



# Sustainability Report 2024

Extract from the 2024 Universal Registration Document





# 3

## SUSTAINABILITY REPORT

AFR

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Chapter 3 of this Universal Registration Document sets out the GTT Group's sustainability information, in accordance with European Directive 2024/2464 of December 14, 2022, transposed into French law by Order no. 2023-1394 and Application Decree no. 2023-1394 on the Corporate Sustainability Reporting Directive (CSRD).

This European directive seeks to reinforce undertakings' transparency and responsibility with respect to sustainability. It outlines how the Company and the undertakings included in its scope of consolidation consider the social and environmental impacts of their business activities, as well as the effects those activities have on human rights compliance, anti-corruption and tax avoidance. The CSRD replaces the Non-Financial Reporting Directive (NFRD) and establishes more stringent requirements with regard to environmental, social and governance (ESG) reporting.

## GTT's 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 both for 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."

GTT's mission statement, which was defined in 2020, focuses on steering the Group's capacity for innovation towards energy sustainability matters and transforming customers to deal with such matters.

This mission statement was the result of several months of collaborative work involving Group employees and external stakeholders. It was incorporated into the company's bylaws in June 2020.

## The Group's values

- Safety of our employees, our technologies, our services and our customers.
- Excellence in all our processes in order to remain present in our markets and maintain our market advantage by meeting our customers' needs.
- Innovation at all levels to continue to make GTT a company of opportunities.
- Teamwork, not only internally but also with our customers, our customers' customers and our suppliers so that success is achieved together.
- Transparency in order to build long-term, trust-based relationships with our workforce.

At GTT we have shaped our corporate culture around values that enable us to achieve our mission and that reflect our commitments to our stakeholders and to society as a whole.

These values have been formally incorporated into our Group Code of Ethics to guide GTT's organisational structure and practices.

## 3.1 GENERAL DISCLOSURES [ESRS 2]

### 3.1.1 BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT

#### 3.1.1.1 General basis for preparation of sustainability statements [BP-1]

The sustainability statement (hereinafter the “statement” or the “sustainability statement”) of GTT is prepared on a consolidated basis and follows the same scope as that used for the Group’s consolidated financial statements as presented in chapter 5 of the Universal Registration Document. This statement also includes information on the Group’s upstream and downstream value chain, as defined below.

The Group has conducted a double materiality analysis covering both its own operations and those of the upstream and downstream

value chains. As a result of this exercise, the GTT Group has identified the impacts, risks and opportunities it considers material given its business activity and the expectations of its stakeholders, and which are described in detail in this sustainability report. In order to address these challenges, GTT develops and implements policies and action plans covering its value chain.

To monitor their effectiveness, the Group has, since 2024, set itself series of targets as presented in its 2024-2026 CSR roadmap.

#### 3.1.1.2 Disclosures in relation to specific circumstances [BP-2]

##### Time horizons

GTT adopts the same time horizons as those recommended by the standards and defined in chapter 6.4 of ESRS 1:

- short-term: short-term covers the reporting period of this sustainability statement;
- medium-term: the medium-term horizon extends to five years from the end of the reporting period;
- long-term: the long-term time horizon extends beyond five years.

GTT has also adopted an invariable time horizon when the impacts, risks and opportunities may arise at any time.

##### Sources of uncertainty associated with estimates and results and estimates concerning the value chain

This sustainability statement contains information that cannot be measured directly and that must therefore be estimated, thus resulting in a certain margin of uncertainty.

These estimates are, where possible, based on recognised databases. However, despite efforts made by GTT to guarantee the reliability of the data, the absence of available underlying data of a sufficient quality may give rise to uncertainties regarding such estimates. In such cases, the Group discloses the level of accuracy and margin of error relating to such data. GTT continues to strive to improve the accuracy of its estimates and hopes for an improvement in the quality of the underlying data in the years to come.

This sustainability statement includes forward-looking information based on current opinions and assumptions concerning future events. Such information is based on projections and estimates linked to expected objectives, projects, operations and performance. These elements are, however, subject to risks, uncertainty and external factors, such as the evolution of GTT and its subsidiaries, industry trends, investment, the economic climate, the competition and regulations. Consequently, actual results may differ significantly from those anticipated.

##### Disclosures stemming from other legislation or generally accepted sustainability reporting

The sustainability statement includes additional information required by French legislation. In order to comply with the requirements of the French Commercial Code, GTT sets out, in section 3.5.5 *Prevention and detection of corruption [G1-3]* of this statement, information concerning its actions aimed at combating tax avoidance.

##### Incorporation of information by reference

To facilitate the reading of the sustainability statement and of this Universal Registration Document, GTT incorporates certain information by reference, in order to avoid redundancy.

The table below summarises the disclosure requirements and specific datapoints required by the ESRS and incorporated by reference:

<b>Disclosure requirement</b>	<b>Section and page of the sustainability report where the reference is used</b>	<b>Chapter, section and page of the reference used</b>
ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies	Section 3.1.2.1 <i>The role of the administrative, management and supervisory bodies [GOV-1]</i> Page 83	Chapter 4 2024 Report on Corporate Governance Section 4.1 <i>Presentation of governance</i> Page 162
ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies	Section 3.1.2.1 <i>The role of the administrative, management and supervisory bodies [GOV-1]</i> Page 83	Chapter 4 2024 Report on Corporate Governance Section 4.1.3 <i>Composition and work of the Board of Directors</i> Page 164
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	Section 3.1.2.3 <i>Integration of sustainability-related performance in incentive schemes [GOV-3]</i> Page 84	Chapter 4 2024 Report on Corporate Governance Section 4.2 <i>Compensation and benefits</i> Page 190
ESRS 2 SBM-1 Strategy, business model and value chain	Section 3.1.3.1 <i>Strategy, business model and value chain [SBM-1]</i> Page 85	Chapter 5 <i>Comments on the financial year and financial statements</i> Section 5.1.5 <i>Notes to the consolidated financial statements</i> Page 233
	Section 3.1.3.1 <i>Strategy, business model and value chain [SBM-1]</i> Page 85	Chapter 1 <i>Presentation of the Group and its activities</i> Section 1.5.2 <i>Digital Services</i> Page 60
	Section 3.1.3.1 <i>Strategy, business model and value chain [SBM-1]</i> Page 85	Chapter 1 <i>Presentation of the Group and its activities</i> Section 1.6 <i>Electrolysers for green hydrogen production</i> Page 61
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	Section 3.2.1.1 <i>Integration of sustainability-related performance in incentive schemes [ESRS 2 GOV-3]</i> Page 104	Chapter 4 2024 Report on Corporate Governance Section 4.2 <i>Compensation and benefits</i> Page 190
ESRS E1-3 Actions and resources in relation to climate change policies	Section 3.2.4.3 <i>Actions to reduce indirect emissions – Scope 3</i> Page 108	Chapter 1 <i>Presentation of the Group and its activities</i> Section 1.3.2.3 <i>Development focus and projects</i> Page 37
ESRS 2 SBM-2 – Interests and views of stakeholders (SBM-2)	Section 3.4.1.1 <i>Interests and views of stakeholders [SBM-2]</i> Page 129	Chapter 4 2024 Report on Corporate Governance Section 4.2.1 <i>Compensation of corporate officers for the 2024 financial year</i> Page 190
ESRS S1 S1-9 Diversity metrics	Section 3.4.3.4 <i>Diversity metrics [S1-9]</i> Page 142	Chapter 4 2024 Report on Corporate Governance Section 4.1 <i>Presentation of governance</i> Page 162

## 3.1.2 GOVERNANCE

### 3.1.2.1 The role of the administrative, management and supervisory bodies [GOV-1]

#### Composition of the administrative bodies and governance metrics

The Group's executives are informed of the monitoring of impacts, risks and opportunities via the administrative, management and supervisory bodies presented below.

#### The Board of Directors

The Board of Directors is the central governance body of GTT. It aims to enable strategic relevance to be maintained when addressing the Group's challenges, while ensuring that there is a balance of power within the Company's bodies and taking into account developments in best practices.

The current composition of the Board of Directors and its committees ensures a balance of power within the Company's bodies, given the high proportion of independent directors on the Board and the committees, the full involvement of the directors in the work of the Board and its committees and the diversity of their profiles, skills and expertise.

#### Composition and diversity

As at December 31, 2024, this Board of Directors is chaired by Philippe Berterottière and is composed of eight members, 12.5% of whom are executive members and 87.5% of whom are non-executive members. The composition and diversity of the Board of Directors are described in chapter 4 of the *2024 Report on Corporate Governance*, 4.1 *Presentation of governance*.

#### Role and responsibilities

With regard to sustainability information, the Board of Directors is responsible for monitoring the associated impacts, risks and opportunities. To this end, it delegates preparation of the Board's work on the material impacts, risks and opportunities to the Strategic and CSR Committee and to the Audit and Risk Management Committee.

Within the Board of Directors, the three specialised committees oversee and manage sustainability-related impacts:

- audit and Risk Management Committee;
- the Strategic and CSR Committee;
- the Compensation and Nominations Committee.

The composition and roles of these three committees are presented in section 4.1.3 *Composition and work of the Board of Directors*.

#### Expertise and skills of the directors

The directors have a diverse range of skills and experience, acquired throughout their career. The areas of expertise and contributions specific to each director are presented in detail in section 4.1.3 *Composition and work of the Board of Directors* of the Universal Registration Document (URD).

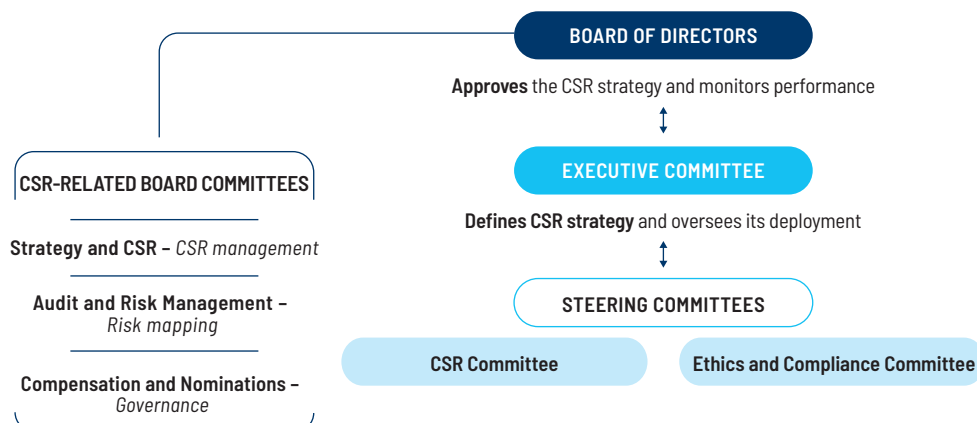
#### The Executive Committee

Chaired by the Chief Executive Officer, its role is to assist the General Management in defining and implementing the Company's strategic orientations. The Executive Committee meets twice a month. The composition of the Board of Directors is described in chapter 4 *2024 Report on Corporate Governance*, section 4.1 *Presentation of governance* of this document.

#### Topic-specific governance of sustainability matters

Responsibility for coordinating the CSR roadmap falls to the Chief Financial Officer – a member of the Executive Committee – in conjunction with the directors of Innovation, Human Resources and General Secretary, who also serve on the Executive Committee. Each is tasked with proposing policies related to their areas of responsibility and monitoring the implementation of those policies, as shown in the governance diagram below.

The Chief Financial Officer is also responsible for the reliability and consistency of the non-financial disclosures provided by the Group, working with other Group departments, not only through the sustainability report but also responses to the rating agencies and, more broadly, to stakeholders in the financial community. He is supported in this effort by the Investor Relations Department. Further support came in 2023 with the creation of a new position, CSR manager, to coordinate the CSR roadmap's implementation, boost the teams' expertise in this area and enhance Group management.



### 3.1.2.2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies [GOV-2]

#### Board of Directors

During the reporting period, the Board of Directors reviewed the double materiality matrix, including the list of ESG considerations and the list of impacts, risks and opportunities (IROs). The Board also approved the Group's diversity and professional equality policy, as well as the CSR roadmap. The results of the double materiality analysis were presented and approved by the Strategic and CSR Committee and by the Audit and Risk Management Committee in December 2024.

#### Audit and Risk Management Committee

In addition to its review of the preparatory work for the sustainability report, the Audit and Risk Management Committee also approved the anti-corruption policies and action plans.

#### Strategic and CSR Committee

The Strategic and CSR Committee monitored the preparation of the sustainability report.

#### Compensation and Nominations Committee

The Compensation and Nominations Committee approved the diversity and professional gender equality policy prior to its presentation to the members of the Board of Directors.

#### Board of Directors

In 2024, the Executive Committee received training on CSR and ESG topics. Preparation of the sustainability report was supervised by the Chief Financial Officer, the Human Resources Director and the General Secretary.

### 3.1.2.3 Integration of sustainability-related performance in incentive schemes [GOV-3]

In 2024, the proportion of the variable pay of the Chairman and Chief Executive Officer of GTT and of the Chief Executive Officer based on CSR criteria was 21%. This variable compensation includes decarbonisation levers that are aligned with the goals in the CSR roadmap shown in section 3.7 *Additional information* of this document. For more information, please see the compensation criteria tables in chapter 4 2024 Corporate Governance Report, section 4.2.2.2.1 *Compensation policy applicable to the Chairman and Chief Executive Officer (applicable to Philippe Berterottière in his capacity as Chairman and Chief Executive Officer with effect from February 9, 2025 and to any Chief Executive Officer who may be appointed in the future)*.

### 3.1.2.4 Statement on due diligence [GOV-4]

Essential aspects of due diligence	Paragraphs in the sustainability statement
Embedding due diligence in governance, strategy and business model	3.1. General disclosures [ESRS 2]
	3.1.2.1 The role of the administrative, management and supervisory bodies [GOV-1]
	3.1.3.1 Strategy, business model and value chain [SBM-1]
Stakeholder engagement at every stage in the due diligence process	3.1 General disclosures [ESRS 2]
	3.1.3.2 Interests and views of stakeholders [SBM-2]
Identifying and assessing adverse impacts	3.1. General disclosures [ESRS 2]
	3.1.4.1 Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]
Taking measures to remediate these negative impacts	All parts on actions or Management of the IROs in the following sections:
	3.2. Climate change [ESRS E1]
	3.4. Own workforce [ESRS S1]
	3.5. Business conduct [ESRS G1]
Tracking the effectiveness of these efforts and communicating	3.1. General disclosures [ESRS 2]
	3.1.2.1 The role of the administrative, management and supervisory bodies [GOV-1]
	3.1.3.1 Strategy, business model and value chain [SBM-1]

The Board of Directors, through the Audit and Risk Management Committee, supervises GTT's commitment to ethics and compliance, particularly anti-corruption policy, with the assistance of the Company's Statutory Auditors who carry out regular due diligence on the entire scope of the Ethics & Compliance policy. The Group conducts specific due diligence to identify negative impacts and financial risks, notably in terms of corruption and data management:

- the Group's Ethics & Compliance programme mainly consists of (i) a regular review, outsourced to an independent third-party expert at least every two years, of the Group's ethical exposure

to corruption risk and to risks arising from personal data breaches and non-compliance with the General Data Protection Regulation (GDPR), and (ii) preparing appropriate action plans;

- GTT's Ethics & Compliance programme provides for the systematic assessment of third parties (mainly listed or major direct or indirect suppliers, subcontractors, partners and customers) before a contractual relationship may be entered into.



When it comes to planned acquisitions, disposals or equity investments (even minority ones), a specific ethical and compliance due diligence procedure is carried out on the company (sellers and targets) to analyse any upstream risks and determine

if corrective action will need to be taken when the Group's ethics programme is subsequently rolled out. This procedure has been systematically applied to all projects reviewed by the Group, particularly the stakes taken by GTT Ventures in 2024.

### 3.1.2.5 Risk management and internal controls over sustainability reporting [GOV-5]

GTT implemented a risk management and internal control framework to guarantee the reliability and completeness of its sustainability reporting. This framework is based on control mechanisms already established for financial and accounting information, adapting them for the specific challenges relating to sustainability. The internal control and risk management system for sustainability is based on several fundamental principles:

- compliance with sustainability reporting standards;
- the reliability of the data published and information provided to stakeholders;
- the application of internal instructions and guidelines;
- the avoidance and detection of anomalies, inconsistencies and risks linked to sustainability reporting.

In order to identify and prioritise the risks linked to sustainability reporting, GTT applies a structured evaluation approach. This methodology is based on an in-depth analysis of the following risks:

- the accuracy and completeness of the data collected, notably those concerning CO<sub>2</sub> emissions, energy consumption and the environmental impact of the Group's activities;
- the availability and quality of the data obtained from the value chain;
- compliance with deadlines for the disclosure of sustainability information;
- the implementation of verification processes to prevent any alteration or inaccuracy in the data disclosed.

Several major risks have been identified in connection with sustainability reporting. Among these risks, inconsistencies and errors in the data represent a key issue, requiring the implementation of validation processes prior to any disclosure.

The incomplete availability of data also constitutes a risk, addressed by the establishment of protocols (governance model, RACI etc.) to ensure the completeness of data collected from the subsidiaries and partners concerned. Lastly, changes to regulatory frameworks are monitored continuously in order to constantly adapt the reporting methodologies to new requirements.

The Group strives to constantly improve its data collection and processing processes, and to optimise its monitoring systems and tools. Training is also rolled out to reinforce the skills of teams involved in the production and verification of the data, thus guaranteeing the rigorous and reliable management of sustainability reporting.

GTT ensures regular communication of the results of risk assessments and the monitoring of internal controls to the governance bodies:

- the Audit and Risk Management Committee, which conducts verifications and issues recommendations for improvement;
- the Administrative and Financial Division, which oversees all internal control processes and ensures their regulatory compliance;
- the Chief Executive Officer, who guarantees the internal control system and the reliability of the information disclosed.

This approach enables GTT to strengthen transparency and the robustness and compliance of its sustainability reporting, based on proven internal control and risk management practices. In 2024, the Strategic and CSR Committee and the Audit Committee were informed of the various stages of sustainability reporting, thus confirming the Group's commitment to maintaining a rigorous framework in line with current requirements.

## 3.1.3 STRATEGY

### 3.1.3.1 Strategy, business model and value chain [SBM-1]

#### Presentation of the GTT business model

GTT is a leading player in the design of membrane containment systems for the maritime transportation and storage of liquefied natural gas (LNG). Based on this expertise, the Group focuses its development on two priorities: valuing its human capital and responsible management of its environmental impacts. The undertaking is thus positioned to anticipate major technological and environmental changes, by responding to transformations in the global energy sector and new customer expectations.

As part of its general strategy, GTT focuses on technological innovation to meet sustainability challenges in the maritime and energy sector. The company proposes advanced solutions for the transportation and storage of LNG, as well as membrane containment technologies for onshore and offshore storage tanks. GTT also develops digital services to optimise vessel performance and recently expanded its portfolio with electrolyzers for green hydrogen production, in order to support the energy transition. These products and services aim to meet the growing need for decarbonisation in industry.

GTT primarily targets the maritime, energy and hydrogen production sectors.



## Ressources

### HUMAN CAPITAL

- 888 employees
- 80 % engineers
- 19 087 training hours

### INTELLECTUAL CAPITAL

- R&D investments of 53 million euros in 2024
- 200 employees working on innovation

### FINANCIAL CAPITAL

- Orderbook of 1.9 billion euros
- Potential operational growth
- External growth strategy
- Solid balance sheet

### SOCIETAL CAPITAL

- 2024-2026 CSR roadmap
- Code of ethics
- Code of conduct for suppliers and partners
- ISO 37001 (anti-corruption certification)

### ENVIRONMENTAL CAPITAL

- Reduced environmental footprint as activity is mainly intellectual

## TOWARDS A LOW-CARBON FUTURE

### DIGITAL SERVICES

- Energy optimisation
- Emissions monitoring
- Operational excellence

### SERVICES CORE BUSINESS

- Consultancy
- Support/maintenance services
- Training

### VENTURE CAPITAL

- Eight minority interests

### TRANSFORMATION

- Electrolysers
- Carbon capture
- Gas management technologies

### EXTENSION

- LNG as fuel
- Transportation of LH2

### IMPROVEMENT

- GTT systems
- NH3 compatibility

### INTENSIFICATION

- LNG carriers
- Offshore
- Multi-gas
- Onshore storage tanks

## Value Creation

### HUMAN CAPITAL

- Employee engagement (87% participation in the capital increase reserved for employees)
- Gender equality index: 81%

### INTELLECTUAL CAPITAL

- 3 482 patents, active or applied for

### FINANCIAL CAPITAL

- High profitability (61% EBITDA margin in 2024)
- Strong cash-flow generation (338 million euros in 2024)
- Attractive distribution policy (more than 80% of net income)

### SOCIETAL CAPITAL

- Safety of installations and crews
- Assistance and training for ship-owners

### ENVIRONMENTAL CAPITAL

- Effectiveness and strength of containment systems
- Lower CO2 emissions thanks to GTT's activities

The table below summarises the link between the main groups of products/services and the Group's stakeholders:

Activity	Subsidiary	Description	Key stakeholders
Activity linked to LNG	GTT S.A.	Design of technologies for the maritime transportation of LNG with membrane containment systems. GTT is a leading global player in this domain.	Ship-owners, maritime operators, LNG carrier builders
		Onshore membrane storage tank solutions for the storage of LNG. Effective technology suitable for a range of storage capacities.	Storage industries, storage tank operators
		LNG floating storage solution resting on the seabed. This system does not require additional infrastructure, thus reducing the installation costs and environmental impact.	Ports, LNG industries, offshore operators
		Solutions for the transportation and storage of other liquefied gases such as ethane, ethylene, propane, butane and propylene.	Ship-owners, liquefied gas manufacturers, maritime operators
		Solutions for the offshore LNG industry, including floating storage and regasification units (FSRUs), floating storage and unloading units (FLNGs) and floating storage units (FSUs).	Offshore operators, LNG manufacturers, energy companies
		Adaptation of containment technology for LNG-fuelled vessels, contributing to the decarbonisation of the maritime sector.	Ship-owners, operators of merchant vessels
		Consultancy services, engineering studies, operational support, maintenance and repairs of GTT membrane systems for vessels equipped with LNG technology.	Ship-owners, maritime operators, maintenance companies, LNG suppliers
Activity linked to digital services	Ascenz Marorka, OSE Engineering	Decision-making tools for ship-owners and operators, including data analysis and vessel performance optimisation thanks to advanced sensors and environmental reporting systems.	Ship-owners, maritime operators, maritime technology companies
Activity linked to hydrogen	Elogen	Design and assembly of large-capacity electrolyzers for the production of green hydrogen from renewable energy.	Suppliers of materials and components, intellectual property offices, EPC, customers

The Group operates in an extensive economic and financial environment, covering a vast geographical area including Europe, the Middle East, Africa, Asia and North America. Details of the geographical locations and breakdown of subsidiaries can be found in note 4 of section 5.1.5 *Notes to the consolidated financial statements* of this document.

### Breakdown of employees by geographical area

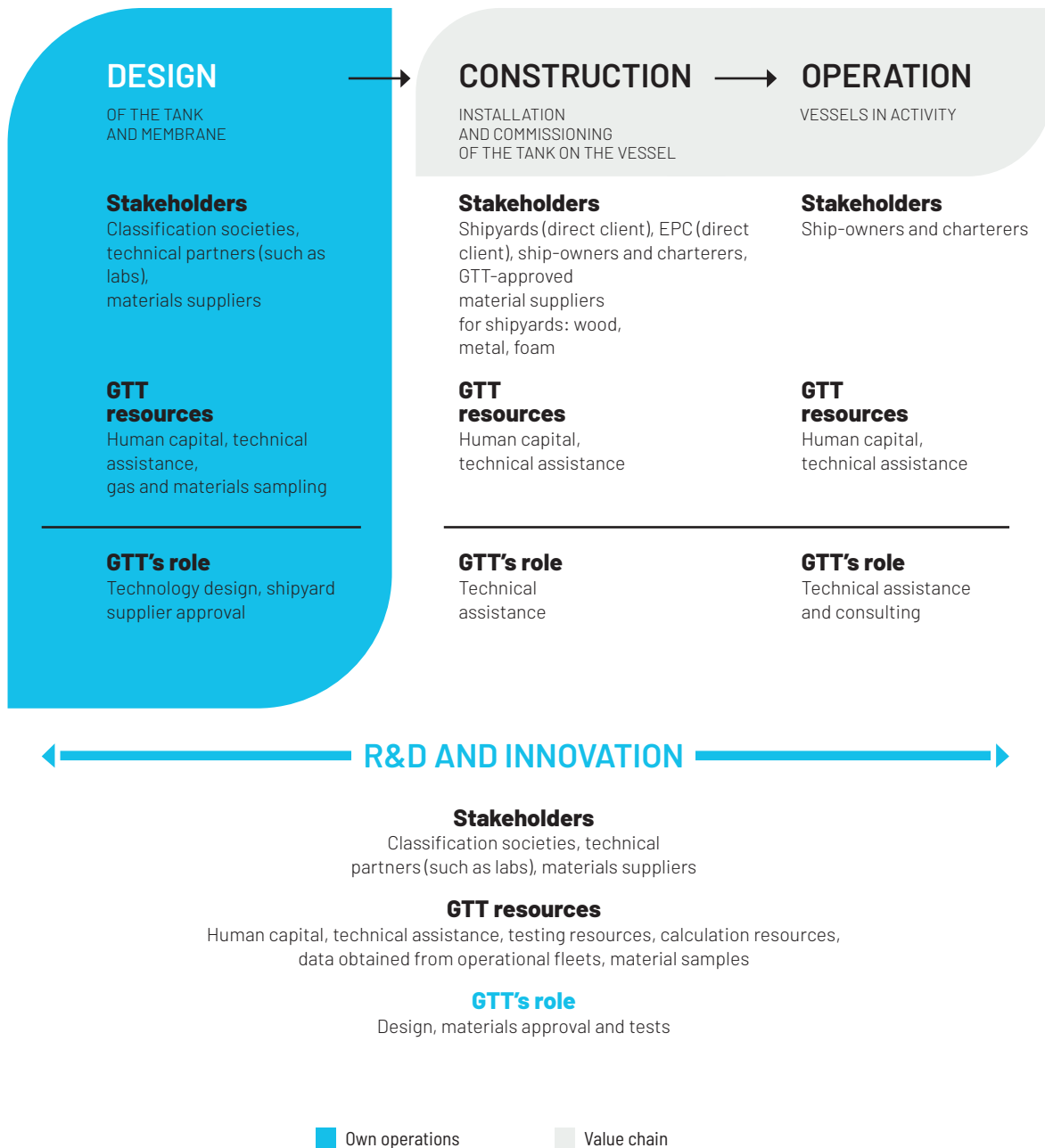
At December 31, 2024, the Group had 888 employees spread over nine countries, organised into two regions: Europe (847 employees) and the other countries (33 employees) in which the Group conducts business.

### Presentation of the value chain

The products and services proposed by GTT are rolled out throughout its downstream value chain, while the upstream value chain, as well as the internal operations of the Group, correspond to its own operations which are essential to carrying out its activities.

As part of its double materiality exercise, described in section 3.1.4.1 *Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]* of this chapter, GTT has identified three separate value chains corresponding to its three main activities: those linked to LNG, those linked to digital services and those dedicated to the design and assembly of electrolyzers for the production of green hydrogen.

**Cryogenic containment technological engineering – Activity representing 92% of the GTT Group's revenues at December 31, 2024**

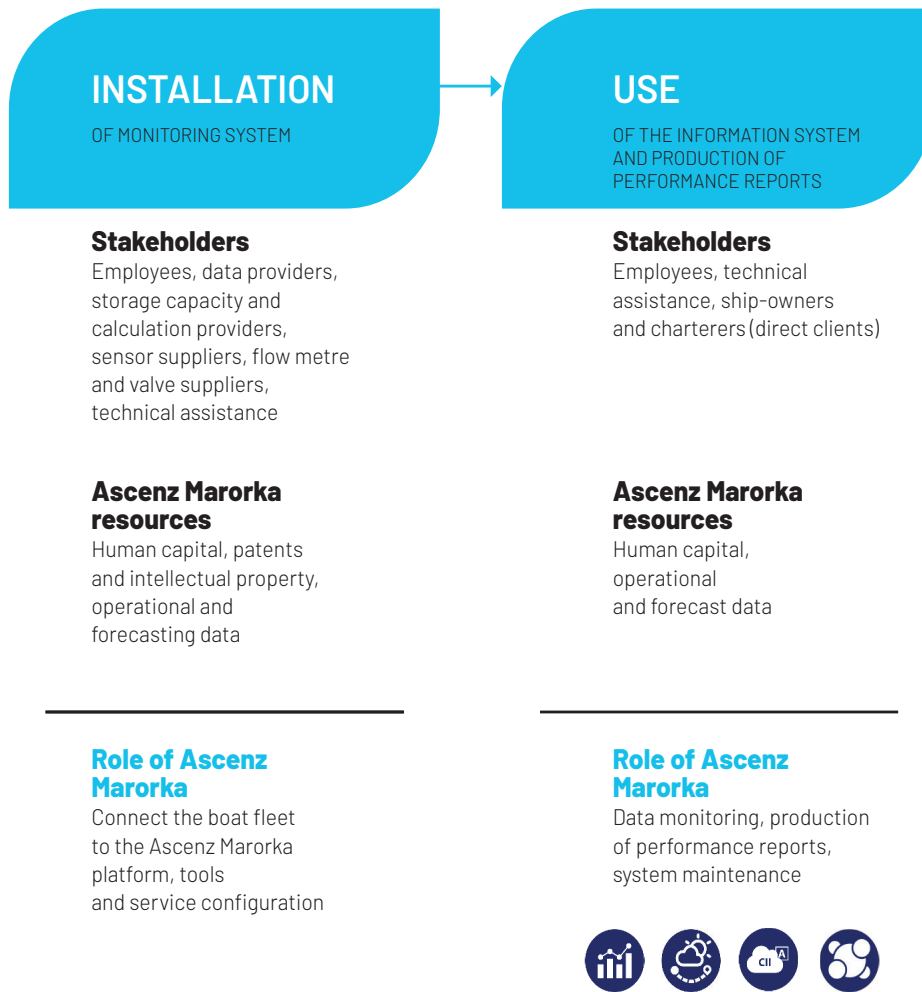


GTT is a technology and engineering company – a leading player in cryogenic membrane containment systems used to transport and store liquefied gas, and LNG (liquefied natural gas) in particular. For nearly 60 years now, GTT technologies have been used on board LNG carriers, LNG floating units, and multi-gas transport vessels. GTT also develops solutions dedicated to onshore storage tanks and semi-immersed tanks (GBS<sup>(1)</sup>), and provides

a wide range of related services. The Group develops and sells these technologies to shipyards under licence. GTT does not have its own manufacturing operations for the containment systems it designs. The shipyards use the Group's technologies to build the vessels and tanks ordered by ship-owners, who themselves take account of the charterers' requirements.

