

Sustainability Report 2025

Extract from the 2025 Universal Registration Document



GTT



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 2022/2464 of December 14, 2022, transposed into French law by Order no. 2023-1142 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 undertaking'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 costumers' need.
- 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 Ethics Charter 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 the GTT Group is prepared on a consolidated basis and is based on the same scope as that used for the Group’s consolidated financial statements as presented in chapter 5 of the Universal Registration Document. It also includes, where relevant, information relating to the Group’s upstream and downstream value chain, as defined in this report.

To identify the sustainability matters most relevant to its business model, activities and stakeholder expectations, GTT uses a double materiality assessment that covers both its own operations and its value chain. This exercise has identified the impacts, risks and opportunities that the Group considers material and that provide a structure for the content of this sustainability statement. To

address these, GTT defines and implements policies and action plans covering its value chain, presented in the different sections of the report.

The effectiveness of these systems is monitored based on a range of objectives related to metrics outlined in the Group’s 2024-2026 CSR roadmap, which serves as the framework for steering its sustainability commitments.

In 2025, GTT completed the acquisition of Danelec, a player specialising in maritime digital solutions. This change in scope led the Group to gradually integrate Danelec into its sustainability reporting for the current financial year. For those metrics where this integration was not possible in 2025, details are provided in the relevant parts of chapter 3 of this Universal Registration Document.

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 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 frameworks

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 (see section 3.8 – *Annexes*).

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, 2025, the Board of Directors chaired by Philippe Berterottière is composed of nine members, 11% of whom are executive members and 89% of whom are non-executive members. The composition and diversity of the Board of Directors are described in chapter 4 – *2025 Report on Corporate Governance*, section 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:

- the 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 – *Report on Corporate Governance 2025*, 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.

In 2025, the CSR Steering Committee brought together members representing the various functions and reporting to members of the Executive Committee. The purpose of this committee is to promote information sharing and discussion on sustainability matters, and to make recommendations to the Executive Committee when CSR issues are submitted to it.



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

In 2024, the Board of Directors reviewed and approved the results of the double materiality assessment, including the list of ESG matters and impacts, risks and opportunities (IROs). This defines the scope for the 2025 sustainability report and validates the Group's diversity and professional gender equality policy, as well as its CSR roadmap.

Audit and Risk Management Committee

As part of its work to monitor the Group's governance and risk management systems, the Audit and Risk Management Committee is informed of the work related to the preparation of the sustainability report and the monitoring of the main ESG considerations identified in the double materiality assessment carried out in 2024, as well as compliance-related issues. In 2025, the Committee was also kept informed of applicable regulatory developments and actions taken throughout the year.

Strategic and CSR Committee

The Strategic and CSR Committee oversees the Group's sustainability matters and the implementation of the CSR roadmap. As such, it is informed of the progress of the preparation of the sustainability report, as well as the progress made with respect to the CSR roadmap action plans over the course of the year.

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 in 2024. It also approved the 2025 compensation criteria, in line with the objectives of the 2025 CSR roadmap.

Executive Committee

In 2025, the 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 2025, the proportion of the variable pay of the Chief Executive Officer of GTT based on CSR criteria was 22%. This variable pay 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 – *Report on Corporate Governance 2025*, section 4.2.2.1 – *Compensation policy applicable to the Chairman and Chief Executive Officer (applicable to Philippe Berterrotière in his capacity as Chairman and Chief Executive Officer up to January 4, 2026)*.

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 process 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 2025.

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 mechanisms already in place for financial and accounting information, adapting them to the specific requirements of non-financial reporting.

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 CO₂ 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.

In 2025, GTT strengthened its internal control system applied to sustainability information through the implementation of a formalised control plan. In particular, this plan covers the verification of the reporting scope, compliance with the double materiality assessment, the completeness of ESRS information, the reconciliation of data with internal sources and the consistency between quantitative data and the narrative. This system is part of the Group's continuous improvement approach.

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 2025, 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 services to optimise vessel performance and advanced technologies to support the energy transition, including the manufacture of proton exchange membrane (PEM) electrolyzers for the production of green hydrogen. These products and services aim to meet the growing need for decarbonisation in industry.

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

RESOURCES

Dedicated and committed teams

- 862 employees
- 80% engineers
- 15,047 training hours
- Talent development and internal mobility policy

Cutting-edge expertise

- 47.6 million euros invested in R&D in 2025
- > 200 employees working on innovation

A robust financial base and good visibility

- Solid balance sheet
- Order book worth 1.6 billion euros
- Potential operational growth
- Development of activities with high potential for synergies

A culture of trust and transparency

- Ethics charter
- Supplier & Partner Code of Conduct
- ISO 37001 (anti-corruption) certification

Concrete commitments

- 2024-2026 CSR roadmap
- Emission reduction trajectory up to 2033

Two activities dedicated to...

GTT ENERGY

Design of containment systems to transport and store liquefied gases

- LNG carriers - Ethane carriers - Offshore - Multi-gas - Onshore storage tanks
- LNG as Fuel
- Services to ship-owners and gas companies

GTT MARINE

Creating and developing marine and digital solutions to optimise vessel performance

- Data collection and transmission equipment
- Route optimisation
- Improved performance
- Operational control centres

... energy and economic efficiency

**R&D - INNOVATION - DATA INTELLIGENCE
- OPERATIONAL EXCELLENCE**

VALUE CREATION

Employees

- Gender equality index: 82/100

Trade receivables

- 3,637 patents, active or applied for
- 68 new patents filed in 2025
- Proven and reliable technologies

Users

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

Shareholders

- High profitability (67% EBITDA margin in 2025)
- Strong cash-flow generation (271 million euros in 2025)
- Attractive distribution policy (more than 80% of net income)

Environment

- Reduced CO₂ emissions thanks to containment system performance
- Adaptation of containment systems to alternative fuels

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., Cryovision	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, Danelec, VPS	Design and marketing of digital equipment and solutions for ship-owners and operators, to optimise the energy, operational and safety management of vessels.	Ship-owners, maritime operators, maritime technology companies
Activity linked to hydrogen	Elogen	Design and assembly of large-capacity electrolysers 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, 2025, the Group had 862 employees spread over 12 countries, organised into two regions: Europe (732 employees) and the other countries (130 employees) in which the Group conducts business.

Presentation of the value chain

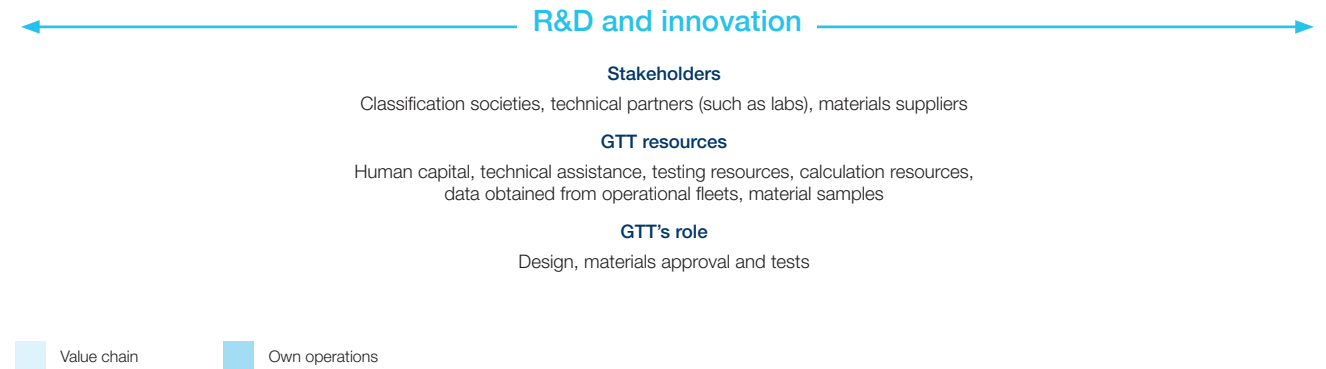
The products and services proposed by GTT are rolled out throughout its downstream value chain, while the upstream value chain, as well as the internal operations of the Group, correspond to its own operations which are essential to carrying out its activities.

