The Group does not tolerate any form of human rights violation, any form of illegal or forced labour, particularly child labour or any form of modern slavery.

The Group expects a similar commitment from its suppliers and partners.

### ✓ DO

- Treat every person with **fairness**, dignity and respect.
- Report any kind of human rights violation.
- Promote **social dialogue** to guarantee fair and equitable treatment for all employees.
- Ensure that your **suppliers and partners** comply with these principles.

### ✗ DO NOT

- Ignore or be afraid to report something you think is a human rights violation.
- Work with **stakeholders who do not meet the Group's requirements** with regard to social norms.
- Interfere with **employees' free choice** to form or join an organisation to represent their professional interests.
- Discriminate positively or negatively against union representatives with regard to other employees.

### FOR FURTHER INFORMATION

- International Bill of Human Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact





## IN PRACTICE

**One of our partners, based in a country where it is legal to hire 12-year-old children, employs several 12-year-old children. Is this acceptable for the Group?**

→ No. Group entities do not work with third parties that use child labour. The ILO sets 15 as the minimum age for employment or labour and 18 (16 under strictly defined conditions) as the minimum age for dangerous work. If you have any concerns regarding the practices of a customer, supplier or partner, report these to the appropriate people mentioned in the “Your contacts” section below.

**You receive information that a subcontractor of one of our commercial partners working on one of our industrial sites is using unregistered workers.**

→ If you have any concerns regarding the practices of a partner, report these to the appropriate people mentioned in the “Your contacts” section below. They must carry out an investigation into this commercial partner and take the appropriate measures.

**You receive information that some employees of one of our subcontractors are working in dangerous conditions.**

→ This difficult situation could be a sign of a form of modern slavery. If you have any concerns regarding the practices of a supplier or subcontractor, report these to your HSE manager and to the appropriate

people mentioned in the “Your contacts” section below. They must, where applicable, carry out an investigation into this commercial partner and take the appropriate measures.

**I wonder whether a specific issue requires the involvement of staff representatives. Who can I contact?**

→ You can contact the Human Resources Division/ Department of the Group or of your entity, who will help you clarify the situation.

### FIND OUT MORE

For more information, consult the Group’s Supplier and Partner Code of Conduct

### YOUR CONTACTS

Your manager, the Group Compliance Officer, the Group’s Ethics & Compliance Department, your entity’s Compliance contact, the Legal Division/Department of the Group or of your entity, the Purchasing Division/Department of the Group or of your entity.

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# 2

## PROTECTING OUR EMPLOYEES AND OUR COMMUNITY

### 17

Health, safety, quality of life  
and well-being at work

### 20

Fair employment practices,  
equal opportunities

### 22

Inclusion, non-discrimination  
and promotion of diversity

### 24

Fighting psychological  
and sexual harassment  
and sexist behaviour

### 26

Protecting the personal  
data of our employees,  
customers, suppliers  
and business partners



# Health, safety, quality of life and well-being at work

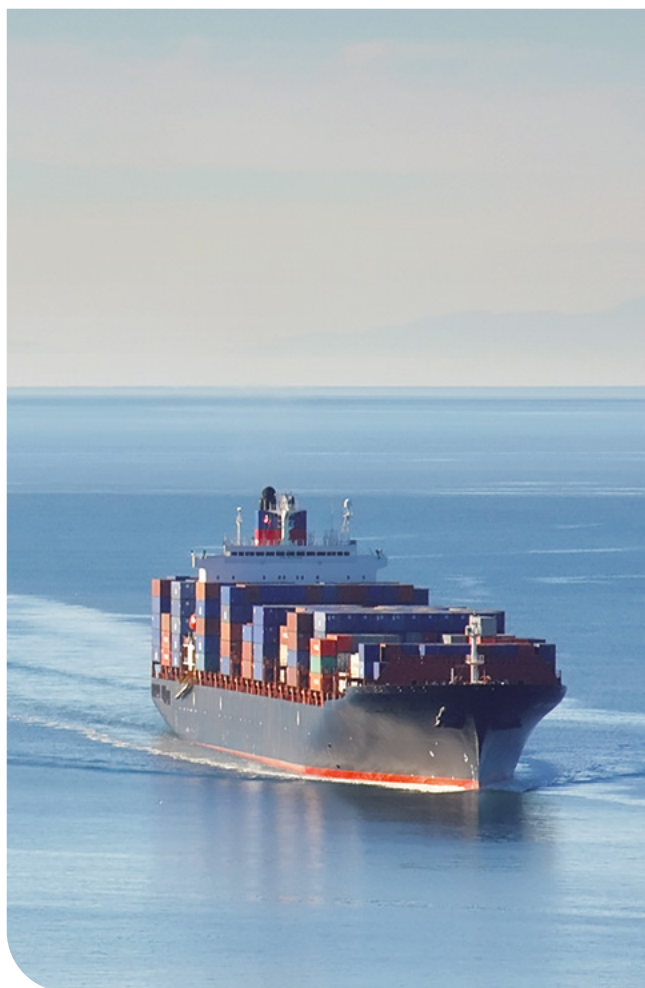
## BASIC PRINCIPLES

Ensuring a safe working environment for all our employees and all the people working at any of the Group's sites is a top priority. The Group has a "zero accident" target for its sites.

The Group makes every effort to ensure that the strictest standards are respected, to offer everyone a safe workplace, prevent and eliminate risks to the health or safety of employees that may arise from the performance of our activities.

The Group promotes a culture of health and safety in which everyone accepts their own share of responsibility. Everyone must follow the training and awareness-raising programmes set up by the Group or their entity and respect the HSE rules.

Any Group employee working on a third party's site must be aware of the third party's applicable HSE rules and comply with them. The Group expects a similar commitment from its suppliers and partners.



## FOR FURTHER INFORMATION

The Group has an HSE (Hygiene, Safety, Environment) policy and golden rules applicable to all its entities.

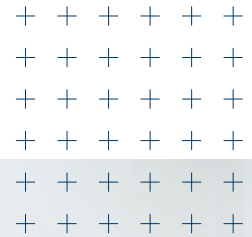
The ISO 45001 standard is the guideline for the Group entities' HSE management systems.

 DO

- **Protect your health** and safety, and the health and safety of others, particularly by alerting them to any dangerous situations.
- **Know the rules** on health and safety.
- **Be exemplary** in your compliance with applicable HSE guidelines and advice.
- **Take into account your employees' concerns** regarding their working conditions and be proactive in improving them.
- **Take care of your work environment**, and the hardware and equipment to which you have access.
- **Alert your entity's HSE manager** whenever you witness behaviour or situations that are potentially dangerous to health or safety in the workplace and report any accidents that happen, however minor.

 DO NOT

- **Ignore the applicable rules and procedures**, compromise on health and safety.
- **Agree to work on a site where no safety rules are established.**
- **Adopt any conduct that could endanger** your own safety or that of your colleagues.
- **Violate the provisions** of the Internal Regulations applicable to us, with regard to prevention and safety at work.
- **Turn a blind eye when others are working in conditions dangerous** to their health or safety, whether they are an employee of the Group, an employee of one of its suppliers or partners, or any other person.



**FIND OUT MORE**

For more information, consult the Group's HSE Policy and the 10 HSE rules as well as your entity's agreement on remote working and the right to disconnect.

**YOUR CONTACTS**

Your manager, the HSE manager of your entity, the HSE Division/Department of the Group or of your entity.





## IN PRACTICE

### What to do in the event of an accident?

→ You must take all the immediate measures required to avoid any additional damage and seek the necessary help, particularly by contacting your entity's workplace first aiders. You should then alert and report the situation to your manager and your entity's HSE manager. You should also record this event so that the lessons learnt from your accident can prevent it from happening again.

### What to do in the event of a safety risk?

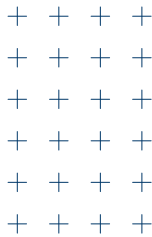
→ You should immediately stop your activity and ensure your own safety and the safety

of others before resuming your work. You should also alert and report this situation to your manager and your entity's HSE manager so that this situation does not happen again.

**One of your colleagues, who often works remotely, shares with you their struggles with work/life balance, telling you that they think work is encroaching on their private life.**

→ You should encourage them to raise this point with their manager, with their entity's HSE manager or with the Human Resources Division/Department of the Group or of their entity.





# Fair employment practices

## Equal opportunities

### BASIC PRINCIPLES

The Group offers equal employment opportunities to all its employees and all qualified candidates, to ensure that everyone can contribute and succeed within the Group.

All decisions relating to the hiring, performance evaluation, promotion, compensation and development of employees are made solely on the basis of objective criteria such as merit, professional qualifications, performance and other professional skills.

The recruitment, training and personal development of people from different backgrounds are a major asset for the Group, which recognises and values these differences.

Only the skills and experiences of the candidate, along with their adherence to the group's values, will be considered during recruitment.

In no case do the age, gender, ethnic or national origin, religion, disability, marital status, sexual orientation, political opinions or trade union membership of a candidate constitute selection criteria.

#### ✓ DO

- Assess candidates and employees on the basis of their merit and achievements, in relation to their skills and professional performance.
- As the person responsible for recruitment, be aware of your biases and implement mechanisms to circumvent them.

#### ✗ DO NOT

- Reject a candidate for reasons unrelated to the requirements of the position.



## IN PRACTICE

**My service is currently recruiting new employees. I heard that some candidates were rejected for reasons unrelated to the requirements of the position.**

**Can I report this problem and challenge the selection process?**

→ Yes, you are encouraged to talk about it. You can contact the Human Resources Division/ Department of the Group or of your entity, to share your queries.

However, remember that an application can be rejected for reasons relating to security, a conflict of interest or for legal reasons.

Guaranteeing fair hiring practices in an inclusive work environment is a key objective to which we can all contribute.



### YOUR CONTACTS

Your manager, the Human Resources Division/Department of the Group or of your entity.



# Inclusion, non discrimination and promotion of diversity

## BASIC PRINCIPLES

The Group is committed to promoting equality and diversity for an open and inclusive corporate culture.

The Group prohibits and denounces any form of discrimination related to age, gender, ethnic origin, nationality, religion, disability, marital status, sexual orientation, political opinions, union membership or any other status or characteristic protected by the laws and regulations in force.



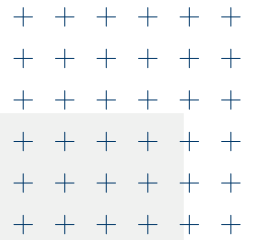
### ✓ DO

- Promote diversity within your teams.
- Contribute to creating and maintaining an inclusive working environment.
- Treat everyone with dignity, without favouritism and with respect for their private lives.
- Assess each employee on the basis of their professional performance, regardless of any criteria concerning their private life.

### ✗ DO NOT

- Treat any contact (employee, candidate, customer or supplier) differently because of their age, gender, appearance, ethnic origin, nationality, religion, disability, marital status, sexual orientation, or any other status or characteristic protected by the laws and regulations in force.
- Make inappropriate comments to your colleagues with regard to their age, gender, appearance, ethnic origin, nationality, religion, disability, marital status, sexual orientation, or any other status or characteristic protected by the laws and regulations in force.
- Prejudge or stereotype an employee's skills or commitment because of their personal situation.
- Ignore signs of discrimination around you.





## IN PRACTICE

**In our service, one of the managers gets carried away easily and sometimes mistreats employees. I wonder whether I should report it. Does the Group punish this kind of behaviour?**

→ Yes, you should report this problem to the appropriate people mentioned in the “Your contacts” section below. We must all demonstrate professionalism and treat our colleagues with dignity and respect.

**I want to promote a member of my team, but that person has told me she is going to have a baby. I don’t think she will be able to commit sufficiently to her new roles with a small child.**

**Can I go back on my decision?**

→ No! Having a child does not mean that a person will be less committed to their work. This decision, based on non-objective criteria, would constitute discrimination and expose you to penalties.