(1) Gravity-based structures.

**Digital services for maritime transportation (Ascenz Marorka) – Activity representing 2% of the GTT Group's revenues at December 31, 2024**



◀ **R&D AND INNOVATION** ▶

**Stakeholders**  
GTT S.A., OSE Engineering, classification societies, solution providers

**GTT resources**  
Human capital, technical assistance

**GTT's role**  
Design of new functions, continuous improvement of existing functions

■ Own operations



Through its subsidiary, Ascenz Marorka, the GTT Group provides a wide range of solutions to the maritime industry:

- an electronic fuel monitoring system: to manage fuel consumption in real time in order to reduce costs;
- vessel performance management: to monitor and optimise the energy performance of fleets and vessels;
- electronic management of fuel deliveries: to ensure the traceability and transparency of operations;
- meteorological routing and optimisation of journeys: to plan optimal itineraries in order to minimise safety risks and reduce costs;
- LNG fuel management: to monitor and ensure the safety of the use of LNG as fuel;
- LNG cargo management: to optimise transportation and storage operations;
- shaft power limitation (ShaPoLi) system: to monitor and regulate engine power in order to reduce wear and emissions;
- management of reporting and compliance: to ensure compliance with international standards and regulations;
- trip optimisation to improve vessel economy and safety;
- opening of a real-time fleet performance monitoring centre in France in 2023, followed by a second in Singapore in 2024, managed by a team of sailors and analysts with extensive expertise in navigation, meteorology, marine performance management, LNG operations and offshore operations.

See section 1.5.2 *Digital services* for details concerning digital activities and their development during the year.

**Green hydrogen production technologies – Activity representing 2% of the GTT Group's revenues at December 31, 2024**



**Stakeholders**

Research agencies,  
Technological partners

Customers, Research  
agencies, Technological  
partners

Suppliers  
of materials  
and components,  
Intellectual property  
offices, EPC

Customers

Customers

**Elogen resources**

Human capital,  
Test laboratories  
and equipment,  
External financing,  
Intellectual property

Modelling  
and simulation tools,  
Technical expertise,  
Customer feedback

Supply of materials,  
Production  
and assembly lines,  
Quality management  
systems,  
Staff training

Dedicated project team,  
Transport  
and logistics equipment,  
Technical documentation

Technical support teams,  
Service management  
systems,  
Ongoing training  
programmes

**Elogen's role**

Design  
and development  
of new electrolysis  
technologies

Design of electrolyser  
systems  
and integrated solutions

Assembly design  
and quality control  
of electrolysis systems

Monitoring of  
installation work  
and on-site system  
commissioning tests.

Provision of technical  
assistance and  
maintenance work

**INNOVATION/MONITORING  
AND CONTINUOUS IMPROVEMENT**

**Stakeholders**

Customers, Research institutes

**Elogen resources**

Data collection systems, Data analysis, User feedback

**Elogen's role**

Analyse system performance and integrate improvements

Own operations

Value chain

Elogen, which has been part of the GTT Group since October 2020, specialises in the design, manufacture and production of electrolyzers for the production of green hydrogen. Elogen is renowned for its expertise in proton exchange membrane (PEM) electrolysis technology, which enables high-yield hydrogen production with increased flexibility. Elogen has an annual production capacity of up to 160 MW, thanks to its research and production centre in Les Ulis in the Île-de-France region.

Due to a difficult market context for green hydrogen, Elogen did not receive any significant orders in 2024. The initial conclusion of the strategic review announced in January 2025 revealed the need for the GTT Group to reposition Elogen in 2025. See section 1.6 *Electrolysers for green hydrogen production* for details concerning activities in connection with Elogen and their development during the year.

### Presentation of GTT's sustainability strategy

Since 2018, GTT has incorporated Corporate Social Responsibility (CSR) into its global strategy, based on the Sustainable Development Goals (SDGs) defined by the United Nations in 2015. This international framework enables the Group to identify and prioritise environmental, social and economic challenges and impacts beyond its legal obligations. Thanks to a materiality analysis conducted in 2019 and updated in 2023, GTT has defined its CSR priorities and directs its initiatives towards addressing current challenges, while contributing to the SDGs.

In 2023, GTT entered a new phase in its commitment by joining the United Nations Global Compact, an international coalition of

businesses seeking to align their practices with the ten principles set out in the Global Compact, promote transparency and take an active part in achieving the SDGs. This membership underscores GTT's desire to contribute to the transformation of global business practices towards a more sustainable and responsible model.

As part of this process, in 2024 the Group presented its first CSR roadmap for the period 2024-2026. Made up of three axes, nine commitments and 24 key metrics, GTT's 2024-2026 roadmap is a management tool that illustrates the Group's commitment to its CSR approach with all stakeholders. Each of the commitments is broken down into quantified objectives and targets with specific deadlines. These objectives cover all environmental, social and governance aspects, focusing in particular on reducing GTT's carbon footprint. Realistic progress targets and action plans for each challenge selected and defined as a priority were drawn up by specific teams and were then discussed and reviewed by the Executive Committee. The Board of Directors also approved the roadmap in January 2024. GTT has, in particular, made ambitious commitments to reduce its greenhouse gas emissions over a ten-year period to help meet the objectives of the Paris Agreement. By adopting this approach, GTT has asserted its role as a responsible leader in its sector and is proactively committed by incorporating sustainability as a driver of performance in the long term.

### CSR roadmap

The full roadmap is available on the GTT website and described in detail in section 3.7 *Additional information* of this chapter.

### 3.1.3.2 Interests and views of stakeholders [SBM-2]







GTT places stakeholder engagement at the core of its business model and strategy. These interactions enable the undertaking to identify key expectations in terms of sustainability and innovation, thus influencing its strategic objectives. The Group engages in regular discussions with its stakeholders to ensure the relevance of its technical solutions and its alignment with regulatory and societal requirements.

Thanks to these exchanges, GTT has identified several stakeholder expectations and in particular the need to accelerate the energy

transition, anticipate regulatory changes and improve transparency with regard to its non-financial performance. This feedback has led to strategic adjustments, such as the increase in R&D investment in alternative energy and the reinforcement of ESG governance.

GTT's governance bodies are regularly informed of stakeholders' expectations and the incorporation of their feedback into the strategy.

The table below shows a list of the Group's main stakeholders, the forms of engagement established with them and the incorporation of their feedback into GTT's strategy.

Categories of stakeholders	Stakeholders	Target	Form of engagement	Purpose of engagement	Incorporation of the results into the strategy
 <b>Business community</b>	<ul style="list-style-type: none"> <li>The main new builds and repair shipyards</li> <li>Ship-owners</li> <li>Gas companies</li> <li>Terminal operators</li> <li>Hydrogen producers</li> <li>Suppliers of the materials used by the Group's technologies (shipyard suppliers)</li> <li>Group's suppliers (service providers, suppliers of products and materials)</li> </ul>	Ensure the quality of technical solutions and compliance with environmental standards	Regular meetings, technical committees, collaboration on innovation	Incorporation of shipyards' needs in the development of new technologies	Continuous adaptation of products to customers' needs
 <b>Authorities</b>	<ul style="list-style-type: none"> <li>Classification societies</li> <li>International maritime regulatory authorities</li> </ul>	Compliance with regulations, anticipation of changes to standards	Participation in sector-specific working groups, regulatory consultations	Alignment of GTT solutions with the new environmental and safety standards	Development of solutions in compliance with emerging regulations
 <b>Human resources</b>	<ul style="list-style-type: none"> <li>Employees</li> <li>Employee representative bodies</li> <li>Candidates for recruitment</li> </ul>	Ensure a constructive social dialogue and attract talent	Internal surveys, interviews and HR committees	Quality of life at work improvement plan, reinforcement of training	Reinforcement of the skills development policy
 <b>Financial community</b>	<ul style="list-style-type: none"> <li>Shareholders</li> <li>Financial institutions</li> <li>Analysts</li> <li>Non-financial rating agencies</li> </ul>	Financial and non-financial transparency	Investor meetings, roadshows, non-financial reports	Improvement of the ESG scoring, increase in the interest of responsible investors	Incorporation of ESG criteria into the financial strategy
 <b>Partners</b>	<ul style="list-style-type: none"> <li>Higher education establishments, research institutes</li> <li>Trade associations</li> </ul>	Support for innovation and skills development	Academic partnerships, funding of research projects	Collaborative projects on hydrogen and the decarbonisation of maritime transportation	Development of low-carbon technologies
 <b>Civil society</b>	<ul style="list-style-type: none"> <li>Media</li> <li>Think tank</li> </ul>	Information and awareness-raising on sustainability matters	Press releases, events, participation in forums	Improvement in the external perception of GTT's CSR commitments	Reinforcement of CSR commitments and responsible communications

GTT implements specific engagement methods for each category of stakeholders.

The Internet site, formal and informal meetings – individual interviews, conferences, round tables, workshops – surveys and satisfaction questionnaires are some of the tools for dialogue and consultation implemented by the Group. If the Group does not consider a regular and direct dialogue with stakeholders, it resorts to information monitoring to track changes in their needs and expectations. The ISO 9001 certified quality management system also contributes directly to this engagement mechanism.

GTT carries out external surveys in this respect to analyse satisfaction levels among its active licence customers (shipyards and outfitters<sup>(1)</sup>). These look at the quality of service provided by the Company, from upstream (order) to downstream (delivery) with active shipyards. Customers are asked about the entire engineering project execution process, including the relevance and quality of deliverables – system plans, calculation notes and reports. GTT therefore pays careful attention to its ability to respect lead-times, to remain attentive to the quality and responsiveness of the responses provided by its teams, and to always be attentive to its customers' needs. The 2024 results revealed a customer satisfaction level of 98.5% (97.5% in 2023).

(1) Subcontractor shipyards.



### 3.1.3.3 Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]

As part of its double materiality analysis, GTT identified 13 ESG considerations with 78 impacts, risks and opportunities (IROs), 24 of which are material.

Following the double materiality exercise, the Group considers that the current and anticipated effects of its material IROs on its business model and value chain are properly presented and reflected in its CSR strategy.

**Table of environmental IROs**

ESG considerations	Impacts, Risks and Opportunities	Current/anticipated effects	Value chain	Time horizon	Description
Climate change adaptation	Negative impact	Potential	Own operations/ Downstream value chain	Medium term	Danger to workers and visitors to sites exposed to the effects of climate change, in operations and/or the value chain (shipyards)
	Risk	Actual	Own operations, Elogen	Short term	Risk of disruption to business activities and even to the transformation of Elogen's business model in the event of disrupted access to energy
Climate change mitigation	Positive impact	Actual	Own operations	Medium term	Contribution to the roll-out of activities and solutions to decarbonise the economy
	Negative impact	Actual	Own operations	Invariable	Contribution to climate change by greenhouse gas emissions (Scopes 1, 2 and 3) resulting from the Group's activities
	Risk	Actual	Own operations	Medium term	Investments allocated to implementing the transition plan and reducing the Group's carbon footprint
	Opportunity	Actual	Own operations	Medium term	Increase in revenue linked (1) to the new solutions and products launched in response to customers' decarbonisation expectations, and (2) to the diversification of business activities

**Table of social IROs**

<b>ESG considerations</b>	<b>Impacts, Risks and Opportunities</b>	<b>Current/ anticipated effects</b>	<b>Value chain</b>	<b>Time horizon</b>	<b>Description</b>
<b>Social dialogue</b>	<b>Negative impact</b>	Potential	Own operations	Invariable	Violation of the fundamental rights of employees as defined by the ILO in the absence of social dialogue, freedom of association and collective bargaining
<b>Employee skills development</b>	<b>Positive impact</b>	Potential	Own operations	Invariable	Improvement of the employability and career perspectives of employees thanks to the training and skills development proposed by the Group
	<b>Risk</b>	-	Own operations	Short term	Risk of a decline in competitiveness and business development due to a skills shortage, failure to anticipate needs or a lack of employee training
<b>Diversity &amp; Inclusion</b>	<b>Negative impact</b>	Potential	Own operations	Short term	Degradation of the working and even living conditions of employees in the case of a lack of action with regard to diversity and inclusion
	<b>Negative impact</b>	Potential	Own operations	Short term	Degradation of the physical and/or mental health of employees in the case of discriminatory practices (lack of equal treatment), violence and/or harassment
<b>Working conditions</b>	<b>Negative impact</b>	Potential	Own operations	Short term	Violation of the human rights of employees and non-employed workers due to practices in breach of the fundamental values of the ILO (forced labour, fairness, working conditions, adequate pay etc.)
	<b>Risk</b>	-	Own operations	Medium term	Cost of bringing the undertaking into compliance or legal proceedings (sanction, litigation and fine) in the case of failure to comply with human rights regulations
	<b>Opportunity</b>	-	Own operations	Medium term	Enhancement of the Group's image and better talent retention thanks to a recognised culture of quality of life at work, helping to improve its attractiveness, as well as levels of employee engagement and satisfaction internally
<b>Employee Health &amp; Safety</b>	<b>Negative impact</b>	Potential	Own operations/ Downstream value chain	Invariable	Serious and irremediable harm to the health of employees in the case of pollution, ingestion of chemical products etc.
	<b>Negative impact</b>	Actual	Own operations/ Downstream value chain	Invariable	Serious and irremediable harm to the safety of employees in the case of poor working conditions
	<b>Negative impact</b>	Potential	Own operations	Short term	Inadequate health and safety training and/or failure to instil a uniform HSE culture within the Group, leading to near accidents or accidents
	<b>Risk</b>	-	Own operations	Short term	Harm to the Group's reputation in the case of serious or fatal accidents affecting GTT employees wherever they may be, or the workers of GTT's subcontractors at a Group site

## Table of governance IROs

ESG considerations	Impacts, Risks and Opportunities	Current/ anticipated effects	Value chain	Time horizon	Description
Business ethics	Negative impact	Potential	Own operations	Invariable	Negative impact on the Company if ethical obligations are violated (including corruption)
	Negative impact	Potential	Own operations	Invariable	Undermining of the safety and/or rights of whistleblowers in the absence of protective policies and measures
	Risk	-	Own operations	Medium term	Harm to the Group's reputation in the case of unethical practices or proven cases of corruption, or of non-compliance with the regulations concerning business ethics
	Risk	-	Own operations	Medium term	Legal proceedings and the associated costs (fines, legal costs, compliance costs) in the case of practices contrary to business ethics or non-compliance with the regulations
	Risk	-	Own operations	Short term	Execution risk in the case of non-compliance with anti-corruption and anti-fraud measures: loss of market share/ credibility and impact on business continuity
Responsible purchasing	Opportunity	-	Own operations	Long term	Improved resilience of business activities thanks to actions taken to strengthen the relationship with key suppliers and ensure their loyalty

## 3.1.4 IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### 3.1.4.1 Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]

#### Structure of GTT's double materiality analysis

GTT's Investor Relations and CSR Division coordinated the double materiality analysis, a project supported by the Financial Division, the General Secretary and the Human Resources Division, and with the assistance of a consulting firm. It took place in four main stages:

1. definition of the material environmental, social and governance (ESG) challenges for the Group and its value chain;
2. identification of the impacts, risks and opportunities (IROs);
3. solicitation and coordination of workshops with the business lines for the review and rating of the IROs;
4. review for consistency, creation of the double materiality matrix and analysis by the governance bodies.

Each ESG challenge, as well as the impacts, risks and opportunities, were classified according to the positioning in the value chain or in the Group's own operations. GTT mapped the three value chains corresponding to its main activities in line with its financial statements, as well as the actors and resources involved upstream and downstream.

#### Definition of ESG considerations

The material ESG considerations for GTT were defined based on a corpus including the topics addressed in the CSRD, the materiality analyses conducted by the Group in order to define its CSR strategy, and all the Group's internal procedures and resources. These challenges were validated by the Financial Division, the General Secretary and the Human Resources Division prior to the double materiality analysis.

Environment	Social	Governance
[E1] Climate change mitigation	[S1] Social dialogue	[G1] Business ethics
[E1] Climate change mitigation	[S1] Employee skills development	[G1] Responsible purchasing)
-	[S1] Diversity and inclusion	-
-	[S1] Working conditions	-
-	[S1] Employee health and safety	-

## Breakdown of ESG considerations into impacts, risks and opportunities (IROs)

An analysis of GTT's activities, business lines and services, as well as its value chain, made it possible to identify an initial list of the impacts, risks and opportunities (IROs) associated with each ESG challenge. The list comprised a total of 78 IROs covering the 13 ESG considerations, which were then evaluated for their materiality with input from business line contributors.

The following factors were taken into account in the identification of the IROs:

- the specific nature of certain of the Group's activities (LNG, Hydrogen, Services);
- the value chain: upstream, downstream and own operations;
- dependency on key resources (human resources, i.e. GTT Group employees, in particular).

The completeness of the analysis was ensured by means of the following approach:

- the effect of each risk/opportunity was assessed with regard to its type: financial, business continuity, legal and regulatory, reputational, stakeholders;
- each positive or negative impact was identified in connection with the type of its effect on: 1. Health and safety, 2. Human rights, 3. The environment, 4. Society and the economy.

The list of IROs was reviewed and validated during workshops with the Group's business line contributors.

## Rating of the impacts, risks and opportunities (IROs)

Impact materiality and financial materiality were assessed according to levels (from 1 – low materiality – to 4 – critical materiality), defined by GTT in line with the Group's risk mapping, as well as by internal experts on the themes concerned.

The various EFRAG criteria for impact materiality and financial materiality were applied to each IRO:

- time horizon (short term, medium term, long term or invariable);
- the actual or potential nature of positive and negative impacts;

- likelihood (unlikely, possible, likely, almost certain).

For risks and opportunities (financial materiality):

- financial scale (low, moderate, significant or major).

For impacts (impact materiality):

- severity (minor, important, significant or critical/decisive);
- scope (concentrated, moderate, widespread or global/total).

For negative impacts only:

- irremediable character (possible to remediate with effort, difficult to remediate in the short or medium term, very difficult to remediate in the medium or long term or irremediable/irreversible).

Each IRO rating was established based on the expertise of the contributors, who provided examples and quantitative data, where necessary.

The materiality threshold above which the environmental, social or governance challenges were deemed relevant (i.e. material) was set at a level more than or equal to 3 on a scale of 4 for financial materiality and impact materiality. This threshold made it possible to obtain a list of material ESG considerations for the sector consistent with the results of existing analyses.

This threshold was validated firstly by the Financial Division, the Human Resources Division and the General Secretary, and then by the Audit and Risk Committee, the Strategic and CSR Committee and the Board of Directors.

The materiality diagnosis ("material" or "non-material") of each ESG challenge depends on a comparison of the general score for maximum financial materiality and/or impact materiality with the materiality threshold of more than or equal to 3. A material positive or negative impact, a material risk or a material opportunity therefore makes it possible to qualify the associated ESG challenge as material.

Section 3.1.3.3 *Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]* provides details of the material challenges for the Group relating to ESRS E1 S1 and G1.



### 3.1.4.2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement [IRO-2]

In order to facilitate the reading of the sustainability statement, the table below shows the datapoints referred to in ESRS 2 and topical ESRS resulting from other European Union legislation, and refers to the pages in which the information relating to each datapoint identified as material for GTT can be found.

Disclosure requirements	Paragraphs	Pages
<b>ESRS 2 GENERAL DISCLOSURES</b>	3.1 General disclosures [ESRS 2]	81
BP-1 General basis for preparation of sustainability statements	3.1.1 Basis for preparation of the sustainability statement	81
BP-2 Disclosures in relation to specific circumstances		81
GOV-1 The role of the administrative, management and supervisory bodies	3.1.2 Governance	83
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	-	84
GOV-3 Integration of sustainability-related performance in incentive schemes	-	84
GOV-4 Statement on due diligence	-	84
GOV-5 Risk management and internal controls over sustainability reporting	-	85
SBM-1 Strategy, business model and value chain	3.1.3 Strategy	85
SBM-2 Interests and views of stakeholders	-	92
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	-	94
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	3.1.4 Impact, risk and opportunity management	96
IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	-	98
<b>ESRS E1 CLIMATE CHANGE</b>	3.2 Climate change [ESRS E1]	104
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	3.2.1 Governance	104
E1-1 Transition plan for climate change mitigation	3.2.2 Strategy	105
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	-	105
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	-	105
E1-2 Policies related to climate change mitigation and adaptation	3.2.3 Policies related to climate change [E1-2]	106
E1-3 Actions and resources in relation to climate change policies	3.2.4 Actions and resources in relation to climate change policies [E1-3]	107
E1-4 Targets related to climate change mitigation and adaptation	3.2.5 Metrics and targets	110
E1-5 Energy consumption and mix	-	112
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	-	113
E1-7 GHG removals and GHG mitigation projects financed through carbon credits	-	-

Disclosure requirements	Paragraphs	Pages
<b>ESRS S1 OWN WORKFORCE</b>	3.4 Own workforce [ESRS S1]	129
ESRS 2 SBM-2	3.4.1 Strategy	129
ESRS 2 SBM-3	-	129
S1-1 Policies related to own workforce	3.4.2 Impact, risk and opportunity management	131
S1-2 Processes for engaging with own workforce and workers' representatives about impacts	-	138
S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns	-	138
S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	-	131
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	-	131
S1-6 Characteristics of the undertaking's employees	3.4.3 Metrics	139
S1-7 Characteristics of non-employees in the undertaking's own workforce	-	141
S1-8 Collective bargaining coverage and social dialogue	-	141
S1-9 Diversity metrics	-	142
S1-10 Adequate wages	-	143
S1-11 Social protection	-	144
S1-12 Persons with disabilities	-	144
S1-13 Training and skills development metrics	-	144
S1-14 Health and safety metrics	-	146
S1-15 Work-life balance metrics	-	146
S1-16 Remuneration metrics (pay gap and total remuneration)	-	147
S1-17 Incidents, complaints and severe human rights impacts	-	147
<b>ESRS G1 BUSINESS CONDUCT</b>	3.5 Business conduct [ESRS G1]	148
ESRS 2 GOV-1 The role of the administrative, supervisory and management bodies	3.5.1 Governance	148
ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	3.5.2 Impact, risk and opportunity management	148
G1-1 Business conduct policies and corporate culture	3.5.3 Business conduct policies and corporate culture [G1-1]	149
G1-2 Management of relationships with supplier	3.5.4 Management of relationships with suppliers [G1-2]	151
G1-3 Prevention and detection of corruption and bribery	3.5.5 Prevention and detection of corruption [G1-3]	152
G1-4 Confirmed incidents of corruption or bribery	3.5.7 Metrics and targets	153

### 3.1.4.3 List of data points required by other European Union legislation

The table below summarises the information presented in the Group's sustainability report corresponding to the material ESRS standards identified following the double materiality analysis:

Topic	Negative impact indicators	Sections of the sustainability State	European legislative acts		
			Applicable Sustainable Finance Disclosure Regulation (SFDR) European legislative act	Pillar 3 reference	European law on climate reference
	Transition plan (ESRS E1-1)	Section 3.2.2.2 <i>Transition plan for climate change mitigation [E1-1]</i>	-	-	Applicable
	"Paris Agreement" reference indexes (ESRS E1-1)	The Group is not concerned by any of the exclusion criteria cited in Article 12 of Delegated Regulation 2020/1818 of July 17, 2020. It is not excluded from the "Paris Agreement" reference indexes. Section 3.2.2.2 <i>Transition plan for climate change mitigation [E1-1]</i>	-	Applicable	-
<b>GHS emissions</b>	GHS emissions (ESRS E1-6)	See section 3.2.5.4 <i>Gross GHG emissions, Scopes 1, 2, 3 and Total GHG emissions [E1-6]</i>	Material	Material	-
	GHG intensity of the companies that are beneficiaries of the investments (ESRS E1-6)	See section 3.2.5.4 <i>Gross GHG emissions, Scopes 1, 2, 3 and Total GHG emissions [E1-6]</i>	Material	Material	-
	GHG absorptions and carbon credits paragraph 56 (ESRS E1-7)	Non-material	-	-	Non-material
	Exposure to companies active in the fossil fuel sector (ESRS 2 SBM-1)	Not applicable*	Not applicable	-	-
	Share of consumption and non-renewable energy production (ESRS E1-5)	Section 3.2.5.3 <i>Energy consumption and energy mix [E1-5]</i>	Material	-	-
	Intensity of energy consumption by high climate impact sector (ESRS E1-5)	Not applicable	Not applicable	-	-
<b>Biodiversity</b>	Activities that have a negative impact on sensitive zones at the level of biodiversity (ESRS 2- IRO 1 - E4)	Non-material	Non-material	-	-
<b>Water</b>	Discharges into water (ESRS E2-4)	Non-material	Non-material	-	-
<b>Waste</b>	Ratio of hazardous waste and radioactive waste (ESRS E5-5)	Section 3.7 <i>Additional information</i>	Non-material	-	-

Topic	Negative impact indicators	Sections of the sustainability State	European legislative acts		
			Applicable Sustainable Finance Disclosure Regulation (SFDR) European legislative act	Pillar 3 reference	European law on climate reference
Social and personal questions	Violations of the principles of the United Nations Global Pact and the guiding principles of the OECD for multinational corporations (ESRS S1-17) (ESRS S2-1) (ESRS S3-1) (ESRS S4-1)	Section 3.4.3.12 <i>Incidents, complaints and severe human rights impacts [S1-17]</i>  Non-material	Material	-	-
	Absence of processes and mechanisms of compliance that control respect for the principles of the United Nations Global Pact and the guiding principles of the OECD for multinational corporations (ESRS S1-1) (ESRS S2-1) (ESRS S3-1) (ESRS S4-1)	Section 3.4.2.1 <i>Policies, actions and objectives related to own workforce [S1-1, S1-4 and S1-5]</i>  Non-material	Material	-	-
	Breakdown of the monetary amounts by acute and chronic physical risk, paragraph 66, point a) ESRS E1-9 Placement of the major assets exposed to a significant physical risk, paragraph 66 point c) (ESRS E1-9)	Phase-in	-	Phase-in	
	Breakdown of the book value of the Company's real estate assets by energy-efficiency class paragraph 67, point c) (ESRS E1-9)	Phase-in	-	Phase-in	
	Unadjusted gender pay gap (ESRS S1-16)	Section 3.4.3.11 <i>Compensation metrics (pay gap and total remuneration) [S1-16]</i>	Material	-	-
	Diversity within governance bodies (ESRS 2 GOV-1)	Section 3.1.2.1 <i>The role of the administrative, management and supervisory bodies [GOV-1]</i>	Material	-	-
	Exposure to controversial weapons (anti-personnel mines, cluster weapons, chemical weapons or biological weapons) (ESRS 2 SBM-1)	Not applicable	Not applicable	-	-