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 (Containment systems and services to operations), those linked to digital services (Marine and Digital Solutions), and those dedicated to the design and assembly of electrolysers for the production of green hydrogen (Elogen).

Containment systems and services to operations – Activity representing 95% of the GTT Group’s revenues at December 31, 2025



Stakeholders		
Classification societies, technical partners (such as labs), materials suppliers	Shipyards (direct clients), EPC (direct clients), ship-owners and charterers, GTT-approved material suppliers for shipyards: wood, metal, foam	Ship-owners and charterers
GTT resources		
Human capital, technical assistance, gas and material samples	Human capital, technical assistance	Human capital, technical assistance
GTT’s role		
Technology design, shipyard supplier approval	Technical assistance	Technical assistance and consulting

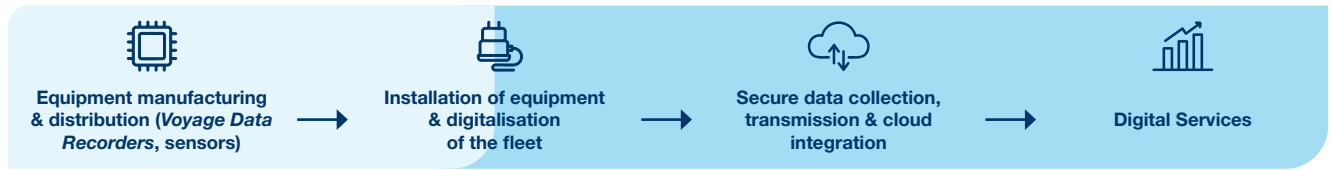


GTT is a technology and engineering company – a leading player in cryogenic membrane containment systems used to transport and store liquefied gas, and LNG (liquefied natural gas) in particular. For nearly 60 years now, GTT technologies have been used on board LNG carriers, LNG floating units, and multi-gas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

semi-immersed tanks (GBS⁽¹⁾), 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.

Marine and digital solutions – Activity representing 4% of the GTT Group’s revenues at December 31, 2025



Stakeholders

Technical partners, manufacturers and suppliers of <i>Voyage Data Recorders</i> and sensors	Employees, shipyards, service engineers, technical partners, equipment suppliers, connectivity/telecommunications providers	Employees, data providers, IT managers, connectivity/telecommunications providers, cloud service providers	Technical managers, fleet operations centres, charterers, customer compliance departments, technicians, customers, internal support teams
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GTT resources

Supply chain team	<i>Voyage Data Recorders</i> , sensors, cloud ingestion modules, global service network	DanelecConnect pipeline, encrypted data units, cloud computing capabilities, cybersecurity standards and rules	Analytical tools, dashboards, APIs*, support services, diagnostics, spare parts
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GTT’s role

Operational supervision and support service	System configuration and regulatory compliance assurance	Secure and standardised data flow management, compliance with GDPR and IMO cybersecurity requirements	Data analytics for efficiency and maintenance optimisation, and ensuring system availability, compliance and support across the lifecycle
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R&D and innovation

Stakeholders

Employees, technologies, partners, regulators

GTT resources

Engineering teams, patents and intellectual property

GTT’s role

Development of new digital features, powerful systems and compliance-ready architectures

Value chain Own operations

*API: Application Program Interface

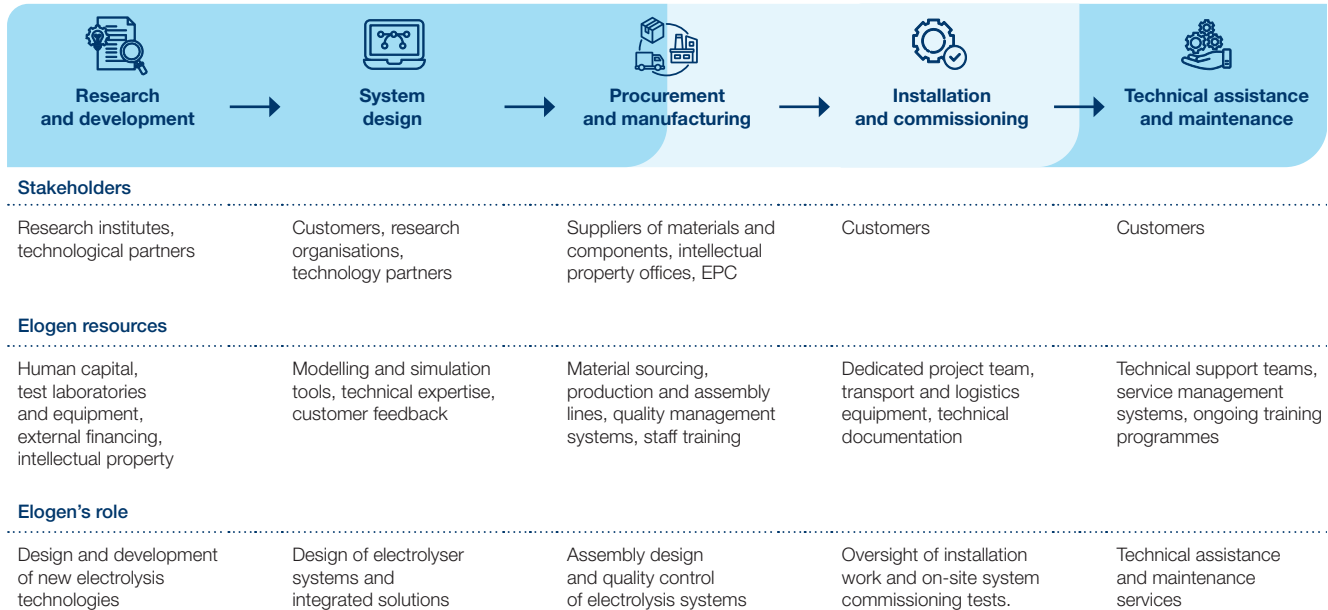
Through its Marine and Digital Solutions activity, the GTT Group provides a wide range of solutions to the maritime industry:

- electronic fuel monitoring and energy performance management;
- meteorological routing and optimisation of journeys;
- electronic management of fuel deliveries;
- regulatory compliance solutions (CII, EU ETS, FuelEU) and automated report generation;
- LNG fuel and cargo management;

- the shaft power limitation (ShaPoLi) solution;
- optimisation of a vessel’s trim via hydrodynamic models;
- solutions to detect the risks of sloshing for FSRUs;
- tools to optimise charter rates;
- VDR systems, on-board data collection platforms and advanced analytics services based on Danelec expertise.