**My manager wants to recruit a new person to their team. But they are rejecting applications from people over 50. Do they have the right to do this?**

→ No! Refusing to recruit someone because of their age is discrimination. You can speak to them directly, or contact one of the appropriate people mentioned in the “Your contacts” section below.

**I’ve noticed that one of our employees is always sidelined by the other members of their team due to their sexual preferences. Who can I report this problem to?**

→ The Group encourages you to report this problem to the appropriate people mentioned in the “Your contacts” section below.

### YOUR CONTACTS

Your manager, the Harassment contact(s) of your entity, the Human Resources Division/ Department of the Group or of your entity.

# Fighting psychological and sexual harassment and sexist behaviour

## BASIC PRINCIPLES

The Group does not tolerate any form of psychological harassment, sexual violence or sexist actions.

These unacceptable behaviours violate fundamental human rights.

The Group in general condemns any action contributing to the creation of a threatening climate in the working environment.

In these cases, whichever entity is concerned, the Group is committed to taking the necessary disciplinary measures, including dismissal in the event of non-compliance with the rules.

These measures are not exclusive of the civil and criminal liability incurred by the perpetrator of the harassment under the laws and regulations in force.

### DO

- Ensure that you behave respectfully and professionally towards your colleagues and in any other working relationship, with people of all genders, to ensure a healthy, respectful, welcoming and supportive professional environment.
- Report any sexist actions, acts of sexual harassment or sexual aggression towards you or towards one of your colleagues.

### DO NOT

- Engage in any sexist actions, acts of sexual harassment or sexual aggression towards any of your colleagues.
- Contribute, actively or passively, to creating a working environment that is conducive to sexism.



## FOR FURTHER INFORMATION

### WHAT IS HARASSMENT?

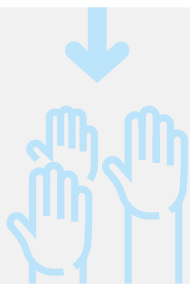
Harassment is defined as a set of comments and actions with the intention or effect of degrading the quality of life of the person to whom they are directed.

**There is a distinction between sexual harassment and psychological harassment.**

**Sexual harassment** is the act of repeatedly imposing on a person comments or behaviour with sexual connotations which either undermine their dignity because of their degrading or humiliating nature, or create an intimidating, hostile, or offensive situation for that person.

**Psychological harassment** is the act of harassing another person using repeated words or behaviour with the intention or effect of degrading working conditions in a way that is likely to infringe on their rights and dignity, harm their physical or mental health or compromise their professional future.

The definition of harassment may vary by jurisdiction. The Group complies with the harassment laws applicable in each country where it operates.



## IN PRACTICE

**A manager has a tendency to humiliate certain team members during meetings. This situation makes participants feel very uncomfortable and has a negative effect on the work environment. What can I do?**

→ This is an unacceptable situation. Your manager does not have the right to humiliate members of their team. You should let them know how the team feels, with specific examples. If the situation persists, contact the appropriate people mentioned in the “Your contacts” section below to report the situation.

**One of my co-workers will not stop making questionable jokes with racist connotations, which makes me very uncomfortable. I don’t know how to make them understand that this language is not appropriate.**

### Who can I contact?

→ These comments are totally unacceptable in a working environment. More broadly, the Group condemns any act of racism. You should alert your manager or any other appropriate people mentioned in the “Your contacts” section below to make them aware of the situation.

**A colleague regularly receives comments of a sexual nature from one member of the team, particularly about the way they dress. I can see that this colleague is scared to react or inform their manager. Some people in the team think that it’s humour and it’s not serious, but I disagree. What should I do in this case?**

→ This behaviour is considered sexual harassment. Sexual harassment is abusive and can in no case be handled with humour. Everyone has the right to be treated professionally, with respect, decency and dignity. Don’t hesitate to speak to a manager and/or the appropriate people mentioned in the “Your contacts” section

below. If your entity has a harassment contact, you may also contact that person. If it is difficult to talk about it internally, use the dedicated reporting platform: <https://gtt.integrityline.fr/>

**My manager and I have known each other for a long time and he is sometimes a bit too tactile with me. It really bothers me, but I don’t know how to bring it up to him without it affecting our professional relationship. Who can I talk to?**

→ If your entity has a harassment contact, you can contact that person. If it is difficult to talk about it internally, use the dedicated reporting platform: <https://gtt.integrityline.fr/>

### YOUR CONTACTS

Your manager, the Harassment contact(s) of the Group or of your entity, the Human Resources Division/Department of the Group or of your entity, the Group Compliance Officer or the Group’s Ethics & Compliance Department, or your entity’s Compliance contact.

# Protecting the personal data of our employees, customers, and business partners

## BASIC PRINCIPLES

The Group places the highest importance on respect for people's private lives and is committed to complying with the applicable laws on the protection of personal data particularly the General Data Protection Regulation (GDPR) of the European Union.

The Group takes all necessary measures to ensure that the personal data of its employees, customers, suppliers and partners, are managed appropriately and in accordance with the Group's instructions as well as the applicable laws and regulations on data protection.

In the performance of your duties, you might have access to other people's personal data. Each employee is responsible for taking measures to prevent personal data from being managed or used inappropriately or disclosed to unauthorised third parties.

### YOUR CONTACTS

Your manager, the Group Compliance Officer, the Group's Ethics & Compliance Department or your entity's Compliance contact, the DPO of the Group or of your entity.

### ✓ DO

- Follow the training arranged by the Group or by your entity on the collection and processing of personal data.
- Collect and use personal data only if they are necessary for legal and legitimate purposes, i.e. if they are required for your work.
- Control the personal data for which you are responsible, without making multiple copies and protecting them in accordance with the instructions of the Group or of your entity.
- Immediately report any personal data protection breaches to [dpo@gtt.fr](mailto:dpo@gtt.fr), following the procedure for managing personal data breaches.
- Send any request received for the exercise of GDPR rights to the DPO immediately, following the rights management procedure.

### ✗ DO NOT

- Collect and use personal data not necessary for your work.
- Assume that personal data collected for a specific purpose can be used for other purposes.
- Collect sensitive data (about health, for example) if not required by law or without the consent of the data subject.
- Keep personal data beyond the time period necessary for the purposes for which they were collected.





## IN PRACTICE

**I accidentally received a copy of a colleague's ID card by email. This email was intended for the Human Resources Division but was sent to me by mistake. What should I do?**

→ If you receive this kind of information by mistake, as in this case, you should inform the Group Compliance Officer or the Ethics and Compliance Department or your entity's Compliance contact, as well as the DPO of the Group or of your entity, who will instruct you to delete the information and not keep any copies.

**During a Teams call with a supplier, one of my colleagues recorded the conversation on their phone to capture all the details and not have to take too many written notes. We did not inform the participants that the call was recorded. Is this authorised?**

→ No, recording calls or meetings without the participants' consent is not authorised and may constitute a breach of data protection regulations.

**A family member is setting up their own business and asked me to get my colleagues' details to boost their professional address book. Can I give them their names and email addresses?**

→ No, you cannot share this information. Employees' names and email addresses

are personal data can only be processed by the Group for legitimate professional purposes.

**I want to make a photo board showing all the members of my team. Is this possible?**

→ Photos are considered personal data. You should therefore obtain the agreement of everyone concerned before displaying their photo. If one of them refuses, you cannot display their photo.



### FOR FURTHER INFORMATION

#### WHAT IS A PERSONAL DATA?

Any information regarding an identified or identifiable individual. For example: names and surnames, photos, information about professional life (roles, training, activity monitoring, work telephone number and email address), financial information (bank details, card numbers), login details (logs, IP address, user names), location data (movements, GPS data).

#### WHAT IS A SENSITIVE PERSONAL DATA?

Social security number, any health data, any biometric data, union membership, religious beliefs etc.

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# 3 PROTECTING OUR ASSETS

**29**

Quality leadership

**32**

Intellectual property, know-how, innovations

**34**

Security and protection of our physical assets

**36**

Cyber security

**39**

Confidentiality of information and data security

**42**

Insider trading, market abuse

**44**

Transparency and integrity of information, external communications

**46**

Company image and brand and social media





# Quality leadership

## BASIC PRINCIPLES

**The Group prioritises customer satisfaction** based on the quality of its products and services, the transparency and respect of its commitments and the standards, laws and regulations applicable.

**The Group's drive to supply excellent products and services** that are increasingly efficient and reliable and meet the requirements of our customers is reflected in the quality approach taken by the Group.

**The Group is committed to acting with honesty and integrity** in all interactions with its stakeholders, particularly through open and transparent communication on issues of quality.

**The Group promotes a culture of continuous improvement**, where all employees are encouraged to contribute ideas to improve processes and results.

**The Group shares its quality commitments** with its suppliers and partners and encourages the development of sustainable relationships with a view to gradually enhancing the quality of products and services.

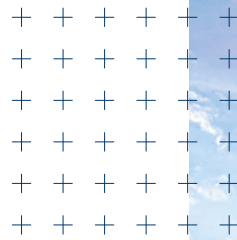
## FOR FURTHER INFORMATION

**The Group has implemented a quality management system** in accordance with the international ISO 9001 standard. GTT is ISO 9001:2015 certified and its subsidiaries follow the same certification process.

The Group continuously assesses the performance of its processes by making periodic assessments to measure performance quality and adapt strategies if necessary.

The Group has a supplier assessment system, which anticipates taking measures against them if they are aware of behaviour that goes against the Group's quality procedures.





**YOUR CONTACTS**

Your manager, the Quality Division/Department of the Group or of your entity.

**FIND OUT MORE**

For further information, consult the Quality Policy of the Group or of your entity and the training documents made available by the Group and your entity.



**✓ DO**

- Follow the requirements of the quality management system.
- Participate with full transparency in internal quality audits and share, as applicable, any discrepancy in relation to the company's standards and the avenues for improvement.
- Inform the Quality Division/ Department of the Group or of your entity of the expression of any failures or concerns regarding one of the Group's products or services, so that it can be handled according to the procedures in force.
- Inform the Quality Division/ Department of the Group or of your entity in the event that any anomalies are found in relation to quality.

**✗ DO NOT**

- Neglect the control procedures or omit the quality control stages of the process to save time.
- Fail to record changes made to designs or processes that could affect the quality of the final product.
- Hide failures during quality tests instead of correcting them, or fail to report problems found during the design or production process.
- Overlook a situation that reveals that providers or suppliers of the Group do not respect quality procedures





## IN PRACTICE



As part of my mission at a shipyard for the construction of LNG carriers, I notice that not all of my entity's quality standards have been met. I inform my usual contact, a specialist technician from the construction shipyard. He asks me to keep this information quiet and offers me a weekend in a luxury hotel in exchange for my silence.

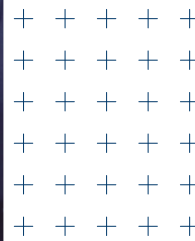
→ You must report to the relevant managers that quality standards are not being met. You must immediately inform the appropriate people, mentioned in the "Your contacts" section on the opposite page, of the solicitation you received.

A supplier has a rating that does not meet expectations, that is below contractual performance indicators, and asks me to be kept on the suppliers panel. How should I react?

→ You must, in this case, inform the purchasing manager concerned, who will set up an action and monitoring plan for the supplier. If the supplier fails to make progress following the quality action plan implemented, the purchasing division may decide to downgrade this supplier and remove them from the panel.

On a visit to a supplier, I find non-compliant parts due to be delivered imminently. The supplier's representative, who I get on with very well because I play football with him, asks me not to say anything about it to the other parties in order to keep the parts delivery on schedule. What should I do?

→ You should report the situation to the Operations Manager responsible for the supplier, and to the Supplier Quality Manager and to the Group's Ethics & Compliance Department or your entity's Compliance contact.



# Intellectual property, know-how, innovations

## BASIC PRINCIPLES

**Our Group is a technologies group.** The Group's intellectual property is therefore a precious asset that each employee, whichever entity they belong to, must recognise and protect.