Topic	Negative impact indicators	Sections of the sustainability State	European legislative acts		
			Applicable Sustainable Finance Disclosure Regulation (SFDR) European legislative act	Pillar 3 reference	European law on climate reference
<b>Emissions</b>	Emissions of organic pollutants (ESRS E2-4)	Non-material	Non-material	-	-
	Emissions of atmospheric pollutants (ESRS E2-4)	Non-material	Non-material	-	-
	Emissions of substances that weaken the ozone layer (ESRS E2-4)	Non-material	Non-material	-	-
	Initiatives taken to reduce the emissions of the Group's entities (ESRS E1-4)	Section 3.2.4 <i>Actions and resources in relation to climate change policies</i> [E1-3]	Material	-	-
<b>Energy performance</b>	Breakdown of energy consumption by type of non-renewable energy sources (ESRS E1-5)	Section 3.2.5.3 <i>Energy consumption and energy mix</i> [E1-5]	Material	-	-
<b>Water, waste and other matter</b>	Water usage and recycling (ESRS E3-4)	Non-material	Non-material	-	-
	Total water consumption in m <sup>3</sup> in relation to the revenues of clean activities (E3-4)	Non-material	Non-material	-	-
	Water management policy (ESRS E3-1)	Non-material	Non-material	-	-
	Exposure to high hydric stress zones (ESRS E3-1)	Non-material	Non-material	-	-
	Investments in companies that produce chemical products (ESRS 2 SBM-1)	Not applicable	Not applicable	-	-
	Degradation of soils, desertification, impermeability of soils (ESRS 2- IRO 1 - E4)	Non-material	Non-material	-	-
	Investments in companies without sustainable land/agricultural practices (ESRS E4-2)	Non-material	Non-material	-	-
	Investments in companies without sustainable practices or policies with regards to the oceans/seas (ESRS E3-1) (ESRS E4-2)	Non-material	Non-material	-	-
	Ratio of non-recycled waste (ESRS E5-5)	Non-material	Non-material	-	-
	Protected natural species and areas (ESRS 2- IRO 1 - E4)	Non-material	Non-material	-	-
	Deforestation (ESRS E4-2)	Non-material	Non-material	-	-

Topic	Negative impact indicators	Sections of the sustainability State	European legislative acts		
			Applicable Sustainable Finance Disclosure Regulation (SFDR) European legislative act	Pillar 3 reference	European law on climate reference
Social and personnel issues	Policy to prevent accidents (ESRS S1-1)	Section 3.4.2.1.5 <i>Employee health and safety</i>	Material	-	-
	Accident rate (ESRS S1-14)	Section 3.4.3.9 <i>Health and safety metrics [S1-14]</i>	Material	-	-
	Number of days lost to injuries, accidents, fatalities or illness (ESRS S1-14)	Section 3.4.3.9 <i>Health and safety metrics [S1-14]</i>	Material	-	-
	Absence of code of conduct for suppliers (ESRS S2-1)	Non-material	Non-material	-	-
	Absence of mechanism to handle disputes or complaints about personnel issues (ESRS S1-3)	Section 3.4.2.3. <i>Processes to remediate negative impacts and channels for own workforce to raise concerns [S1-3]</i>	Material	-	-
	Insufficient protection whistle-blowers (ESRS G1-1)	Section 3.5.3 <i>Business conduct policies and corporate culture [G1-1]</i>	Material	-	-
	Cases of discrimination (ESRS S1-17)	Section 3.4.3.12 <i>Incidents, complaints and severe human rights impacts [S1-17]</i>	Material	-	-
	Ratio of excessive compensation (ESRS S1-16)	Section 3.4.3.11 <i>Compensation metrics (pay gap and total remuneration) [S1-16]</i>	Material	-	-
Human rights	Absence of human rights policy (ESRS S1-1) (ESRS S2-1) (ESRS S3-1) (ESRS S4-1)	Section 3.4.2.1 <i>Policies, actions and objectives related to own workforce [S1-1, S1-4 and S1-5]</i>  Non-material	Material	-	-
	Lack of due diligence (ESRS 2 GOV-4)	Section 3.1.2.4 <i>Statement on due diligence [GOV-4]</i>	Material	-	-
	Absence of processes and measures to prevent human trafficking (ESRS S1-1) (ESRS S2-1)	The Group has not identified specific risks in the treatment of humans, forced labour or even child labour. Non-material	Non-material	-	-
	Businesses and suppliers presenting a major risk of child labour (ESRS 2 SBM3-S1) (ESRS 2 SBM3-S2)	The Group has not identified specific risks in the treatment of humans, forced labour or even child labour. Non-material	Non-material	-	-
	Businesses and suppliers presenting a major risk of forced or mandatory labour (ESRS 2 SBM3-S1) (ESRS 2 SBM3-S2)	The Group has not identified specific risks in the treatment of humans, forced labour or even child labour. Non-material	Non-material	-	-

Topic	Negative impact indicators	Sections of the sustainability State	European legislative acts		
			Applicable Sustainable Finance Disclosure Regulation (SFDR) European legislative act	Pillar 3 reference	European law on climate reference
Number of serious problems and incidents for human rights identified	Number of serious problems and incidents identified for human rights relating to the companies that benefit from investments, on the basis of a weighted average (ESRS S1-17)	Section 3.4.3.12 <i>Incidents, complaints and severe human rights impacts [S1-17]</i>	Material	-	-
	(ESRS S2-4)	Non-material			
	(ESRS S3-4)				
	(ESRS S4-4)				
Anti-corruption measures	Absence of policy to fight corruption and corrupt acts (ESRS G1-1)	Section 3.5.3 <i>Business conduct policies and corporate culture [G1-1]</i>	Material	-	-
	Insufficient measures taken to correct failure to comply with standards to fight corruption and corrupt acts (ESRS G1-4)	Section 3.5.7.1 <i>Incidents of corruption [G1-4]</i>	Material	-	-
	Number of convictions and amount of fines for violation of the legislation on the fights against corruption and corrupt acts (ESRS G1-4)	Section 3.5.7.1 <i>Incidents of corruption [G1-4]</i>	Material	-	-

\* GTT is a technology company with expertise in cryogenic containment systems for the transportation and storage of LNG. The Group is integrated into the LNG value chain but is not directly involved in the operation, transportation, distribution or storage of fossil fuels.

## 3.2 CLIMATE CHANGE [ESRS E1]

### 3.2.1 GOVERNANCE

#### 3.2.1.1 Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

In 2024, the proportion of the variable pay of the Chairman and Chief Executive Officer of GTT and of the Chief Executive Officer based on CSR criteria was 21%. This variable compensation includes implementing decarbonisation levers that are aligned with the goals in the CSR roadmap shown in section 3.7 of this document. For more information, please see the compensation

criteria tables in chapter 4 *2024 Corporate Governance Report*, section 4.2.2.2.1 *Compensation policy applicable to the Chairman and Chief Executive Officer (applicable to Philippe Berterottière in his capacity as Chairman and Chief Executive Officer with effect from February 9, 2025 and to any Chief Executive Officer who may be appointed in the future).*

## 3.2.2 STRATEGY

### 3.2.2.1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities [ESRS 2 IRO-1 and SBM-3]

GTT applies a process to identify and analyse its climate-related impacts, risks and opportunities. In 2024, this process was extended and strengthened by means of a double materiality analysis, described in section 3.1.4.1 *Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]* of this document. Each year, the Group conducts a risk mapping exercise to identify and update the main risks to which it is exposed and define the corresponding priority action plans. For more information, see section 3.2.4 *Actions and resources in relation to climate change policies [E1-3]* of this document.

#### Climate change mitigation

The Group's dependence on the LNG maritime transportation business described in section 2.2.2.1.1 *The Group's dependence on the maritime LNG transport business – Prolonged cyclical decline in LNG membrane orders* constitutes a transition risk to a low-carbon economy. In the event of a marked slowdown in the growth of LNG demand, investment decisions could bottom out over several years, which would have a significant effect on demand for new LNG carriers and therefore for the Group's confinement systems. This transition risk analysis is based on energy demand scenarios. The Group plans to include climate scenarios to supplement these analyses. In 2024, 92% of GTT's income came from activities in the LNG value chain, and these activities are expected to remain dominant in the short (2024-2025) and medium (2025-2035) term. The Group has also identified opportunities linked to the transition to a low-carbon economy, in particular a growth in revenue generated by new products and solutions to meet market expectations with regard to decarbonisation and by the diversification of its activities. This strategy aims to anticipate market transformations by adapting to new regulations and focusing on sustainable solutions. While these investments in decarbonisation may result in additional costs in the medium term, they are vital for ensuring the resilience of GTT's business model and for maintaining its competitiveness in the face of market changes and increasingly demanding requirements in terms of environmental performance.

In order to manage these risks and grasp these opportunities, GTT has adopted a proactive approach based on innovation and the diversification of its activities, as described in section 2.2.2.1.1 *The Group's dependence on the maritime LNG transport business – Prolonged cyclical decline in LNG membrane orders*.

In order to reduce its direct contribution to climate change and mitigate the associated negative impacts, GTT has taken actions to reduce its carbon footprint. These are presented in detail in section 3.2.4 *Actions and resources in relation to climate change policies [E1-3]* of this document. The implementation of the trajectory to reduce greenhouse gas (GHG) emissions will require financial investments likely to result in additional costs for GTT and its stakeholders (in particular its direct and indirect customers) in the medium term.

#### Climate change adaptation

In 2025, the Group has identified climate hazards liable to disrupt its activities, both at tertiary sites (offices) and shipyards. GTT has analysed its exposure to the physical risks based on projections resulting from the latest climate modelling available for each hazard in question<sup>(1)</sup>, based on the following climate scenarios: very high emissions (SSP5-8.5) and intermediate emissions (SSP2-4.5) by 2030 and 2050.

The exposure analysis of its offices in France and the shipyards in China and South Korea covered all the hazards specified in Annex A of the Taxonomy Regulation.

An increase in the frequency and/or intensity of severe heat, heavy rain and flooding by runoff could affect GTT's activities in France, particularly with regard to access to electricity and the working conditions of its teams. A specific risk has been identified for Elogen, whose business model may be undermined by a reduction or instability in access to energy.

In China and Korea, rising sea levels and the possible increased intensity of typhoons expose shipyards to disruption, as well as the risk of severe heat associated with high humidity levels. However, given the nature of GTT's business model, no significant financial risk has been identified.

(1) CMIP6 – IPCC interactive atlas, CMIP5 – Copernicus

To summarise, GTT has identified six climate-related Impacts, Risks and Opportunities (IROs):

ESG considerations	Impacts, Risks and Opportunities	Current/ anticipated effects	Value chain	Time horizon	Description
Climate change adaptation	Negative impact	Potential	Own operations/ Downstream value chain	Medium term	Danger to workers and visitors to sites exposed to the effects of climate change, in operations and/or the value chain (shipyards)
	Risk	Actual	Own operations, Elogen	Short term	Risk of disruption to business activities and even to the transformation of Elogen's business model in the event of disrupted access to energy
Climate change mitigation	Positive impact	Actual	Own operations	Medium term	Contribution to the roll-out of activities and solutions to decarbonise the economy
	Negative impact	Actual	Own operations	Invariable	Contribution to climate change by greenhouse gas emissions (Scopes 1, 2 and 3) resulting from the Group's activities
	Risk	Actual	Own operations	Medium term	Investments allocated to implementing the trajectory for reducing the Group's carbon footprint
	Opportunity	Actual	Own operations	Medium term	Increase in revenue linked (1) to the new solutions and products launched in response to customers' decarbonisation expectations, and (2) to the diversification of business activities

### 3.2.2.2 Transition plan for climate change mitigation [E1-1]

GTT has defined ambitious objectives to reduce its greenhouse gas emissions covering Scopes 1, 2 and 3 by 2033, as described in section 3.2.5.1 *Targets related to climate change mitigation and adaptation* [E1-4] of this document. Contrary to the transition plan criteria defined in the CSRD, GTT has not defined any carbon neutrality objective by 2050 and the Scope 3 emissions reduction trajectory is not aligned with a 1.5°C scenario to take into account the growth outlook for the business. Consequently, GTT has not adopted a transition plan as defined according to CSRD criteria and has not set a date by which it plans to adopt one.

At the start of 2024, GTT submitted its carbon emissions reduction targets for Scopes 1, 2 and 3 to the SBTi (Science Based Target Initiative). Following exchanges with the SBTi as part of the examination of this trajectory, the GTT Group finally decided not to pursue the validation process. In effect, the methodological

approaches proposed by the SBTi are not currently suitable for GTT's business model, as its design and licensing activity would result in the undertaking excluding categories 1 (materials) and 11 (use of containment systems) from its indirect emissions reduction target. As these two categories represents most of GTT's Scope 3 emissions, the Group decided to keep them in its reduction target so as not to reduce the activities included in this scope to a minimum (business travel, for example), which would reflect neither the Group's emissions profile nor its impact on decarbonisation in the maritime sector. GTT reserves the option of reopening dialogue processes with the SBTi in the event of a change in the methodologies.

This approach reflects GTT's ambition to contribute to combating climate change and forms part of its global strategy to support the mitigation efforts of its customers.

## 3.2.3 POLICIES RELATED TO CLIMATE CHANGE [E1-2]

### Mitigation policy

GTT's climate change mitigation policy aims to:

- reduce the direct impact of the Group's activities on the climate by incorporating climate-related challenges into the management of its activities;
- offer products and services enabling its direct and indirect customers to reduce their carbon footprint;
- include climate considerations in its governance and decision-making processes.

This policy is based on the analysis of climate-related risks and opportunities. It covers all the Group's activities and is directly integrated into the CSR roadmap, which includes the trajectory for the reduction of greenhouse gas emissions (GHG) for Scopes 1, 2 and 3.

The mitigation policy involves the efforts of GTT employees as well as the undertaking's main stakeholders. In effect, the engagement and contribution of stakeholders for actions involving the upstream and downstream value chain, in particular direct customers,

purchasing decision makers and approved suppliers, is necessary in order to achieve the GHG reduction targets set by the Group.

**The Group's climate governance** is based on several levels of responsibility and engagement:

- **the Board of Directors**, in particular through specialised committees, plays a key role in managing challenges related to sustainability. These committees include the Strategic and CSR Committee and the Audit and Risk Management Committee, the responsibilities of which are described in sections 3.1.2.1 *Role of the administrative, management and supervisory bodies* [GOV-1] and 3.1.2.2 *Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies* [GOV-2].
- **the Chief Executive Officer** is responsible for incorporating climate considerations into the Group's global strategy and for ensuring their proper implementation, in conjunction with the members of the Executive Committee;

- **the Executive Committee** is in charge of assessing and managing the risks related to the climate transition, whilst respecting the long-term strategic guidelines defined by the Board of Directors. It identifies the opportunities to diversify the Group's activities and supports the development of the personnel's technological expertise in connection with climate-related challenges. In addition, it is responsible for managing the Group's sustainable development strategy, including where this relates to climate-related issues. It also sets the Group's objectives in terms of reducing CO<sub>2</sub> emissions and establishes actions plans to achieve them, under the oversight of the Strategic and CSR Committee of the Board of Directors;
- **the Administrative and Financial Division** is responsible for adopting the strategic guidelines and budgets necessary to enable the Group to achieve its sustainable development goals;

- **the Chief Innovation Officer** also plays a crucial role in contributing to the adoption of innovative, strategic and commercial choices essential for the Group to achieve its decarbonisation goals.

The Investor Relations and CSR Department within the Administrative and Financial Division coordinates cross-functional actions related to the climate policy.

GTT's climate goals are communicated to all external stakeholders via the CSR page of the Group's website. The climate policy is presented in section 3.2.3 *Policies related to climate change [E1-2]* of this document. All GTT Group employees can access this information, as well as specific communications, via direct internal information sessions, as well as on the Intranet page dedicated to the undertaking's CSR commitments.

## Adaptation policy

GTT continues to pursue its work regarding the effects of climate change on its activities, which guides its policy in terms of climate change adaptation. As at this report's publication date, the Group has not formalised an adaptation plan based on the conclusions of its exposure analysis. In its next sustainability reports, the Group will detail risk reduction measures implemented regarding

employee working conditions. In the event of unusual unfavorable weather conditions or exceptional circumstances, the Human Resources Division and the Health and Safety Department already implement targeted action to maintain good working conditions for personnel, such as modification of working hours, for example.

## 3.2.4 ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES [E1-3]

Emission reduction estimates per lever for Scopes 1 and 2 are based, in particular, on the implementation of regulations (such as the tertiary decree in France) and changes in some countries'

energy mixes. For Scope 3, they are primarily based on assumptions related to GTT's R&D and commercial strategy. This information is considered confidential and is not disclosed in this report.

### 3.2.4.1 Actions to reduce direct emissions – Scope 1

As part of its commitment, GTT implements several strategic actions to reduce its direct CO<sub>2</sub> emissions (Scope 1). These actions target, in particular, GTT's head office in Rémy-lès-Chevreuse ("Beauplan"), which represented almost 70% of the workforce at December 31, 2024. These actions include, in particular, improving the energy efficiency of the buildings, transitioning the vehicle fleet to hybrid and electric vehicles and switching to electric heating.

#### Improvement of building energy efficiency

The programme to improve building energy efficiency involves retrofitting the three buildings at the Beauplan site in Saint-Rémy-lès-Chevreuse, the head office of GTT, by 2027. Retrofitting of the first building was completed in 2024, including improvement of the insulation, the replacement of lighting with LEDs, the installation of a rainwater collection system, solar panels, and the setting up of Centralised Technical Management (CTM). These actions seek to reduce energy consumption and improve the overall energy performance of the Group's buildings. These measures are accompanied by eco-friendly behaviour campaigns

targeting employees. The capital expenditure mobilised as part of the energy renovation work for 2024 are presented in section 3.3.2.4, which presents the taxonomy indicators. It concerns the CapEx corresponding to activity 7.3 – Installation, maintenance and repair of energy efficiency equipment. It is also included in note 7 of section 5.1.5 *Notes to the consolidated financial statements*.

#### Transition of the vehicle fleet to hybrid and electric vehicles

GTT has a fleet of ten company cars and five cars available to employees at the Saint-Rémy-lès-Chevreuse site for business travel, mainly in the Paris area. The GTT action plan to reduce emissions from fuel consumption by this vehicle fleet aims to replace at least 70% of the fleet with hybrid or electric vehicles by 2030.

In 2024, the needs of GTT and the associated contracts were reassessed, marking the first stage in this transition. In 2025, electric charging stations will be installed at GTT sites to support this transformation and facilitate the use of these vehicles.



### 3.2.4.2 Actions to reduce indirect emissions – Scope 2

GTT has implemented specific actions to limit its indirect CO<sub>2</sub> emissions (Scope 2), consisting in entering into green electricity contracts and generating renewable energy consumed on site, particularly through the installation of solar panels on the roofs of buildings, where possible.

#### Transition to green electricity supply contracts

The Group has signed green electricity supply contracts to procure electricity generated from renewable sources. In 2024, supply contracts with certificate of origin for the Saint-Rémy-lès-Chevreuse, Paris Beaubourg and Paris Montparnasse sites were renewed for a

period of two years. In addition, a new green electricity contract was signed for the Elogen subsidiary in April 2024. These measures will help reduce GTT's emissions in the market-based approach.

#### Installation of solar panels

As part of the energy retrofitting of its head office, GTT plans to install solar panels on the roofs of buildings that allow this. In 2024, the power installed on the roof of the completed building covered up to 53% of the building's energy needs, thus reducing the consumption of electricity from the grid.

### 3.2.4.3 Actions to reduce indirect emissions – Scope 3

The analysis of GTT's indirect Scope 3 emissions in 2023 enabled the Group to focus on technological improvements with the greatest impact on direct greenhouse gas emissions by the Group's customers.

Nearly 60% of Scope 3 emissions are linked to the use of the products designed and sold: these are mainly emissions from the evaporation (or boil-off) of the liquefied gas that is not used to power the engine and must either be re-liquefied or burnt.

The second major source of indirect GHG emissions are the materials used to manufacture GTT's solutions. Due to the significant emissions of the blowing agent used in the foams that reduce heat conduction in the tanks, this category represents around 26% of all Scope 3 emissions.

Reducing indirect emissions (Scope 3) in line with GTT's greenhouse gas emission reduction trajectory, therefore requires the implementation of actions directly incorporated into the design of the products and services offered by GTT to its customers. In particular, the Group has identified the following levers:

#### Halting the approval of HFC foams

On the basis of the conclusions of both its Innovation Department, particularly the materials division, and Sales Department, GTT has set itself a target to reduce its Scope 3 GHG emissions. This means adopting an action plan that most notably includes stopping the approval of R-PUF type polyurethane foams with HFC as a blowing agent, due to its very significant GWP (Global Warming Potential).

In 2024, GTT informed all shipyard foam suppliers of its intention to cease this approval as of January 1, 2025, subject to contractual commitments in effect on this date. In order to ensure a gradual transition for its customers and their materials suppliers, GTT plans to initiate an engagement process with the stakeholders concerned from 2025.

#### Further development of new, low-BOG (boil-off gas) and reliquefaction systems

The technologies developed by GTT allow ship-owners to optimise the thermal performance and safety of the membrane tanks used to transport or store LNG. Indeed, the insulation efficiency influences the boil-off gas (BOG) rate, and, as a result, the emissions associated with using a containment system. In this respect, reducing BOG is one of the main levers for reducing Scope 3 emissions. This decrease in the boil-off rate constitutes a real added value for gas companies and ship-owners, as combined with a decrease in engine fuel consumption, it significantly reduces vessel operating costs. It also leads to a very significant reduction in CO<sub>2</sub> emissions per cubic metre transported (-47%<sup>(1)</sup> compared with 2011). By providing increasingly high performance and robust technology, GTT is thus reducing its customers' energy losses, and this improvement was made possible by being continuously innovative in terms of the products and technologies on offer.

### 3.2.4.4 Initiatives to reduce carbon in the maritime sector

#### Continuation of innovation and research and development activities

GTT is continuing to develop innovative systems, in particular with:

- GTT NEXT1 technology, an innovative containment system for transporting and storing LNG, which improves the energy efficiency and safety of tanks thanks to the use of two metal

sealing barriers, thereby reducing transport costs while optimising performance. GTT obtained two approvals in June 2024 for this technology: a Design Approval<sup>(2)</sup> from the Bureau Veritas classification society and a General Approval for Ship Application<sup>(3)</sup> from Lloyd's Register;

(1) Reducing CO<sub>2</sub> emissions per tonne shipped compared to 2 LGNCs: 2011 (steam turbine, Mark III, BOR 0.15%, 145,000 m<sup>3</sup>, 110 tonnes daily consumption), versus 2022 (MEGI/XDF, Mark III Flex+, BOR 0.07%, 174,000 m<sup>3</sup>, 70 tonnes daily consumption)

(2) "DA".

(3) "GASA".

- the development of LNG tanks with a design pressure of 1 barg. Developed for vessels fuelled by LNG, the “1 barg” concept enables operations with an effective pressure of up to 1 bar, compared to a current maximum of 0.7 bar. This offers significant advantages for ship-owners, including:
  - increased retention time: the “1 barg” concept improves the performance of LNG tanks by offering a greater range of pressure. This design makes it possible to keep the gas for longer and avoid unnecessary losses during periods of reduced activity. This innovation will enable vessels fuelled by LNG to comply with future port regulations on the electric powering of vessels at berth, such as the FuelEU Maritime Regulation. Thanks to the very low evaporation rate of the Mark III Flex technology and the increased retention time of the “1 barg” design, ship-owners will be able to stop consuming LNG and only use shore power.
- work on alternative fuels:
  - an Approval in Principle (AiP) was obtained in 2024 for the NH<sub>3</sub>-ready rating, allowing tanks to be converted for the use of ammonia (NH<sub>3</sub>), thereby offering greater versatility and the possibility of operating with another fuel during the vessels’ second life,
  - other AiPs have been obtained for some major advances, including three concerning the Mark III “Multifuel Ready” technology enabling the use of ammonia and methanol as alternative fuels.

### Commercial strategy recommending high-performance and reliable technologies to reduce emissions

As part of its commitments to decarbonisation and the diversification of its activities, the Group has put in place a commercial strategy in favour of efficient and robust technologies enabling its customers to reduce their energy losses.

In line with its mission, GTT will be supporting maritime transportation operators in their efforts to reduce their greenhouse gas (GHG) emissions, whether to meet the targets of the International Maritime Organization or to reduce the impact on their business

of the European carbon tax (effective from 2024). In addition to the market for transporting cryogenic gas by sea, the Group is developing new ways to support the commercial shipping industry in its decarbonisation strategy. In particular, GTT is offering LNG fuel containment systems for the entire fleet of commercial shipping vessels as well as a digital services platform.

### Converting commercial shipping to LNG fuel

LNG is currently the only readily available fuel that can reduce GHG emissions from commercial shipping. The Group therefore aims to significantly contribute to reducing the greenhouse gas emissions generated by merchant vessels, thanks to the replacement of oil by LNG. In particular, using LNG as fuel almost totally eliminates sulphur oxide emissions (SO<sub>x</sub>) compared to fuel oil propulsion. Furthermore, it makes it possible to comply with regulations concerning emissions of nitrogen oxide, sulphur oxide, CO<sub>2</sub>, as well as particulate emissions and, in particular, the international Marpol convention<sup>(1)</sup>.

The Recycool™ system is for vessels equipped with tanks for LNG as a fuel, a solution designed to reliquefy excess evaporation gas in vessels fuelled by LNG and equipped with high-pressure engines. The Recycool™ system recovers the cold energy from the LNG before it is vaporised and sent to the engine. This system, already in operation on board several vessels, is simple in design and significantly reduces the CO<sub>2</sub> emissions of any type of vessel fuelled by LNG. In 2024, GTT, in collaboration with Nikkiso Clean Energy & Industrial Gases, the leader in Japan in the supply of cryogenic pumps, received an order from a Chinese shipyard to equip ten container ships fuelled by LNG with this system.

### Research and development on carbon capture and the transportation of liquid hydrogen

Chapter 1 *Presentation of the Group and its activities*, section 1.3.2.3 *Development focus and projects*, describes the innovative solutions implemented by the Group to support the challenges of decarbonising the world of maritime transportation and energy.

### Comparison of emissions for two fuel types

Type of fuel	Energy density Mmbtu/tonne	Engine yield g/kWh	Overconsumption %	SO <sub>x</sub> %m/m	NO <sub>x</sub> g/kWh	Particles g/k fuel	CO <sub>2</sub> kg/kWh
Low-sulphur-content oil or scrubber <sup>(1)</sup>	40-42	140	2-3% (if scrubber)	0.5%	7 to 15	1 to 1.5	0.27 to 0.28
LNG as fuel	48	180		0%	< 1.5 (MEGI)	0	0.21
LNG vs Oil comparison	+15% to 20% denser	+5% to 7% more efficient	+2% to 3% gain vs. scrubber	No SO <sub>x</sub> for LNG	NO <sub>x</sub> : -80% to 90%	No particles for the LNG	CO <sub>2</sub> : -20% to 25%

(1) *Smoke scrubber.*

(1) *International Convention for the Prevention of Pollution from Ships (known as the Marpol convention).*

## Digital solutions

For years, the GTT Group has been expanding its range of digital services to guide its customers through the process of decarbonising their fleet of vessels. GTT develops cutting-edge digital technologies to optimise operational costs for its customers, reduce the associated consumption and emissions, improve safety and achieve operational excellence.

The Group's digital solutions support ship-owners and charterers by enabling them to monitor their compliance and find operational ways to improve their CII classification (Carbon Intensity Index), thereby reducing their GHG emissions.

In 2024, Ascenz Marorka notably inaugurated its second Real-Time Fleet Performance Monitoring Centre in Singapore, which offers, in particular, the advanced "Weather Routing" system. Supported by vessel models based on artificial intelligence and intelligent navigation algorithms, this technology optimises routes, improves energy efficiency and helps reduce CO<sub>2</sub> emissions. By incorporating operational, regulatory and environmental factors, it guarantees safe navigation in various sea conditions, while maximising operational efficiency.

See section 1.3.2.3 *Development focus and projects* for more details about the Group's digital business.

## Engagement with the downstream value chain

GTT initiates dialogue with its direct and indirect customers on sustainability and how to reduce their carbon footprint. This engagement was particularly clear at the seminar organised by GTT in Shanghai in November 2024, the theme of which ("Unlocking the LNG and Ethane Shipbuilding Industry for Greener Shipping") highlighted the importance of innovation for more environmentally friendly shipping. At the Gastech 2024 seminar in Houston, the undertaking also revealed innovations to reduce emissions in the maritime industry, enabling the use of alternative fuels such as ammonia and methanol for LNG vessels. Lastly, the GTT teams organised a seminar in Tokyo attracting 120 key players in the Japanese shipping industry, including ship-owners, shipyards, trading firms and technological partners. This seminar highlighted the innovative solutions offered by the Group to improve efficiency and sustainability in the shipping sector: the GTTNEXT1 solution, the concept for a 200,000 m<sup>3</sup> "slow steaming" LNG carrier, as well as developments in the field of ultra-wide ethane carriers and onshore NH<sub>3</sub> storage tank solutions.

## 3.2.5 METRICS AND TARGETS

### 3.2.5.1 Targets related to climate change mitigation and adaptation [E1-4]

The Group has set itself ambitious targets to reduce its GHG emissions (Scopes 1, 2, 3) to help meet the emission reduction targets of the Paris Agreement.

#### Targets for Scope 1 and 2 emissions

GTT has defined carbon emission reduction targets for Scopes 1 and 2 to help limit global warming to +1.5°C. It targets a -55% reduction in emissions in 2033 compared to the 2021 reference year.

#### Targets for Scope 3 emissions

The Scope 3 emissions reduction target aims to contribute to the "well below 2°C" trajectory and takes into account constraints linked to the growth of the business, shipbuilding lead times and the ecosystem. It targets a -33% reduction in emissions in 2033 compared to the 2021 reference year.

#### Targets related to decarbonisation of the maritime sector

GTT supports the energy transition by developing activities compatible with a low-carbon economy. As part of its roadmap, the Group is committed to allocating an increasing share of its research and innovation efforts to low-carbon solutions, including hydrogen, ammonia and carbon capture. To this end, the Group has created a metric measuring the "share of patents filed in low-

carbon energy" with a baseline of 19% in 2022. The aim is to achieve 28% of patents filed in low-carbon energy by 2026. This metric is calculated by dividing the number of patents filed in low-carbon energy by the total number of patents filed.