See section 1.6 – *Marine and Digital Solutions* for details concerning digital activities and their development during the year.

Design of electrolyzers for the production of green hydrogen – Activity representing 1% of the GTT Group’s revenues at December 31, 2025



R&D and innovation

Stakeholders

Customers, research institutes

Elogen resources

Data collection systems, data analysis, user feedback

Elogen's role

Analyse system performance and integrate improvements

Value chain

Own operations

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 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 and 2025. The implementation of the conclusions of the strategic review announced in January 2025 was carried out over the year and enabled Elogen’s positioning to be redirected while reducing its cash consumption. See section 1.7 – *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) at the heart of its global strategy, based on the Sustainable Development Goals (SDGs) defined by the United Nations. This framework enables the Group to identify and prioritise its environmental, social and governance challenges and impacts beyond strict compliance with regulatory 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, the Group strengthened its commitment to sustainability by joining the United Nations Global Compact. This commitment reflects GTT's desire to align its practices with the ten principles of the Compact and to contribute, in a voluntary and transparent manner, to the achievement of the Sustainable Development Goals. This membership underscores GTT's desire to contribute to the transformation of global business practices towards a more sustainable and responsible model.

To this end, in 2024 GTT presented its first CSR roadmap for the period 2024-2026. Structured around three strategic axes, nine commitments

and twenty-four key metrics, this roadmap is a steering tool that allows the Group's priorities to be broken down into operational objectives, with deadlines and monitored using dedicated metrics. These commitments 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
 Business community	<ul style="list-style-type: none"> The main new builds and repair shipyards Ship-owners Gas companies Terminal operators Hydrogen producers Suppliers of the materials used by the Group's technologies (shipyard suppliers) The Group's suppliers (service providers, suppliers of products and materials) 	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
 Authorities	<ul style="list-style-type: none"> Classification societies International maritime regulatory authorities 	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
 Human resources	<ul style="list-style-type: none"> Employees Employee representative bodies Candidates for recruitment 	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
 Financial community	<ul style="list-style-type: none"> Shareholders Financial institutions Analysts Non-financial rating agencies 	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
 Partners	<ul style="list-style-type: none"> Higher education establishments, research institutes Trade associations 	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
 Civil society	<ul style="list-style-type: none"> Media Think tank 	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⁽¹⁾). 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 thus ensures that it respects lead-times, maintains the quality and responsiveness of the responses provided by its teams, and that it is always attentive to its customers' needs.

For the second year in a row, GTT achieved a customer satisfaction rate of 98.5% (19.70/20), confirming the robustness and reliability of its service model.

(1) Subcontractor shipyards.

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

The double materiality assessment carried out in 2024 enabled GTT to identify 13 ESG considerations with 78 impacts, risks and opportunities (IRO), 24 of which are material.

Against the backdrop of a changing European regulatory framework for sustainability reporting, the Group maintained the conclusions of this analysis for the 2025 financial year. GTT will closely monitor

these developments and, if necessary, revise its assessment when the framework is consolidated.

The identified material IROs continue to reflect the current and expected effects of GTT's activities on its business model and value chain, and remain aligned with 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	-	Own operations, Elogen	Short term	Risk of disruption to business activities or even 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	-	Own operations	Medium term	Investments allocated to implementing the transition plan and reducing the Group's carbon footprint
	Opportunity	-	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

ESG considerations	Impacts, Risks and Opportunities	Current/ anticipated effects	Value chain	Time horizon	Description
Social dialogue	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
Employee skills development	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
Diversity & Inclusion	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
Working conditions	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
Employee Health & Safety	Negative impact	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.
	Negative impact	Actual	Own operations/ Downstream value chain	Invariable	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, leading to 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, or the workers of GTT's subcontractors at a Group site

Table of IROs linked to governance

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 confirmed incidents 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 process to identify and assess material impacts, risks and opportunities [IRO-1]

Framework and governance of GTT's double materiality assessment

The Investor Relations and CSR Division coordinated this assessment, with the support of the Financial Division, the General Secretary and the Human Resources Division, and the assistance of a consulting firm. The results have been approved by the Audit and Risk Management Committee and by the Strategic and CSR Committee of the Board of Directors.

The double materiality assessment was organised around four structural stages:

- Definition of the environmental, social and governance (ESG) matters relevant** to the Group and its value chain, based on a corpus including the topics addressed in the CSRD, the previous materiality assessment conducted for the CSR strategy, and all internal procedures and resources.
- Identification of the impacts, risks and opportunities (IRO)** associated with each ESG matter, taking into account the specific features of the Group's three activities (LNG, Hydrogen, Digital Services), positioning in the value chain (upstream, downstream, own operations) and dependence on key resources.
- Rating of IROs** during workshops with business line contributors, according to criteria harmonised with the Group's risk mapping: time horizon, probability, financial scale, severity, extent and irremediable character.
- Review for consistency**, creation of the double materiality matrix and approval of the results by the governance bodies.

Scope and value chains

The assessment focused on three distinct value chains corresponding to the Group's main activities (for a detailed description, see section 3.1.3.1 of this document):

- Cryogenic containment technological engineering (LNG): design, construction/installation and operation of tanks and membranes for LNG carriers, FSRUs, onshore storage tanks;
- Marine and digital solutions: digital solutions for the optimisation of maritime operations;
- Green hydrogen: design and assembly of electrolyzers.

For each value chain, key stakeholders were identified: classification societies, technical partners, shipyards, ship-owners and charterers, approved suppliers etc.

Definition of ESG matters

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

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

Breakdown of ESG matters 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 matter. The list comprised a total of 78 IROs covering the 13 ESG matters, 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. 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.

Materiality threshold and approval

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 matters 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 matter 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 matter 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 ESG matter for the Group relating to ESRS E1, S1 and G1.

Update of the assessment and regulatory context

The Group considers that the material ESG matters identified in the double materiality assessment carried out in 2024, the associated IROs and their rating remain relevant in 2025 and accurately reflect the Group's situation with regard to its sustainability-related impacts, risks and opportunities.

The Group is closely monitoring developments in the European regulatory framework for sustainability reporting. The ESRS are subject to constant clarifications and interpretations by the European authorities, EFRAG and national regulators. Discussions are also under way regarding the linkage of the various regulations (CSRD, European Taxonomy, SFDR) and the arrangements for the application of certain requirements.

In this context, GTT may be required to update its double materiality assessment in response to regulatory developments. The aim of this approach is to ensure the relevance and robustness of the analysis, avoiding premature revisions that may be rendered obsolete by new regulatory changes.

The Group maintains active regulatory monitoring and remains in contact with its stakeholders (statutory auditors, boards, industry peers) in order to anticipate changes. Any update of the double materiality assessment will be conducted in accordance with regulatory developments and subject to validation by the Audit and Risk Management Committee and the Strategic and CSR Committee of the Board of Directors.

3.2 Climate change [ESRS E1]

ESRS E1

Climate change

GTT's climate strategy has two key pillars: reducing the carbon footprint of its own activities and developing products and services that contribute to the decarbonisation of the maritime sector. It is rooted in the Group's CSR roadmap.