**The Group's intellectual property** includes, among others, patents, inventions, designs, trademarks, trade names, company names, know-how, trade secrets, logos and copyrights created by Group employees in the context of their missions and responsibilities, or by third parties linked to the Group.

### Protecting know-how is a major challenge for the Group.

Any communication including elements of the Group's know-how must be strictly necessary and given a contractual framework by signing a confidentiality agreement validated by the Legal Division/Department of the Group or of your entity.

**Employees must, in all circumstances, take the necessary measures to protect the Group's intellectual property and know-how** and particularly to refrain from mentioning in public any protected sensitive information.

**The Group respects the intellectual property of third parties** with which it has business relationships.

### DO

- **Have the Group's Intellectual Property Department validate** any use of information that is part of the Group's intellectual property.
- **Ensure that you have the necessary authorisations** before using third party content that would be protected by intellectual property rights.
- **Implement confidentiality agreements** validated by the Legal Division/Department of the Group or of your entity before sharing any confidential information.
- **Respect the level of confidentiality** and labelling of documents defined by the Group's documentary policy.

### DO NOT

- **Make unauthorised use of technical information protected** by patents and copyrights (photographs, logos, images, and other protected content) belonging to third parties, or make copies or plagiarise studies, projects, or publications made by others.
- **Copy third party content** without prior verification of the conditions of use for this content.
- **Disclose technical information** relating to a Group innovation or solution without having first ensured the effective implementation of the mechanisms for its protection.



## IN PRACTICE

**I wonder whether, as part of an ongoing development, the Group might be infringing the intellectual property rights of a third party. What should I do?**

→ The misuse of a third party's intellectual property, whether intentional or not, represents a considerable legal and financial risk for the Group. If you have any queries, contact the Group's Intellectual Property Department who will verify the status of this third party intellectual property right and advise you regarding what action to take. The same applies if you think that a third party is using the intellectual property of the Group, or one of its entities, without authorisation.

**At a business lunch, one of my colleagues started presenting the details of our latest prototype to one of our suppliers.**

**I think this critical information for the Group. What should I do in this situation?**

→ If you take part in this exchange, you should immediately interrupt and remind the speakers that this information is confidential and cannot be exchanged without a confidentiality agreement. If the information has already been exchanged, an email or letter should be sent as soon as possible to the participants, giving the date and place of the exchange, the nature of the information given and noting that this information is confidential and is the property of the Group.

**I work in the Innovation Division. I want to send specifications to a testing laboratory to obtain a quote for services. What precautions should I take?**

→ Before any communication, you must sign a confidentiality agreement that complies with the format defined by your entity, following the rules for approval and signature applicable to your entity.

### YOUR CONTACTS

Your manager,  
the Group's Intellectual Property Department,  
the Legal Division/  
Department of the Group  
or of your entity.



# Security and protection of our physical assets

## BASIC PRINCIPLES

The Group has a set of **tangible assets** (physical properties, premises, offices, workshops and production sites, equipment etc.) and intangible assets (resources, IT tools, data etc.) that we are all required to protect against theft, damage, misuse and improper disposal.

**We are also bound to protect the assets made available to us by third parties** with which the Group works in the course of its activities.

**The Group's assets must be used exclusively for professional purposes** and according to the authorisations for use and access defined by the Group. They cannot be used to gain a personal advantage. It is prohibited to give access to these assets, or allow them to be used by any person not employed or authorised by the Group or one of its entities.

Anyone who needs to access the Group's sites must **be previously identified and authorised**, and wear their access badge so it is clearly visible.

**Providers** who have to work on the Group's sites must respect the Internal Regulations of the Group entity concerned.

**The Group's IT tools and resources made available to its employees for the performance of their missions are the property of the Group.**

Each employee and provider working on Group entity sites **should familiarise themselves with their entity's IT Charter and comply with it strictly.**

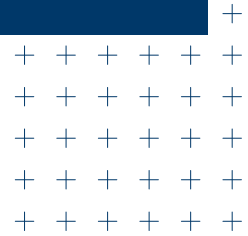
**The misappropriation or theft of tangible or intangible assets belonging to the Group** constitutes a breach of the law which could result in disciplinary measures as well as legal proceedings.

DO

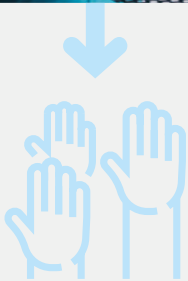
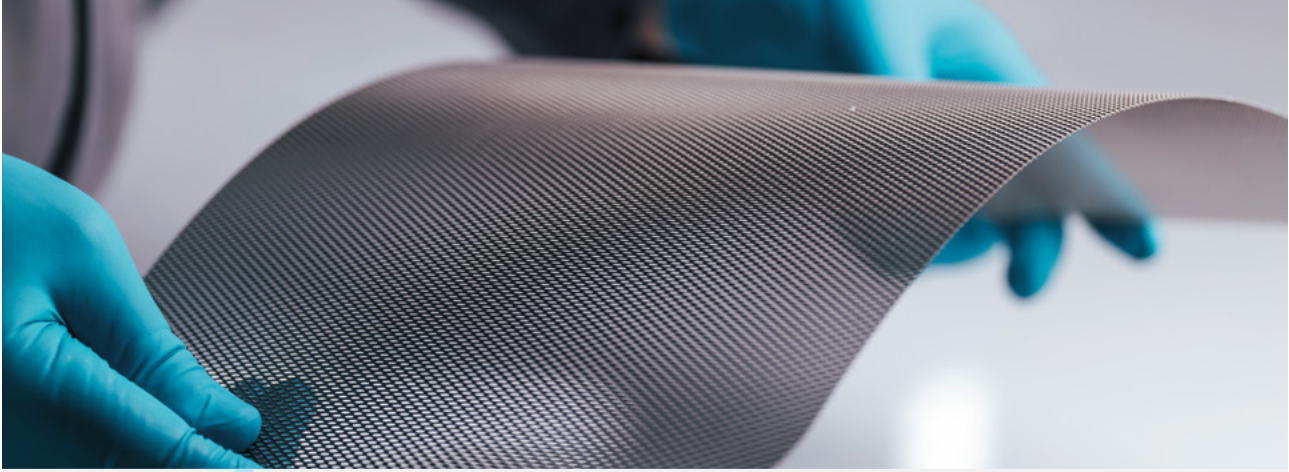
- **Protect all tangible assets of the Group** and its entities (machines on production sites, offices, supplies, computers etc.).
- **Be responsible for the visitors** you receive and never leave them alone on the company's premises.
- **Respect the rules for access** to the Group's sites and third party sites where Group employees are required to work as part of their missions.

DO NOT

- **Lend your access badge** for your entity's site to a colleague or a person from outside your entity.







## IN PRACTICE

**A visitor is stuck at the site entrance to which I have access. What should I do?**

→ You should not grant access to a visitor without having identified and met the person you are due to receive. If you are unable to identify this person, you must accompany the visitor to reception and inform your security contact as well as the general services of your entity.

**A visitor is walking alone through the company premises. What should I do?**

→ You must accompany the visitor to reception and inform your security contact as well as the general services of your entity.

**In my work in my entity's laboratory, I have access to certain tools that I could use to do work at home. Can I borrow them for the weekend?**

→ No, you can't use company resources to do personal work. These tools constitute company assets and are intended to be used exclusively for professional purposes in the context defined by your entity.

**When I'm remote working, I sometimes have to print documents on my personal printer. To cover this need, can I take home reams of paper from the office?**

→ No, because these reams of paper are intended to be used exclusively for printing done on the printers located on the premises of your entity.

### FIND OUT MORE

For more information, consult:

- Your entity's Internal Rules
- Your entity's IT Charter
- Your entity's Provider IT Charter

### YOUR CONTACTS

Your manager, the Information Systems Division or the Information Systems Department of the Group or of your entity, the HSE Division/ Department of the Group or of your entity, the Purchasing Division/Department of the Group or of your entity, and/or the General Services Manager of your entity.

# Cyber security

## BASIC PRINCIPLES

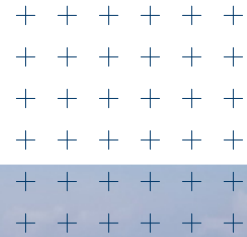
The growing use of new technologies, outsourced solutions, interconnections with service providers and remote connection needs (in remote situations or during business trips) creates new sources of risks for the security of the Group's Information Systems (IS).

**The Group must therefore be prepared to face cyber threats** (e.g. phishing or DDOS type attack, attempted intrusion into the IS by a competitor or enemy country, ransomware etc.), as the impact of a cyber attack on the availability, integrity or confidentiality of data and services of Group entities could be critical.

**The Group's Management is heavily involved in the consideration of Cyber issues** and expects employees using the equipment and tools made available to them in the course of their professional activity, to comply strictly with the rules that their entity has set out on the matter.

**This is why each employee or partner of the Group must:**

- **comply with the IT security rules** in force within their entity;
- **protect and secure** all the confidential information and data made available to them as part of their missions.



### FOR FURTHER INFORMATION

The IT security recommendations are detailed (particularly) in key documents, as applicable, made available by the entity for its employees or partners.

- **The ISSP** (Information System Security Policy), which is the foundational document for cyber management in the entity. This document identifies the applicable security rules ensuring a level of IS security in line with the entity's strategy. The ISSP is validated by the entity's Management and, as applicable, is set out in thematic policies (e.g. Policy on the management of accounts and passwords), charters or operational procedures;
- **The IT Charter**, intended for employees of the Group entity, which defines the access conditions and rules of use for the IT resources for this entity.
- **The IS Provider Charter** which completes the IT Charter and is intended for individuals with a contract for the provision of services with any Group entity and using IT resources made available to them by this entity. This document defines, for providers, the access conditions and rules of use for IT resources within the Group entity concerned.
- **French Cybersecurity Agency (ANSSI) Guides** available at [cyber.gouv.fr](http://cyber.gouv.fr)

### ✓ DO

- **Comply with the directives of your ISSP.**
- **Be vigilant when transporting your belongings** to prevent theft.
- **Use a confidentiality filter on your screen** when handling sensitive or confidential information outside your office.
- **Apply a "tidy desk" policy** and do not leave sensitive or confidential documents in full view on your desk when you are away.
- **Be vigilant when receiving electronic messages** from outside that contain a link or attachment.
- **Use secure means of storage** when travelling.
- **If you have queries about an email,** or in the event of theft (or loss) of hardware and/or data, immediately inform your IS manager.

### ✗ DO NOT

- **Share your password!**
- **Connect to public networks** (WIFI networks in airports, stations, trains, hotels, cafés, restaurants etc.) when travelling for work. These networks are not secure.
- **Leave your belongings unsupervised** when travelling.
- **Throw sensitive and/or confidential documents in an unsuitable dustbin.**
- **Send Group documents from a personal email address** (such as gmail or hotmail).



## IN PRACTICE

**If I am away from my desk for 5 minutes, do I need to lock my session?**

→ If you leave your session open, anyone can see your emails or documents. You should lock your session, even for a short absence.

**At home, I lend my work PC to my spouse or children. Is this authorised?**

→ No, personal use of a work PC is tolerated for you (checking emails etc.) but it is strictly prohibited to let a third person (even a relative) use the PC provided by the Group.

**Can I check my professional emails on my personal phone?**

→ No, this may only be done on a business telephone.

**I need to transfer large volumes of data to a provider. Can I use the USB stick they gave me?**

→ No, the use of a USB stick to exchange data with a provider is not authorised. Contact the appropriate people named in the “Your contacts” section below and they will direct you to a secure alternative solution.

### FIND OUT MORE

For more information, consult:

- Your entity's ISSP\*
- Your entity's IT Charter
- Your entity's Provider IT Charter
- French Cybersecurity Agency (ANSSI) Guides

\* Information System Security Policy.

### YOUR CONTACTS

In the event of problem relating to Cybersecurity, contact the Information Systems Division/Department of the Group or of your entity as quickly as possible.