In 2024, the GTT Group filed 29% of its patents in alternative fuels, hydrogen or carbon capture.

GTT has also set itself the goal of defining a methodology to quantify the emissions avoided thanks to use of its technologies in order to measure its contribution to reducing the carbon footprint of its customers. Avoided emissions denote the positive impact resulting from a comparison between the GHG impact of a solution and an alternative, baseline solution. An avoided emission is therefore the difference between the GHG emissions produced, or that will be produced (the "solution") and the emissions that would have been produced without the solution (in the baseline scenario).

In order to ensure the credibility of this approach, a rigorous methodology is under development with an external service provider, with the aim of disclosing avoided emissions in 2026.

In 2024, the GTT Group defined a methodology linked to the frameworks proposed by the World Business Council for Sustainable Development ("WBCSD") and the Net Zero Initiative. This first approach has been applied to a selection of technologies and will enable an initial quantification of avoided emissions in 2025.

### 3.2.5.2 Summary table of climate targets

Commitment		Position in the value chain	Reference year	Baseline			Sub-targets	Levers	Key undertaking actions in 2024	2024 results
Sub-commitment	Metric				Target	Timescale				
REDUCING THE CLIMATE IMPACT OF OUR ACTIVITIES										
Reduction of Scope 1 emissions										
	Tonnes of Scope 1 CO <sub>2</sub> emitted	Own operations	2021	448	-55%	2033	Improvement of building energy efficiency	Retrofitting of three buildings at the Beauplan site in Saint-Rémy-lès-Chevreuse, the head office of GTT. These buildings housed 70% of the teams at 12.31.2024.	Delivery of GTT Head Office building C (support functions and General Management) including, in particular: <ul style="list-style-type: none"><li>change of insulation</li><li>replacement of lighting outside the senior executive area with LEDs</li><li>installation of a rainwater collection system</li><li>implementation of Centralised Technical Management (CTM)</li></ul>	See section 3.2.5.4 <i>Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]</i>
							Replacement of the car fleet with electric/hybrid vehicles and electric charging points	Replacement of the car fleet with electric/hybrid vehicles and electric charging points	Reassessment of the needs and associated contracts	
							Progressive transition to electric heating	Progressive transition to electric heating	Conversion of building C to electric heating	
Reduction of Scope 2 emissions (market-based)										
	Tonnes of Scope 2 CO <sub>2</sub> emitted	Own operations	2021	160	-55%	2033	Transition to green electricity supply contracts	Transition to green electricity supply contracts	<ul style="list-style-type: none"><li>Renewal of the supply contracts with certificate of origin for Saint-Rémy, Paris Beaubourg and Paris Montparnasse for two years</li><li>Signing of a green electricity contract for Elogen in April 2024</li></ul>	See section 3.2.5.4 <i>Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]</i>
							Installation of solar panels	Installation of solar panels	<ul style="list-style-type: none"><li>Installation of solar panels on building C covering 53% of the building's needs</li></ul>	
Reduction of Scope 3 emissions										
	Tonnes of Scope 3 CO <sub>2</sub> emitted	Downstream	2021	12,568,000	-33%	2033		<ul style="list-style-type: none"><li>Further development of new, low-BOG and reliquefaction systems</li><li>Halting the approval of HCF foams</li></ul>		See section 3.2.5.4 <i>Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]</i>
DECARBONISING THE MARITIME SECTOR										
Adopting a robust method of assessing our contribution to the decarbonisation of our customers (avoided emissions)										
	Construction of a methodology to quantify avoided emissions		2022	N/A	Disclosure of avoided emissions	2026			Construction of a methodology with an external service provider	See section 3.7 <i>Additional information</i>
Contributing to a low-carbon world										
	Share of patents filed in low-carbon energy		2022	19%	28%	2026			Continued filing of patents in alternative fuels and carbon capture	29%  See section 3.2.5.1 <i>Targets related to climate change mitigation and adaptation [E1-4]</i>

### 3.2.5.3 Energy consumption and mix [E1-5]

The GTT Group's energy consumption mainly consists of the consumption of electricity and heat for its offices, as well as the use of fuel for the fleet of company cars and vehicles made available to personnel at the Saint-Rémy-lès-Chevreuse site.

#### Changes in electricity consumption

In 2024, the GTT Group recorded a total electricity consumption of 4,306 MWh, up +16% compared to 2023 due to a full year's occupancy of the Paris Montparnasse offices (opened in September 2023) and the acquisition of research and development premises in Buc, near Saint-Rémy-lès-Chevreuse, in the third quarter of 2024.

The signing of new green electricity supply contracts enabled GTT to cover 89% of its electricity needs, compared to 70% in 2023.

	Unit	2023	2024
Total electricity consumption	MWh	3,729	4,306
O/w electricity from renewable sources	MWh	2,609	3,848
Share covered by contractual instruments used to purchase energy bundled with production attributes	%	70.0%	89.4%

#### Consumption of fossil fuels

In 2024, the recognition of new company cars over a full year resulted in a +40% increase in litres of fuel consumed. A fuel oil generator ensures the stability of the electricity supply at the head office. Its consumption increased by +14% in 2024. Natural gas consumption fell by -13% in 2024 due to the non-use of buildings undergoing works at the Beaulieu site.

Overall, GTT's energy consumption from fossil fuel sources represented 34% of its total consumption in 2024, compared to 45% in 2023. This decrease was largely due to building retrofitting works that resulted in a reduction in natural gas consumption.

#### Consumption of low-carbon and renewable energy

The implementation of renewable electricity supply contracts for a greater scope in 2024 explains the 48% rise in renewable energy. Consumption from nuclear sources comes from the French residual mix.

These actions made it possible to limit the carbon footprint of the total energy consumed in 2024, which was up +21%.

## Energy consumption and mix

The energy consumption and mix of GTT break down as follows:

Energy consumption and mix	Unit	2023	2024	Change
(1) Fuel consumption from coal and coal products	MWh	0	0	-
(2) Fuel consumption from crude oil and petroleum products	MWh	104.45	146.47	+40.2%
(3) Fuel consumption from natural gas	MWh	1,951.43	1,689.25	-13.4%
(4) Fuel consumption from other fossil sources	MWh	0	0	-
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	111.35	111.34	-
<b>(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)</b>	<b>MWh</b>	<b>2,167.22</b>	<b>1,947.06</b>	<b>-10.2%</b>
Share of fossil sources in total energy consumption	%	45%	34%	-
(7) Consumption from nuclear sources	MWh	1,051.00	394.56	-62.5%
Share of consumption from nuclear sources in total energy consumption (%)	%	22%	7%	-
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen etc.)	MWh	0	0	-
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	2,608.94	3,847.69	+47.5%
(10) Consumption of self-generated non-fuel renewable energy	MWh	0	0	-
<b>(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)</b>	<b>MWh</b>	<b>2,608.94</b>	<b>3,847.69</b>	<b>+47.5%</b>
Share of renewable sources in total energy consumption (%)	%	55%	66%	-
<b>TOTAL ENERGY CONSUMPTION (MWh) (CALCULATED AS THE SUM OF LINES 6 AND 11)</b>	<b>MWh</b>	<b>4,776.17</b>	<b>5,794.76</b>	<b>+21.3%</b>

### 3.2.5.4 Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]

#### Methodology

The standard used by GTT to calculate its carbon footprint is the Greenhouse Gas (GHG) Protocol. This standard is the most widely used greenhouse gas accounting standard.

GTT is constantly working to improve the calculation of its emissions by reassessing the criticality of emissions items and by refining the calculation of its largest emissions items.

In 2024, the Group reinforced its collection of physical data prior to the calculation of GHG emissions and updated the emissions factors applied to market-based electricity consumption.

#### Reference year

GTT has defined 2021 as the reference year, as it is representative of the activities included in the reporting scope while excluding exceptional external factors and other disruptive events for the market or for the value chain.

#### Scope

For the years 2021 to 2024, emissions are calculated at constant scope, according to the operational control methodology provided for in the GHG Protocol.



## Direct and indirect emissions: Scopes 1 and 2

Scope 1 represents the greenhouse gas emissions from:

- energy consumption – with the exception of purchased electricity, heat and steam – on the sites controlled by GTT, mainly consisting of fuel combustion (natural gas, other fossil fuels etc.);
- fuel consumption for company cars.

The following primary data were collected by GTT, at all the sites under its control:

- for fuel: type of fuel and annual quantity consumed in litres.

Scope 1 biogenic emissions are negligible for the GTT Group and therefore were not included in this analysis.

Scope 2 represents GHG emissions from the production of purchased electricity, steam and heat consumed at sites controlled by GTT.

The following primary data were collected by GTT, at all the sites under its control:

- type of electricity purchased and annual quantity consumed in kWh.

The emissions factors used are taken from the French Agency for Ecological Transition (Ademe) database, Defra UK and the U.S. Environmental Protection Agency (Eco Invent).

Scope 2 biogenic emissions are negligible for the GTT Group and therefore were not included in this analysis.

## Other indirect emissions: Scope 3

The following table presents the application of the GHG Protocol to GTT, by category deemed relevant according to the initial inventory carried out by the Group. Items deemed to be of low criticality are not subject to annual monitoring, whereas items deemed to be of medium criticality are calculated annually based on estimates resulting from the initial carbon inventory carried out by the Group. Scope 3 biogenic emissions are negligible for the GTT Group and therefore were not included in this analysis. Emission items with the highest criticality are calculated each year based on updated, physical data published in the Universal Registration Document. GTT mainly uses secondary data to calculate its Scope 3 emissions, such as navigation profiles and how they evolve over the vessels' life span. For each containment system, GTT defines an emission profile based on the materials used, the freight capacity and the operational profile of the vessel.

Scope 3 category	Application to GTT	Criticality
(1) Purchased goods and services	Materials approved by GTT used in membrane containment technology and supplied directly by suppliers to GTT's customers Invar (Fe,C,Cr)/Inox (Fe, Ni) membranes, polyurethane foams, plywood, mastic/glues, glass wool, blowing agent	High
(2) Capital goods	Equipment purchased by GTT during the year and amortised by GTT (e.g. office supplies, IT equipment)	Low
(3) Fuel and energy-related activities	Emissions related to fuel and energy not included in Scopes 1 and 2	Low
(4) Upstream transportation and distribution	Transport of materials from suppliers to the shipyards.	Medium
(5) Waste generated in operations	GTT does not produce significant volumes of waste as part of its design and engineering activities	Low
(6) Business travel	Impact of business travel (train, plane, hire car)	Medium
(7) Employee commuting	Travel by GTT employees to work by their own means	Medium
(8) Upstream leased assets	Not applicable	-
(9) Downstream transportation and distribution	Not applicable	-
(10) Processing of sold products	Assembly of membrane systems	High
(11) Use of sold products and services	Emissions related to boil-off gas (BOG) throughout the life of membrane systems installed on vessels (excluding the powering of engines)	High
(12) End-of-life treatment of sold products	End-of-life treatment of products sold or recommended by GTT: polyurethane foams, plywood, metal membranes, mastic	High
(13) Downstream leased assets	Not applicable	-
(14) Franchises	Not applicable	-
(15) Investments	Impact of GTT's investments in third-party undertakings: GTT Strategic Ventures	Low

### Definition of reduction targets

The reduction targets for Scopes 1 and 2 have been defined with the aim of helping to limit global warming to 1.5°C. The comprehensive analysis of the greenhouse gas emissions during the life cycle of its products and technologies (Scope 3) conducted in 2023 had enabled GTT to define significant emission items and set a reduction target over a limited scope as defined by the SBTi, representing 87% of its Scope 3 emissions (categories 1 and 11).

A ten-year time horizon has been adopted to take into account the time necessary to influence the value chain. The target is calculated based on vessels delivered during the year and ordered three to four years beforehand, to take into account the construction lead times indicated by the shipyards. The Well Below 2°C trajectory chosen for the Scope 3 target corresponds to a -33% reduction in emissions over a ten-year period and takes into account GTT's market dynamics.

The time horizon established to measure GTT's contribution to the reduction of greenhouse gas emissions is the year 2033, in line with the reduction trajectory adopted in January 2024 and approved by the Group's Board of Directors.

### Summary of Gross Scope 1, 2, 3 and Total GHG emissions

	Retrospective data				Milestones and target years			
	2021 reference year	2022	2023	2024	% 2024/ 2023	2033	2050	Annual target %/ Base year
<b>SCOPE 1 GHG EMISSIONS</b>								
<b>Gross Scope 1 GHG emissions (tCO<sub>2</sub>eq)</b>	<b>448</b>	<b>463.9</b>	<b>367.2</b>	<b>322.9</b>	<b>-12%</b>	<b>203.4</b>		<b>-28%</b>
Percentage of Scope 1 GHG emissions resulting from regulated emissions trading systems (as a %)	N/A	N/A	N/A	N/A	-	-	-	-
<b>SCOPE 2 GHG EMISSIONS</b>								
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	160.0	155.0	203.4	119.6	-41%	72.6		-73%
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	N/A	N/A	79.1	42.6	-46%	-	-	-
<b>SIGNIFICANT SCOPE 3 GHG EMISSIONS</b>								
<b>Total indirect gross GHG emissions (Scope 3) (tCO<sub>2</sub>eq)</b>	<b>14,427,893.00</b>	<b>7,415,964.00</b>	<b>8,347,027.0</b>	<b>13,456,569.0</b>	<b>+61%</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total indirect gross GHG emissions (Scope 3) (tCO<sub>2</sub>eq), restricted WB 2 Degrees</b>	<b>12,568,359.0</b>	<b>6,421,184.0</b>	<b>7,190,958.0</b>	<b>11,244,661.6</b>	<b>+56%</b>	<b>8,483,642.3</b>		<b>-11%</b>
(1) Purchased goods and services	2,841,239.00	1,835,264.00	2,171,558.00	3,455,381.61	+59%	-	-	-
(10) Processing of sold products	1,720,514.00	909,656.00	1,048,125.00	2,010,752.96	+92%	-	-	-
(11) Use of sold products	9,727,120.00	4,585,920.00	5,019,400.00	7,789,280.00	+55%	-	-	-
(12) End-of-life treatment of sold products	139,020.00	85,124.00	107,944.00	201,154.41	+86%	-	-	-
<b>TOTAL GHG EMISSIONS</b>								
<b>Total GHG emissions (location-based) (tCO<sub>2</sub>eq)</b>	<b>14,428,501.0</b>	<b>7,416,582.9</b>	<b>8,347,597.6</b>	<b>13,457,011.4</b>	<b>+61.2%</b>	<b>-</b>	<b>-</b>	<b>-7%</b>
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>eq)</b>	<b>14,428,501.0</b>	<b>7,416,582.9</b>	<b>8,347,473.2</b>	<b>13,456,934.4</b>	<b>+61.2%</b>	<b>8,483,918.3</b>	<b>-</b>	<b>-7%</b>

In 2024, GTT's emissions increased by 61% in absolute terms due to the increase in the delivery of vessels.

Scope 1 and Scope 2 emissions fell due to the reduction in gas consumption at the Beauplan site and the signing of new supply contracts for electricity from renewable resources for GTT S.A. and the Elogen subsidiary.

GTT's carbon footprint mainly consists of indirect Scope 3 emissions, which represent 99% of its total emissions. GTT's Scope 3 performance is closely linked to the number of vessels it delivers during the year. In 2022 and 2023, 28 and 33 LNG carriers were delivered respectively, compared to 62 in 2024, i.e. an increase of 88% in deliveries.

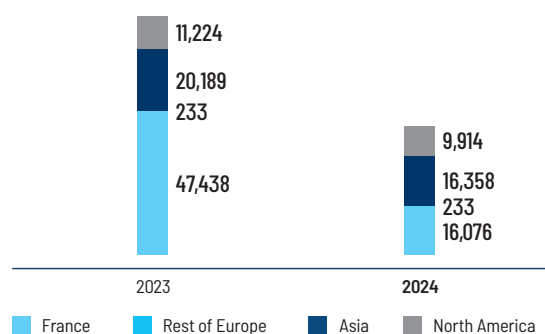
Based on the number of LNG tankers delivered, average Scope 3 emissions per unit fell by -14% in 2024, compared with -4% in 2023.

### Breakdown of Scope 1 and 2 emissions by geographical area and business activity

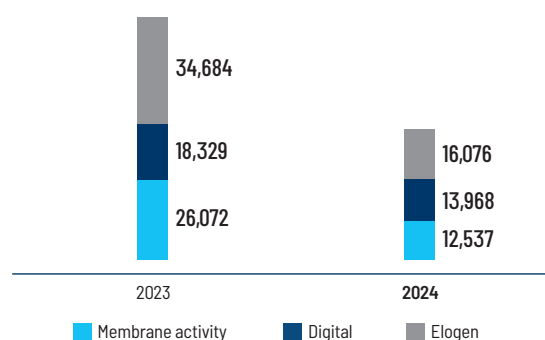
Direct Scope 1 emissions correspond to consumption associated with GTT's activities at Saint-Rémy-lès-Chevreuse: they are therefore all located in France.

Scope 2 emissions correspond to electricity consumption used for the offices of GTT and its subsidiaries in several regions in the world. The Group's capacity to procure low-carbon or renewable energy depends on available contractual instruments in the regions where it is present.

### Breakdown of market-based Scope 2 emissions by region (in tCO<sub>2</sub>eq)



### Breakdown of market-based Scope 2 emissions by business (in tCO<sub>2</sub>eq)



### Table presenting GHG intensity per net revenue

Note 4 *Operating income* in chapter 5 *Comments on the financial year and financial statements* shows the Group's net revenues taken into account when calculating GHG emission intensity.

GHG intensity per net revenue	Comparative	2024	% 2024/2023
Total GHG emissions (location-based) per net revenue (in tCO <sub>2</sub> eq/millions of euros)	19.5	21.0	+7.5%
Total GHG emissions (market-based) per net revenue (in tCO <sub>2</sub> eq/millions of euros)	19.5	21.0	+7.5%

## 3.3 EUROPEAN TAXONOMY

### 3.3.1 BACKGROUND

#### 3.3.1.1 Regulatory framework

Introduced by Regulation (EU) 2020/852 of June 18, 2020, the European taxonomy translates the European Union (EU) climate and environmental objectives into qualification criteria for economic activities. The general framework and the conditions for selection and qualification of economic activities are specified in the following documents:

- “Climate” Delegated Acts 2021/2139 and 2021/2178 specifying the qualification criteria for the climate change mitigation and adaptation objectives;
- Complementary Delegated Act 2022/1214 specifying the conditions for inclusion in the European taxonomy of activities in the nuclear and gas sector;
- Delegated Acts 2023/2485 and 2023/2486 specifying the qualification criteria with regard to the environmental objectives of the taxonomy and amending the list of activities relating to climate objectives.

The taxonomy classifies economic activities into three categories:

- a taxonomy-eligible economic activity is one which is described in the taxonomy, whether or not it meets the technical screening criteria;
- a taxonomy-aligned economic activity is one which is described in the taxonomy and which meets the technical screening criteria;
- a taxonomy-non-eligible economic activity is an economic activity that is not included and described in the taxonomy, for various reasons: the economic activity in question may be explicitly excluded from the system, or the qualification criteria for the activity have not yet been defined and approved.

The activities currently included in the European taxonomy assessment system are emitting activities with strong potential to improve their carbon footprint. The portion of a company's activities that are taxonomy-eligible and/or taxonomy-aligned therefore makes it possible to assess its current level of performance and current contribution in relation to the scenario in which the global temperature is limited to 1.5°, and not its sustainability and responsibility approach as a whole.

### 3.3.2 GTT'S ELIGIBLE AND ALIGNED ACTIVITIES

#### 3.3.2.1 Eligible activities

In relation to the above corpus, the following activities have been identified as eligible for GTT:

Group activities	Taxonomy objective	Reference Climate Delegated Act (Annex I)	Taxonomic title of the activity
Elogen	Climate change mitigation	3.2	Manufacture of equipment for hydrogen production and use
LNG as fuel	Climate change mitigation	3.3	Manufacture of low-carbon transportation technologies
Digital Services	Climate change mitigation	8.2	Data-driven solutions to reduce GHG emissions
R&D	Climate change mitigation	9.1	Research, development and innovation (RD&I) to reduce, prevent or eliminate GHG emissions

#### 3.3.2.2 Analysis of eligible activities

To be considered aligned, GTT's eligible activities must satisfy three types of criteria:

- technical criteria that make a “substantial contribution” to one or more of the environmental objectives of the taxonomy;
- Do No Significant Harm (DNSH) criteria;
- minimum safeguards criteria.

Only activities that meet all three criteria can be recognised as aligned.

#### Activity 3.2 – Elogen

##### Analysis of substantial contribution criterion

Activities related to the Elogen subsidiary's hydrogen infrastructure are designed to produce low-carbon hydrogen, in line with the Taxonomy criteria.

In 2024, Elogen performed a life cycle analysis (LCA) in conjunction with Bureau Veritas on the manufacture of its electrolyzers. The analysis confirmed that the carbon footprint of manufacturing a 5MW electrolyser was 655 tCO<sub>2</sub>e.

By comparing this impact to typical hydrogen production over the equipment's lifetime, manufacturing-related emissions represented around 0.1 to 0.16 CO<sub>2</sub>e/th<sub>2</sub>, depending on the electrolyser's effective lifetime (10 to 15 years) and an optimised load factor. These calculations were based on estimates made by the Group's in-house experts.

In addition, since Elogen's electrolysers are designed for green hydrogen production, the carbon footprint from their use complies with Green Taxonomy requirements, with emissions below the 3 tCO<sub>2</sub>e/th<sub>2</sub> threshold set by European regulations. Using electrolysers is the customer's responsibility once the project is delivered. GTT Group relies on commitments and public communications with Elogen's customers regarding their use of renewable energy to produce green hydrogen.

Therefore, these activities are considered to be aligned with the substantial contribution criterion.

### Analysis of Do No Significant Harm criterion

#### Climate change adaptation

In accordance with Appendix A of the Climate Change Mitigation annex, GTT has verified its compliance with the generic DNSH criteria for climate change adaptation by analysing its exposure to the physical risks corresponding to the acute or chronic hazards specified by the European Commission.

Details of this analysis can be found in section 2.2.1 *Description of the processes to identify and assess material climate-related impacts, risks and opportunities and analysis of climate resilience* of the sustainability report.

#### Water resources

Elogen's HSE policy commits to minimising the use of natural resources required to manufacture electrolysers. In 2023, Elogen conducted an environmental impact assessment for its megafactory. The assessment did not identify water as a significant environmental issue or identify any risk of environmental degradation related to water quality or water stress.

#### Circular economy

For its waste management and recycling processes, Elogen is currently engaging with PAPREC, a leader in recycling and waste management, for its future production site.

#### Pollution prevention

Elogen's electrolysers do not contain any substances or products mentioned in the pollution prevention annex of the delegated act. In general, the Group has installed systems for the selective sorting, collection and recycling of its waste, such as electrical and electronic equipment, batteries and accumulators, chemical waste, paper and organic waste.

#### Biodiversity

The environmental impact assessment conducted by Elogen for its megafactory did not identify any major issues requiring immediate mitigation or offsetting measures.

The activities are therefore considered to be aligned with the DNSH criteria.

#### Revenue

Activity 3.2 is deemed to comply with technical criteria, thus validating the alignment of revenues and the associated CapEx and OpEx.

### Activity 3.3 – LNG as fuel

#### Analysis of substantial contribution criterion

The Group's activities related to the transportation of LNG as fuel fall under the criteria of activity 3.3 of the European Taxonomy related to the manufacture of low-carbon technologies for transport. More specifically, GTT includes the criterion defined in point L (iv).

The EEDI (*Energy Efficiency Design Index*) is a regulatory indicator established by the International Maritime Organization (IMO) to improve the energy efficiency of vessels and reduce their greenhouse gas emissions.

In 2024, GTT applied a rigorous methodology to assess the compliance of its vessels with this criterion. The approach involved selecting a representative vessel from each series of LFS in service. Analyses conducted on these samples confirmed that the vessels in question performed significantly better than required, with a reduction in EEDI of more than 10% compared to the regulatory threshold.

In addition, GTT's solutions for LNG as fuel enable vessels to run on fuels from renewable sources (bio-LNG or synthetic LNG).

The Group believes these activities are in line with the criteria of a material contribution, and are therefore aligned, with the exception of LNG-propulsion projects for LNG carriers: indeed, vessels designed for the transportation of fossil fuels are explicitly excluded from the European taxonomy.

## Analysis of Do No Significant Harm criterion

### Climate change adaptation

In accordance with Appendix A of the Climate Change Mitigation annex, GTT has verified its compliance with the generic DNSH criteria for climate change adaptation by analysing its exposure to the physical risks corresponding to the acute or chronic hazards specified by the European Commission.

Details of this analysis can be found in section 2.2.1 *Description of the processes to identify and assess material climate-related impacts, risks and opportunities and analysis of climate resilience* of the Sustainability Report.

### Water resources

GTT does not manufacture the solution that it designs. The quality of the water used to manufacture the product is therefore outside the scope of GTT.

### Circular economy

GTT has a rigorous process in place to ensure that the materials used in GTT's technologies adhere to the strictest standards. The Group provides each manufacturer with a list of certified suppliers of materials. A specific GTT department is responsible for supplier qualification. Its mission consists in making a rigorous selection of suppliers who provide the materials used in GTT technologies.

The latter must meet the requirements set out in the supplier qualification procedure and the requirements set out in the material specifications. A Selection Committee approves the launch of the approval process for a new material following a thorough analysis of the file sent by the materials supplier. The decision is based on the quality of the supplier, the means of production, the characteristics of the material, the state of the market, and the effort made to provide materials which are increasingly environmentally friendly.

After analysing the material data sheets, the Selection Committee will not propose materials if they are less environmentally friendly than those already available on the market.

### Pollution prevention

The solutions designed by GTT for LNG as fuel do not contain any substances or products mentioned in the pollution prevention annex of the delegated act. In general, the Group has installed systems for the selective sorting, collection and recycling of its waste, such as electrical and electronic equipment, batteries and accumulators, chemical waste, paper and organic waste.

### Biodiversity

GTT designs but does not manufacture the solutions sold to its customers.

As indicated in section 1.4.1 *Description of the processes to identify and assess material impacts, risks and opportunities* of the Sustainability Report, the issues of water resources, the circular economy, pollution and biodiversity were not defined as material in the double materiality assessment.

### Revenue

Activity 3.3 is deemed to comply with technical criteria.

In 2024, revenue from the LNG as fuel business increased by +5%. CapEx also increased year-on-year, with 3% of investment in this business considered aligned at the end of 2024. These changes are the result of an increase in orders and the recognition of associated revenues.

See note 20.1 of section 5.1.5 *Notes to the consolidated financial statements*.

## Activity 7.3 – Energy performance

### Analysis of substantial contribution criterion

In 2024, the Group carried out energy renovation work at its head office to improve its energy efficiency and reduce its Scope 1 emissions. These efforts were part of the emissions reduction trajectory defined in section 3.2.5.2 *Summary table of climate targets*.

### Analysis of Do No Significant Harm criterion

#### Climate change adaptation

As with other activities, GTT has taken all necessary steps to comply with the generic DNSH criteria for climate change adaptation. Details of the analysis of exposure to physical risks, which took into account the acute and chronic hazards defined by the European Commission, can be found in section 2.2.1 *Description of the processes to identify and assess material climate-related impacts, risks and opportunities and analysis of climate resilience* of the Sustainability Report.

#### Pollution prevention

The construction components and materials used comply with the criteria set out in Annex C of the delegated act.

#### Revenue

Activity 7.3 is deemed to comply with technical criteria. In 2024, expenditure associated with activity 7.3 accounted for 11% of the total capital expenditure described in note 20.3 of section 5.1.5. *Notes to the consolidated financial statements* of the URD.



## Activity 8.2 – Digital services

### Analysis of substantial contribution criterion

Ascenz Marorka's digital solutions, particularly its weather routing solution, help reduce fuel consumption and, consequently, greenhouse gas (GHG) emissions. By providing ship-owners and crews with recommendations based on advanced analyses, these tools promote more efficient and sustainable shipping.

While there are other maritime routing solutions on the market, there is no standardised data on their environmental performance. Consequently, Ascenz Marorka is unable to produce a quantified comparison of GHG savings over the entire life cycle. This means that it is not possible to fully demonstrate a reduction in GHG emissions *via* normative assessments (ISO 14067, ISO 14064-2). However, energy efficiency gains are clearly measurable by users of the Ascenz Marorka solution. Internal simulations indicate that route optimisation can deliver fuel savings of up to 10% per journey, with a commensurate reduction in GHG emissions.<sup>(1)</sup> This approach compensates for the lack of market data and demonstrates Ascenz Marorka's contribution to decarbonising the maritime sector.

### Revenue

Despite significant advances in digital services and proven environmental benefits, the Group is unable to fully demonstrate its alignment with activity 8.2 due to the lack of comparative data and standardised methodologies. For this reason, GTT classifies this activity as eligible but not aligned.