This section sets out the Group's climate governance, its policy and the actions taken concerning climate change for financial year 2025, as well as the associated monitoring metrics and indicators.

ENVIRONMENTAL MATTERS

Climate change adaptation

1 negative impact

1 risk

Climate change mitigation

1 negative impact

1 positive impact

1 risk

1 opportunity

KEY FIGURES 2025

Greenhouse gas emissions

Scope 1
686 tCO₂eq

Scope 2
252 tCO₂eq

Scope 3
17,422 ktCO₂eq

40%
Patents contributing to decarbonisation

3.2.1 Governance

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

In 2025, the proportion of the variable pay of the Chief Executive Officer of GTT based on CSR criteria was 22%. This variable pay 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 –

2025 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 up to January 4, 2026).

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. This process, extended and strengthened in 2024 by means of a double materiality assessment, was maintained and consolidated in 2025. A detailed description of these procedures is provided 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 risk for the transition 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 2025, 92% of GTT's income came from activities in the LNG value chain, and these activities are expected to remain dominant in the short (2025-2026) and medium (2026-2036) term. The Group has identified opportunities linked to the transition to a low-carbon economy, in particular growth in revenue generated by new solutions, products and services to meet market expectations with regard to decarbonisation and by the development of adjacent 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. The analysis of the exposure to physical risks carried out in 2024 based on projections resulting from the latest climate modelling available for each hazard in question⁽¹⁾, based on the following climate scenarios: very high emissions (SSP5-8.5) and intermediate emissions (SSP2-4.5) by 2030 and 2050, remains applicable.

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.

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	-	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	-	Own operations	Medium term	Investments allocated to implementing the trajectory for reducing the Group's carbon footprint
	Opportunity	-	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. However, 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. The Group is closely monitoring developments in the European regulatory framework, in particular the ongoing work to simplify sustainability reporting requirements, which may lead to changes in the content of the sustainability report.

At the start of 2024, GTT submitted its carbon emissions reduction targets for Scopes 1, 2 and 3 to the SBTi (*Science Based Targets initiative*). Following exchanges with the SBTi as part of the examination of this trajectory, the Group finally decided not to pursue the validation process, as the methodological approaches proposed were not currently suitable for the Company's business model. In effect, its design and technical assistance core business would result in GTT excluding categories 10 (processing of sold products) and 11 (use of containment systems) from its indirect emissions reduction target.

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

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 (GHG) emissions for Scopes 1, 2 and 3. In 2025, the methodology for calculating the GHG balance was extensively revised to enhance the reliability and comparability of data (described in detail in section 3.2.5 of this document).

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 promoting and managing challenges related to sustainability. These committees include the Strategic and CSR Committee, the Audit and Risk Management Committee and the Compensation and Nominations 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 CO₂ 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.

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 and objectives in terms of climate change adaptation. As of this report's publication date, the Group has not formalised an adaptation plan based on the conclusions of its exposure analysis, but concrete progress was made in 2025. The renovation works undertaken at the head office in Saint-Rémy-lès-Chevreuse contribute in particular to improving the

thermal comfort of the buildings in periods of severe heat and are part of a three-year action plan.

Lastly, in the event of unusual unfavourable weather conditions or exceptional circumstances, the Human Resources Division and the health and safety department already implement targeted actions 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]

The actions presented in this section are mainly related to climate change mitigation. They are aimed at reducing the Group's greenhouse gas emissions (Scopes 1, 2 and 3) and contributing to the decarbonisation of the maritime sector. Some actions, including the energy renovation programme for buildings, also contribute to adaptation by improving the resilience of installations to the effects of climate change. Specific adaptation measures are outlined in section 3.2.3 of this document.

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 CO₂ emissions (Scope 1). These actions target, in particular, GTT's head office in Saint-Rémy-lès-Chevreuse, which concentrated almost 62% of the workforce at December 31, 2025. 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.

Head office energy renovation programme

In 2025, GTT continued its energy renovation programme for the head office buildings as part of the action plan initiated in 2024. The main achievements during the financial year include completion of the renovation of the restaurant, delivered in 2025, the continuation of work on an additional building at the head office and the installation of electric charging stations.

The energy efficiency study carried out in 2025 allowed for the sequencing and definition of milestones for the implementation of actions over three years aimed at improving energy consumption and employee working conditions. This programme contributes both to mitigation, by reducing natural gas consumption and thus

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.

CO₂ emissions, and to adaptation, by improving the thermal comfort of buildings in periods of severe heat. This approach was approved by the Administrative and Financial Division and coordinated by the purchasing department as part of structural real estate projects.

The capital expenditure mobilised as part of the energy renovation work for 2025 is 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*.

Replacement of the vehicle fleet

GTT has initiated the installation of electric charging stations on the Saint-Rémy-lès-Chevreuse site in order to facilitate the use of electric vehicles by employees.

This infrastructure is part of the Group's vehicle fleet transitioning process, aimed at converting the fleet to hybrid or electric vehicles by 2030. More broadly, it encompasses the real estate projects initiated by GTT – tertiary decree, installation of solar photovoltaic panels – which aim to reduce the environmental footprint of its sites.

3.2.4.2 Actions to reduce indirect emissions – Scope 2

GTT has implemented specific actions to limit its indirect CO₂ emissions (Scope 2), consisting in entering into green electricity contracts and generating renewable energy consumed on site.

Renewable electricity supply

In 2025, all of the electricity needs of GTT S.A. and Elogen were covered by renewable electricity contracts. In 2024, supply contracts with certificate of origin for the Saint-Rémy-lès-Chevreuse, Paris Beaubourg and Paris Montparnasse sites had been renewed for a period of two years. In addition, a new green electricity contract had been signed for the Elogen subsidiary in April 2024. The Group's performance on Scope 2 reflects its efforts to achieve the targets set.

Installation of solar panels

GTT installed solar photovoltaic panels on the roof of building C of its head office in Saint-Rémy-lès-Chevreuse. This installation can cover up to 53% of the building's energy needs, thus reducing the consumption of electricity from the grid. Details of the self-generated electricity consumed on site are presented in section 3.2.5.3 – *Energy consumption and mix [E1-5]* of this document.

As part of the multi-year real estate renovation programme that has been launched, the roll-out of solar panels for other buildings on the site is under consideration, in line with the Group's Scope 2 emission reduction targets.

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.

In 2025, 64% of Scope 3 emissions were thus linked to the use of products designed and sold. These are mainly emissions from the management of excess boil-off gas not required to meet the vessel's energy needs.

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 emission source represents around 26% of all Scope 3 emissions.

Reducing indirect emissions (Scope 3) in line with GTT's GHG 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 2025, a cross-functional working group was set up to coordinate the follow-up of actions necessary to reduce Scope 3 emissions. This group, involving several Group departments, ensures consistency between the commitments made under the reduction trajectory and the Group's strategy.

In particular, GTT has identified the following levers:

Substitution of HFC insulating foams with HFO

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 2025, GTT continued to focus on this key priority of reducing Scope 3 emissions. In line with the commitment made in 2024, a cross-functional working group carried out the preliminary studies necessary for discussions with shipyards and ship-owners, which began in 2025 and are expected to continue gradually, in compliance with existing contractual commitments.