# Confidentiality of information and data security

## BASIC PRINCIPLES

Any information that has not been made public, is the Group’s internal information and must be protected as such.

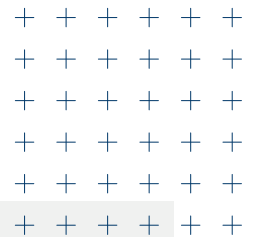
We are all, individually, guarantors of the confidentiality of the information entrusted to us.

**The documentary policy applicable within your entity defines several levels of confidentiality, and therefore of protection,** according to the nature and degree of the sensitivity of the information (personal data, commercial data, technical data, any data relating to the tangible and intangible assets of the Group). All employees of the GTT Group must respect the confidentiality rules that are defined in the documentary policy.

Since much of the confidential information to which employees have access has been digitised, the Group entities have implemented an IT Charter setting out the rules for access and use of digital tools and IT resources.

Every employee may be required, as part of their duties, to manage or hold confidential information of any nature, such as personal data, commercial data, technical data, but also information relating to the tangible and intangible assets of the Group, its activities or strategy, its personnel, or more generally its economic, commercial or legal environment. This confidential information may belong to the Group but also to third parties that are partners of the Group. In any case, all this data must be protected.

**Consult the appropriate people mentioned in the “Your contacts” section on the page opposite if you have any questions about the level of classification and protection of information available to you.**



**REMEMBER**

Before you share any information with a third party, it is essential to:

- ensure that this sharing is required for running of the project. The best protection for confidential information is to control its distribution;
- when the sharing is indeed necessary, or essential, ensure that a confidentiality agreement validated by the Legal Division/ Department of the Group or of your entity has been signed by with the third party, and that this agreement covers the information to be shared;
- continue monitoring the confidential information that is shared, in order to ensure, at the end of the project, that the third party has fulfilled its obligation to return or destroy this confidential information.



 **DO**

- **Identify sensitive information** made available to you (in any way) that needs to be protected and apply your entity's documentary policy, defining the rules for the classification, access and conservation of documents.
- **Verify the classification level** applied to the document to find out its level of confidentiality and ensure that this level of confidentiality is in line with the level of sensitivity of the information.
- **Ensure that the documents are classed** in the classification plans/registers for their level of confidentiality.
- **Only share confidential documents in tools expressly authorised** by the Information Systems Division/Department of the Group or of your entity.
- **Carry out regular audits of the rights to your files** to verify that only authorised people have access to the documents.
- **Share and receive confidential information with third parties only after the signing of a confidentiality agreement** validated by the Legal Division/Department of the Group or of your entity.
- **Apply the "need to know" principle** when you send a message containing sensitive or confidential data. Ensure that all recipients are authorised to receive this information.

 **DO NOT**

- **Share confidential information with people or entities not authorised** to know that information, within or outside the Group.
- **Send documents to third parties without verifying the distribution rules** for their confidentiality classification level.
- **Use, modify or disclose confidential information** belonging to a third party without their authorisation.
- **Leave confidential documents on printers** or in meeting rooms, or on your desk (when you leave your work station).
- **Send third parties your passwords to connect to the company's digital tools.**
- **Grant access to IT tools to people who do not have the resources or level of authorisation required.**
- **Use the information entrusted to you for personal purposes.**
- **Falsify or amend this information** to do harm or for unethical or illegal purposes.
- **Use document sharing tools not authorised by the Group** to exchange documents with a partner or provider.

**YOUR CONTACTS**

Your manager, the Quality Division/Department of the Group or of your entity, the Legal Department of the Group or of your entity, the Information Systems Division/Department of the Group or of your entity.

**FIND OUT MORE**

For more information, consult your entity's IT Charter, your entity's documentary policy and instructions, your entity's quality policy.



## IN PRACTICE

**A friend asks me about the Group's financial health and its current acquisition plans. How can I respond?**

→ Any information that has not been the subject of public communication by the Group is confidential and protected information. You must therefore show prudence and refrain from sharing this type of information externally.

**A colleague does not have access to an IT tool for which I am an administrator. Can I send him my connection details?**

→ You must not share your connection details with your colleague. You can create a new access for your colleague, provided you have received prior confirmation of their rights.

**I want to establish a partnership with a company as part of a future project. Am I authorised to exchange sensitive information with this potential partner during negotiations?**

→ Before exchanging any confidential information, you must ensure that this third party has signed a validated confidentiality agreement.

**I notice that access to the sensitive data from my project is not sufficiently protected. Who should I contact?**

→ If you find that the protection measures are insufficient, you should alert your manager. You should act in the same way if you notice a theft, attempted theft, hacking, intrusion, sabotage or damage. Each of us is a guarantor of the protection of the Group's assets.

**I have just received an email containing sensitive information for the Group. I notice that certain people in my team, who are not authorised to receive information with this level of confidentiality, are copied on this email. What should I do?**

→ You should immediately remind the person who sent the message that they should respect the distribution rules for the confidentiality level of the data shared. You should also secure the commitment of the unauthorised people who received this email, to keep this information strictly confidential.





# Insider trading, market abuse

## BASIC PRINCIPLES

As a French listed company, GTT is subject to European and French law, as well as regulations issued by the Autorité des Marchés Financiers (AMF).

These regulations impose on the Group, its corporate officers, executives and employees, particularly strict restriction obligations when these people know confidential information considered to be especially sensitive, classed as “inside information”.

“Inside information” is (i) precise, (ii) non-public, (iii) directly or indirectly about GTT, one of its entities or the Group in general, and which (iv), if it were made public, would be likely to have a considerable influence on GTT’s share price.

As part of your duties, you may be required to access inside information (for example, budget forecasts; financial income; forecasts; acquisition, sale or equity investment projects; conclusion or non-renewal of a major commercial contract; significant litigation; marketing of a new technology etc.).

Corporate officers or employees holding inside information are bound by enhanced legal obligations in terms of confidentiality and restrictions, as specified in the stock market code of ethics published on the GTT Intranet site.

Any person holding inside information, until this information has been made public by the Group, must refrain from:

- unlawfully disclosing the inside information;
- dealing, directly or indirectly, on their own behalf or on the behalf of others, in GTT shares;
- recommending or encouraging any other person to make any dealingsin GTT shares.

**The violation of these obligations constitutes “insider trading”, exposing the person concerned to administrative and criminal penalties, as well as disciplinary penalties (which may go as far as dismissal).**

## YOUR CONTACTS

**Your manager, the Secretary General, the Group’s Governance Department, the Legal Division/Department of the Group or of your entity.**

## FIND OUT MORE

- For more information, consult:**
- the GTT stock market code of ethics
  - the General Regulations of the AMF



 **DO**

- **Review internal policies** on the prevention of insider trading and ensure that they are always applied.
- **Ensure the confidentiality of inside information in your possession.**
- **Exercise caution** with regard to information about commercial partners, because this information may also be inside information.

 **DO NOT**

- **Buy or sell shares in GTT or another listed company** if you are in possession of inside information at the time of the transaction.
- **Share inside information** with anyone within the Group, third parties including friends or family members.
- **Suggest that a family member or friend buys shares in GTT** on the basis of inside information, even if you make no financial profit from the purchase yourself.



**IN PRACTICE**

**I learnt from a confidential source that the Group is on the verge of buying another company. I would like to buy shares in this company because there is a chance that their value will increase once the agreement is made public. Can I do it?**

→ No. As an employee of the Group there is a possibility that you would be considered an insider, and therefore you cannot buy or sell shares in GTT or the target company until the agreement is made public.

**A shareholder asked me for information about the financial health and future performance of the Group. How can I respond?**

→ You cannot respond to them. You should ask them to contact the Group's Investor Relations Department or the Group's Communication and Public Affairs Division, the only departments authorised to answer their questions.

**I have been invited to a meeting where investors will be present. Can I attend?**

→ You cannot participate in this type of event without the prior express agreement of the Investor Relations Department of GTT.

**At a family gathering, my brother-in-law came to see me and asked me whether he should invest in GTT. He needs money and would like to make a good deal. What can I do in this kind of situation?**

→ As an employee of the Group there is a possibility that you would be considered an insider, and therefore you cannot share inside information or recommend that anyone, even a relative, deal in GTT shares.



# Transparency and integrity of information, external communications

## BASIC PRINCIPLES

In their communication, the Group entities are committed to ensuring that the information provided is accurate, complete, precise, understandable, published in a timely manner and compliant with confidentiality rules.

Any external communication with media outlets or on networks may have an impact on the Group's image, reputation and stock price, and on our employees. It must therefore be examined and controlled with care.

These missions and responsibilities are distributed between the Group's Communication and Public

Affairs Division, which is responsible for coordinating and managing communications with customers, opinion leaders, the public and other external stakeholders and the Group's Investor Relations Department which manages relationships with analysts and investors.

**An employee who wants to speak in public, publish or respond to an interview on a subject that relates to one of the Group's activities, must therefore have prior authorisation** from an authorised person and the content of their communication must have been validated by the Group's Communication

and Public Affairs Division and the Group's Investor Relations as applicable.

Any non-mandated employee can express themselves freely, provided that they first specify that they are speaking or writing in their own name and not in the name of the Group or one of its entities.

Any expression must respect the applicable laws and regulations and comply with the principles of respect for the human person, whatever the vehicle of expression.

### DO

- **Obtain authorisation from your line managers** and the Group's Communication and Public Affairs Division and the Communication Department of your entity before any public communication and verify that the data to be shared are reliable and publishable.
- **Ensure that you only share information previously validated** by the relevant divisions and published by the Group.
- **Send any request for comment from the media to the Group's** Communication and Public Affairs Division, the Communication Department of your entity and the Group's Investor Relations Department.

### DO NOT

- **Supply information to the media without prior authorisation** and without assistance from the Group's Communication and Public Affairs Division, the Communication Department of your entity and, as applicable, the Group's Investor Relations Department.
- **Publicly denigrate the products, services or employees of the Group** or those of a competitor.
- **Agree to speak at a conference without prior authorisation** and without assistance from the Group's Communication and Public Affairs Division, or the Communication Department of your entity.



## IN PRACTICE



**I received a call from a journalist who asked me questions for an article they he is writing. From our exchange, I get the impression that he has inaccurate information about our Group. Who should I contact?**

→ You should put the journalist in touch with the Group's Communication and Public Affairs Division or the Communication Department of your entity who will decide the best way to respond. It is very important that the information supplied to the public is accurate. However, it is also essential for all media relationships to be managed by

the teams in charge of the Group's Communication and Public Affairs Division.

**I was contacted by a media outlet about placing an advert in a magazine specialising in hydrogen that I read often. They gave me a good price and I think the offer is relevant. Am I entitled to accept?**

→ No, it would be preferable to send the request to the Group's Communication and Public Affairs Division or the Communication Department of your entity who will judge the relevance and will be able to provide the elements to the media outlet.

**I am contacted by telephone by a journalist who wants to interview me about the Group's strategy. Can I answer their questions spontaneously?**

→ You should never answer a journalist's questions immediately. It is essential to send the request to the Group's Communication and Public Affairs Division or the Communication Department of your entity who are authorised to manage this type of request.

### FIND OUT MORE

For more information, please refer to the social media guide.

### YOUR CONTACTS

Your manager, the Group's Communication and Public Affairs Division, the Communication Department of your entity and the Group's Investor Relations Department.



# Brand image and social media

## BASIC PRINCIPLES

The brand image and reputation of the Group, and of each of its entities, constitute one of the foundations of the Group's value.

Employees should therefore always bear in mind that they are representatives of the Group, regardless of the place and circumstances in which they perform their activities. Whether on the premises of Group entities, travelling for work or during their missions on sites where they are asked to work, Group employees must focus on promoting the brand image and interests of the Group through their actions and behaviour.

Every employee of the Group, whichever entity they belong to, must protect the image and reputation of the Group through professional and prudent management of communication with regard to the media, and particularly when they distribute information about the Group on internal or external social media.

For the Group, social media is a tool that allows information sharing and participation in industry network activities.