### 3.3.2.3 Methodology

GTT's methodology for identifying taxonomy-aligned activities has been executed in four main steps:

#### 1. Mapping and eligibility assessment of the Group's activities

GTT has conducted a mapping of the Group's activities to determine if they are included in the economic activities described by the EU Taxonomy Environmental Delegated Act, thus identifying them as eligible for the taxonomy's climate change mitigation objective. The assessment focused on the specific technical operations the Group performs rather than on generic activity codes used in financial consolidation (NACE). Given GTT's specialised nature and relatively small size, this approach ensures a more accurate representation of its sustainable activities, as industry-standard classifications like NACE codes do not adequately capture the nuances of GTT's operations.

In 2024, the Group recorded eligible revenues of 2.4% and substantial year-on-year increases in CapEx and OpEx. See note 20.3 of section 5.1.5 *Notes to the consolidated financial statements*.

These results reflect both the boom in the digital solutions market and the Group's strategic ambitions in this area. In particular, they demonstrate the Group's commitment to supporting the maritime sector's digital transformation and decarbonisation.

## Activity 9.1 – Research, development and innovation

As of December 31, 2024, several GTT Group innovation and R&D projects dedicated to reducing GHG emissions have reached the TRL6 stage, and can therefore be considered eligible.

### Analysis of substantial contribution criterion

In the context of the taxonomy, only innovations projects and activities linked to eligible economic activities can be considered aligned. Innovation projects connected to the transportation of LNG (an activity not included in the taxonomy) do not meet this criterion. Other projects have not yet reached the level of maturity required for eligibility.

### Revenue

As GTT's R&D projects do not meet the substantial contribution criteria, the associated CapEx and OpEx are not aligned.

#### 2. Screening of taxonomy-eligible activities

GTT has implemented a detailed screening process for its taxonomy-eligible activities, evaluating them against the technical criteria for substantial contribution and Do No Significant Harm (DNSH). This assessment was conducted at an individual project level for the Group's non-homogeneous business activities and at the level of a subsidiary for homogeneous business activities. The Group first determined alignment with the substantial contribution criteria before conducting the DNSH screening. Given that GTT's activities identified as eligible are so because of the climate change mitigation objective, DNSH assessments were focused on climate change adaptation, water, circular economy, pollution prevention and biodiversity.

For this assessment, GTT draws on its environmental policy and, in particular, on its waste management, as well as on its decisions regarding the choice of materials for its solutions, and environmental impact assessments.

(1) *Travel Optimisation – Ascenz Marorka.*

### 3. Assessment of the Group's minimum safeguard policies and procedures

GTT has conducted a comprehensive assessment of its policies and procedures against the EU Taxonomy's minimum safeguards. This assessment concentrated on four principal areas: Human rights (including labour rights), anti-corruption measures, taxation, and fair competition.

GTT's approach to assessing its adherence to minimum safeguards is grounded in the Group's existing frameworks, including, but not limited to its Ethics Charter, which underlines the Group's commitment to respect for human rights, corruption prevention, competition law adherence, and tax regulation compliance.

In its Ethics Charter, applicable to GTT and all its subsidiaries, the Group explicitly commits to respecting human rights, preventing and combating corruption (highlighted by the Group's ISO 37001

certification since 2018), adhering to competition laws and regulations, and respecting tax regulations in all countries where GTT operates. Furthermore, in 2023 the Group joined the United Nations Global Compact, thereby committing to promote the "Ten Principles" on human rights, labour standards, the environment and anti-corruption, and to implementing the 17 Sustainable Development Goals (SDGs) in its environmental, social and governance policies.

Thus, the Group pursues its activities in compliance with the United Nations Guiding Principles on Business and Human Rights. In addition, GTT has adopted the Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises – in particular, in relation to human rights, anti-corruption, competition, taxation and environment. For a more detailed description, please refer to section 3.5 *Business conduct [ESRS G1]* of this Universal Registration Document.

### Summary of internal policies and procedures relating to Minimum Safeguards

Requirements	As applicable to GTT
<b>Human rights due diligence</b>	As part of its Governance policy, GTT has documents governing its business conduct. These documents are listed below and are described in section 3.5.3 <i>Business conduct policies and corporate culture</i> of this chapter: <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Ethics Charter</li> <li>• Internal procedures relating to Ethics &amp; Compliance</li> <li>• Procedure for avoiding conflicts of interest</li> <li>• Procedure for collecting and processing reports</li> </ul>
<b>Human rights conviction</b>	In 2024 the Group was not the subject of any conviction related to human rights.
<b>Anti-corruption procedures</b>	The Group has set up a procedure for collecting and processing reports, as described in section 3.5.3 <i>Business conduct policies and corporate culture</i> of this chapter:
<b>Corruption conviction</b>	In 2024 the Group was not the subject of any conviction related to corruption.
<b>Tax governance</b>	The Group has not set up a tax governance procedure.
<b>Tax penalties</b>	In 2024 the Group was not the subject of any conviction related to tax penalties.
<b>Open competition procedure</b>	The Group has not set up a free-competition procedure.
<b>Free-competition conviction</b>	In 2024 the Group was not the subject of any conviction related to free competition.

#### 4. Allocation of revenue, CapEx, and OpEx

The allocation of revenue, capital expenditure (CapEx), and operating expenditure (OpEx) is determined based on the Group's assessment of whether each economic activity is aligned, eligible, or non-eligible. This financial allocation to taxonomy-eligible or taxonomy-aligned activities is carried out at the level of individual projects or at the level of subsidiaries, if a subsidiary is entirely dedicated to an economic activity defined in the taxonomy.

##### Revenues KPI

The Revenues KPI is determined by the portion of revenues generated from products or services, including intangible assets, that are associated with taxonomy-eligible or taxonomy-aligned economic activities (the numerator), as a percentage of total revenues (the denominator). The revenues attributable to eligible or aligned activities is calculated on a per-project or per-subsidiary basis. The total revenues are documented in the financial statements, specifically under the "Revenues from operating activities" heading in the income statement (see section 5.1.2).

##### CapEx KPI

The CapEx KPI is assessed as the portion of capital expenditure (CapEx) associated with assets or processes related to taxonomy-eligible or taxonomy-aligned economic activities, as a percentage of total CapEx (the denominator). CapEx encompasses intangible

assets and property, plant and equipment acquired during the financial year before impairment, depreciation, amortisation and any revaluations, including those resulting from revaluations and impairments for the same financial year and excluding changes in fair value. This calculation includes research and development (R&D) expenditure activated in accordance with the IAS 38 criteria.

The CapEx under the heading "Acquisitions of non-current assets" in the statement of cash flows (section 5.1.3).

##### OpEx KPI

The OpEx KPI is measured by identifying the portion of operating expenditure (OpEx) linked to assets or processes that are aligned with taxonomy-eligible economic activities as a percentage of total OpEx (the denominator). This includes expenditure on training, payroll and direct non-capitalised costs attributed to R&D activities.

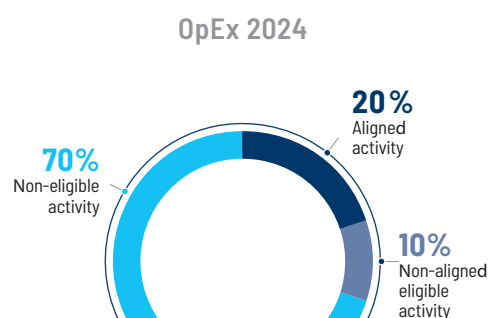
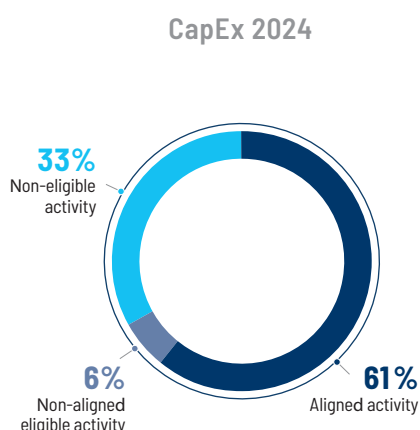
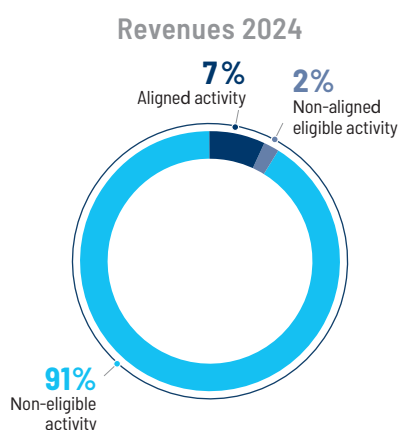
OpEx covers direct non-capitalised costs relating to the day-to-day servicing of assets of property, plant, and equipment by the undertaking or by the third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets. This OpEx is exclusively related to R&D, building upkeep and maintenance expenditure, short-term leasing and any other operating expenditure. R&D costs already accounted for in the CapEx KPI do not appear in OpEx.

OpEx appears under the headings "Costs of sales", "External expenses", "Personnel expenses" and "Tax and duties", presented in comprehensive income (section 5.1.2).

#### 3.3.2.4 Metrics

The graphs below show a summary of the portion of non-eligible, aligned, and eligible but non-aligned activities:

	2024 revenues	CapEx 2024	OpEx 2024
Eligible activities	9%	67%	30%
of which aligned activities	7%	61%	20%
Non-eligible activities	91%	33%	70%



The tables below show the percentage of eligible, aligned and non eligible economic activities in the form of three key performance indicators (KPIs): revenues, CapEx and OpEx.

**Proportion of revenues from products or services associated with taxonomy-aligned economic activities – Disclosures covering 2024**

2024 financial year				Substantial contribution criteria						Do No Significant Harm criteria									
Economic activities	Code(s)	Revenues (3)	Portion of revenues (4)	Climate change mitigation (5)	Climate change adaptation (6)	Aquatic and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Aquatic and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum guarantees (17)	Proportion of revenues that is aligned (A.1.) or eligible (A.2.), 2023 (18)	Enabling category (19)	Transitioning category (20)
	thousands of euros	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Taxonomy-aligned activities																			
Manufacture of equipment for hydrogen production and use	CCM 3.2	11,363	1.8%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	2.4%	E	
Manufacture of low-carbon transportation technologies	CCM 3.3	30,895	4.8%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	3.8%	E	
Revenues of taxonomy-aligned activities (A.1)		42,258	6.6%	100%	0%	0%	0%	0%	0%		Y	Y	Y	Y	Y	Y	6.1%		
o/w enabling activities		42,258	6.6%	100%	0%	0%	0%	0%	0%		Y	Y	Y	Y	Y	Y	6.1%	E	
o/w transitioning activities		0	0.0%	0%	-	-	-	-	-		-	-	-	-	-	-	-		
A.2. Taxonomy-eligible but non-taxonomy-aligned activities																			
Data-driven solutions to reduce GHG emissions	CCM 8.2	15,591	2.4%	N	N	N/EL	N/EL	N/EL	N/EL								2.2%		
Research, development and innovation (RD&I) to reduce, prevent or eliminate GHG emissions	CCM 9.1	0.00	0.0%	N	N	N/EL	N/EL	N/EL	N/EL								0%		
Revenues of taxonomy-eligible but non-taxonomy-aligned activities (A.2.)		15,591	2.4%	100%	0%	0%	0%	0%	0%								2.2%		
Total A (A.1+A.2)		57,849	9.0%	100%	0%	0%	0%	0%	0%								8.3%		
B. NON-TAXONOMY-ELIGIBLE ACTIVITIES																			
Revenues of non-taxonomy-eligible activities (B)		583,538	91.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL		641,387	100%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

CCM: Climate Change Mitigation

Y: Yes

N: No

N/EL: Non eligible

E: Enabling

**Proportion of revenues from taxonomy-eligible and/or taxonomy-aligned economic activities  
by environmental objective – Disclosures covering 2024**

	Proportion of revenues/total revenues	
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	7%	9%
CCA	0%	0%
WTR	0%	0%
EC	0%	0%
PPC	0%	0%
BIO	0%	0%

**Proportion of CapEx from products or services associated with taxonomy-aligned economic activities – Disclosures covering 2024**

2024 financial year				Substantial contribution criteria						Do No Significant Harm criteria									
	Code(s)	CapEx (3)	Portion of CapEx (4)	Climate change mitigation (5)	Climate change adaptation (6)	Aquatic and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Aquatic and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum guarantees (17)	Portion of CapEx aligned (A.1.) or eligible (A.2.) 2023 (18)	Enabling category (19)	Transitioning category (20)
Economic activities		thousands of euros	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Taxonomy-aligned activities</b>																			
Manufacture of equipment for hydrogen production and use	CCM 3.2	28,700	47%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	44.2%	E	
Manufacture of low-carbon transportation technologies	CCM 3.3	1,727	3%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2.6%	E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	6,977	11%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	-	E	
<b>CapEx of taxonomy-aligned activities (A.1)</b>		<b>37,404</b>	<b>61%</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>46.7%</b>		
o/w enabling activities		37,404	61%	100%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	46.7%	E	
o/w transitioning activities		0	0.0%	0%	-	-	-	-	-	-	-	-	-	-	-	-	-		
<b>A.2. Taxonomy-eligible but non-taxonomy-aligned activities</b>																			
Data-driven solutions to reduce GHG emissions	CCM 8.2	3,300	5%	N	N	N/EL	N/EL	N/EL	N/EL								0.3%		
Research, development and innovation (RD&I) to reduce, prevent or eliminate GHG emissions	CCM 9.1	665	1%	N	N	N/EL	N/EL	N/EL	N/EL								3.4%		
<b>CapEx of taxonomy-eligible but non-taxonomy-aligned activities (A.2)</b>		<b>3,965</b>	<b>6%</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>								<b>3.7%</b>		
<b>Total A (A.1+A.2)</b>		<b>41,368</b>	<b>67%</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>								<b>50.4%</b>		
<b>B. NON-ELIGIBLE ACTIVITIES</b>																			
<b>CapEx of non-eligible activities</b>		<b>20,330</b>	<b>33%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>TOTAL</b>		<b>61,698</b>	<b>100%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

CCM: Climate Change Mitigation

Y: Yes

N: No

N/EL: Non eligible

E: Enabling

**Proportion of CapEx from taxonomy-eligible and/or taxonomy-aligned economic activities  
by environmental objective – Disclosures covering 2024**

	Proportion of CapEx/Total CapEx	
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	61%	67%
CCA	0%	0%
WTR	0%	0%
EC	0%	0%
PPC	0%	0%
BIO	0%	0%



**Proportion of OpEx from products or services associated with taxonomy-aligned economic activities – Disclosures covering 2024**

2024 financial year				Substantial contribution criteria							Do No Significant Harm criteria									
	Code(s)	OpEx (3)	Portion of OpEx (4)	Climate change mitigation (5)	Climate change adaptation (6)	Aquatic and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)		Climate change mitigation (11)	Climate change adaptation (12)	Aquatic and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum guarantees (17)	Portion of OpEx aligned (A.1.) or eligible (A.2.) 2023 (18)	Enabling category (19)	Transitioning category (20)
Economic activities		thousands of euros	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1. Taxonomy-aligned activities</b>																				
Manufacture of equipment for hydrogen production and use	CCM 3.2	44,660	18%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	Y	15.0%	E	
Manufacture of low-carbon transportation technologies	CCM 3.3	5,415	2%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	Y	2.9%	E	
<b>OpEx of taxonomy-aligned activities (A.1)</b>		<b>50,075</b>	<b>20%</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>		<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>18%</b>		
o/w enabling activities		50,075	20%	100%	0%	0%	0%	0%	0%		Y	Y	Y	Y	Y	Y	Y	18%	E	
o/w transitioning activities		0	0.0%	0%	-	-	-	-	-		-	-	-	-	-	-	-	-		
<b>A.2. Taxonomy-eligible but non-taxonomy-aligned activities</b>																				
Data-driven solutions to reduce GHG emissions	CCM 8.2	22,870	9%	N	N	N/EL	N/EL	N/EL	N/EL									5.4%		
Research, development and innovation (RD&I) to reduce, prevent or eliminate GHG emissions	CCM 9.1	1,769	1%	N	N	N/EL	N/EL	N/EL	N/EL									1.0%		
<b>OpEx of taxonomy-eligible but non-taxonomy-aligned activities (A.2)</b>		<b>24,639</b>	<b>10%</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>									<b>6.3%</b>		
<b>Total A (A.1+A.2)</b>		<b>74,714</b>	<b>30%</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>									<b>24.3%</b>		
<b>B. NON-TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>OpEx of non-taxonomy-eligible activities:</b>		<b>172,567</b>	<b>70%</b>	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-
<b>TOTAL</b>		<b>247,280</b>	<b>100%</b>	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-

CCM: Climate Change Mitigation

Y: Yes

N: No

N/EL: Non eligible

E: Enabling

**Proportion of OpEx from taxonomy-eligible and/or taxonomy-aligned economic activities  
by environmental objective – Disclosures covering 2024**

	Proportion of OpEx/Total OpEx	
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	20%	30%
CCA	0%	0%
WTR	0%	0%
EC	0%	0%
PPC	0%	0%
BIO	0%	0%

**Nuclear and fossil gas related activities**

Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

## 3.4 OWN WORKFORCE [ESRS S1]

### 3.4.1 STRATEGY

#### 3.4.1.1 Interests and views of stakeholders [SBM-2]

In 2024, GTT continued and strengthened its efforts to incorporate the rights, interests and viewpoints of its employees into its strategy and business model. Social dialogue remains a key lever to ensure the active participation of employees in decision-making processes and to align the Group's priorities with those of its internal stakeholders.

##### Organisation of social dialogue

In 2024, 91% of GTT's workforce was covered by an employee representative body or trade union. This coverage not only guarantees compliance with their fundamental rights, but also provides a high level of representation ensuring freedom for employees to express their concerns.

In 2024, the Social and Economic Council (CSE) of GTT S.A. continued to fulfill its strategic role with its 12 full members, and was joined by seven new employee representatives from the Elogen subsidiary, further reinforcing the systems in place for representation and feedback within the entity.

In Group entities with fewer than 50 employees, claims concerning working conditions and the application of labour regulations were also addressed through exchanges between employees and their employers. In larger entities, employees actively participated in discussions on the organisation of work, business management and strategic projects, contributing to reflections on the Group's medium- and long-term evolution.

As part of its social dialogue policy, GTT has set up accessible and transparent communication channels to inform its workforce effectively. Signed agreements are thus made available on the Intranet and displayed in strategic locations within the undertaking, such as in break rooms and other busy areas, ensuring clear and visible communication of the commitments made. In addition, in-company displays are regularly updated to facilitate access to information and strengthen the link between management and personnel.

In 2024, the Group conducted its double materiality analysis, for which it consulted internal stakeholders in order to ascertain the impacts, risks and opportunities related to its employees. This analysis made it possible to identify the actions described in section 3.4.2.1 – *Policies, actions and objectives related to own workforce [S1-1, S1-4 and S1-5]* of this report.

##### Strengthening social commitments

In 2024, an open-ended special profit-sharing agreement and a three-year agreement (2023-2025) on incentives were fully implemented. These agreements improved the compensation policy, thus reinforcing GTT's attractiveness and employee engagement.

##### Incorporation of employee rights and expectations into the strategy

In 2024, GTT continued to actively incorporate employee rights and expectations into its strategic decisions, taking into consideration their concerns, notably by means of an engagement survey conducted in November and discussion sessions with General Management.

These interactions made it possible to shed light on GTT's strategy and business model, ensuring that employees' human rights and interests are effectively taken into account.

##### Contribution to the strategy and business model

Through regular social dialogue, GTT is able to align its economic, environmental and social interests. In 2024, exchanges between personnel and management covered topics related to health and safety, training, the Group's strategic projects (M&A), individual performance assessments, building retrofitting programmes, psychosocial risks and engagement surveys.

#### 3.4.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model [ESRS 2 SBM-3]

As indicated in section 3.1.4.1 *Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]* of this report, GTT has identified several impacts, risks and opportunities (IRO) relating to its personnel.

GTT acknowledges that the material IROs identified relating to its personnel directly influence its business model and strategy. The Group's interactions with its workforce, presented in section 3.1.4.1 *Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]* of this chapter, enabled the Group to adjust its priorities while reinforcing its resilience and commitment towards its employees.

The scope of GTT's impacts, risks and opportunities covers all personnel directly concerned by its activities. This includes GTT employees as well as non-employed workers active in its own operations or in its value chain, whether they are self-employed or employed by third parties: GTT employees seconded to shipyards, temporary staff and self-employed workers hired for intellectual services.

The material IROs identified include:

- GTT's own activities, its products and services and its business relations;
- exceptional cases linked to specific incidents or events;
- circumstances linked to sensitive geographical areas.

To summarise, the 12 impacts, risks and opportunities identified by GTT are:

ESG considerations	Impacts, Risks and Opportunities	Current/ anticipated effects	Value chain	Time horizon	Description
<b>Social dialogue</b>	Negative impact	Potential	Own operations	Invariable	Violation of the fundamental rights of employees as defined by the ILO in the absence of social dialogue, freedom of association and collective bargaining
<b>Employee skills development</b>	Positive impact	Potential	Own operations	Invariable	Improvement of the employability and career perspectives of employees thanks to the training and skills development proposed by the Group
	Risk		Own operations	Short term	Risk of a decline in competitiveness and business development due to a skills shortage, failure to anticipate needs or a lack of employee training
<b>Diversity and Inclusion</b>	Negative impact	Potential	Own operations	Short term	Degradation of the working and even living conditions of employees in the case of a lack of action with regard to diversity and inclusion
	Negative impact	Potential	Own operations	Short term	Degradation of the physical and/or mental health of employees in the case of discriminatory practices (lack of equal treatment), violence and/or harassment
<b>Working conditions</b>	Negative impact	Potential	Own operations	Short term	Violation of the human rights of employees and non-employed workers due to practices in breach of the fundamental values of the ILO (forced labour, fairness, working conditions, adequate pay etc.)
	Risk		Own operations	Medium term	Cost of bringing the undertaking into compliance or legal proceedings (sanction, litigation and fine) in the case of failure to comply with human rights regulations
	Opportunity		Own operations	Medium term	Enhancement of the Group's image and better talent retention thanks to a recognised culture of quality of life at work, helping to improve its attractiveness, as well as levels of employee engagement and satisfaction internally
<b>Employee Health and Safety</b>	Negative impact	Potential	Own operations/ Downstream value chain	Invariable	Serious and irremediable harm (including long-term harm) to the health of employees in the case of pollution, ingestion of chemical products etc.
	Negative impact	Actual	Own operations/ Downstream value chain	Short term	Serious and irremediable harm to the safety of employees in the case of poor working conditions
	Negative impact	Potential	Own operations	Short term	Inadequate health and safety training and/or failure to instil a uniform HSE culture within the Group, which could result in near accidents or accidents
	Risk		Own operations	Short term	Harm to the Group's reputation in the case of serious or fatal accidents affecting GTT employees wherever they may be (GTT site or its value chain), or the workers of GTT's subcontractors on a Group site

## 3.4.2 IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### 3.4.2.1 Policies, actions and objectives related to own workforce [S1-1, S1-4 and S1-5]

The section below describes all the policies, actions and objectives aligned with the social impacts, risks and opportunities identified as material.

GTT's human resources policies are based on a collection of directives and practices guaranteeing that the workforce is managed in line with the undertaking's ambition and strategy. GTT adapts its policies to the current regulations in each of the countries in which it operates. In order to ensure responsible social practices and foster well-being within the undertaking, GTT relies on five fundamental policies applicable to its entire workforce such as the Skills Development Policy, the Diversity and Inclusion Policy, the Social Dialogue Policy, the Working Conditions Policy and the Health and Safety Policy. These policies are implemented and managed by the Group's Human Resources Director.

To properly manage its policies, the Group has set objectives to ensure their progress. In the context of the 2024-2026 CSR roadmap, GTT has defined social objectives to manage its material impacts, risks and opportunities in connection with its workforce. These objectives cover material issues, especially skills development, talent promotion, diversity and inclusion, and occupational health and safety.

GTT has defined its social objectives through dialogue established with its employees and their representatives, presented in section 3.4.1 *Strategy*. Accordingly, these discussions made it possible to:

- identify the priority issues regarding working conditions, professional development and well-being within the Group;
- set clear and measurable objectives, aligned with the undertaking's overall strategy;
- track performance through defined metrics and regular reporting;
- adjust actions and targets according to employee feedback and regulatory changes or sector best practices.

GTT's social performance metrics are tracked annually and compared to the results of previous years in order to ensure their stability and relevance over time. The undertaking is committed to maintaining a consistent approach to ensure data comparability and effective assessment of the progress made.

The Group's social metrics and the progress made in 2024 are presented below.

The achievement of these targets is monitored by Human Resources, and the results are shared and presented annually to the Board of Directors and/or the Strategic and CSR, and Compensation and Nominations Committees.

#### 3.4.2.1.1 Social dialogue

##### Social dialogue policy

GTT actively engages with its employees through various communication channels, as described in section 3.4.1.1 *Interests and views of stakeholders [SBM-2]*, to ensure regular and transparent discussions. The dialogue established between the management and the representatives within the Works Council takes place as part of a constructive and open process, in both routine or mandatory consultations and negotiations covering specific issues.

This dialogue especially aims to promote decent jobs and social protection, and enables the management to be aware of the expectations of employees, who are considered the undertaking's primary stakeholders. GTT strives to facilitate communication and the organisation of meetings with trade unions and employee representative bodies. The Group involves its representatives in the implementation of its major initiatives, such as those related to occupational health and safety, sustainable development, gender diversity and the policy to support people with disabilities, thus ensuring that social and environmental issues are taken into account at all levels of the organisation.

##### Actions

In 2024, the Works Council met 20 times. In addition to regulatory bodies, the Human Resources Division has initiated the creation of an Occupational Health Committee which includes employee representatives in order to foster regular discussions on working conditions. In particular, the Occupational Health Committee worked on the questionnaire submitted to the teams as part of the Psychosocial Risks diagnosis in October 2024. The engagement survey conducted in November 2024 also contributed to social dialogue.

#### Targets

Commitment		Reference year	Baseline	Target	Timescale	2024 result	
Sub-commitment	Metric						
PROMOTING DIVERSITY AND WELL-BEING							
Well-being at work							
	Survey of work/life balance (satisfaction level as a %)	2022	N/A	> 70%	2026	82%	

GTT conducts an engagement survey every two years. GTT's engagement survey conducted in 2024 was sent to employees, both permanent and fixed-term, who have been with GTT for at least six months. In order to ensure the comparability of the results of this second survey conducted in the Group scope, the questionnaire was identical to that of 2022: 78 questions divided into 13 sections and 11 topics. The participation rate of 71% versus 76% in 2022 is partially explained by the large volume of requests sent to the teams at this time of the year, closely followed by the engagement survey conducted only a few weeks after the survey specifically relating to psychosocial risks.

The satisfaction rate relating to work-life balance is assessed by means of the positive responses obtained to the questions included in the questionnaire submitted to employees concerning topics related to their work-life balance.

### 3.4.2.1.2 Employee skills development

#### Skills development policy

GTT considers that the management of its employees' careers is crucially important, in order to develop their skills and offer them careers aligned with their aspirations and the undertaking's requirements. The Group offers targeted training, enabling employees to acquire new skills to contribute to achieving the undertaking's goals.

To this end, GTT seeks to identify and develop talent in collaboration with managers and the Talent team, in order to foster internal development and mobility within the organisation. Investment in training is part of the Group's overall strategy, and meets both individual and collective needs. At the same time, GTT implements suitable workforce management and individualised support, thus ensuring personalised support for each employee in their professional development.

In order to consider employee interests when drawing up its policy, GTT holds structured dialogue through People Reviews and Career Talks, allowing employees to directly discuss their professional aspirations, career development and expectations with their managers and with talent managers. These regular discussions promote mutual understanding of individual needs and company objectives, thereby contributing to suitable career paths. In September 2023 an international mobility policy was rolled out to harmonise GTT's Group-wide practices at the same time as ensuring it remained competitive in its market. Almost 117 expatriates were affected by this policy at end-December 2024.

#### Targets

Commitment		Reference year	Baseline	Target	Timescale	2024 result
Sub-commitment	Metric					
DEVELOPING SKILLS AND PROMOTING TALENT						
Implementation of training and awareness-raising actions						
	Training/raising awareness of CSR among Executive Committee members and managers	2022	N/A	100% (Executive Committee in 2024, 100% managers in 2025/2026)	2026	100% of the Executive Committee trained
	Number of training hours per employee	2022	N/A	≥10	Annual	16.6
Career management policy						
	Internal mobility/Positions filled ( <i>as a %</i> )	2022	23%	30%	2026	39%
	People Review vs eligible population	2022	95%	≥90%	Annual	93%

GTT also takes care to publicly communicate its objectives and policy updates via its Universal Registration Document (URD) and its CSR roadmap, thus ensuring transparency and alignment with its commitments regarding social and environmental responsibility.

#### Recruiting policy

The talent recruitment and development policy prohibits all forms of discrimination and stipulates that no employee shall be subject to any discrimination, including on the grounds of sex, age, ethnic origin, skin colour, religion, sexual orientation, disability or political opinion. These fundamental principles are set out in the Ethics Charter. The Group recruits people from all backgrounds and relies on the cultural diversity of its teams to maintain its performance and raise its level of excellence.