Further development of new, low-BOR (boil-off rate) and reliquefaction systems

The technologies developed by GTT aim to enhance the thermal performance of the membrane containment systems used to transport and store LNG. This thermal performance determines the BOR of the gas. This boil-off gas is primarily used for the vessel's energy needs (propulsion and auxiliary systems). Any boil-off gas in excess of the vessel's power requirements will be reliquefied for storage. In category 3.11 – *Use of sold products*, GTT includes GHG emissions generated by the production of electricity required for operation of the reliquefaction or, exceptionally, by the combustion of excess boil-off gas.

The reduction of BOG (boil-off gas) is therefore one of the main levers for reducing indirect Scope 3 emissions. As the energy efficiency of propulsion systems increases, the thermal performance of containment systems plays a key role in preventing the vessel's reduced energy needs from leading to an increase in the need for reliquefaction of excess BOG not necessary for the vessel's operation, and to a resulting increase in Scope 3 emissions.

Besides the environmental impact, the reduction in BOG increases the amount of LNG the vessel can deliver. This also contributes to improving the vessel's operational profitability.

Illustration of the performances of two LNG carriers equipped with technologies from different generations – Source GTT

As an example, comparing two architectures from different generations described in the table below shows that the development of propulsion technologies, combined with the improved thermal performance of confinement systems, leads to a significant reduction in CO₂eq emissions per tonne of LNG transported (-47%, according to an analysis based on the parameters shown in the table below).

Propulsion system	Daily consumption	LNG containment technology	Capacity	Daily boil-off	Savings of CO ₂ per m ³ transported
Steam turbine	110 tonnes	Mark III	145,000 m ³	0.15%	-
MEGI/XDF	70 tonnes	Mark III Flex+	174,000 m ³	0.07%	47%

This improvement in thermal performance, made possible thanks to continuous innovation in terms of the products and technologies on offer, enables GTT to provide shipyards and ship-owners with increasingly more efficient and robust solutions.

3.2.4.4 Initiatives to reduce carbon in the maritime sector

Continuation of innovation and research and development activities

GTT has maintained its strong momentum in innovation and investments in research and development. The Group develops innovative systems, in particular with:

- **GTT NEXT1 technology**, an innovative containment system for LNG transport and storage combining the strengths of Mark III and NO96 technologies. Thanks to its double metal membrane, GTT NEXT1 has a BOR of 0.07% of the volume per day for a standard 174,000m³ LNG carrier, one of the lowest on the market. This thermal performance significantly reduces cargo losses during transport. This technology obtained design approval from Bureau Veritas, Lloyd's Register and, in February 2026, the American Bureau of Shipping (ABS), attesting to its technological maturity and paving the way for its marketing to shipyards and ship-owners;
- **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. In 2025, GTT obtained DNV approval for this design, which provides several benefits for ship-owners: extended retention time, higher bunkering temperature and compliance with the requirements for cold ironing at quayside;

- **work on alternative fuels**: in 2025, GTT received an AiP from Lloyd's Register for the "NH₃-ready" rating of the Mark III containment system, applicable to LNG-powered vessels, as well as LNG carriers (LNGCs), very large ethane carriers (VLECs) and bunkering vessels. This innovation strengthens the flexibility of vessels by enabling them to transport or use ammonia (NH₃), a lower-carbon energy alternative.

The Group also concluded several joint development projects with partners to strengthen the performance and competitiveness of its technologies and participate in the introduction of disruptive technologies. To this end, GTT formalised a joint innovation project with Bloom Energy and Ponant Explorations Group to develop an integrated energy system for marine applications. The system combines LNG-powered solid oxide fuel cells (SOFC) with high electrical efficiency and CO₂ exhaust gas capture technology developed by GTT. The solution also leverages the low temperature energy from the vessel's cryogenic installations to optimise the thermal management of the system.

This project is part of the contribution to the decarbonisation objectives of the International Maritime Organization (IMO) and is expected to equip Ponant Explorations Group's future *Swap2Zero* cruise vessel, cofinanced by the European Innovation Fund and France 2030.

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).

This strategy is divided into several complementary aspects. In the LNG carrier segment, GTT has been working for several years to improve the design of its containment and isolation systems, reducing evaporation losses and associated emissions. At the same time, GTT offers a range of services dedicated to the operational optimisation of existing vessels, including retrofitting of vessels with LNG fuelling through integration of membrane containment systems, as well as technical and engineering services to optimise boil-off gas management and the energy performance of vessels in operation.

In addition to LNG transport, GTT has maintained its investments in onshore storage and maritime transportation of green hydrogen in liquid form and green ammonia, considered to be decarbonised energy vectors. Despite the slowdown in the market, the Group has continued these programmes where other players have chosen to suspend them, with resources adjusted to the context.

Converting commercial shipping to LNG fuel

LNG is currently the only readily available fuel that can reduce greenhouse gas 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_x) compared to fuel oil propulsion. Furthermore, it makes it possible to comply with regulations concerning emissions of nitrogen oxide, sulphur oxide, CO₂, as well as particulate emissions and, in particular, the international MARPOL Convention⁽¹⁾.

GTT offers containment system technology for the entire fleet of commercial shipping vessels to provide LNG fuelling for vessels. In 2025, the Group marketed GTT CUBIQ™, a tank concept with cubic geometry – tried and tested on other types of vessels – specifically optimised for container ships. This concept simplifies construction for shipyards, while allowing for greater payload capacity and reduced construction time. The Group also markets tanks with a higher pressure (1 barg), offering greater flexibility in operation and anticipating future regulations on cold ironing at quayside.

The RecyCool™ system, intended for LNG-fuelled vessels equipped with high-pressure engines, complements this offering: it recovers the cold energy from the LNG before vaporisation in order to reliquefy the excess boil-off gas, thus significantly reducing CO₂ emissions. Already in operation on several vessels and incorporated into recent orders in partnership with Nikkiso Clean Energy & Industrial Gases, this simple design system is part of the broader approach developed by GTT to recover the cold energy from LNG.

Comparison of emissions for two fuel types

Type of fuel	Energy density Mmbtu/tonne	Engine yield g/kWh	Over-consumption %	SO _x %m/m	NO _x g/kWh	Particles g/k fuel	CO ₂ kg/kWh
Low-sulphur-content oil or scrubber ⁽¹⁾	40 to 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 _x for the LNG	NO _x : -80% to 90%	No particles for the LNG	CO ₂ : -20% to 25%

(1) Smoke scrubber.

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.

Marine and 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.

Ascenz Marorka continued to roll out its network of real-time fleet performance monitoring centres. After the opening of the first centre in France, a second centre was inaugurated in Singapore in 2024, strengthening the Group's presence in the Asia-Pacific region. In March 2025, a third centre was opened in Vancouver, completing a global network that is now present on three continents. With these three strategic locations, the subsidiary now provides operational support to ship-owners, charterers and fleet managers worldwide.

(1) International Convention for the Prevention of Pollution from Ships (known as the MARPOL Convention).

These centres rely on a team of maritime experts specialising in navigation, meteorology and vessel performance management, as well as LNG and offshore operations. They also offer the advanced Weather Routing system, powered by artificial intelligence-based vessel models and intelligent navigation algorithms. This technology optimises routes, improves energy efficiency and reduces CO₂ emissions. By incorporating operational, regulatory and environmental factors, it guarantees safe navigation in various sea conditions, while maximising operational efficiency.