**The distribution of confidential, proprietary, insulting, offensive or degrading information relating to any employee, of the Group or one of its entities is prohibited.**

Any external distribution must be validated by the Group's Communication and Public Affairs Division, the Communication Department of your entity and the Group's Investor Relations Department, as applicable, and comply with laws and regulations, particularly those regarding data protection, when you publish photos of people or groups.

### ✓ DO

- Show prudence when mentioning the Group, its entities, activities or employees on social media.
- Only repost content that has already been posted on a company account, perhaps with a brief introduction using the official wording.
- In the event of a controversy or negative comments about the Group, inform the Group's Communication and Public Affairs Division or the Communication Department of your entity.
- Redirect anyone asking a question about one of the Group's products or services or a job advertisement to the right contact.

### ✗ DO NOT

- Post photos/videos of designs, products or services, or Group entities' sites on social media, unless reposting an official communication.
- Post photos/videos of partners, customers or any recognisable person without having obtained prior written authorisation to share personal data.
- Reply to any comments regarding legal issues, litigation, or any party involved in litigation involving the Group.
- Publish confidential information about the Group's projects, works or creations.
- Publish discriminatory, hateful, defamatory or insulting content.

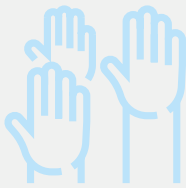


### FIND OUT MORE

For more information, please refer to the social media guide.

### YOUR CONTACTS

Your manager, the Group's Communication and Public Affairs Division and/or the Communication Department of your entity and the Group's Investor Relations Department.



## IN PRACTICE

**An unhappy customer left a comment on my entity's LinkedIn page regarding a problem with one of our products. Can I reply to them to try to resolve the problem?**

→ No, you should not reply directly to negative comments from customers on social media. Report this comment to the appropriate people mentioned in the "Your contacts" section above. They are authorised to give an official response.

**An influential blogger has published an article strongly criticising one of the Group's new products, with inaccurate information.**

**As an expert on this product, I want to reply to set the record straight. What should I do?**

→ You should not comment or reply to this article yourself. Send it to the Group's Communication and Public Affairs Division or the Communication Department of your entity who will decide the best way to respond officially, as applicable. As an employee, you cannot speak on behalf of the Group on social media.

**Can I share a photo of me on my entity's site with my friends on social media?**

→ Only authorised people are allowed to take photos on the production sites and share them. These photos should in no case be shared from a private account on social media. This is essential for protecting our intellectual property and the value of our brand.

**A journalist contacted me for information about one of the Group's ongoing confidential projects. I can't tell them anything but I would like to at least confirm that the project exists. Can I do it?**

→ No, you must never make any comments about the Group's confidential projects. Confirming or denying their existence may constitute a breach of confidentiality. Send the request to the appropriate people mentioned in the "Your contacts" section above.

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# 4 RESPECTING OUR BUSINESS ETHICS

**49**

Fighting fraud  
and corruption

**54**

Gifts and hospitality

**56**

Donations, patronage  
and sponsorship

**58**

Our rules for working  
with third parties

**60**

Conflicts of interest

**62**

Export controls  
and international sanctions

**64**

Fair competition  
and anti-trust rules



# Fighting fraud and corruption

## BASIC PRINCIPLES

**Acting with integrity in all circumstances is a part of our values and warrants the trust of our partners and stakeholders in the Group.**

The Group has set up a system for the prevention and detection of corruption and influence peddling.

We apply a zero tolerance policy and prohibit all forms of corruption (active or passive, direct or indirect), fraud, influence peddling, and in general any action contrary to probity in its business relationships with public officials or private sector players.

The Group and its employees are committed to respecting and applying anti-corruption laws, and to strictly refusing any form of corruption and influence peddling, even if this leads the Group to refuse contracts and the related revenue.

The Group's Supplier and Partner Code of Conduct defines the levels of requirement with regard to integrity and transparency, which its suppliers and partners must adopt and implement.

The use of third party intermediaries is a part of classic corruption scenarios and calls for increased vigilance in particular when they are public officials. In the context of our corruption risk prevention policy, we have implemented an assessment policy for third parties to ensure that they are not the subject of any controversy or accusation, particularly with regard to integrity.



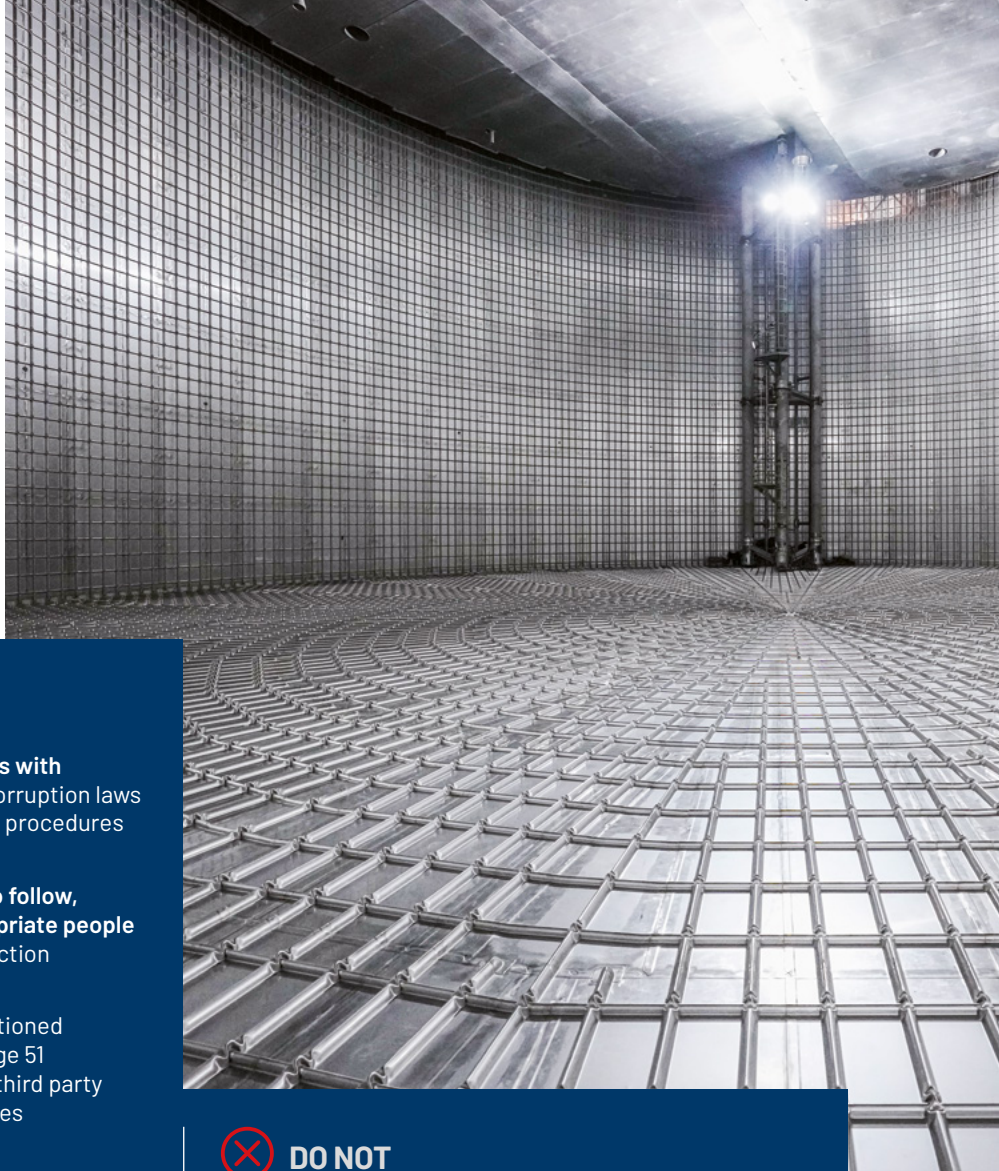
## WHAT IS CORRUPTION?

An act of active corruption is constituted by a person proposing, without the right to do so, at any time, directly or indirectly, offers, promises, donations, gifts, or advantages of any kind to a public official or to any private sector player, so that they perform or refrain from performing, or because they have already performed or refrained from performing, an act within their activity, role, mission, or mandate, with the aim of obtaining or retaining business, contracts or any form of undue advantage.

An act of passive corruption is constituted by a person soliciting or accepting, without the right to do so, at any time, directly or indirectly, offers, promises, donations, gifts, or advantages of any kind, for themselves or for others, in exchange for performing their role.

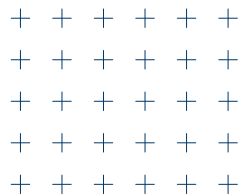
The actions of the corrupter (active corruption) and those of the corrupted (passive corruption) can be prosecuted and tried separately and the punishment of one is in no way conditioned by the penalty awarded to the other.





 **DO**

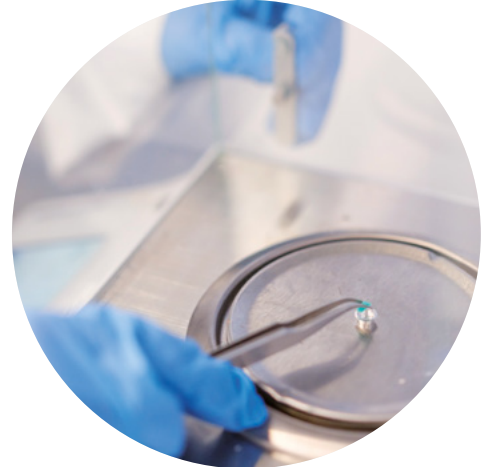
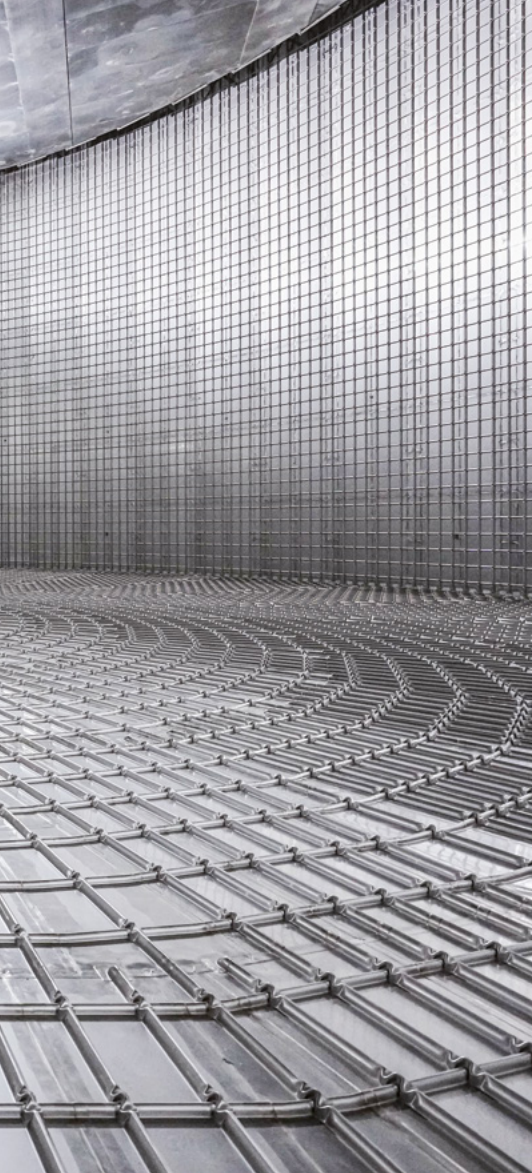
- **Conduct your professional activities with integrity**, complying with the anti-corruption laws in force and the Group's policies and procedures regarding ethics and compliance.
- **If you are unsure what procedure to follow, don't hesitate to contact the appropriate people** mentioned in the "Your contacts" section on page 51.
- **Inform the appropriate people** mentioned in the "Your contacts" section on page 51 if a customer, supplier or any other third party requests or solicits undue advantages or payments.
- **Seek advice from the appropriate people** mentioned in the "Your contacts" section on page 51 if you have any queries regarding payments you have been asked to make.
- **Use the reporting channels in place** to report any act of corruption or any attempt to conceal an act of corruption.
- **Participate regularly in all the training specifically designed for your role** by the Group and your entity, and don't hesitate to ask the appropriate people mentioned in the "Your contacts" section on page 51 if you have any questions.