Given GTT's outlook of diversification and continued growth, the Group intends to bring together mature skills and promote the transmission of knowledge. For this reason, the Group is committed to an inter-generational management policy for the employees that make up the undertaking. 89% of the Group's headcount are employees aged under 50 and the average age is 38 years. Whilst this youth constitutes a vital force of GTT, the Group capitalises strongly on the knowledge of seniors to pass on know-how and key skills. GTT is always driven by the commitment to ensure that all talent and its diversity is represented at every level.

#### Actions

In 2024, GTT continued its actions aimed at attracting and recruiting the best talent. GTT teams participated in 20 forums and career days held by engineering schools across France. In addition, students from the Centrale Nantes school as well as HEC and ENSTA Paris had the opportunity to visit the undertaking or have privileged discussions with operational staff during round tables (Evolen Jeunes at Mines de Paris) or "CV day" workshops (UTC Compiègne). The Group renewed its participation in student challenges such as D-Event held by École des Ponts. Finally, the co-optation programme rolled out in 2023 was renewed for GTT S.A. employees and extended to Elogen.

GTT conducts an engagement survey every two years. GTT places skills development at the core of its HR strategy. The Group considers raising awareness of CSR issues among executive teams to be particularly important. In 2024, 100% of the members of the Executive Committee received training in CSR.

As part of its commitment to training, GTT has set itself the objective of ensuring that each employee receives at least 10 hours of training per year (excluding compulsory training). In 2024, this metric reached 16.6 hours of training per employee, reflecting the Group's investment in skills development. The training primarily aimed to support the Group's growth, paying particular attention to technical skills, as well as to managerial and intercultural skills, in order to support internal changes and develop key skills within the teams.

In terms of internal mobility, GTT aims to fill 30% of positions through internal mobility by 2026. In 2024, this metric already stood at 39%, reflecting a strong drive in internal development. This increase can be explained, in particular, by the opportunities for mobility with the subsidiaries, internal promotion and the impact of the compensation policy review, which led to reorganisations and encouraged internal mobility.

Finally, GTT continued its efforts with regard to talent management and career development. In 2024, 93% of eligible employees benefited from a People Review, thus exceeding the 90% objective. This strategic exercise enables better monitoring of career paths and the anticipation of internal development.

### 3.4.2.1.3 Diversity and inclusion

#### Diversity and inclusion policy

GTT firmly believes that the diversity of talented individuals is the root of its performance and success. In accordance with its values, GTT is committed to promoting diversity and inclusion at all levels of the organisation. The Group has identified the risk of discrimination as a priority issue and adopts a zero-tolerance policy against any form of discrimination, whether on the basis of sex, age, origin, skin colour, religion, sexual orientation, disability or political opinion.

In this context, GTT aims to make uniqueness an added value, by cultivating a culture of diversity, openness and mutual respect. The Group implements concrete actions to foster gender equality and actively supports people with disabilities, in order to ensure their inclusion and involvement within the undertaking.

GTT also considers the interests of candidates and employees, as well as the applicable regulatory requirements, in creating its diversity and inclusion policy. This approach ensures that the Group's practices meet internal expectations while conforming to legal standards and societal expectations. GTT also takes care to publicly communicate its objectives and policy updates via its Universal Registration Document (URD) and its CSR roadmap, thus ensuring transparency and alignment with its commitments regarding social and environmental responsibility.

#### Diversity and inclusion actions

In 2024, the Group implemented several actions to both ensure inclusive and fair working conditions and target the risks and opportunities related to diversity and inclusion.

In order to combat any form of discrimination and foster a respectful working environment, GTT has implemented specific training for its recruitment team entitled "Recruiting without

discrimination". This initiative seeks to prevent material negative impacts related to unconscious bias and ensure equal opportunity in the recruitment process. As part of this approach, an e-learning module on diversity and inclusion has been developed and distributed to all employees, raising awareness of cognitive bias and stereotyping that could influence interactions in the workplace. As of December 31, 2024, 50% of the workforce had completed the diversity and inclusion module.

A mandatory training module on sexist behaviour and sexual harassment is also required of all Group employees. This training aims to enable teams to understand and identify sexist behaviour and sexual harassment in the workplace environment. It also provides information regarding the legal framework and resources available to combat these acts. 79% of GTT S.A. teams completed this training in 2024.

On the subject of gender diversity and gender equality, GTT has set up a display in the undertaking to raise team awareness of sexist remarks. This campaign was renewed in January 2025, on the French National Day Against Sexism (Journée nationale de lutte contre le sexisme) with the addition of a communication about the factors that influence the training and career choices of French women in the scientific and technical fields. These actions illustrate the undertaking's commitment to promote equal treatment between women and men.

GTT's Recruitment and School Relations teams are particularly active at engineering schools, allowing young women to discover the jobs and career possibilities within the undertaking. In 2024, the undertaking participated in 20 student forums and also organised several visits to its Saint-Rémy-lès-Chevreuse site for students to discover the laboratories and workshops, and to have conversations with professionals.

Several events were held throughout the year to raise awareness of employees with disabilities and promote discussions with them. On the occasion of the European Disability Employment Week, the GTT Group conducted actions dedicated to invisible disabilities. Awareness raising workshops then allowed nearly 80 employees to better understand dyslexia, visual impairment and autism spectrum disorders. The aim of these scenarios was to provide the keys to adapt to the needs of people with disabilities.

At Elogen, a disability newsletter was sent throughout the week to raise employee awareness of different types of disabilities, as well as the resources that can be implemented to support them, particularly recognition of disabled worker status (reconnaissance de qualité de travailleur handicapé, RQTH) which is a valuable tool for improving working conditions for the individuals concerned. GTT has also strengthened its relationship with the Aigrefoin work assistance organisation (ESAT), holding a conference dedicated to working in a sheltered environment and expanding the services requested. In addition to sales of market garden and artisanal products, the GTT teams called on the ESAT for team building events.

GTT's commitment to diversity and inclusion is also reflected in its diagnostic and continuous improvement actions. A disability audit, conducted with the French fund for the professional inclusion of disabled people (AGEFIPH) was launched in late 2024. At the same time, the appointment of two disability representatives for GTT S.A. and Elogen aims to structure and perpetuate the policy of inclusion of people with disabilities.



## Targets

Commitment		Reference year	Baseline	Target	Timescale	2023 result	2024 result
Sub-commitment	Metric						
PROMOTING DIVERSITY AND WELL-BEING							
Gender equality							
	Percentage of women in the workforce	2022	21%	>25%	2033	24%	25%
	% of female hires	2022	31%	>35%	2033	27%	30%
	Percentage of female Executive Committee members	2022	29%	40%	2030	11%	14%
	Female representation in management positions	2022	N/A	≥25%	2033	17.5%	22.2%
Inclusion							
	Adoption and implementation of a disability inclusion plan	2022	N/A	Adoption of a plan	2026	N/A	in progress, see section 3.2.1.3

GTT is actively pursuing its diversity and inclusion efforts, reflected in the implementation of several metrics within its CSR roadmap. In 2024, the proportion of women in the workforce was 25%, up compared to 2023. GTT continues to strive to increase the presence of women in technical positions, in particular through actions carried out by the recruitment teams and relations with schools. Regarding the percentage of female hires, 30% of new hires in 2024 were women, compared to 27% in 2023. This increase is in part due to the recruitment of women at the Elogen subsidiary and for technical positions within GTT S.A.

Female representation in management positions stood at 22.2%, compared to 17.5% in 2023, with a goal of 25% in 2033. Management positions are defined as those involving the management of a team. A particular effort was made in 2024 to increase the proportion of women incorporated into succession planning for positions of responsibility: as of December 31, 2024, this proportion stood at 17.5% compared to less than 12% in 2023, thus illustrating a net increase in terms of the identification and preparation of women for positions of strategic responsibility.

The proportion of women on the Executive Committee was 14% in 2024: one woman occupying the position of General Secretary sat on the Executive Committee as at December 31, 2024. The actions in favour of diversity described in this same section of the report aim to accelerate progress towards this goal.

### 3.4.2.1.4 Working conditions

#### Working conditions policy

GTT considers the expectations of its employees regarding personal development, well-being and work-life balance. To address this, the Group implements measures to offer optimal working conditions and adapted flexibility. The wider use of teleworking, facilitated by collective agreements and commitments on the right to disconnect, is part of this approach.

The GTT Group ensures compliance with applicable regulations on working conditions and strives to offer an environment conducive to the personal development of employees, while integrating the avoidance of psychosocial risks. In 2024, the Human Resources Division also launched an Occupational Health Committee made up of representatives of staff and the HSE, CSR and Human Resources departments. The committee's 2024 work and discussions concentrated on the Psychosocial Risk assessment, conducted by means of a survey administered in October 2024 with all of the Group's employees.

In order to consider the interests of employees in the creation of its policy, GTT conducted a biannual engagement survey to allow its employees to express themselves regarding various aspects of their professional experience and to actively contribute to improving the Group's practices. GTT also takes care to publicly communicate its objectives and policy updates via its Universal Registration Document (URD) and its CSR roadmap, thus ensuring transparency and alignment with its commitments regarding social and environmental responsibility.

#### Work-life balance and well-being at work

The working environment provided at the Saint-Rémy-lès-Chevreuse site enables employees to enjoy many open-air sports. In addition to sporting initiatives, the Group's catering offer includes meals appropriate for a healthy and balanced diet.

A further challenge related to well-being at work concerns avoidance measures to protect employees' mental health. GTT is strongly committed to developing programmes that educate staff about psychosocial risks. Resources include assistance and support units, training and an internal whistleblowing system.

### A fair and attractive pay policy

GTT wants to recognise, attract and motivate talented individuals by offering competitive pay across the Group. For this reason, in 2023 the Group reviewed its pay policy with the aim of balancing individual and collective pay for head office employees. The Group has reviewed its pay equity policy to align it with market levels, following an in-depth survey that took into account the characteristics of GTT's businesses and activities. The wages of head office employees increased by more than 10% on average in 2023, and the variable elements of pay are now linked more closely to the achievement of individual targets.

### Group pay and benefits

For the entire Group, staff costs for the year 2024, bringing together the elements of wage, pay, employee savings and social security costs, increased by more than 17.6% compared with 2023.

As part of its overall pay policy, GTT supports its employees through improved social protection measures that are advantageous and based on additional health insurance offering the freedom to choose from several levels of cover, and a personal risk agreement covering the risks of illness, disability and death. GTT offers a contribution split that is very advantageous for employees.

### Targets

Commitment		Reference year	Baseline	Target	Timescale	2023 result	2024 result						
Sub-commitment	Metric												
PROMOTING DIVERSITY AND WELL-BEING													
Well-being at work													
	Training in the avoidance of psychosocial risks	2022	N/A	100% Executive Committee (2024)/100% managers (2026)	2026	-	100% of the Executive Committee trained						

Regarding the matter of psychosocial risks, a diagnostic survey was conducted in October 2024 to identify teams' needs and propose appropriate actions. This approach ensures that internal management practices do not have detrimental effects on the physical and mental health of employees. The Executive Committee received dedicated training on the topic in December 2024 at the same time that the survey results were submitted to Management. The survey did not reveal any structural issues conducive to the generalised development of psychosocial risks among employees, and emphasised that interpersonal relationships were a strong point for the undertaking, with its economic stability and the autonomy granted to teams.

### Human rights commitments

The Group is committed to respecting human rights and refers to the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the Fundamental Conventions of the International Labour Organization.

By adhering to these principles, GTT undertakes in particular to defend freedom of association and collective bargaining, to fight against discrimination, to combat all forms of forced labour and child labour and to protect health and safety at work.

Given the safety risks inherent to the liquefied gas transportation sector, GTT is particularly committed to protecting the health and safety of people during its operations and its technologies in use and promoting safety in its downstream value chain.

### Actions

In 2024, the Group rolled out several initiatives to improve working conditions, in particular through actions related to diversity and inclusion. These initiatives are presented in section 3.4.2.1.3 *Diversity and inclusion* of this report.

Moreover, at Elogen, a system for avoiding harassment was implemented, including a dedicated commission with harassment advisors at the Works Council and company level. At Elogen, the implementation of a dedicated platform and employee participation in psychosocial risk surveys made it possible to analyse changes in working conditions and to adjust the actions taken accordingly.

Awareness-raising initiatives regarding breast cancer, such as "October Rose" breast cancer awareness month at Elogen and the "Wear your trainers" charity challenge organised at Group level for the benefit of the ELA association in December 2024, helped to strengthen the undertaking's commitment to the health and well-being of employees, in addition to contributing to charitable causes.

### 3.4.2.1.5 Employee health and safety

#### Employee health and safety policy

Although the risk of serious accidents is limited to GTT's engineering activity, health and safety issue is applicable to laboratory and technical assistance activities on construction and/or repair sites. The Group is therefore responsible for identifying potential risks and hazards at each of its sites and for assessing their impact on employee health.

The main health and safety risks to which Group employees are exposed vary in nature and depend on the nature of the activities performed:

- risks related to supervision or assistance at shipyards or at onshore storage tanks: working at heights, working in confined spaces, falling objects, mechanical shock, atmospheric pollution;
- risks related to ballast tank inspections in the case of the Cryovision subsidiary;
- risks related to the installation of on-board systems in the case of the Ascenz Marorka subsidiary;
- risks related to the use of machines, test benches and chemicals in the case of GTT and Elogen employees;
- liquid nitrogen (anoxia, burns) in the case of GTT laboratories;
- risks related to commuting accidents.

The Group's Health, Safety and Environment (HSE) management system includes all the measures necessary to prevent work-related accidents and protect its employees and those of subcontractors. Particular attention is paid to the management of near misses, in order to adopt an approach of prevention rather than cure.

Health and safety risks related to working conditions on shipyards or other construction sites (onshore tanks) are identified and addressed each year by the CSSCT and the HSE department. Health and safety policies are specific to each shipyard and the ship owners support the shipyards in their application.

In order to ensure the best possible working conditions for its employees and to support local policies, since 2018 GTT has deployed a network of health and safety managers at each shipyard whom GTT employers can ask for advice. Several times per quarter, all of the coordinators and GTT's Head of HSE meet to discuss the accidents/near misses that have occurred, to ensure continuous improvement. GTT employees seconded to shipyards or onshore storage tank construction sites fall under the responsibility of a site manager supported, where occupational health and safety (HSE) is concerned, by a dedicated HSE coordinator.

The management systems used by the subsidiaries conform to the Group's HSE policy. Subsidiaries with on-board operational activities have chosen to be ISO 45001 certified.

The Group's new Health and Safety policy rolled out in 2024 is based on legal obligations and the ISO 45001 standard for the implementation of its health and safety management system. The new HSE policy specifies the central role of health and safety in the Group's culture and highlights the role that each employee can play:

- Actor: Each employee is the primary actor in their own health and safety at work, through complete knowledge of the risks linked to their activity and through compliance with the safety measures to be adopted to deal with these risks. As an expert in their activity, they take care to implement the health and safety management system for their scope, consistent with the Group's CSR objectives.

- Contributor: the employee helps to protect health, safety and the environment by adopting a responsible attitude in the performance of their professional activity and by fully complying with the health, safety and environmental rules in force. They share risks, experiences and best practices to enhance the health and safety management system and achieve the Group's CSR objectives.
- Leader: the employee takes the initiative to preserve or improve everyone's health and safety, convinced that these must take precedence over any other form of consideration. Through their daily commitment, they make a real difference in ensuring a safe and secured working environment for all, thanks to a proactive, pragmatic and constructive attitude; in this regard, they do not hesitate to suggest any improvements they deem appropriate in terms of health, safety or the environment.

#### Health and safety governance

The GTT Group has implemented internal health and safety governance. GTT's head of HSE reports to the General Secretary, who reports on this subject to the Executive Committee. The role of the Executive Committee and the Board of Directors in terms of risk assessment consists of defining policies and monitoring the associated performance. To this end, the Board of Directors approves the Group's HSE policy on the proposal of General Management, as well as the main performance indicators, in particular the frequency rate (indicator integrated into the Chief Executive Officer's variable pay. For further information, see section 3.1.2.3 – *Integration of sustainability-related performance in incentive schemes [GOV-3]*).

An HSE Committee meets monthly, bringing together GTT's head of HSE, the HSE Manager based in Asia and HSE coordinators appointed at each shipyard and each onshore storage tank construction site. At the level of each subsidiary, depending on the nature of the subsidiaries' activities and their HSE challenges, the HSE function may be carried out directly by the subsidiary head or by a dedicated HSE manager/executive, as is the case with Cryovision, Ascenz Marorka and Elogen.

Finally, the HSE Division reports to the Human Resources Division on all actions relating to working conditions and quality of life at work (QLW).

#### Health and safety actions

As part of its internal Health, Safety and Environment (HSE) policy, the Group implements concrete actions to prevent and mitigate material negative impacts on its workforce, while taking advantage of opportunities to improve working conditions. The objective is to ensure a safe and healthy working environment with a long term view to risk reduction and continuous improvement.

The Group adopts a proactive approach to preventing serious employee health and safety risks, especially by:

- implementing HSE management systems compliant with international standards;
- adopting strict safety rules on all sites and during operations on customers' premises;
- regularly training employees on workplace risks and HSE best practices;
- implementing heightened monitoring of working conditions and identifying risky situations to prevent any incidents.

The actions rolled out in 2024 by the health and safety department were designed to strengthen the dissemination of a Group HSE culture, as well as to pursue the avoidance of accidents and injuries.

Following the signs of weakness observed in shipyards in China and Korea at the end of 2023, all shipyards in China and Korea were audited in 2024 by GTT's HSE department. These audits and the occurrence of a significant accident in March 2024 in one of these shipyards led GTT to strengthen its HSE team in Asia by creating an HSE Manager position based in Shanghai, responsible for strengthening the safety culture among site representatives and with shipyard HSE contacts.

Regarding health and safety equipment at the GTT's head office, collective protection equipment (air purifiers) was installed in the carpentry/metalwork area, respiratory protection equipment with assisted ventilation was rolled out for welding operations, and a study carried out on the installation of fume extraction tables led to the purchase of such tables and their delivery in the first quarter of 2024. Finally, regarding chemical risks, software has been rolled out with appointed representatives on the teams concerned for managing chemical product safety data sheets, and two chemical risk audits were conducted at GTT and Elogen by a specialised firm, which made it possible to implement appropriate corrective actions.

Moreover, GTT has continued to disseminate the ten golden rules of health and safety (Group) and rolled out three awareness-raising modules for employees on targeted HSE subjects. Four specific trainings were offered to the teams: one regarding gas risk (with a particular focus on the use of liquid nitrogen), one regarding chemical risk, one dedicated to laser risk (in addition to the appointment of an in-house representative) and one dedicated to risks on the road. Regular communications have been made during seminars for managers of the undertaking, via internal newsletters and during dedicated webinars, and monthly Safety Talks have been held since January 2025.

The organisation within the subsidiary Elogen evolved, with the appointment of a QHSE director, who was responsible for conducting an analysis of any discrepancies in the system in place with regard to the requirements of the ISO 45001 standard. HSE activity at Ascenz Marorka in 2024 concentrated on ISO 45001 preparation, which will be assessed during the first quarter of 2025.

In 2024, a total of 477 Group employees, or 62% of the workforce, received health and safety training and awareness sessions. The training focused on the following topics:

- golden rules;
- personal protective equipment (PPE);
- first-aiders at work;
- fire protocols and fire-extinguisher handling;
- working at heights;
- working in confined spaces;
- using liquid nitrogen;
- using diisocyanates;
- handling oxygen balaclavas;
- working in explosive atmospheres (ATEX);
- electrical and recycling accreditation;
- using forklift trucks;
- using pallet trucks;
- using overhead cranes;
- laser risks;
- avoidance of commuting accidents.

When an incident occurs, the Group immediately implements corrective measures to limit the consequences and improve future procedures. This includes creating specific action plans to mitigate the impacts identified, conducting an in-depth analysis of the causes with feedback and implementing preventative actions, as well as assisting the employees involved, including medical and psychological support if necessary.

In a continuous improvement approach, the Group invests in initiatives to promote a strong and consistent HSE culture. It implements an awareness-raising programme with enhanced training for employees and subcontractors. Furthermore, it promotes best practices and encourages sharing positive Health and Safety experiences. In order to optimise safety in the field, the Group regularly improves its equipment and infrastructure. Finally, it fosters collective responsibility by encouraging individual initiative through the "Actor, Contributor, Leader" concept.

The group tracks and assesses the effectiveness of its actions through several mechanisms. It uses HSE performance indicators, such as the frequency rate and severity of accidents as well as the number of HSE training hours. It conducts internal and external audits in order to monitor the application of current standards. Finally, regular consultation with employees takes place to identify avenues for improvement and adapt strategies accordingly. The Group also relies on regulatory monitoring, feedback from the field and risk diagnostics to identify and continuously adjust HSE actions.

The single general risk assessment document of GTT S.A. is updated on an annual basis, and each subsidiary is responsible for its own single document. The Group has identified the nature of the risk for each work unit, process or machine. Avoidance measures associated with action plans and a training programme are implemented for each work unit. Likewise, an assessment of chemical risks is carried out periodically, in particular by means of an inventory, locating of chemical products on the GTT site, the use of the software, Seirich, and the sampling of air in the laboratories.

Specific safety procedures have been developed, reinforced and multiplied within the departments and activities which are most exposed to risk, taking account of changes in the regulations and technical changes, including:

- the research and testing laboratories designed to carry out fluid dynamics tests in real conditions using wave simulators (hexapods), grouped into a single building developed and constructed with safety issues in mind;
- the test laboratory dedicated to characterising the thermal and mechanical properties of materials and sub-assemblies, in particular in cryogenic conditions, and thermomechanical tests of materials and assembly in cryogenic conditions. There is a high risk of gas leaks and anoxia in some laboratories and employees are well-trained and have specific PPEs such as portable oxygen detectors;
- the joinery and metallurgy workshops;
- the industrialisation tooling development laboratory;
- foreign shipyards; and
- onshore storage tanks construction sites.

In the event of an emergency intervention, GTT has procedures for fire evacuations, assistance for employees who are victims of illness or accident, and a procedure for "significant" events that result in states of shock or stunning.

The Group takes care not to cause or worsen negative impacts by including Health and Safety in its purchasing and operating practices. Any decision includes an analysis of health and safety impacts.

The Group dedicates specific human and financial resources to managing HSE impacts:

- budget allocated to HSE training, audits and equipment;
- dedicated HSE departments in each entity with clear roles;
- continuous improvement plan to optimise HSE management.

## Targets

Commitment							
Sub-commitment	Metric	Reference year	Baseline	Target	Timescale	2023 result	2024 result
<b>GUARANTEEING THE HEALTH AND SAFETY OF OUR TEAMS</b>							
<b>Health and Safety</b>							
	0 fatalities	2022	0	0	Annual	0	0
	Number of workplace accidents with lost time	2022	4	3	Annual	1	4
	Frequency rate of workplace accidents	2022	3.75	<2.65	Annual	0.78	2.64

In 2024, the increase in the rate of workplace accidents and the number of days lost compared to 2023 is explained mainly by two long periods of lost work time: one following a commuting accident and another following an accident with no connection to the usual professional activity (injury during a team-building session).

Detailed metrics regarding occupational health and safety actions conducted by GTT are available in section 3.4.3.9 *Health and safety metrics* [S1-14].

### 3.4.2.2 Processes for engaging with own workforce and workers' representatives about impacts [S1-2]

In order to include employee viewpoints in its decision-making processes, GTT maintains a continuous dialogue with its employees and their representatives. These discussions allow the Group to identify and mitigate actual or potential material impacts affecting its workforce. This engagement relies on various mechanisms, including the detailed description and assessment of their effectiveness appearing in section 3.4.1.1 *Interests and views of stakeholders* [SBM-2].

GTT's General Management takes care to hold regular discussions and ensure rigorous management of own workforce material impacts, risks and opportunities.

### 3.4.2.3 Processes to remediate negative impacts and channels for own workforce to raise concerns [S1-3]

#### General approach regarding remediation of negative impacts

GTT recognises the importance of identifying and remediating material negative impacts that may affect its employees. Thus the Group has set up a whistleblower system in compliance with the Sapin II and Wasserman laws. This mechanism allows employees

to report, in good faith, any violations of the Group's Code of Conduct. If a material negative impact on employees is identified, GTT is committed to providing or facilitating appropriate remediation and to assessing the effectiveness of the corrective actions put in place. For further information, see section 3.5 *Business conduct* [ESRS G1] of this chapter.

### 3.4.3 METRICS

#### 3.4.3.1 Characteristics of the undertaking's employees [S1-6]

Tables 1 to 4 below outline all of GTT's fixed-term employment contracts or permanent employment contracts.

However, this list excludes interns, the number of which increased to five and includes apprentices, the number of which increased to 36 at the end of 2024. These employees benefit from the same working conditions as those described previously for fixed-term employees.

Fixed-term and permanent contract staff are counted according to their place of work and expense coverage.

The data presented below have been collected and consolidated by the HR teams of each subsidiary as of December 31, 2024.

**Table 1 – Employees by gender**

	2024
Gender	Workforce
Male	669
Female	219
<b>TOTAL</b>	<b>888</b>

As of December 31, 2024, GTT employed a total of 888 people, 24.5% of whom were women. Section 3.4.2.1.3 *Diversity and inclusion*, details past, present and future measures implemented by the Group to promote the employment of women across its various businesses.

**Table 2 – Employees by country**

	2024
Country	Workforce
France	809
United Kingdom	8
Iceland	13
United States	2
Qatar	1
Singapore	21
China	9
Germany	6
Denmark	19
<b>TOTAL</b>	<b>888</b>

At the end of 2024, France represents over 91% of the Group's workforce. Due to its activities, the majority of GTT employees are engineers. In particular, 21% of Group employees work in innovation jobs, mainly at the undertaking's registered office in France. In addition to the head office, the Group has ten main subsidiaries, seven of which are international. 13% of GTT S.A. employees are expatriates.

**Table 3 – Employees by type of contract, broken down by gender**

	2024		
	Male	Female	Total
Number of employees – Headcount	669	219	888
Number of permanent employees (CDI) – Headcount	544	194	738
Number of fixed-term employees (CDD) – Headcount	125	25	150

As of December 31, 2024, over 83% of the Group's employees were permanent (CDI) employees, including 75% in France. GTT does not include employees without guaranteed hours in its headcount.

**Table 4 – Employees by type of contract, broken down by region**

	2024		
	Number of employees – Headcount	Number of permanent employees (CDI) – Headcount	Number of fixed-term employees (CDD) – Headcount
France	809	670	139
United Kingdom	8	8	0
Iceland	13	13	0
United States	2	2	0
Qatar	1	1	0
Singapore	21	21	0
China	9	2	7
Germany	6	6	0
Denmark	19	15	4
<b>TOTAL</b>	<b>888</b>	<b>738</b>	<b>150</b>

In 2024, GTT hired 220 employees in total, including 151 permanent, 51 fixed-term, and 18 work-study. Approximately 91% of these new recruits were hired in France.

Furthermore, in 2024, 117 employees were expatriated from France to China, the United States, Qatar and South Korea, thus reflecting the Group's internal mobility policy.

**Table 5 – Departures (permanent contracts)**

	2024		
	Male	Female	Total
<b>TOTAL NUMBER OF DEPARTURES</b>	<b>51</b>	<b>20</b>	<b>71</b>
Voluntary departures (resignations)	22	9	31
Voluntary departures (mutual terminations)	13	6	19
Retirement	2	0	2
Redundancies	1	2	3
Other departures	13	5	16

In 2024, the Group had 71 departures, 85% of which were departures linked to resignations (31 employees) and mutual terminations (19 employees), primarily motivated by career developments. The resignation rate of GTT S.A. stood at 2.47% in 2024.

Retirements (2 employees) and redundancies (3 employees) remain marginal and reflect the stable management of the Group's human resources. Other departures (16 employees) consist of various situations, such as the end of probationary periods or the end of secondment contracts between the Group's companies.



**Table 6 – Turnover rate**

	2024		
	Male	Female	Total
Turnover rate (headcount)	7.3%	9.1%	7.8%
Voluntary turnover including retirement	7.6%	9.1%	8.0%

The data of the two tables above highlight the importance of personnel management within the Group. The workforce turnover rate is 8%, of which 7.6% for men and 9.1% for women. These rates include voluntary departures, retirements, redundancies and other departures. In 2024, the rate of employee-initiated resignations within GTT S.A., representing 91% of the Group's employees, stood at 2.47%.

In 2024, 220 people were hired Group-wide, demonstrating GTT's continued attractiveness. Recruitment staff rose to the challenge, with increased attention given to the expectations of applicants and whether they were aligned with the Group's values, such as excellence, innovation, entrepreneurial spirit and commitment.

GTT's employer promise is illustrated by targeted actions in schools. The increase in the number of forums, ambassador involvement in conferences, and a dynamic campaign on social media have enhanced the Group's employer brand. GTT's Student Innovation Challenge once again attracted a large number of participants, emphasising students' interests in topics such as maritime decarbonisation. The co-optation programme, launched in June 2023 and continued in 2024 also contributed to enriching the Group's talent pool.

These efforts, combined with the effective management of departures and continuous adjustment to the needs of the job market allow GTT to maintain a manageable turnover rate while attracting new talent vital to its growth and innovation.