For more detailed information on the Group's digital activities, see section 1.3.2.3 – *Development focus and projects*.

Engagement with the downstream value chain

In 2025, GTT continued to engage with its direct and indirect customers on sustainability and carbon footprint reduction, particularly at major industry gatherings where the Group showcased its latest technological innovations.

3.2.5 Metrics and targets

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

The Group has maintained its 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 maintained its 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 restricted Scope 3 emissions in 2033, compared to the 2021 reference year. The restricted Scope 3 accounts for 87% of Scope 3 emissions in 2021 and includes the following emission sources:

- emissions from material approved by GTT used in membrane containment technologies, included in category 3.10 Processing of sold products,
- boil-off gas (BOG) emissions throughout the life of membrane systems, included in category 3.11 Use of sold products and services.

The Group participated in major industry events including the Gastech conference in Milan in September 2025, the 25th World LNG Summit & Awards in Istanbul in December 2025, and the World Gas Conference (WGC) in Beijing in May 2025. These events were an opportunity to showcase the Group's technological solutions contributing to the improvement of the energy and environmental performance of maritime transportation, and to engage in discussions with the main players in the sector about decarbonisation challenges. The Group also participated in LNG2026 event in Doha in February 2026, where several technological advances were presented.

These contributions demonstrate the Group's commitment to bringing its technological solutions to the heart of the industry's debates, and to maintaining an active dialogue with the entire value chain on the topic of the environmental performance of maritime transportation.

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 2025, the GTT Group filed 40% (compared with 29% in 2024) 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 refer to the difference 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).

To quantify its contribution to the decarbonisation of the maritime sector, since 2024 the Group has embarked on an approach to measuring emissions avoided thanks to its technologies. The GTT Group has defined a methodology linked to the frameworks proposed by the World Business Council for Sustainable Development (WBCSD) and the Net Zero Initiative. Thanks to this approach, applied to a selection of technologies, in 2025 it was possible to carry out a first quantification of avoided emissions. A case study illustrating this approach is presented in section 3.7 – *Additional information* of this document.

3.2.5.2 Summary table of climate targets

Metric	Position in the value chain	Reference year	Baseline	Target	Time scale	Sub-targets	Levers	Key undertaking actions in 2025	2025 results
REDUCING THE CLIMATE IMPACT OF OUR ACTIVITIES									
Reduction of Scope 1 emissions									
Tonnes of Scope 1 CO ₂ emitted	Own operations	2021	1,037*	-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, including the staff restaurant	<ul style="list-style-type: none"> Delivery of a new building (staff restaurant), as a result of which 74.3% of the site has now been retrofitted as part of the programme Definition of a three-year energy optimisation action plan per building at the head office 	See section 3.2.5.4 – Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]
						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	<ul style="list-style-type: none"> Installation work for electric charging points with a connection planned for the first half of 2026 	
						Progressive transition to electric heating	Progressive transition to electric heating	<ul style="list-style-type: none"> Three-year action plan including the gradual replacement of gas/fuel oil boilers with heat pumps (building by building) defined in 2025 	
Reduction of Scope 2 emissions (market-based)									
Tonnes of Scope 2 CO ₂ emitted	Own operations	2021	522*	-55%	2033	Transition to green electricity supply contracts	Transition to green electricity supply contracts	<ul style="list-style-type: none"> Continuation of renewable electricity supply contracts for GTT S.A. and Elogen 	See section 3.2.5.4 – Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]
						Installation of solar panels	Installation of solar panels	<ul style="list-style-type: none"> N/A 	
Reduction of restricted Scope 3 emissions									
Tonnes of Scope 3 CO ₂ emitted	Downstream	2021	12,237,038*	-33%	2033		<ul style="list-style-type: none"> Further development of new, low-BOG and reliquefaction systems Halting the approval of HFC foams 	<ul style="list-style-type: none"> Initiation of engagement with suppliers and direct customers on the switch to HFO 	See section 3.2.5.4 – Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]
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			<ul style="list-style-type: none"> Completion of a case study with the support of a specialist external service provider 	See section 3.7 – Additional information
Contributing to a low-carbon world									
Number of patents filed in low-carbon energy		2022	19%	28%	2026			<ul style="list-style-type: none"> Continued filing of patents in alternative fuels and carbon capture 	40% See section 3.2.5.1 – Targets related to climate change mitigation and adaptation [E1-4]

* Reference value updated as part of the methodological review carried out in 2025. More information is provided in section 3.2.5.4

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 2025, the GTT Group recorded total electricity consumption of 5,343 MWh, up 20% compared to 2024. This increase is explained by several factors related to the extension of the scope and the growth of businesses:

- the opening of the GTT China centre of excellence for a full year in 2025 (compared to six months in 2024);
- the integration of Danelec into the scope from August 1, 2025, following its acquisition;

- the integration of VPS for the entire 2025 financial year (subsidiary acquired in 2024).

The signing of new green electricity supply contracts enabled GTT to cover 91% of its electricity needs, compared to 86% in 2024. In addition, the installation of solar photovoltaic panels on building C at the head office generated 39 MWh of self-generated electricity, a first for the Group.

	Unit	2023	2024	2025	Change
Total electricity consumption	MWh	3,730	4,452	5,343	+20%
O/w electricity from renewable sources	MWh	2,903	3,999	5,058	+27%
Share covered by contractual instruments used to purchase energy bundled with production attributes	%	78%	86%	91%	+5pp

Consumption of fossil fuels

In 2025, the Group's total fossil energy consumption amounted to 2,470 MWh, up 6% compared to 2024. This increase is the result of several factors:

- petroleum products: an increase in fuel oil consumption due to a generator test as well as increased demand on this equipment;
- natural gas: a decrease in gas consumption at the Beauplan site, consistent with the energy renovation works being undertaken and the non-use of certain buildings under refurbishment;
- fossil-based electricity: an increase mainly attributable to the extension of the scope of consolidation (GTT China's centre of excellence over 12 months, integration of Danelec and VPS).

Overall, the share of fossil sources in the Group's total energy consumption decreased slightly, from 35% in 2024 to 33% in 2025, despite the extension of the scope.

Consumption of low-carbon and renewable energy

Purchased renewable electricity consumption amounted to 5,058 MWh in 2025 (compared to 3,999 MWh in 2024, or +27%), an increase mainly due to renewable electricity supply contracts covering a more comprehensive scope than the previous year, notably thanks to the integration of the VPS and Danelec subsidiaries.

Consumption from nuclear sources is now very low, following Elogen's switch to a 100% renewable electricity contract in April 2024, which was in effect for the entire 2025 financial year. In previous years, consumption from nuclear sources mainly corresponded to the French residual mix applicable to this entity.

Self-generated renewable energy in 2025 corresponds to the electricity generated by the solar panels installed on the roof of building C of the Saint-Rémy-lès-Chevreuse head office. This installation can cover up to 53% of the building's energy needs.

These actions increased the share of renewable sources to 67% of the Group's total energy consumption in 2025, compared with 61% in 2024, against a backdrop of a 14% increase in the total volume of energy consumed.