 **DO NOT**

- **Make payments or offer objects or items of value** (such as gifts, loans or discounts), incur excessive hospitality expenses or use the Group's funds or assets to influence a decision inappropriately, under any circumstances.
- **Offer anything of value giving the appearance of a breach of ethics.**
- **Supply anything of value for the purpose of obtaining or maintaining an undue advantage.**
- **Act in a way that does not comply with local legislation** or the rules and directives of the customer company regarding business conduct.
- **Go through a third party intermediary to solicit or make promises or payments that do not comply with the Group's policies and procedures.**
- **Discover that your customer or supplier is the subject of a fraud or corruption investigation and not tell anyone** or take any action.
- **Contract with a customer, supplier or partner without having first carried out an assessment.**
- **Give the impression that only our suppliers and partners are responsible for breaches of ethics** committed as part of activities performed for our benefit or in our name.





### YOUR CONTACTS

Your manager, the Group Compliance Officer, the Group's Ethics & Compliance Department or your entity's Compliance contact.



### WHO SHOULD BE CONSIDERED AS A PUBLIC OFFICIAL?

"Public official" is a generic term that should be interpreted broadly and refers, in particular, to any person working for a public body, elected public representatives or candidates of a political party, but also employees of state-controlled companies or employees of international organisations.

For example, regulatory bodies consider the following people to be public officials:

- Any employee or former employee, official agent, contractor, consultant or representative of a public or state-controlled enterprise.
- Any agent or elected representative appointed by the State.
- Any employee or former employee, official agent, contractor, consultant or representative of a government or administration, public or state-controlled enterprise.
- Any employee or former employee, or any person acting in the name of or on behalf of an administration, agency or public enterprise, or performing a government role, such as a regulatory or tax officer.
- Any political party, agent, employee or person acting on behalf of or in the name of a political party, or a candidate for public office.
- Family members and close relatives of any of the aforementioned persons.



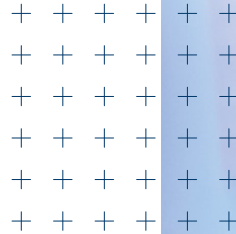
## WHAT IS INFLUENCE PEDDLING?

Acts constituting active influence peddling include “proposing” (directly or indirectly) offers, promises, donations, gifts or advantages of any kind to a person holding public authority, charged with a public service mission or invested with a public elective mandate, for themselves or for others.

- Either for them to perform or refrain from performing, or because they have performed or refrained from performing, an act within their role, mission, or mandate or an act facilitated by their role, mission or mandate;
- Or for them to abuse, or because they have abused, their real or supposed influence in order to obtain from an authority or a public administration, distinctions, jobs, markets or any other favourable decision.

Acceptance or solicitation of these offers, promises, donations, gifts or advantages of any kind for the same purpose by a person holding public authority, charged with a public service mission or invested with a public elective mandate, for themselves or for others, constitutes an act of passive influence peddling.

Influence peddling is a criminal offence.



### FOR FURTHER INFORMATION

- **The 1997 OECD Anti-Bribery Convention**
- **The 2016 SAPIN II law** on transparency, anti-corruption and modernisation of economic life,
- **The 2010 UK Bribery Act,**
- **The 1977 Foreign Corrupt Practices Act (FCPA)** of the United States of America.
- **The violation of these laws constitutes a serious offence** that may incur heavy fines and penalties for the Group and for its employees, individually.

### FIND OUT MORE

**For more information,** consult:

- The Third Party Assessment Procedure
- Commercial Consultant Assessment Procedure
- The Commercial Consultant Assessment Procedure
- The Supplier & Partner Code of Conduct



## IN PRACTICE

**To develop our activities in the Middle East, we need a local consultant. I think I have found the perfect candidate. He is very well placed in the gas and maritime sector in the region, he already has business relationships with potential customers, and is said to be very close to members of Government. He assures me he is indispensable if we want to do business in the region.**

→ The Group has established policies and procedures on the fight against corruption that make provisions for conducting assessments and due diligence on our potential high risk partners before committing ourselves to a commercial relationship with them. Even if this candidate tells you that they are indispensable, they must go through the assessment process. You should therefore contact the appropriate people mentioned in the “Your contacts” section on page 51 so that the

candidate can be assessed according to the Group’s procedures.

**A representative of one of our biggest Korean customers requests an internship for their son. Can we accept their son on an internship?**

→ Be very prudent, because according to anticorruption, laws, this offer of an internship could be considered an “item of value” offered by the Group to obtain an undue advantage from a public official. Therefore, give your contact the steps to follow to make an official application. Only the Human Resources Division/Department of the Group and of your entity are authorised to offer internships according to the candidates’ level of education and the needs of the Group.

**During a site inspection, I notice that certain installations do not comply with our specifications. The technical manager of the site asks me not to report this non-compliance, saying that safety was not in question. He ends by offering me an all-expenses-paid weekend at a very nice hotel in the region.**

**This situation makes me very uncomfortable. Who can I talk to?**

→ Such an arrangement would constitute an offence of passive corruption. Immediately contact your manager and the appropriate people mentioned in the “Your contacts” section on page 51 regarding the solicitation you received.

**In the context of submitting a joint offer with a partner, we were informed, via our partner, that the customer could guarantee us the business in exchange for a certain amount of money. Our partner said that they could add this amount under an additional “miscellaneous” item on a future invoice. Is this arrangement acceptable?**

→ No, this type of payment is intended to exert an inappropriate influence on a decision and is considered a bribe. Payments of this type are illegal. You must give your partner a firm refusal, and inform your line manager, the appropriate people mentioned in the “Your contacts” section on page 51.

# Gifts and hospitality

## BASIC PRINCIPLES

The exchange of gifts or invitations can contribute to maintaining good commercial relationships with our customers, suppliers and subcontractors. However, certain gifts or invitations are not appropriate for a business relationship and are strictly prohibited (cash donations, gifts of an excessive value or questionable nature).

In general, the value of gifts and invitations must remain symbolic and transparency must be the rule.

They should in no case seek to influence, or give the impression of influencing, a commercial decision.

Discernment and prudence must therefore be used with regard to the gifts and invitations offered, granted to or received from customers, suppliers and other partners.

Group employees must comply with the laws and regulations applicable on the subject in each country where the Group operates.

Certain subsidiaries or commercial partners can apply stricter rules with regard to gifts and invitations.

We always apply the most restrictive rule, where relevant.

Depending on their amount, prior internal validations must be obtained. Don't hesitate to contact the appropriate people mentioned in the "Your contacts" section above if you have any questions or queries.

## YOUR CONTACTS

Your manager, the Group Compliance Officer, the Group's Ethics & Compliance Department or your entity's Compliance contact.

## FIND OUT MORE

For more information, consult your entity's Gifts and Hospitality Procedure in the Supplier and Partner Code of Conduct.

## DO

- Inform your commercial partner of the Group's policy on gifts and hospitality, as set out in your entity, at the start of any new commercial relationship.
- Request prior authorisation from your line manager before offering gifts or invitations to public officials.
- Respect the approval thresholds defined by the Group, as set out in your entity, for any gift or invitation, before offering or accepting them.
- Accept or offer restaurant invitations only if they are linked to a specific professional event and up to the limit of the amount approved by the Group rules as set out in your entity.
- Immediately declare any gift or invitation, offered or accepted, to the Group's Compliance Department or your Compliance contact.
- Familiarise yourself with the local customs and laws before offering or accepting gifts, invitations or any other advantage.
- Seek advice from the appropriate people mentioned in the "Your contacts" section above if you have any questions or queries.





## IN PRACTICE

**I am organising a technical seminar for customers. Several participants have asked me to organise a guided tour for the group of participants after the session, including accommodation for the weekend. What should I do?**

→ It is normal for the Group to provide reasonable assistance to its customers,

especially if they come from abroad. In this case, the Group may provide logistical support and handle the accommodation bookings mentioned by the customer. However, it is not possible to go beyond and pay the accommodation costs. Consult the appropriate people mentioned in the “Your contacts” section on the opposite page if you have any questions or queries.

**I work in the Purchasing Department and a supplier, with which we are negotiating a call for tender,**

**wants to offer me and my family tickets to a sporting event in a VIP box. What should I do?**

→ You must refuse the invitation. Refer to the Gifts and Hospitality Procedure. This invitation could be perceived as having been made by the supplier with the aim of favourably influencing the outcome of discussions and constitute a disguised act of corruption.



## DO NOT

- Offer or accept, directly or indirectly a gift or hospitality of an excessive, monetary or non-monetary value, addressed to or proposed by a public official, customer, supplier, partner or any other third party.
- Offer or solicit gifts or invitations that would be difficult to justify to your colleagues, line manager, family or media outlets.
- Offer gifts of hospitality, even of a minimal value, at a frequency which could give the appearance of an irregularity when considered in total.
- Accept gifts or invitations from potential suppliers which could make us indebted to the latter, especially during critical periods for making decisions or awarding contracts.

# Donations, patronage and sponsorship

## BASIC PRINCIPLES

The Group has established rules to create a framework for its practices regarding donations, patronage and sponsorship, to avoid them exposing the Group to acts of corruption.

As a responsible company and corporate citizen, the Group fosters the support of local communities in the geographical areas where the Group conducts its activities by making in-kind donations.

All these actions must comply with the global strategy, priorities and values held by the Group entities and have an appropriate purpose. They must not create a real or apparent conflict of interest, or be carried out with the purpose of obtaining an undue advantage.

Donations, patronage and sponsorship operations are specifically subject to a process of prior approval outlined in the Group's rules. The beneficiaries or co-contractors are also subject to due diligence to ensure that these transactions are carried out for the benefit of reliable and reputable organisations.



### ✓ DO

- **Comply with the procedure applicable to donations, patronage and sponsorship operations** and seek advice from the Group Compliance Officer in the event of queries about whether the transaction qualifies.
- **Record every donation, patronage and sponsorship transaction** in the dedicated register to ensure the traceability of these transactions.
- **Inform the Group's Communication and Public Affairs Division**, the Communication Department of your entity and the Group's CSR Department before any transaction to ensure that the donation, patronage or sponsorship action complies with the global strategy, priorities and values of the Group.
- **Verify that the charities and beneficiaries of donations, patronage and sponsorship transactions are not using the funds paid for illegal purposes.**

### ✗ DO NOT

- **Perform any donation, patronage or sponsorship transaction without knowing its real or ultimate beneficiary**, or where prohibited by local legislation.
- **Perform any donation, patronage or sponsorship transaction with the aim of influencing a third party** to obtain an undue advantage.
- **Authorise a third party to approve donations on behalf of the Group or one of its entities**, or conceal a donation transaction in the accounts of the Group or one of its entities.



## IN PRACTICE

**At the end of a mission to clarify our commercial offer, our customer contact (public company) tells us that we will need to contribute to a local charity intending to build a training centre, in order to improve our position on the short-list of competitors. After a quick initial check, I realise that this charity is chaired by his wife. What should I do?**

→ You can ask your contact whether this request is part of a local content obligation, which obeys the transparent rules defined in the call for tender and must apply to all bidders. If not, you should politely refuse,

referring to the Group's policy on donations. The Group refuses to participate in charity for the purpose of obtaining, directly or indirectly, an undue advantage. In this case, this contribution could be interpreted as constituting a disguised act of corruption. Promptly inform the appropriate people mentioned in the "Your contacts" section, they will be able to advise you and/or take the necessary action in such a case.