### 3.4.3.2 Characteristics of non-employee workers in the undertaking's own workforce [S1-7]

**Table 7 – Rate of non-employees**

	2024
Number of non-employees – Headcount	391
% of non-employees	31%

GTT's external collaborators, i.e. workers without employee status, include those who have signed a contract with the undertaking to provide specific services ("self-employed people") as well as those provided by companies specialising in labour services. GTT integrates non-employee workers into its workforce, mainly via technical assistance contracts.

This allows the Group to meet specific and one-off needs, such as the need for highly qualified expertise, including engineers and other specialists, who provide considerable added value to research and development projects. These collaborations with external experts are essential to meet the undertaking's specific needs, promote innovation and maintain a high level of technical skills.

In 2024, GTT used 391 non-employee workers, 50% of them engineers.

### 3.4.3.3 Collective bargaining coverage and social dialogue [S1-8]

**Table 8.1 – Collective bargaining coverage**

	2024
% of employees covered by collective bargaining agreements	91%

GTT S.A. and its French subsidiaries are covered by a branch collective bargaining agreement. The social partners in the sector use collective bargaining to bring the respective interests of employees and undertakings into line by signing an agreement. These agreements apply to employees who work in France.

Furthermore, employees of GTT S.A., OSE and ELOGEN are represented by a Works Council which ensures the collective expression of employees' interests in various areas. At GTT S.A., a union delegate has been designated among the elected Works Council members, which allows agreements with the undertaking to be signed.

The mechanisms described below are specifically for France and do not cover foreign subsidiaries, for which local employment law applies. Accordingly, the work of all the Group's employees complies with local employment law at a minimum.

**Table 8.2 – Collective bargaining coverage by country**

	2024
	Employees – EEA
	France
<b>Coverage Rate</b>	<b>100%</b>
0-19%	-
20-39%	-
40-59%	-
60-79%	-
80-100%	100%

In 2024, 100% of GTT employees in France, representing more than 91% of the Group's total headcount, was covered by collective bargaining. GTT complies with applicable social dialogue practices in the other countries where it operates.

**Table 9 – Workers' representatives**

	% of employees represented by workers' representatives (EEA only)			
	France	Germany	Denmark	Iceland
<b>Coverage Rate</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
0-19%	-	0%	0%	0%
20-39%	-	-	-	-
40-59%	-	-	-	-
60-79%	-	-	-	-
80-100%	100%	-	-	-

In 2024, GTT S.A.'s staff representatives participated in 20 meetings in France.

Other Group locations in the EEA, representing 38 workers in three countries, do not have workers' representatives in accordance with local regulations. However, the Group maintains regular discussions with these employees via the communication channels described in section 3.4.2.1.1 *Social dialogue* of this chapter.

### 3.4.3.4 Diversity metrics [S1-9]

Gender diversity must be an integral part of GTT's culture. In 2024, women accounted for 25% of Group talent. The Group has made a formal commitment to gender equality and gender diversity at the highest level and to that end has made the professional development of women, and more broadly the full

expression of their role, a key focus of its HR strategy. GTT therefore aims to accelerate the gender parity programme as it pertains to key positions by 2033. In 2024, 22.2% of senior management positions were held by women.

**Table 10 – Top management distribution by gender**

	2024		
	Male	Female	Total
BoD members	5	3	8
% CA	63%	38%*	1
Executive Committee Members	7	1	8
% Executive Committee	88%	14%**	1

\* This representation is compliant with the rule that if a board has eight members or fewer, the maximum difference between the genders cannot exceed two.

\*\* Excluding the Chief Executive Officer

Section 3.4.2.1.3 *Diversity and inclusion* of this report presents the policies, actions and objectives set up by the Group in this area. Chapter 4 of this Universal Registration Document also provides detailed information on the roles and composition of the administrative and governance bodies.

Table 11 – Breakdown of employees by age bracket

	2024
Less than 30 years old	172
Between 30 and 49 years old	599
50 years old or more	117
<b>TOTAL</b>	<b>888</b>

In 2024, the global average is 38 years old, 37 for men and 38 for women. In 2024, the global average length of service duration is 5 years, 6 for men and 3 for women.

Table 12 – 2024 EGAPRO Index

	Score obtained	Scale
(1) Pay gap (%)	36	40
(2) Individual pay rise gaps (% points)	10	20
(3) Promotion gaps (% points)	15	15
(4) Percentage of employees receiving a pay rise after returning from maternity leave (%)	15	15
(5) number of employees of the underrepresented sex amongst the 10 highest paid	5	10
<b>INDEX OUT OF 100 POINTS</b>	<b>81</b>	<b>100</b>

The workplace equality index for 2024 is **81/100** for GTT S.A. (86/100 in 2023).

The reduction in the score compared to 2023 is explained mainly by the wage increases in 2024, which did not benefit the significant

number of new female talents hired at the end of the year who were therefore not eligible for wage reviews. Calculation of the index highlighted the positive trend in the promotion rate for women in 2024, resulting in a maximum rate. In 2024, the French average was 88.5/100 and 86.4/100 in the engineering sector.

### 3.4.3.5 Adequate wages [S1-10]

The GTT Group applies an adequate wage to all of its employees, guaranteeing fair and competitive compensation. This commitment is part of an overall approach seeking to recognise, attract and retain talent while ensuring a balanced sharing of the value created by the undertaking.

In accordance with the definition of the International Labour Organization (ILO), an adequate wage allows a worker and their family to cover their essential needs (food, housing, health, education etc.) while having discretionary income. GTT ensures that all of its employees receive at least this level of compensation, in line with economic and social realities.

In 2023, GTT revised its compensation policy for GTT S.A. employees, who represent 66% of the Group's total headcount. This development, conducted with the support of the Mercer firm, made it possible to align wages with market levels while considering the specific features of the Group's businesses. This dynamic continued in 2024 with regular adjustments and the optimisation of variable components, in order to better value the individual and collective performance of employees, thus making it possible to maintain fair and competitive pay.

To this end, efforts in terms of financial recognition are also reflected in the evolution of employee benefit expenses. For the

entire Group, these costs, encompassing the elements of wages, pay, employee savings and social security, increased by more than 17.6% in 2024 compared with 2023.

Beyond wages, GTT ensures that it involves its employees in the undertaking's results. Accordingly, all French companies with 50 or more employees comply with the legal requirement to set aside a special profit-sharing reserve. In addition, GTT and its subsidiaries in France (Elogen, Cryovision and Ose Engineering) also have an employee incentive agreement, enabling employees to benefit directly from the undertaking's performance.

All these entities are also members of the Group savings scheme, which offers a diversified range of six mutual funds, thus providing employees with a savings opportunity under advantageous conditions.

To this same end, a capital increase project reserved for employees was approved in 2023 by the Board of Directors. This initiative took shape in 2024 with a share issue of 55,618 shares at a discount of 20% and a contribution of up to 1,500 euros, thus increasing the involvement of employees in the Group's success.

In addition to pay, GTT adopts a global approach to the financial well-being of its employees by offering social security coverage and advantageous pension plans.

### 3.4.3.6 Social protection [S1-11]

In accordance with its working conditions policy (presented in section 3.4.2.1 *Policies, actions and objectives related to own workforce [S1-1, S1-4 and S1-5]*), GTT implements high quality and advantageous social protection for its employees. This is based on a supplementary health insurance plan offering several levels of coverage for employees to choose from, as well as a personal risk policy covering the risks associated with illness, disability and death. The distribution of contributions is made largely by the employer.

Concerning other aspects, such as unemployment or disability, coverage depends primarily on the public schemes in effect in the countries where the Group operates. In Singapore, for example, five employees are subject to a specific regime which does not provide for employer or employee social security contributions on these aspects.

The undertaking ensures that all employees have clear and easy access to information regarding the social security, offerings and schemes made available to them.

### 3.4.3.7 Persons with disabilities [S1-12]

**Table 13 – Employees with disabilities**

	2024		
	Male	Female	Total
% of employees	0.3%	0%	0.2%

In 2024, GTT recruited 1 person with a disability and included 2 employees with disabilities among its headcount.

As part of its commitment to increase the inclusion of persons with disabilities, GTT has set a target for establishing a system for inclusion by 2026, with concrete actions already rolled out in 2024 and 2025. This plan is an integral part of the undertaking's CSR roadmap. For further information, see the Diversity and inclusion section.

### 3.4.3.8 Training and skills development metrics [S1-13]

**Table 14 – Performance evaluation and career development**

	2024		
	Male	Female	Total
Number of employees who had an annual interview – Headcount	544	166	710
Number of permanent employees (CDI) who had an annual interview	455	162	617
Number of fixed-term employees (CDD) who had an annual interview	89	4	93
% of employees who participated in regular performance evaluations and career development	81.3%	75.8%	80%

In 2024, all the Group's eligible employees participated in a performance evaluation with their immediate superior via People Reviews and Career Talks (for further information, see section 3.4.2.1.2 Employee skills development).

Table 15 – Training

	2024		
	Male	Female	Total
Number of training hours	13,784	5,303	19,087
Number of training hours per employee (excluding mandatory training)	10,391	4,364	14,755
Average number of training hours per employee	20.6	24.2	21.5
Average number of training hours per employee (excluding mandatory training)	15.5	19.9	16.6

The success of GTT is largely based on the commitment of its staff, their expertise and their involvement in the projects of the undertaking. To this end, HR staff work closely with the Group's directors and managers to roll out actions that support the undertaking's strategy and respond to their challenges.

From this perspective, GTT considers that the management of its employees' careers is crucially important, in order to develop their skills and offer them careers that are in line with their aspirations and the undertaking's requirements. To retain top talent, the Group ensures:

- the availability of career advisors tasked with helping employees consolidate their career plans and pursue mobility opportunities. In 2024, a total of 80 employees benefited from personalised career guidance (i.e. 9%) and 98 internal transfers were approved (including 14 for international positions);
- the involvement of its management community, through annual talent reviews (People Review – 93% of employees assessed), succession planning (for the Group's main positions), promotion and access to executive status (6 promotions approved in 2024), plus biennial assessment interviews;

- the launch of the Archimedes Community of Experts in early 2024, which helped promote technical careers and capitalisation on technical knowledge by ensuring that know-how is passed on. 12 experts and around fifty specialists in GTT's technical areas participated in this flagship initiative in 2024 which aimed to:

- enhance scientific and technical skills and capacity for innovation,
- contribute to sales momentum,
- retain talent.

The sector is structured according to 12 areas of expertise including structural mechanics, scientific modelling and including Digital & Smart Shipping. The primary duties of Experts and Specialists consist of ensuring technological monitoring, providing technical support for projects as well as to the development of the Group (M&A and VC), and, finally, of ensuring the development of skills and the capitalisation and transmission of knowledge.

**Training\****(in millions of euros)*

	2021	2022	2023	2024
Training costs	1.1	1.6	2.1	2.1
Group payroll	67.6	95.6	112.4	112.4
Employees receiving training during the year (%)	1.6%	1.7%	1.8%	1.8%

\* GTT 2024 and 2023 = Group scope; 2022 and 2021 = GTT S.A. head office scope.

In 2024, investment in training at Group level exceeded 2.1 million euros, or 1.8% of payroll.

In 2024, the number of training days per permanent employee was 3.6 days and 93% of employees received training during the year.

### 3.4.3.9 Health and safety metrics [S1-14]

**Table 16 – Health and safety**

	2024	2023
Percentage of employees covered by the health and safety management system	100%	100%
Number of deaths due to workplace accidents and occupational illnesses	0	0
Number of workplace accidents with lost work time	4	1
Rate of workplace accidents (frequency rate: number of accidents per 1 million hours of work)	2.64	0.78
Number of cases of occupational illnesses counted (subject to legal restrictions on data collection)	0	0
Number of days lost due to workplace accidents, deaths due to workplace accidents, to work-related health problems and deaths due to work-related health problems (Severity rate: number of days lost for 1,000 calendar hours)	140	20

The four workplace accidents with lost work time in 2024 were:

- injury of one employee in a shipyard following faulty handling of a machine by the site operator;
- bicycle fall of one employee in a shipyard (bicycles are a vital source of travel on some sites);
- injury of one employee during a team building seminar;
- one employee sprain.

Despite these four accidents, the frequency rate (2.64) is in line with the objective of the CSR roadmap (objective <2.65) thanks to actions to spread HSE culture in a context of an increase in the Group's headcount in 2024.

The health and safety policy, described in section 3.4.2.1.5 – *Employee health and safety policy*, covers all of the Group's employees. Although the risk of serious accidents remains limited at the head office due to the nature of GTT's activities (mainly engineering studies conducted in an office environment using IT tools), the Group implements all the necessary measures to raise awareness and train its employees in identifying and avoiding risks.

GTT rolls out many initiatives in this regard. They are shown in section 3.4.2.1 *Policies, actions and objectives related to own workforce [S1-1, S1-4 and S1-5]*.

The increase in the number of people trained in health and safety, as well as the number of action plans generated following near-miss reports underline the efforts rolled out in 2024 by the Health and Safety Department and all of GTT's teams.

Metric	2022	2023	2024
Number of man-days of occupational health and safety training	136	143	317
Number of people trained in health and safety	172	358	485
Near-miss reports	24	63	59
Number of action plan generated following near-miss declarations	22	58	56
Number of hours worked	1,066,217	1,278,550	1,516,515
Number of commuting accidents	9	5	7
Number of occupational illnesses	0	0	0
Absenteeism rate <sup>(1)</sup> <i>The absences taken into account are: sickness, exceptional leave, workplace and commuting accidents, paternity leave, maternity leave, sick children leave, parental education leave and leave without pay.</i>	3.20%	2.39%	2.67%

(1) Data on absenteeism presented covers 92% of the Group's average headcount due to differences in the availability or definition of this metric within certain entities. The entities included are as follows: GTT S.A., Cryovision, OSE, Elogen, and Ascenz Marorka France.

### 3.4.3.10 Work-life balance metrics [S1-15]

**Table 17 – Family-related leave**

	2024		
	Male	Female	Total
% of employees entitled to family-related leave	100.0%	100.0%	100%
% who took family-related leave	6.0%	8.2%	6.5%

GTT guarantees all of its employees, in all of its locations, fair access to family-related leave, in accordance with current local regulations and its commitments regarding work/life balance. GTT is committed to promoting equal access to these systems and to supporting its employees in exercising their rights.

### 3.4.3.11 Compensation metrics (pay gap and total remuneration) [S1-16]

Table 18 – Differences in compensation

	GTT S.A.	Elogen	OSE	Ascenz Marorka Iceland	VPS	Ascenz Marorka Singapore	GTT China
Gender pay gap ( <i>fixed compensation</i> )	1.70%	5.1%	0.82%	8.00%	21.45%	16.33%	53.29%

The gender pay gap indicates the difference in average compensation between male and female employees, expressed as a percentage of the average level of male workers' compensation.

The differences shown in the table above take into account the compensation structures specific to each country. For subsidiaries with small headcounts, the differences are more a reflection of the heterogeneity of the positions.

The gender pay gap does not concern the following subsidiaries, due to a headcount that is too small: Ascenz Marorka France, GTT Training, GTT SEA, GTT Middle East, GTT NA, Cryovision.

Table 19 – Ratio of the highest pay to the median

	GTT SA	OSE	Elogen
The highest remuneration	€900,629 (PDG)	€1,163,381 (DG)	€68,940
Median remuneration	€89,221	€89,221	€56,171
<b>ANNUAL TOTAL REMUNERATION RATIO OF THE HIGHEST PAID TO THE MEDIAN ANNUAL TOTAL REMUNERATION TO ALL EMPLOYEES (EXCLUDING THE HIGHEST)</b>	<b>10.09</b>	<b>13.04</b>	<b>1.23</b>
			<b>2.99</b>

The ratio of the highest compensation to the median does not concern the following subsidiaries, due to a headcount that is too small: Ascenz Marorka, GTT Training, GTT SEA, GTT Middle East, GTT NA, Cryovision. The table above takes into account the separation of roles in 2024 and the appointment of a Chief Executive Officer. The methodology applied by GTT for this year

takes into account components of fixed and variable compensation, annualised benefits in kind and exceptional components for the Chairman and CEO and for the Chief Executive Officer. For the median compensation of employees, the components correspond to fixed and variable compensation and value-sharing mechanisms (profit-sharing and incentives, for example).

Table 20 – Profit sharing, incentives and employee saving schemes

(in millions of euros)*	2024	2023	2022	2021
Profit sharing	4.7	5.1	5.9	8.1
Incentives	4.7	2.2	2.2	1.3
Employee savings scheme matching contribution	1.9	1.8	1.8	1.6
<b>TOTAL</b>	<b>11.3</b>	<b>9.1</b>	<b>9.1</b>	<b>11.0</b>

\* Amounts paid in year 2024 for year 2023

All French companies with 50 or more employees are required to set aside a special profit-sharing reserve enabling employees to share in the company's profits. GTT and its subsidiaries in

France (Elogen, Cryovision and Ose Engineering) also have an employee incentive agreement. All belong to the Group savings scheme which offers a range of six mutual funds.

### 3.4.3.12 Incidents, complaints and severe human rights impacts [S1-17]

In the context of its tracking of social and human rights impacts, GTT has not recorded any incident or complaint relating to the following criteria during the reference period:

- number of discrimination incidents, including harassment, reported;
- number of complaints relating to social subjects related to working conditions and fair treatment (excluding discrimination and harassment);

- total amount of fines, penalties and compensation resulting from incidents and complaints (discrimination and harassment);
- Number of serious human rights incidents.

GTT remains fully committed to the prevention of risks related to human rights and social impacts, by relying on robust internal policies and appropriate vigilance mechanisms to ensure a respectful and fair working environment. For further information, see section 3.4.2.1 *Policies, actions and objectives related to own workforce* [S1-1, S1-4 and S1-5] of this report.



## 3.5 BUSINESS CONDUCT [ESRS G1]

### 3.5.1 GOVERNANCE

#### 3.5.1.1 The role of the administrative, management and supervisory bodies [ESRS 2 GOV-1]

The Board of Directors, in particular the Audit and Risk Management Committee, oversees the definition and deployment of the Group's strategy in line with best practices as regards ethics and compliance. It reviews GTT's commitment to ethics and compliance, with the assistance of the Company's Statutory Auditors who carry out regular due diligence on the entire scope of the Ethics & Compliance policy, particularly in the areas of anti-corruption, compliance with international sanctions and the management of personal data. It ensures that ethics issues are integrated into the Group's strategy and assesses, on an annual basis, the implementation of these commitments.

GTT has introduced an Ethics & Compliance programme in line with international standards, texts and regulations, based on three pillars:

- preventing and fighting corruption;
- protecting personal data; and
- complying with international sanctions, export controls and embargo measures.

The members of the Board of Directors have diversified and complementary expertise, including specific skills regarding ethics, compliance and risk management. This expertise enables them to carry out strategic management appropriate for GTT's complex issues, especially those related to anti-corruption and protection of personal data.

The GTT Group's senior executives, including the Chief Executive Officer, members of the Executive Committee and all Group business directors, are responsible for the Group's Ethics & Compliance programme. They ensure the proper application of ethics in operations, especially by a zero tolerance culture regarding forms of fraud and corruption. This approach is regularly reiterated and reinforced by the management bodies.

The Ethics Committee, which includes the Group Compliance Officer, the Group Legal Manager, the Group Finance Manager and the Social Relations Manager, plays a central role in assessing and processing ethical reports. It takes care to ensure impartial and confidential treatment of each of the reports.

The Group Compliance Officer, reporting to the General Secretary, is responsible for developing Group Compliance policies and procedures as well as their effective implementation in all entities. It relies on an internal network to relay and monitor the application of the policies. The Group Compliance Officer has in-depth expertise in compliance and risk management, supplemented by specific knowledge of the applicable international standards and local regulations.

The Data Privacy Officer, reporting to the Compliance Officer, is responsible for ensuring the compliance of the Group's operations with personal data protection legal and regulatory requirements. They ensure that the personal data processing register of the Group entities concerned is kept up to date and advise teams on how to set up projects that involve personal data processing.

Thus, the GTT organisation ensures robust governance and in-depth integration of ethics and compliance principles into all of its activities, relying on specific skills and processes to prevent risks, promote an ethical culture, and guarantee the protection of personal data.

### 3.5.2 IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### 3.5.2.1 Description of the processes to identify and assess material impacts, risks and opportunities [ESRS 2 IRO-1]

The GTT Group conducts a systematic and detailed analysis of its impacts, risks and opportunities related to business conduct. This approach relies on robust methodology, including the specific geographical, economic and regulatory features of the markets in which the Group operates.

In 2024, GTT carried out its double materiality analysis based on risk mapping work done in 2023 in collaboration with an independent expert. This approach made it possible to identify critical risk scenarios, including:

- corruption risks, in particular in subsidiaries operating in emerging markets or outside the core business;
- non-compliance related to Personal Data Protection (GDPR);
- issues related to export controls and international sanctions.

For each risk identified, priority action plans have been defined and implemented, with quarterly tracking ensured by the Group Compliance Officer.

GTT also assesses the particular features of the markets where it operates, taking into account local regulations, often variable and complex, which directly influence its operations. The Group also assesses sector dynamics, such as technological innovations and competitive developments, to anticipate strategic opportunities and risks.

This assessment makes it possible to adjust to local cultural and economic conditions while aligning the Group's practices with international regulatory requirements.

The process used to identify impacts, risks and opportunities is described in section 3.1.4.1 *Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]*.

ESG considerations	Impacts, Risks and Opportunities	Current/ anticipated effects	Value chain	Time horizon	Description
Business ethics	Negative impact	Potential	Own operations	Invariable	Negative impact on society in the case of a breach of its ethical obligations (incl. corruption)
	Negative impact	Potential	Own operations	Invariable	Undermining of the safety and/or rights of whistleblowers in the absence of protective policies and measures
	Risk	-	Own operations	Short term	Harm to the Group's reputation in the case of unethical practices or proven cases of corruption, or of non-compliance with the regulations concerning business ethics
	Risk	-	Own operations	Medium term	Legal proceedings and the associated costs (fines, legal costs, compliance costs) in the case of practices contrary to business ethics or non-compliance with the regulations
	Risk	-	Own operations	Medium term	Execution risk in the case of non-compliance with anti-corruption and anti-fraud measures: loss of market share/credibility and impact on business continuity
Responsible purchasing	Opportunity		Own operations	Long term	Improved resilience of business activities thanks to actions taken to strengthen the relationship with key suppliers and ensure their loyalty

### 3.5.3 BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE [G1-1]

GTT applies various anti-corruption documents, reflecting its commitments as well as its rights and obligations in different forms such as guides, Codes of Conduct or charters. GTT has thus created guidelines, policies and procedures that define its principles, general orientations and its operating methods.

The corporate culture applied to GTT's business conduct mainly relies on the Group's Ethics and Compliance mechanism, the main principles of which are to oversee business conduct practices, support the mission and commitments to stakeholders and protect the Group.

Accordingly, GTT has established and implemented procedures aimed at clarifying and supervising the rules applicable to all of its employees and stakeholders, particularly in the area of anti-corruption, assessment of third parties, management of conflicts of interest and gifts and tokens of hospitality. This structured collection makes up the Group's internal procedures.

This corporate culture is supported at the highest level by General Management and relayed regularly by the Compliance Department through targeted communication campaigns and the organisation of events.

General Management regularly expresses its commitment in statements and communications, such as at each Townhall and during the Compliance Week organised in December 2024 for International Anti-Corruption Day. The Chief Executive Officer expressed his support at the launch before the employees present, reiterating the importance of business ethics and compliance in the Group's operations.

#### The Ethics and Compliance programme

The Ethics and Compliance programme revolves around an Ethics Charter and internal procedures. The Ethics Charter specifies the rules that guide GTT in conducting its activities and details its commitments regarding all internal and external stakeholders. Through this Ethics Charter, GTT confirms its commitment to a culture of compliance with the standards in force in every country in which it operates.

This charter defines the essential ethics rules according to which GTT conducts its business, and must be a standard for behaviour and action, whether collective or individual. It reiterates the rules of conduct to adopt and illustrates their daily implementation, consistent with the Group's *raison d'être* and values.

Created with reference to international standards and key legislation, such as the OECD anti-corruption convention, the Sapin II Law, the UK Bribery Act and the Foreign Corrupt Practices Act, and under the responsibility of the Chief Executive Officer of the GTT Group, the Ethics Charter was updated in 2024.

The Ethics Charter applies to all of GTT's internal stakeholders, especially employees (whether permanent or fixed-term), as well as to any person seconded to GTT by a third party provider. It governs their interactions with all of the Group's current and potential partners. In addition, the charter is also shared with external stakeholders to ensure understanding and compliance with the Group's ethics principles. Training on the Ethics Charter via e-learning will be rolled out in 2025: this training is intended to be provided to every new employee as part of their support programme.

To ensure widespread accessibility, the Ethics Charter (available in several languages, including in Chinese and Korean) is made available to all internal and external stakeholders via the GTT Group's website and Intranet.

### Awareness-raising and training

Internal communications provide employees with essential information about GTT's commitment to integrity, while raising awareness and reinforcing understanding about the Ethics and Compliance programme. The GTT Group has created a dedicated Intranet page: "Cap GTT" providing access to resources (procedures, useful contacts, websites etc.) for all employees, in order to provide them with solutions to their ethical situations.

Cap GTT enables the Group's employees to report any behaviour they witness contrary to its values and, more broadly, to the principles set out in the Group's Ethics Charter, and keeps them informed of new compliance procedures. GTT regularly distributes communication materials on subjects linked to ethics and compliance through "GTT Link".

In December 2024, for International Anti-Corruption Day, the GTT Group organised Compliance Week, a large-scale internal communications campaign on topics related to Ethics and Compliance. The campaign consisted of a presentation by General Management, two events that drew more than 400 participants and a number of communications. By proposing fun activities open to as many people as possible, the Group recorded a very high level of engagement and impact.

External communications are also a mean of informing stakeholders about the GTT Group's integrity and implementing the Ethics and Compliance programme.

Each year, an awareness-raising and mandatory training campaign for all GTT Group employees is organised with the aim of ensuring that all employees are trained in topics related to Ethics and Compliance. Several awareness-raising and training programmes are delivered throughout the year according to employees' level of exposure to the risk of corruption. For employees exposed to the risk of corruption, in-person anti-corruption training is mandatory every two years.

Hence, as of December 31, 2024, 100% of employees requiring training and awareness followed their respective training programmes.

Several specific training courses are proposed:

- a module on anti-corruption accounting controls was prepared and delivered to employees in the Finance Department in order to raise awareness about specific risks;
- the Ethics and Compliance programme also includes specific training on the criminal risk for the Group's executives. This training focuses on what is expected of General Management in the event of an investigation by a public authority.

### Group procedures

In order to reinforce its Ethics and Compliance programme, the GTT Group has established specific procedures regarding conflicts of interest, whistleblowing, gifts and tokens of hospitality and donations, patronage and sponsorship.

### Procedure for avoiding conflicts of interest

GTT has implemented a procedure aimed at identifying and addressing potential conflicts of interest encountered by each GTT Group employee in the performance of their duties, including targeted employee awareness-raising on risky situations. In addition, an annual campaign of declaring conflicts of interest is organised for employees whose duties have been identified as exposed to a risk of corruption.

Intended for GTT employees and available via the Intranet, this procedure is intended to help them recognise and manage situations of potential or proven conflicts of interest.

### Procedure for collecting and processing reports

GTT has established a procedure for collecting and processing reports that describes the system for receiving, analysing, investigating and processing reports received via the various channels:

- third-party whistleblowing platform;
- dedicated email address;
- letter to the Group Compliance Officer.

This procedure, which is available to Group employees and commercial partners, whether natural or legal persons (external employees, service providers, subcontractors, suppliers etc.), or more generally any Group stakeholder, regardless of its geographical location, is intended to enable the reporting of any event or information involving the violation of applicable laws and regulations, the standards and principles set out in the Group's Ethics Charter, and/or any internal Group procedure.

In order to encourage reporting, this system relies on key principles, in particular: protecting the confidentiality and identity of the person issuing the report, protecting the presumption of innocence of the person targeted by the report, protecting the person who issues a report in good faith and who meets the conditions provided for in Article 6 of the Sapin II law against any form of retaliation or reprisal and protecting personal data. This system offers the possibility for the whistleblower not to disclose their identity and to submit a report anonymously.

GTT has been ISO 37001 certified since 2018, confirming the quality of its system. In accordance with the Sapin II law, the European Convention on the Protection of Whistleblowers and the Wasserman Law, this management system is part of the Group's ethics approach. It supplements the other ethics reporting mechanisms open to all employees as well as anyone outside the Group and accessible via the GTT Group's website and Intranet.

The system for collecting and processing reports is implemented and monitored at the Group scale by two committees:

- **the Ethics Committee** is responsible for the proper application of this procedure. It receives the reports and manages the platform for collecting and processing outside reports. It is made up of four permanent members, who are not members of the Executive Committee. For the purposes of this role, each of the members is independent;
- **the Committee sponsor** validates the action plans and recommendations made by the Ethics Committee after processing an alert, and, as applicable, brings them to the attention of General Management, the Executive Committee and/or the Board of Directors, depending on the nature of the facts covered by the report and the potential impact on the Group. It is made up of three permanent members, all members of the Executive Committee: the General Secretary, Finance and Human Resources. For the purposes of this role, each of the members is independent.