Energy consumption and mix

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

Energy consumption and mix	Unit	2023	2024	2025	Change
(1) Fuel consumption from coal and coal products	MWh	0	0	0	-
(2) Fuel consumption from crude oil and petroleum products	MWh	120	203	248	+22%
<i>Including fuel consumption for vehicles</i>	<i>litres</i>	<i>8,810</i>	<i>18,057</i>	<i>16,472</i>	<i>-9%</i>
(3) Fuel consumption from natural gas	MWh	2,506	1,947	1,925	-1%
(4) Fuel consumption from other fossil sources	MWh	0	0	0	-
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	139	177	297	+68%
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	MWh	2,765	2,327	2,470	+6%
<i>Share of fossil sources in total energy consumption</i>	<i>%</i>	<i>43%</i>	<i>35%</i>	<i>33%</i>	<i>-2pp</i>
(7) Consumption from nuclear sources	MWh	689	277	17	-94%
<i>Share of consumption from nuclear sources in total energy consumption (%)</i>	<i>%</i>	<i>11%</i>	<i>4%</i>	<i>0%</i>	<i>-4pp</i>
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen etc.)	MWh	0	0	0	-
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	2,902	3,999	5,019	+26%
(10) Consumption of self-generated non-fuel renewable energy	MWh	0	0	39	+100%
(11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)	MWh	2,902	3,999	5,058	+27%
<i>Share of renewable sources in total energy consumption (%)</i>	<i>%</i>	<i>46%</i>	<i>61%</i>	<i>67%</i>	<i>+6pp</i>
TOTAL ENERGY CONSUMPTION (MWH) (CALCULATED AS THE SUM OF LINES 6, 7 AND 11)	MWH	6,356	6,603	7,545	+14%

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

2025 methodology changes

The 2025 financial year was characterised by a methodological update of the greenhouse gas emissions assessment. The objective is twofold: to strengthen the robustness of data disclosed and to improve its comparability over time, in line with the GHG Protocol⁽¹⁾.

The main methodology changes were as follows:

- **update of emission factors:** the emission factors were reviewed and standardised. This update led to the recalculation of values from past years and the update of the 2021 reference year, thus strengthening the comparability and robustness of the data;
- **Scope 1:** fugitive emissions from refrigerant and laboratory gases have been included in the calculation scope. Until 2024, these emissions were not counted due to their diffuse nature and the heterogeneous availability of data within the entities. Taking into account their potential contribution to total direct emissions and for improved completeness of Scope 1 in accordance with the GHG Protocol, they were included in 2025 and for the entire historical scope;

- **Scope 2:** application of the market-based approach for the calculation of the reference year for the Scope 2 target. This change, consistent with the Group's actions (green electricity contracts), enables the impact of energy supply choices to be reflected.

- **Scope 3:**

- a Scope 3 emissions categorisation review has been conducted to more accurately reflect GTT's positioning in the value chain, including emissions related to materials and maintenance over a vessel's lifetime, as set out in the table below. This reclassification does not imply any change in the total value of Scope 3 emissions.
- emissions related to GTT's technologies, impacting Scopes 3.10 *Processing of sold products*, 3.11 *Use of sold products and services* and 3.12 *End-of-life treatment of sold products*, were standardised with respect to the standard volume of a 174,000 m³ LNG carrier to measure the change in carbon performance of GTT's technologies, excluding the effects due to vessel size.

Scope 3 categories impacted	2024	Change	2025
3.1 <i>Purchased goods and services</i>	Materials approved by GTT used in membrane containment technologies.	Reclassified in 3.10	N/A
3.10 <i>Processing of sold products</i>	Assembly of membrane systems	No change	<ul style="list-style-type: none"> • Materials approved by GTT used in membrane containment technologies. • Assembly of membrane systems • Tests carried out on the tank before vessel delivery
	Tests carried out on the tank before vessel delivery	No change	
Maintenance operations carried out over the vessel's lifetime	Reclassified in 3.11		
3.11 <i>Use of sold products and services</i>	Boil-off gas (BOG) throughout the life of membrane systems installed on vessels	No change	<ul style="list-style-type: none"> • Maintenance operations carried out over the vessel's lifetime • Boil-off gas (BOG) throughout the life of membrane systems installed on vessels
3.12 <i>End-of-life treatment of sold products</i>	End-of-life treatment of products sold or recommended by GTT	No change	<ul style="list-style-type: none"> • End-of-life treatment of products sold or recommended by GTT

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 2025, emissions are calculated 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;

- fugitive emissions of gases used in air-conditioning installations and laboratories.

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

- for energy consumption: type of energy and annual quantity consumed in kWh;
- for fuel: type of fuel and annual quantity consumed in litres;
- for fugitive gas emissions: type of gas, quantity of gas released during a leak identified, surface area cooled by air conditioning installations.

Estimation of the quantities of refrigerant gas emitted by air-conditioning installations is carried out by using an annual leakage rate per m² based on data published by the IPCC (Intergovernmental Panel on Climate Change).

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

(1) Greenhouse Gas Protocol, an international standard aimed at establishing a regulatory framework to improve how greenhouse gas emissions are defined and measured so that they can be reduced.

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 annual amount of heat consumed in kWh.

The emission factors used are taken from the carbon database of the U.S. Environmental Protection Agency (Eco Invent), the Association of Issuing Bodies (AIB), the French Agency for Ecological Transition (ADEME) and the sixth Intergovernmental Panel on Climate Change (IPCC) report.

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. Emissions are calculated annually. Scope 3 biogenic emissions are negligible for the GTT Group and therefore were not included in this analysis. Emission categories with high criticality are determined using updated physical data and published in the Universal Registration Document.

Consistent with the reclassification of the *materials approved by GTT used in membrane containment technologies* from category 3.1 to category 3.10, the criticality of category 3.1 has been downgraded from high to medium, and now only includes goods and services directly purchased by GTT. 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	Goods and services purchased directly by GTT during the financial year	Medium
(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	Not applicable	-
(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	Low
(8) Upstream leased assets	Not applicable	-
(9) Downstream transportation and distribution	Not applicable	-
(10) Processing of sold products	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) Assembly of membrane systems Tests carried out on the tank before vessel delivery	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) Emissions related to maintenance operations carried out over the vessel's lifetime	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 sources and set a reduction target over a limited scope representing 83% of its Scope 3 emissions (included in categories 10 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 since 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 Base year	2023	2024	2025	Change %	2033	2050	Annual target %/ Base year
SCOPE 1 GHG EMISSIONS								
Gross Scope 1 GHG emissions (tCO₂eq)	1,037	769	680	686	+1%	471		-4%
Percentage of Scope 1 GHG emissions resulting from regulated emission trading schemes (as a %)	N/A	N/A	N/A	N/A	-	-	-	-
SCOPE 2 GHG EMISSIONS								
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	191	145	202	340	+68%	-	-	-
Gross market-based Scope 2 GHG emissions (tCO₂eq)	522	54	122	252	+107%	237	-	-4%
SIGNIFICANT SCOPE 3 GHG EMISSIONS								
Total indirect gross GHG emissions (Scope 3) (tCO₂eq)	14,095,249	9,123,121	13,634,973	17,421,985	+28%	-	-	-
Total indirect gross GHG emissions (Scope 3) (tCO₂eq) restricted	12,237,038	7,940,147	11,418,667	14,498,503	+27%	8,260,001		-3%
(10) Processing of sold products	3,606,151	2,712,831	4,475,730	5,928,306	+32%	-	-	-
(11) Use of sold products	10,350,078	6,302,346	8,958,089	11,233,104	+25%	-	-	-
(12) End-of-life treatment of sold products	139,020	107,944	201,154	260,575	+30%	-	-	-
TOTAL GHG EMISSIONS								
Total GHG emissions (location-based) (tCO ₂ eq)	14,096,477	9,124,036	13,635,856	17,423,010	+28%	-	-	-
Total GHG emissions (market-based) (tCO₂eq)	14,096,808	9,123,944	13,635,775	17,422,923	+28%	-	-	-

In 2025, GTT's Scopes 1 and 2 emissions amounted to 938 tCO₂eq (market-based approach), up +17% compared to 2024 (802 tCO₂eq). This change is a direct result of the variations in energy consumption described in section 3.2.5.3 – *Energy consumption and mix* [E1-5] and mainly reflects the extension of the Group's scope, while the decarbonisation actions undertaken are implemented on the historical scope.