**The mayor of a municipality where we have just set up our production site, asks me if we can sponsor the municipality's football team. What should I do? Who should I talk to?**

→ Any request for donations, patronage and sponsorship should be addressed to the Group Compliance Officer, who will determine whether

the request falls within the activities supported by the Group, as defined in the Donations, Patronage and Sponsorship Procedure.

### YOUR CONTACTS

Your manager, the Group Compliance Officer, the Group's Ethics & Compliance Department, your entity's Compliance contact, the Group's Communication and Public Affairs Division, the Communication Department of your entity and the Group's CSR Department.

### FIND OUT MORE

For more information, please refer to the Donations, Patronage and Sponsorship Procedure and the Third Party Assessment Procedure.

# Our rules for working with third parties

## BASIC PRINCIPLES

In the performance of its activities, the Group is frequently required to interact and collaborate with third parties. These may be customers, suppliers, distributors, resellers, consultants, commercial agents, partners in joint ventures, service providers or any other third party.

The Group treats its suppliers and partners with fairness and integrity. Purchases of goods and services are based on neutral, transparent and objective criteria in order to guarantee fair treatment for all suppliers whatever the co-contracting Group entity. The Group honours its commitments and respects the conditions set out in orders and contracts signed with

its customers, suppliers and commercial partners.

The Group places the highest importance on integrity and loyalty in its interactions with third parties and puts ethics and integrity at the heart of its values and principles by applying a zero-tolerance policy for any form of corruption or influence peddling.

The Group has implemented and applies strict and detailed assessment and anti-corruption due diligence procedures to ensure that it only works with third parties that follow the same approach.

Every third party is subjected to a rigorous risk-based assessment before entering

into any contractual relationship with the Group.

Monitoring and controls are also carried out throughout the commercial relationship to ensure that the highest requirements for quality and integrity have been and are being met and that the expected value and quality have been supplied to the Group.

### DO

- **Ensure that there is a legitimate need to call on a third party** and that there are no internal resources that could obtain the same result.
- **Check whether the future commercial partner is linked to a public authority** and if so, immediately inform the appropriate people mentioned in the "Your contacts" section on the opposite page.
- **Subject each third party to an assessment before signing any contracts**, in accordance with the Group's applicable procedures.
- **Immediately send the appropriate people** mentioned in the "Your contacts" section on the opposite page any information indicating that a third party presents, or may present, **a risk in terms of ethics**.
- **Ensure that third parties working for the Group have a current and approved contract** in accordance with the Group's procedures as set out in the entity concerned.
- **Before any payment, verify the effective, complete and compliant nature of the commercial partner's services**. If you have doubts, do not proceed with the payment and inform the Group Compliance Officer, or the Group's Ethics & Compliance Department or your entity's Compliance contact.

### DO NOT

- **Attempt to override or bypass the Group's rules and procedures**, particularly with regard to the assessment, selection and monitoring of third parties.
- **Agree to work with a commercial consultant only on the basis of a recommendation** made by a third party or because it is imposed by a third party.
- **Use a supplier, commercial partner or commercial consultant without a contract** or with a contract that does not comply with the Group's rules.
- **Turn a blind eye or fail to report any controversy** or accusation, particularly with regard to integrity, against a third party with which the Group works or envisages working.
- **Pay a third party without having first checked the reality of their service provision** or without an invoice





## IN PRACTICE

One of the suppliers that replied to our call for tender for hardware is offering good products but at a higher price than some of its competitors. Another supplier is not offering the same level of quality but is much cheaper. Can I inform the first supplier of the price proposed by the second company to encourage them to lower their price?

→ No. Exchanging confidential information between competitor suppliers is unethical, as well as being illegal in many countries. However, you may inform the first supplier that you have found better prices elsewhere,

without revealing the price or the identity of the second supplier.

Within a tight deadline, I have to appoint a commercial partner to help us to secure a contract on a new market. Can I conclude the contract so as not to waste time, and carry out the necessary formalities and verification later?

→ No, prior verifications and due diligence, internal validations and a written agreement must be carried out in advance. Refer to the Third Party Assessment Procedure/ Commercial Consultant Assessment Procedure and contact your Ethics and Compliance Manager who will be able to help you. Experienced commercial partners with a good reputation know that these elements must be resolved before work can formally begin.

We want to hire a supplier based on a tip from a customer. We have been informed by our customer that this supplier has a good reputation and that has worked for them for several years. Given that the customer knows and trusts this company, can we hire this company without going through our third party selection and assessment process?

→ No, we cannot hire this supplier without going through the mandatory procedure for the assessment and selection of the Group's suppliers and partners. The Group is committed to treating all its suppliers in a fair and transparent way, applying the same rules for assessment and selection.

### FOR FURTHER INFORMATION

The Group's Supplier and Partner Code of Conduct defines the standards and principles regarding ethics and compliance that the Group asks its suppliers and partners to adopt and respect as a minimum when working with one of the Group entities.

### FIND OUT MORE

For more information, consult:

- Supplier and Partner Code of Conduct
- Purchasing Procedure
- Third Party Assessment Procedure
- Commercial Consultant Assessment Procedure.

### YOUR CONTACTS

Your manager, the Group Compliance Officer, the Group's Ethics & Compliance Department, your entity's Compliance contact, the Legal Department of the Group or of your entity.

# Conflicts of interest

## BASIC PRINCIPLES

The Group respects the personal interest and private life of its employees. However, it is important to avoid any conflict between the interests of the Group and personal interests.

A conflict of interest may arise when a personal interest is likely to interfere with a Group interest and consequently affect our ability to make professional, impartial and objective decisions in the sole interest of the Group.

The perception of conflicts of interest alone can impact the Group's reputation and should be treated as a conflict of interest.

There are many situations that are or could be perceived as creating conflicts of interest.

There may be a conflict of interest if our personal, social, financial or political activities (or those of our family members or people closest to us) come or are likely to come into conflict with our professional responsibilities within the Group.

Our personal interest must not interfere with that of the Group.

We must declare any relationship that could entail a conflict of interest or give the impression of one.

Group employees must not engage in professional activities outside the Group, without specific written authorisation from their line manager or their Human Resources contact.

The existence of a conflict of interest is not a problem per se, if it is declared and managed correctly.

The Group asks all its employees to declare the existence of any conflict of interest when they join the Group and periodically.

If you have any queries or if you are faced with a real or apparent conflict of interest, you should inform the appropriate people mentioned in the "Your contacts" section on the page opposite.

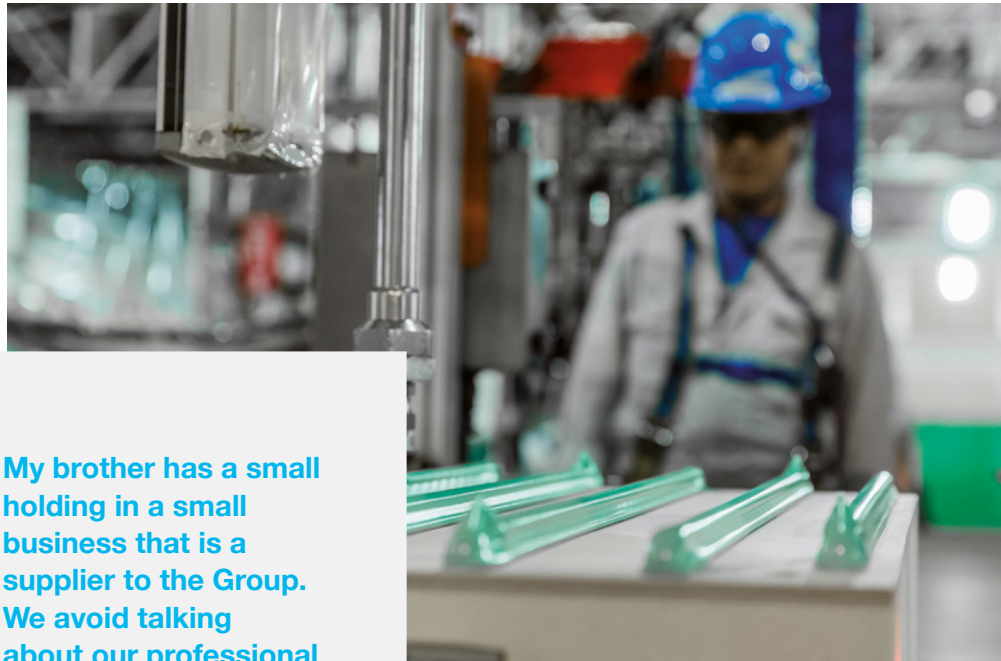


### DO

- Use common sense and act appropriately in all situations where the objectivity of professional decisions could be altered or seem to be.
- Inform your line manager and ethics & compliance manager of an external interest that creates or could give the impression of creating a conflict of interest.
- Immediately declare any change of situation to your line manager and obtain prior authorisation from the Group or your entity before accepting a position in an external business while still working for the Group.
- Respect and implement the decisions taken by your line managers enabling them to manage any conflict of interest situations.

### DO NOT

- Conceal information regarding a real or potential conflict of interest for any reason.
- Put yourself in a situation where personal interests could influence, or appear to influence your professional decisions within the Group.



## IN PRACTICE

**A family member who is currently struggling asked me whether there is any chance of a job within the Group. How can I answer this question?**

→ The Group encourages employees to recommend good candidates. You can encourage this person to submit an application to the Human Resources Division/Department of the Group or of your entity, the only departments authorised to handle the recruitment process. You should avoid interfering in the recruitment process or trying to influence any internal decision on the matter.

**My brother has a small holding in a small business that is a supplier to the Group. We avoid talking about our professional activities and I have never been involved in any decision regarding the selection or assessment of his business. Should I report the existence of this link?**

→ Yes, this link could create the appearance of a conflict of interest. You should inform the appropriate people, mentioned in the “Your contacts” section, of the existence of this link and declare it in writing. Even if in this case there is no direct conflict of interest, the appearance of a conflict could damage the perception of your professional integrity or undermine the reputation of the Group.

### FIND OUT MORE

For more information, please refer to the Conflicts of Interest Prevention Procedure.

### YOUR CONTACTS

Your manager, the Group Compliance Officer, the Group's Ethics & Compliance Department, your entity's Compliance contact, the Human Resources Division/ Department of the Group or of your entity.

# Export controls and international sanctions

## BASIC PRINCIPLES

The Group supplies products, technologies and services in countries around the world.

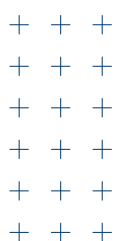
The majority of these countries apply customs regulations, export or importation controls applicable to the products, technologies and services that we supply.

In this complex and changing regulatory environment, the Group is committed to complying with the laws and regulations on international sanctions and import and export controls that apply to the Group.

The Group has implemented procedures that assure strict respect for international sanctions and import and export controls, and regularly assesses these procedures to reflect the state of regulations that may impact the Group.



### ✓ DO



- **Ensure that your project complies with the most recent regulations on international sanctions**, and import and export control. Seek advice from the appropriate people mentioned in the “Your contacts” section on the opposite page if you have any queries regarding the possibility of carrying out your project in strict compliance with these regulations.
- **Regularly review and comply with the Group’s applicable procedures with regard to international sanctions and import and export controls.**
- **Ensure that all specific additional preliminary procedures implemented by the Group have been properly followed on all points.**

### ✗ DO NOT

- **Carry out an import or export transaction without complying with the Group’s procedures on the matter.**
- **Make any commitments to a third party regarding a project in a sensitive country or region without having consulted your line management and/or without complying with the Group’s procedures with regard to international sanctions and import and export controls.**
- **Refrain from verifying information sent by a new partner.**
- **Transport equipment of spare parts in your luggage without having received prior written authorisation from the appropriate people mentioned in the “Your contacts” section on the opposite page.**





## IN PRACTICE

The Group does not export military or dual-use products and technologies. Why should I worry about export controls?

→ The regulations are not limited to military or dual-use products, services and technologies. The list of goods, products, technologies and services subject to international sanctions and/or export controls is long and constantly being updated. Familiarise yourself with the procedures and approach the legal manager or ethics and compliance manager of your entity or of the Group.