An internal investigation guide will be published in 2025 to guide the Ethics Committee members and anyone asked by the Ethics Committee to conduct relevant fact checking and interviews, as appropriate, as part of their investigation.

### Procedure for gifts and tokens of hospitality

GTT has implemented a procedure providing a framework for practices with regard to gifts and tokens of hospitality offered and/or received. The aim of this procedure is to ensure that such practices are legitimate and proportionate, in order to ensure that they are not misused for the purpose of corruption or influence peddling. As such, this procedure specifies when gifts and tokens of hospitality can be offered or accepted and the requirements in terms of recording them.

A tombola was held during the Compliance Week organised in December 2024, during which all gifts received by staff, including General Management, were redistributed at random to the Group's employees.

### Procedure for donations, patronage and sponsorship

In order to ensure the legal and ethical nature of donations, patronage and sponsorship and thus mitigate the risks of corruption and damage to the Group's reputation, in 2024 the GTT Group put in place a procedure for donations, patronage and sponsorship. Donations, patronage and sponsorship are governed by sound practices, including in particular a risk assessment and specific due diligence.

## 3.5.4 MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS [G1-2]

### Third-party assessment procedure

The Ethics Charter is supplemented and supported by specific procedures and policies. In particular, stakeholders in investment projects, commercial consultants and major suppliers are subject to ad hoc procedures, providing for prior due diligence, as well as enhanced preventive actions, such as standard contractual clauses requiring them to meet the Group's integrity rules and standards and imposing penalties or automatic termination of the contract in the event of non-compliance.

GTT's Ethics & Compliance programme provides for the systematic assessment of third parties (mainly listed or major direct or indirect suppliers, subcontractors, partners and customers) before a contractual relationship may be entered into. The third-party assessment procedure describes the process for assessing and approving third parties with whom the GTT Group wishes to enter into a business relationship, by means of a risk assessment as well as specific due diligence.

The risk applicable to third parties is assessed on the basis of objective criteria, especially the country of registration of the third party, the country where the service is provided (purchase or sale), the type of partnership planned with this third party and the structure of its shareholding. Based on this assessment, specific due diligence of varying depth will be carried out, at the end of which approval of the third party by the Compliance Department may be granted, depending on the results.

The Group Compliance Officer may also decide on specific measures to implement with regard to third parties, such as:

- the implementation of regular monitoring, through daily verification that no sanctions have been imposed on this third party;
- the inclusion of specific contractual clauses to protect the Group, for example clauses for regular audits or reviews, or even the suspension or termination of discussions.

Furthermore, when it comes to planned acquisitions, disposals or equity investments (even minority ones), a specific ethical and compliance due diligence procedure is carried out on the company (sellers and targets) to analyse any upstream risks and determine if corrective action will need to be taken when the Group's ethics programme is subsequently rolled out.

This procedure has been systematically applied to all projects reviewed by the Group, particularly the stakes taken by GTT Ventures in 2024.

Lastly, a special procedure applies whenever a Group company uses business consultants. Among other things, it provides for (i) an in-depth assessment before the contract is signed, (ii) the use of an ad hoc contract template, and (iii) regular reviews of contract performance.

Created with reference to international standards and key legislation, such as the OECD Anti-Bribery Convention and the Sapin II Law, under the responsibility of the Group Compliance Officer of the GTT Group, this document is provided to GTT Group employees via its Intranet.

### Integrating CSR criteria into the choice of suppliers

As part of its commitments to a responsible purchasing policy, GTT enforces the consideration of environmental, social and governance (ESG) criteria in the supplier selection process. Accordingly, CSR weighting representing 10% of the overall score is included in the evaluations of calls for tender exceeding a significant threshold of 50,000 euros.

This approach is part of a continuous improvement approach, with no defined time limit, so as to ensure an increasingly responsible selection aligned with GTT's values.

The CSR score allocated to suppliers is based on several key concepts:

- **Quality and governance:** analysis of the organisation, processes and controls in place;

- **Societal commitment:** assessment of the impact and social initiatives related to the mission;
- **Environmental performance:** consideration of practices to reduce the environmental footprint;
- **Social and ethical policy:** analysis of the supplier's commitments regarding working conditions, diversity and business ethics.

GTT also ensures that it establishes a fair relationship with its suppliers by applying a transparent and rigorous payment policy. In order to avoid payment delays, especially with regard to SMEs, specific tracking is in place to ensure that deadlines are respected and prevent any financial stress in the supply chain.

## Training suppliers and buyers

As part of its responsible purchasing approach, GTT plans to increase awareness and skills development among its teams and partners.

Starting in 2025, all the Group's buyers will be trained in the use of the EcoVadis platform in order to fully include CSR assessment in their process for selecting and monitoring suppliers. This initiative is intended to ensure better understanding of ESG issues and favour the most responsible choice.

## 3.5.5 PREVENTION AND DETECTION OF CORRUPTION [G1-3]

### Procedure for prevention and detection of corruption

The GTT Group's senior executives, including the Chief Executive Officer, members of the Executive Committee and all Group business directors, are responsible for the Group's Ethics & Compliance programme and ensuring that it is properly applied to the Group's operations. Compliance procedures across all Group entities are monitored through periodic reviews as part of internal control and internal and external audit systems. An annual report of these reviews is presented to the Group's governance and management bodies.

In particular, GTT has implemented a "zero tolerance" policy for all forms of fraud and corruption, which is regularly reiterated by the Group's management bodies.

The Ethics and Compliance programme begins as soon as employees join the Group, at which time they are given the Ethics Charter, the procedure for collecting and processing reports and the procedure on conflicts of interest.

Next, as part of their orientation, each employee is asked to take an e-learning course to raise awareness of the Ethics and Compliance programme, which covers each of the compliance procedures of which it is composed.

The Ethics and Compliance programme is also supplemented by specific procedures relating to gifts and tokens of hospitality as well as donation, sponsorship and patronage operations within the framework of the Group's business relationships. In accordance with the Sapin II law, this approach seeks to regulate these practices and ensure that they are not perceived as attempted corruption or influence peddling. These procedures apply to all of the GTT Group's employees. All of the compliance procedures are available for GTT Group employees on the Intranet for each of the Group's entities, in French and English. The Ethics Charter, the whistleblowing procedure and the Supplier Code of Conduct are accessible for the majority of the Group's Intranet sites. These documents, available in French and English, should also soon be translated into Chinese and Korean, allowing them to be better assimilated in the countries in which the Group operates.

### Risk mapping

GTT's exposure to corruption risks was updated in the corruption risk mapping in 2023 across its entire scope. This made it possible to identify priority risk scenarios requiring the implementation of action plans, designed in particular to strengthen (i) the

anti-corruption controls in place and (ii) the effective roll-out of the anti-corruption programme to the Group's subsidiaries, in particular through the strengthening of the corruption risks training programme adapted to the degree of exposure to risk.

### Tax transparency

GTT has retained the tax rules applicable to all countries and takes into account the Group's ethical rules. As an international group, GTT pays taxes, duties and fees in the countries where it operates. GTT rigorously applies tax rules and ensures compliance

with local regulations, international treaties and the directives of international organisations. The Group only has locations abroad for the purpose of developing its activities or meeting operational needs.

## 3.5.6 PRIVACY AND DATA PROTECTION

The GTT Group has responded to the requirements of the General Data Protection Regulation ("GDPR") and launched specific training to manage the key issues targeted by this regulation. This training is mandatory for Group employees in Europe and for key functions.

GTT considers that the global roll-out of a digital strategy must reconcile economic objectives and compliance with people's fundamental rights, such as the protection of their personal data and privacy.

GTT has thus put in place an organisation, workflows and controls in line with the obligations resulting from the GDPR and regulations regarding data protection and privacy, including in particular:

- training and awareness-raising campaigns;
- processing registers;
- an internal data privacy policy;
- a mechanism for managing data breaches and a notification process.

A governance ecosystem including a Group Data Protection Officer (DPO) and an external GDPR expert has been established.

### 3.5.7 METRICS AND TARGETS

#### 3.5.7.1 Incidents of corruption [G1-4]

In 2024, the GTT Group was never convicted of an offence against anti-corruption legislation or of acts of corruption.

#### 3.5.7.2 Training

##### Training courses on corruption prevention

	Exposed personnel	Non-exposed personnel
<b>Participants:</b>		
• Total	142	451
• Total receiving training	127	369
<b>Format and duration:</b>		
• Classroom training	X	
• Computer-based training	X	X
<b>Topics covered:</b>		
• Definition of corruption	X	X
• Procedures on suspicion/detection	X	X

For more information about the training delivered to Group employees, see section 3.5.3 *Business conduct policies and corporate culture* [G1-1].

## 3.6 NON-FINANCIAL PERFORMANCE

### 3.6.1 ESG RATING

GTT was externally rated on its non-financial performance on the basis of public and declarative information. This rating is valuable, since it is a component of the independent assessment of the Group's performance and recognised by its stakeholders.

	2022	2023	2024	Comments
<b>MSCI</b>	BBB	BBB	BBB	MSCI ESG assesses undertakings on a scale of AAA to CCC relative to their sector of activity, with regard to the ESG considerations most relevant to their activities. In 2024, GTT maintained its BBB rating.
<b>Sustainalytics</b>	N/A	18.8 low risk	18 low risk	The Sustainalytics rating assesses the degree of financial risk related to ESG factors. In 2024, GTT's ESG risk rating improved to 18, i.e., low risk.
<b>EthiFinance</b>	62/100	67/100	74/100	EthiFinance ESG Ratings assesses companies according to a benchmark of approximately 140 criteria divided into four pillars: Environmental, Social, Governance and External Stakeholders (ESG-ESH). The ratings range from 0 to 100 (best). GTT's score increased by +7 points in 2024.
<b>ISS</b>	C+ prime	C+ prime	C+ prime	GTT maintained its prime status in 2024, being rewarded namely for its actions in terms of transparency and sustainability within its sector of activity.
<b>Moody's</b>	46/100	47/100	57/100	Moody's assesses the practices of undertakings in the same sector of activity in terms of governance, social and environmental matters. GTT gained 10 points in 2024, especially distinguishing itself regarding governance and business ethics.
<b>CDP Climate</b>	B	B	B	GTT filled out CDP's Climate questionnaire and received a "B" rating for the third consecutive year.
<b>Global Compact</b>	N/A	N/A	CoP available	As a member of the Global Compact since 2023, GTT submitted its Communication on Progress (CoP) to the Global Compact in 2024, in line with its commitment to transparency towards its stakeholders.



### 3.6.2 TAXONOMY REPORTING

The description of, and revenue from, the Group's taxonomy-eligible and taxonomy-aligned activities can be found in section 3.3 *European taxonomy*.

## 3.7 ADDITIONAL INFORMATION

In 2024, GTT's Board of Directors approved the Group's first CSR roadmap on the proposal of the Executive Committee. This document was the result of a work that began at the end of 2022 to update the undertaking's approach by reassessing stakeholder expectations and reviewing its practices. Realistic progress targets and action plans for each challenge selected and defined as a priority were drawn up by specific teams and were then discussed and reviewed by the Executive Committee.

Made up of three axes, nine commitments and 24 key metrics, GTT's 2024-2026 roadmap is a management tool that illustrates the Group's commitment to its CSR approach with all stakeholders.

GTT's three priorities for this first year of implementing the CSR roadmap involved setting up the approach internally, spreading a culture of sustainability and ensuring compliance with the CSRD regulation. A special effort was made to communicate the actions rolled out and to illustrate the process by means of newsletters, webinars and the participation of the CSR team in various internal seminars.

The table below summarises the results of the first year of implementation of GTT's roadmap.

## AXIS 1 – REDUCING THE CLIMATE IMPACT AND DECARBONISING THE MARITIME SECTOR

### Commitment 1 – Reducing the climate impact of our activities

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result
Reduction of Scope 1 emissions	Tonnes of CO <sub>2</sub> eq Scope 1 emitted	2021	448	-55%	2033	See section 3.2.5.2
Reduction of Scope 2 emissions	Tonnes of CO <sub>2</sub> eq Scope 2 emitted	2021	160	-55%	2033	See section 3.2.5.2
Reduction of Scope 3 emissions	Tonnes of CO <sub>2</sub> eq Scope 3 emitted	2021	12,568,000*	-33%	2033	See section 3.2.5.2

### Commitment 2 – Decarbonising the maritime sector

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result
Adopting a robust method of assessing our contribution to the decarbonisation of our customers (avoided emissions)	Construction of a methodology to quantify avoided emissions	N/A	2022	N/A	Disclosure of avoided emissions	See section 3.2.5.1

### Commitment 3 – Aligning with a sustainable world

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result
Contributing to a low-carbon world	Number of patents filed in low-carbon energy	2022	19%	28%	2026	See section 3.2.5.1
Biodiversity & Environment	Number of actions to promote biodiversity and the environment	2022	1	3	Annual	See below



GTT's goal of implementing three actions a year to support biodiversity and the environment reflect its global commitment to sustainability. The undertaking can thus bring its employees together around environmental topics and make its contribution to non-material issues as per the CSRD, but with added value for the environment. To this end, in 2024 GTT performed:

- an ecological survey on its Beaulieu site in Saint-Rémy-lès-Chevreuse;
- a day of action on World Clean Up Day;
- certified training on eco-design and awareness of the circular economy.

The diagnosis carried out on the Beaulieu site, which accommodates nearly 70% of employees, made it possible to identify the site's natural issues, to assess the potential for supporting biodiversity and to provide recommendations for favourable management and development.

In September 2024, more than 80 Group employees participated in litter collection, organised as part of World Cleanup Day. This global initiative is intended to mobilise citizens to collect abandoned waste. More than 325kg of waste was collected by teams trained in France in Saint-Rémy and Massy, in Germany in Cologne by Elogen GmbH, as well as in South Korea, with the involvement of employees from all the construction sites on the peninsula.

Finally, as part of the innovation process to identify solutions to reduce the environmental impact of GTT's technologies, employees from the Innovation, Technical and Commercial Departments participated in training in eco-design. These two days enabled participants to understand the environmental issues involved with the design of products and services, to become familiar with regulations and to take ownership of the methods and tools to be implemented to integrate an environmentally responsible approach to GTT's future development projects. Workshops and practical cases complemented the theoretical training.

The nature of GTT's activities has less of an adverse impact on the environment, due to the fact that the Group does not manufacture the products it designs. In its concern to limit the impact of the growth of its activity on natural resources and biodiversity, and to limit the risks of pollution, GTT monitors changes in its consumption of inputs and pays particular attention to the management of its waste. Accordingly, although the topics are not material within the meaning of the CSRD, the Group continues to track and publish its water consumption and its waste production.

## Water consumption

GTT's water consumption includes consumption required to carry out materials testing, but is mainly related to internal use in the undertaking's head office restaurant, water fountains, drinks machines and sanitary facilities.

GTT has also implemented a policy in recent years aiming to reduce water consumption, by the installation of water consumption detectors installed in the sanitary facilities, and the progressive installation of sub-metering for water to better detect possible leaks.

<i>m</i> <sup>3</sup>	2022	2023	2024	Change
Water consumption	6,584*	6,516.20	6,912.94	+6%

\* GTT S.A., CRYOVISION and Elogen only. The other subsidiaries are non-material.

Water consumption increased by +6% in 2024 due to an increasing number of employees on the Saint-Rémy site.

## Waste production

The end of life management of products used to equip vessels is the responsibility of the ship-owner. Internally, GTT S.A. has installed systems for the selective sorting, collection and recycling of its waste, such as electrical and electronic equipment, batteries and accumulators, chemical waste, paper and organic waste.

This system encourages employees to adopt responsible processes and acts in terms of traceability and waste management. In 2024, the sharp rise in office waste, plastic waste and the volume of exceptional waste was mostly due to renovation works undertaken at GTT's head office, as well as the reorganisation carried out.

Waste	Unit	Description	2022	2023	2024	Change
Food waste	kg	Food waste	7,290	6,308.00	6,624.00	5.0%
Organic waste	l	Household waste	84,480	96,360.00	53,460.00	-44.5%
Office waste (paper, cardboard)*	kg	Paper, cardboard	N/A	1,352.00	11,118.00	-
Plastic waste*	kg	-	N/A	60.00	368.00	-
WEEE**	kg	-	N/A	4,998.00	1,176.00	-76.5%
Exceptional waste	kg	Office furniture	N/A	N/A	5,785.00	-

\* Waste treatment agreement initiated in November 2023.

\*\* Waste electrical and electronic equipment

As part of its laboratory testing, GTT uses resins, hardeners, hydroalcoholic gel, and plastics. Chemicals considered hazardous (such as paints, aerosols, and oils) are also subject to specific treatment and monitoring by the undertaking. The recent increase in the use of certain hazardous waste is due, in particular, to the fact that service providers send more containers than planned to provide a safety margin in case of loss or additional testing needs, to make sure the Group has enough samples for testing.

Waste	Unit	Description	2023	2024	Change
Laboratory waste	metric tonnes		7.7	7.0	-9%
<i>o/w non-hazardous</i>	<i>metric tonnes</i>	<i>Resins, batteries, Plexiglas</i>	4.9	3.3	-35%
<i>o/w hazardous</i>	<i>metric tonnes</i>	<i>Hydraulic oils, batteries, paints</i>	2.7	3.8	37%

## AXIS 2 – A RESPONSIBLE EMPLOYER

### Commitment 4 – Guaranteeing the health and safety of our teams

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result
Guaranteeing the health and safety of our teams	0 fatalities	2022	0	0	Annual	0
	Number of workplace accidents with lost time	2022	4	3	Annual	4
	Frequency rate of workplace accidents	2022	3.75	<2.65	Annual	2.64

Details of GTT's health and safety policy can be found in section 3.4.3.9.

### Commitment 5 – Developing skills and promoting talent

Sub-commitment	Metric	Reference year	Baseline	Target	Timescale	2024 result
Implementation of training and awareness-raising actions	Training/raising awareness of CSR among Executive Committee members and managers	2022	N/A	100% (Executive Committee in 2024, 100% managers in 2025/26)	2026	100% of the Executive Committee trained
	Number of training hours per employee - excluding compulsory training	2022	N/A	≥10	Annual	16.6
Career management policy	Internal mobility/Positions filled ( <i>as a %</i> )	2022	23%	30%	2026	39%
	People Review vs eligible population	2022	95%	≥ 90%	Annual	93%

Details of GTT's training policy and associated metrics can be found in section 3.4.3.8.

### Commitment 6 – Promoting diversity and well-being

Sub-commitment	Metric	Reference year	Baseline	Target	Timescale	2024 result
Gender equality	Percentage of women in the workforce	2022	21%	> 25%	2033	25%
	% of female hires	2022	31%	> 35%	2033	30%
	Percentage of female Executive Committee members	2022	29%	40%	2030	14%
	Female representation in management positions	2022	N/A	≥ 25%	2033	22,2%
Inclusion	Adoption and implementation of a disability inclusion plan	2022	N/A	Adoption of a plan	2026	See section 3.4.1.3
Well-being at work	Training in the avoidance of psychosocial risks	2022	N/A	100% Executive Committee (2024)/ 100% managers (2026)	2026	100% of the Executive Committee trained
Well-being at work	Survey of work/life balance (satisfaction level as a %)	2022	N/A	> 70%	2026	82%

Details of GTT's diversity and well-being at work policy can be found in section 3.4.2.1.3, while the associated metrics are presented in section 3.4.3.4.

## AXIS 3 – CORPORATE CITIZENSHIP

### Commitment 7 – Acting in an integrated way

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result
Anti-corruption	Roll-out of universal ethics guidelines within the Group	2022	N/A	Promotion of a shared culture of integrity throughout the Group	2026	Adoption of a new Ethics Charter
	Continuous improvement of the Ethics and Compliance programme	2022	N/A	100% of the Group action plan implemented	2026	Renewal of the ISO 37001 certification

The details of GTT's business ethics mechanism are available in section 3.5.3 and the associated metrics in section 3.5.6.

### Commitment 8 – Promoting responsible conduct in the value chain

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result
Responsible purchasing	Percentage of our suppliers that have signed the code of conduct for suppliers and partners	2022	0	100%	2026	36%

### Commitment 9 – Having a positive impact on communities

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result
Having a positive impact on communities	Number of societal actions in response to a local need	2022	1	3	Annual	See below

GTT's locally rooted actions aim to generate a positive impact in the territories in which the undertaking operates. They seek to contribute to economic growth, social cohesion, and the preservation of natural or cultural heritage by directly involving GTT teams or by establishing dedicated partnerships.

To this end, in 2024, GTT S.A. transferred part of its stock of stainless steel sheets to the Coubertin Foundation so that they could be used the arts and crafts training courses provided by the foundation. Located in Saint-Rémy-lès-Chevreuse, the Coubertin Foundation welcomes 35 young French and foreign workers each year, practicing a trade at the Ateliers Saint-Jacques or at the Fonderie de Coubertin (carpenter, cabinetmaker, stonemason, mason, plasterer, metalworker, ironworker, foundryman, boilermaker, painter and landscaper).

Employee teams worked alongside the Yvelines branch of the Fondation Agir Contre l'Exclusion (FACE 78) on a day dedicated to welcoming a class of middle school students from priority neighbourhoods. These students had an opportunity to discover GTT's laboratories and workshops in Saint-Rémy-lès-Chevreuse as well as to talk to professionals from various career paths. This initiative allowed teams and teachers to introduce these young people to companies present in the Yvelines region. Finally, GTT has strengthened its relationship with the Aigrefoin work assistance organisation (ESAT) by expanding services and organising a conference dedicated to disabilities.

In addition to its locally-rooted actions, the Group mobilised in France and abroad as part of a charitable challenge for the benefit of the European Leukodystrophy Association (ELA). On December 3, 179 Group employees from around the world walked for the association: in 24 hours, more than 1.6 million steps were taken and converted into donations.

## 3.8 REPORT ON THE CERTIFICATION OF SUSTAINABILITY INFORMATION AND VERIFICATION OF THE DISCLOSURE REQUIREMENTS UNDER ARTICLE 8 OF REGULATION (EU) 2020/852, RELATING TO THE YEAR ENDED DECEMBER 31, 2024

To the Annual General Meeting of GTT,

This report is issued in our capacity as statutory auditor of GTT. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended December 31, 2024 and included in section "Sustainability Report" of the management report.

Pursuant to Article L. 233-28-4 of the French Commercial Code, GTT is required to include the above-mentioned information in a separate section of its management report. This information has been prepared in the context of the first-time application of the aforementioned Articles, a context characterized by uncertainties regarding the interpretation of the laws and regulations, the use of significant estimates, the absence of established practices and frameworks in particular for the double-materiality assessment, and an evolving internal control system. This information enables an understanding of the impact of the activity of the Group on sustainability matters, as well as the way in which these matters influence the development of the business of the Group, its performance and position. Sustainability matters include environmental, social and corporate governance matters.

Pursuant to Article L. 821-54 paragraph II of the aforementioned Code our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the sustainability reporting standards adopted pursuant to Article 29 b of Directive (EU) 2013/34 of the European Parliament and of the Council of 14 December 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process implemented by GTT to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code;
- compliance of the sustainability information included in the Sustainability Report with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on *Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852*.

In the three separate sections of the report that follow, we present, for each of the sections of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken individually and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three sections of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by GTT in Sustainability Report, we have included an emphasis of matter(s) paragraph hereafter.

### Limits of our engagement

As the purpose of our engagement is to express limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

Furthermore, this engagement does not provide guarantee regarding the viability or the quality of the management of GTT, in particular it does not provide an assessment of the relevance of the choices made by GTT in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

It does, however, allow us to express conclusions regarding the Entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Any comparative information that would be included in the management report is not covered by our engagement.

## Compliance with the ESRS of the process implemented by GTT to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code

### Nature of procedures carried out

Our procedures consisted in verifying that:

- the process defined and implemented by GTT has enabled it, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities, that lead to the publication of information disclosed in the Sustainability Report; and
- the information provided on this process also complies with the ESRS.

We also checked the compliance with the requirement to consult the social and economic committee.

### Conclusion of the procedures carried out

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by GTT with the ESRS.

We inform you that, as of the date of this report, the consultation of the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code has not yet been performed.

### Elements that received particular attention

We set out below the elements that have been the subject of particular attention in relation to our assessment of compliance with the ESRS of the process implemented by GTT to determine the information reported.

### Concerning the identification of stakeholders

Stakeholder information is mentioned in section 3.1.3.1 of the Sustainability Report.

We have taken note of the analysis carried out by the entity to identify:

- stakeholders, who may affect or may be affected by entities within the scope of information, by their direct or indirect business activities and relationships in the value chain;
- Principal users of sustainability statements (including principal users of financial statements)

We spoke with management and individuals we deemed appropriate and inspected the available documentation.

Our due diligence consisted of assessing the consistency of the main stakeholders identified by the entity with the nature of its activities, taking into account its business relationships and its value chain.

### Concerning the identification of impacts, risks and opportunities

Information on the identification of impacts, risks and opportunities is mentioned in section 3.1.3.3 of the Sustainability Report.

We have taken note of the process implemented by GTT regarding the identification of impacts (negative or positive), risks and opportunities ("IRO"), actual or potential, in connection with the sustainability issues mentioned in paragraph AR 16 of the "Application Requirements" of the ESRS 1 standard, as presented in section 3.1.3.3 of the Sustainability Report.

We have taken note of the mapping carried out by the entity of the identified IROs, including the description of their distribution in the company's own activities and the value chain, as well as their time horizon (short, medium or long term) and assessed its consistency with our knowledge of GTT.

We examined the consistency of this list of IROs with the elements presented to the Board of Directors.

### Concerning the assessment of impact materiality and financial materiality

The information relating to the assessment of impact materiality and financial materiality is mentioned in section 3.1.4.1 of the Sustainability Report.

We have taken note, through interviews with management and inspection of available documentation, of the impact materiality assessment process implemented by the entity and assessed its compliance with the criteria defined by the ESRS 1 standard.

We have taken note of the decision-making process put in place by the entity in the assessment of impact and financial materialities, and appreciated the presentation made in the aforementioned section.

We assessed the way in which GTT established and applied the materiality criteria set out in ESRS 1, including the setting of thresholds, to determine the material disclosures for the material IRO indicators identified in accordance with the relevant thematic ESRS standards.

## Compliance of the sustainability information included in the Sustainability Report with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS

### Nature of procedures carried out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable an understanding of the general basis for the preparation and governance of the sustainability information included in the Sustainability Report, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by GTT for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgement or decisions of users of this information.

### Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the Sustainability Report, with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS.

### Elements that received particular attention

We set out below the elements that have been the subject of particular attention in relation to our assessment of the compliance of the sustainability information included in the sustainability report with the requirements of Article L.233-28-4 of the French Commercial Code, including the ESRS.

## Information provided in application of environmental standards (ESRS E1)

The disclosures for climate change (ESRS E1) are mentioned in section 3.2 of the Sustainability Report.

Our due diligence consisted in:

- conducting interviews with the CSR Department, to inquire about the process adopted by the entity to produce this information, particularly the description of the policies, actions and targets put in place by the entity;
- Defining and implementing appropriate analytical procedures, based on this information and our knowledge of the entity.

With respect to the entity's disclosures in the Sustainability Report for its greenhouse gas ("GHG") emissions, we have also:

- reviewed the entity's GHG emissions assessment procedure and:
  - assessed the consistency of the scope considered for the assessment of GHG emissions with the scope of the consolidated financial statements, and the upstream and downstream value chain;
  - reviewed the methodology for calculating the estimated data and the sources of information used in the preparation of the estimates that we considered structuring, which the entity used to present its GHG emissions in its Sustainability Report;
- carried out certain specific tests:
  - assessed, on the basis of tests, the emission factors used and the calculation of the related conversions as well as the calculation and extrapolation assumptions, taking into account the uncertainty inherent in the state of scientific or economic knowledge and the quality of the external data used;
  - reconcile, for directly measurable data, such as energy consumption related to scope 1 and 2 emissions, on the basis of tests, the underlying data used for the assessment of GHG emissions with supporting documents;
- assessed, regarding Scope 3 emissions:
  - the information collection process;
  - the methodology, as well as a selection of calculation and extrapolation assumptions used, considering the uncertainty inherent in the quality of the external data used.

## Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852

### Nature of procedures carried out

Our procedures consisted in verifying the process implemented by GTT to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on the basis of a selection, the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgement or decisions of users of this information.

### Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

### Elements that received particular attention

Below we present the elements that have been the subject of particular attention on our part regarding compliance with the information disclosure requirements laid down in Article 8 of Regulation (EU) 2020/852.

### Concerning the eligibility of activities

Information on the alignment of activities can be found in section 3.3.2 of the Sustainability Report.

Our verifications included:

- assessing the choices made by the entity as to whether or not to take into account the European Commission's communications on the interpretation and implementation of certain provisions of the Taxonomy Framework;
- consulting a selection of documentary sources used, including external sources where appropriate, and conducted interviews with the persons concerned;
- assessing the analysis carried out in terms of compliance with the minimum guarantees, mainly with regard to the elements collected in the context of the knowledge of the entity and its environment.

Finally, we assessed the consistency of the information in section 3.3 of the Sustainability Report with the other sustainability information in that report.

Paris-La Défense, April 24, 2025

The Statutory Auditor

*French original signed by*

ERNST & YOUNG Audit

Stéphane Pédrón



Technology for a sustainable world

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