A prospect in a sensitive country suggested I sign a confidentiality agreement in order to share information in the context of a very interesting project. Can I do it?

→ No, since this is a sensitive country, you cannot engage in discussions, including regarding a confidentiality agreement, without having previously consulted and obtained the agreement of your line manager and/or the appropriate people mentioned in the “Your contacts” section below.

We urgently need to send computers from France to a customer

based in a country in Asia who is not the subject of any commercial sanctions. Can I go ahead and send them?

→ No, you cannot go ahead and send these before verifying whether the export and import of this equipment is regulated.



### FIND OUT MORE

For more information, consult the Group's International Sanctions Procedures.

### YOUR CONTACTS

Your manager, and the Legal Division/ Department of the Group or of your entity, the Group Compliance Officer, the Group's Ethics & Compliance Department or your entity's Compliance contact.

# Fair competition and anti-trust rules

## BASIC PRINCIPLES

The Group is committed to carrying out all its activities in accordance with the applicable laws on competition and rules on merger controls.

The Group refrains from entering into any agreement with competitors or partners with the intention or effect of:

- fixing prices or margins,
- falsifying a public or private tender process,
- distributing market shares or customers,
- agreeing to limit production or investments

- boycotting a customer, a supplier or a new entrant in the market.

The Group also refrains from obtaining or exchanging commercially sensitive information with competitors or partners by illegal means.

This information includes all information related to price, margins, contractual conditions (purchase and sale), revenues, customers, costs, and in general all information that could have an impact on the commercial behaviour of the Group. As such, the Group's employees must prove

themselves particularly vigilant when participating in meetings of professional associations or trade shows.

The Group is also committed to complying with the applicable regulations on merger controls, in the context of its growth or partnership operations, joint-ventures or similar operations.

### ✓ DO

- Follow training to know and comply with the competition rules applicable to the Group and consult the appropriate people mentioned in the "Your contacts" section on the opposite page for the necessary details.
- Refuse to join or leave a meeting during which competitors exchange commercially sensitive information.
- Show prudence and protect the Group's sensitive information when absent from your work station or when travelling.
- Be extremely careful when communicating with competitors as part of a professional association or exchanges with a joint-venture partner (who may also be a competitor elsewhere). The scope and purpose of the discussions must not be interpreted as or give the appearance of a practice that violates competition rules.
- Keep a record of meetings held with competitors, draw up and archive the minutes.
- Contact the appropriate people mentioned in the "Your contacts" section on the opposite page if you have the slightest doubt about how to act in light of certain requests and/or actions by your competitors or partners.

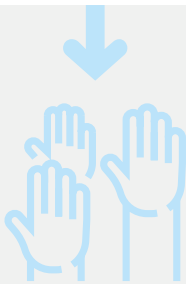
### ✗ DO NOT

- Become a member of a professional association that includes competitors of the Group without having obtained the appropriate authorisation from the Group.
- Collect commercially sensitive information in an illegal or unethical way.
- Exchange information on the price, margins, sales volumes, sales conditions, cost structures, participation in calls for tender or any other similar transaction, regardless of the means of communication and informal nature of the exchange.
- Engage in discussions about a bid manipulation, price agreement or distribution of market shares or customers.
- Communicate or exchange, with purchasers from competitor companies, information about the Group's purchasing policy, prices or suppliers competing with the latter.

**YOUR CONTACTS**

Your manager, and the Legal Division/  
Department of the Group or of your entity,  
the Group Compliance Officer, the Group's  
Ethics & Compliance Department or your  
entity's Compliance contact.

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**IN PRACTICE**

At a trade fair in which the Group regularly participates, I am caught up in a spontaneous discussion about the market in general and ongoing projects with employees of a competitor. What should I pay attention to during this conversation?

→ If your discussion is limited to general remarks about the market, that poses no problem. However, you cannot discuss or exchange commercially sensitive or non-public information. Disclosing such information is likely to damage the commercial interests of the Group. If you have any doubts about the sensitive nature

of the subjects covered, we recommend changing the subject, or ending this conversation.

**At the end of a meeting organised by a professional association, the representative of a competitor started a discussion about innovations and mentioned a new technology that they are developing and started to go into details. Is this type of conversation authorised? What should I do?**

→ No, this type of conversation with competitors about technologies, products or R&D projects is prohibited. In a case like this, you must immediately end this discussion or leave this meeting, ensuring that your departure has been duly noted in the minutes of the meeting. You should inform the appropriate

people mentioned in the “Your contacts” section above of this incident.

**A competitor proposed submitting an overestimated bid to allow the Group to take the contract and in exchange, overestimating ours in a future call for tender. I am not comfortable with this proposal, what precautions should I take?**

→ You should immediately refuse this proposal because such practices are contrary to competition law and could incur the liability of the Group. You should immediately inform the appropriate people mentioned in the “Your contacts” section above.

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# 5 DOING BUSINESS RESPONSIBLY

**67**  
Respecting our commitments for the climate & protecting the environment

**69**  
Respecting our commitments with regard to our stakeholders





## Respecting our commitments for the climate & protecting the environment

### BASIC PRINCIPLES

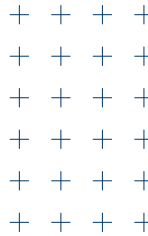
The Group's mission is to devise cutting-edge technological solutions for improved energy efficiency contributing to building a sustainable world. The reduction of greenhouse gas emissions is a major concern for the Group, which has placed decarbonisation at the heart of its strategy, innovation, and research and development activities, to reach its carbon emissions reduction targets.

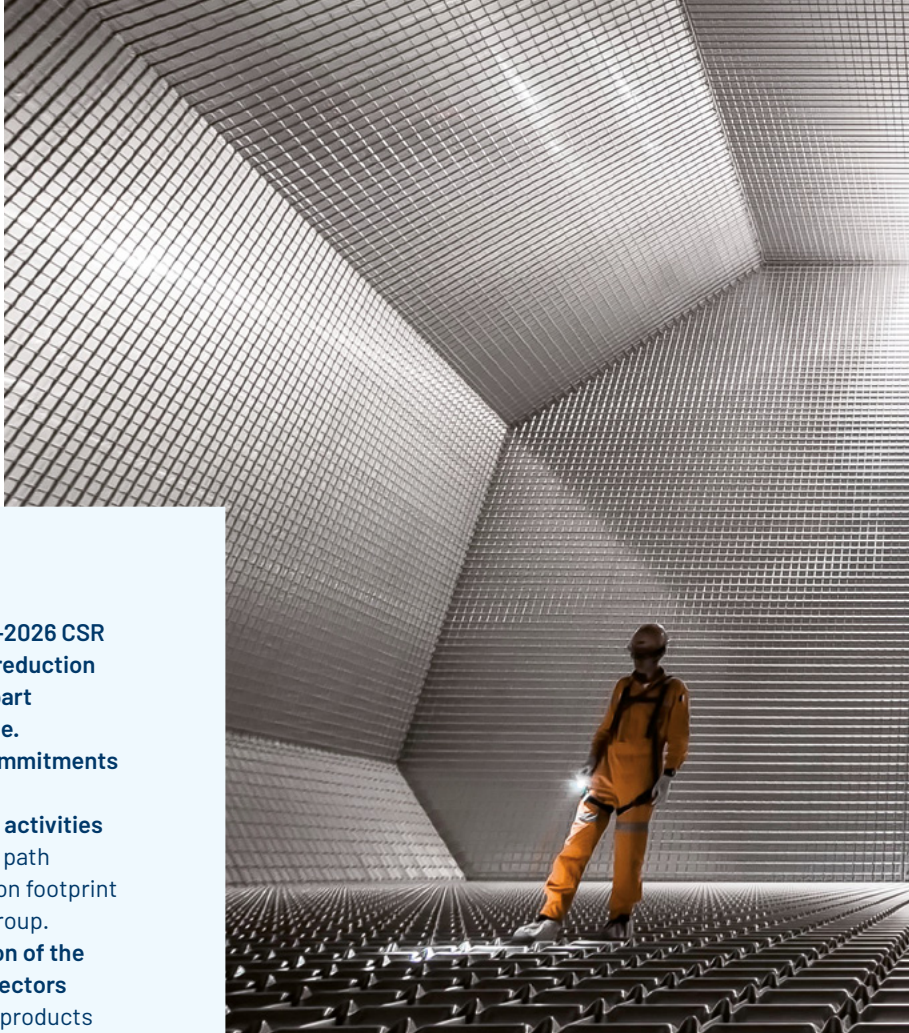
In accordance with the guidelines and targets of the Group's CSR Roadmap, the Group's teams are focused on reducing the company's direct emissions in the performance of its activities and supporting the group's customers with their energy transition and decarbonisation targets.

In general, the Group strives to reduce the environmental footprint of its activities and services, and to develop solutions that respect the environment and benefit everyone.

#### To do this, the Group takes particular care to:

- Integrate climate considerations into the development of its products and services to offer its customers decarbonisation solutions that integrate the best technical, environmental and safety performance;
- Reduce waste production from products and services designed by the teams.





**FOR FURTHER INFORMATION**

The first axis of the Group's 2024–2026 CSR roadmap specifically targets the reduction of greenhouse gas emissions as part of the fight against climate change.

The Group has therefore made commitments seeking to:

- **Reduce the climate impact of its activities** by taking an emissions reduction path that would result in a better carbon footprint for the products offered by the Group.
- **Participate in the decarbonisation of the maritime transport and energy sectors** by developing new technologies, products and services for its customers.
- **Be part of a more sustainable world more broadly**, by taking action to protect the environment and biodiversity.



**DO**

- Integrate environmental and climate considerations from the design stage of solutions developed by the Group.
- Ensure the responsible management of resources (for example, not using more materials than necessary) and try to reduce consumption where possible.
- Adopt behaviour that respects the environment in the course of your daily activities.
- Advise our customers to improve the reduction of their carbon and environmental footprint.

**DO NOT**

- Consider the environment and climate as secondary issues.
- Ignore the guidelines applicable to waste processing.
- Follow a process or use equipment that does not comply with the applicable environmental requirements and regulations.

# Respecting our commitments with regard to our stakeholders

## BASIC PRINCIPLES

Responsible behaviour and continued relationships with all our stakeholders are, for the Group, the foundation of sustained and sustainable growth.

This is why the Group is particularly attentive to the following commitments:

- information transparency;
- customer satisfaction and listening to customers;
- support for innovation through work on research projects in partnership with engineering companies, research centres and universities.

To ensure its long-term development, the Group holds a continuous dialogue with its professional and economic environment adapted to each of the stakeholders affected. The ISO9001 quality management system applied within the Group, contributes to the quality of the dialogue between the Group and its partners.

Lastly, in the context of its CSR commitments, the Group intends to contribute to local initiatives promoting environmental protection, solidarity and development in the areas concerned.

### FOR FURTHER INFORMATION

Since 2018, GTT has registered its sustainable development approach within the framework defined by the Sustainable Development Goals (SDG) adopted by the United Nations in 2015.

The comprehensive framework provided by the SDG has allowed the Group to highlight its priorities in terms of challenges and impact affecting the Group beyond its regulatory obligations. In 2023, the Group signed up to the United Nations Global Compact to join the international movement of companies supporting the ten principles of the Compact, transparency of progress systems and the private sector's contribution to the SDG.

### FIND OUT MORE

For more information, consult the Group's CSR Roadmap accessible on the Group's website.

## YOUR CONTACTS

Your manager, the Group's CSR Department.



### DO

- **Encourage listening, mutual respect and sincerity in exchanges with our stakeholders** (customers, employees, suppliers, partners etc.).
- **Pay attention to the feedback shared by our stakeholders** to draw out areas for improvement and avenues for innovation.
- **Identify local projects and initiatives striving to create a social link**, which could benefit from the Group's skills with no commercial advantage for the Group in return.



### DO NOT

- **Fail to consider the effects of the Group's activities on its stakeholders.**







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Technology for a sustainable world