Scope 1 emissions remained stable at 686 tCO₂eq (+1%), with decreases in natural gas consumption at the Beauplan site related to ongoing energy renovation work, compensating for one-off increase factors – including increased generator stress and equipment testing. Scope 1 emissions decreased by -34% compared to 2021, showing progress towards GTT's target of reducing its Scope 1 emissions by -55% by 2033 relative to its base year.

An increase in Scope 2 emissions was observed in 2025, to 252 tCO₂eq from 122 tCO₂eq in 2024 (+107% in a market-based approach), for structural reasons linked to the extension of the scope: GTT China's centre of excellence was operational for the entire year,

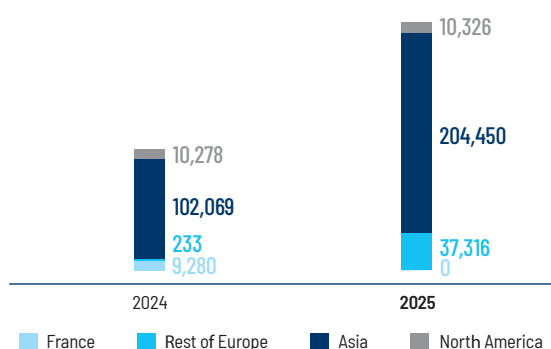
and the electricity and heat consumption of Danelec since its acquisition in August 2025 and VPS were included in the scope of consolidation. At constant scope, Scope 2 emissions remain under control through continued efforts to supply renewable electricity and the commissioning of solar panels on building C at the head office. Scope 2 emissions were down -52% in 2025 compared to 2021, highlighting the Group's efforts to achieve its commitment to reduce its Scope 2 emissions by -55% by 2033.

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, as well as to the configurations of those vessels (engine type, containment system technology and other equipment in line with the characteristics required by the customers). GTT's Scope 3 performance is 57% dependent on BOG (boil-off gas) emissions which can be greatly reduced depending on the GTT technology installed.

In 2025, 82 LNG carriers were delivered, compared to 62 in 2024, i.e. an increase of +32% in deliveries, which explains the +28% increase in total GHG emissions compared to 2024. Restricted Scope 3 emissions were also up by +18% compared to 2021, the base year for GTT's emissions reduction trajectory. This is also linked to a higher number of LNG carrier deliveries in 2025 compared to 2021, 82 and 53, respectively.

Based on the number of LNG carriers delivered, average Scope 3 emissions per unit fell by -3% in 2025. This decrease in carbon intensity per unit delivered is the result, in particular, of the profiles of the vessels delivered. As a reminder, Scope 3 emissions are calculated based on vessels actually delivered during the year and ordered three to four years beforehand, corresponding to the shipbuilding schedules indicated by the shipyards.

Breakdown of market-based Scope 2 emissions by region (in tCO₂e)



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

Direct Scope 1 emissions correspond to consumption mostly associated with GTT's activities at Saint-Rémy-lès-Chevreuse and Elogen's activities (i.e. 98% 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 of establishment.

Breakdown of market-based Scope 2 emissions by business (in tCO₂e)

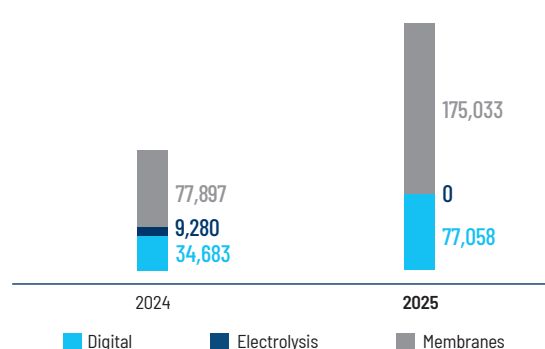


Table presenting GHG intensity per net revenue

Note 5 – 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	2024	2025	Change
Total GHG emissions (location-based) in relation to net revenue (in tCO ₂ e/million euros)	21,260	21,696	+2%
Total GHG emissions (market-based) in relation to net revenue (in tCO ₂ e/million euros)	21,260	21,696	+2%
GHG emissions (market-based) incorporated into the reduction trajectory* in relation to net revenue (in tCO ₂ e/million euros)	17,804	18,056	+1%

* The emissions reduction trajectory covers Scope 1, Scope 2 (market-based) and Scope 3 (restricted) emissions, as defined in the CSR roadmap.

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.
- Delegated Act 2026/73 of July 4, 2025 introducing simplification measures (introduction of a materiality threshold, reduction of the DNSH pollution criterion and new reporting models).

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 an undertaking'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.

In line with the simplification measures outlined in the Delegated Act adopted by the European Commission on July 4, 2025 and published in the *Official Journal of the European Union* on January 8, 2026, the Group implemented these simplification measures in its 2025 reporting.

Therefore, some activities representing less than 10% of the metrics (revenue, CapEx and OpEx) were considered non-material and were not subject to detailed analysis. This was the case for the Digital Services activity (8.2 – Data-driven solutions to reduce GHG emissions).

These simplifications also involve the presentation of four consolidated regulatory tables, compared to seven previously.

It should be noted that prior-year data have not been restated to reflect these simplifications, as no eligible activities were identified as non-material for the 2024 reporting period. Therefore, the amounts for N-1 in the tables are the same as those reported last year.

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 the production and use of hydrogen
LNG as fuel	Climate change mitigation	3.3	Manufacture of low-carbon technologies for transport
N/A	Climate change mitigation	7.3	Installation, maintenance and repair of energy efficiency equipment
Digital Services	Climate change mitigation	8.2	Data-driven solutions for GHG emissions reduction
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 5 MW electrolyser was 655 tCO₂eq.

By comparing this impact to typical hydrogen production over the equipment's lifetime, manufacturing-related emissions represented around 0.1 to 0.16 CO₂eq/th₂, 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 electrolyzers are designed for green hydrogen production, the carbon footprint from their use complies with Green Taxonomy requirements, with emissions below the 3 tCO₂e/th₂ threshold set by European regulations. Using electrolyzers 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 Annex *relating to climate change mitigation*, 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 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]* of the sustainability report.

Water resources

Elogen takes care to minimise the use of natural resources required to manufacture electrolyzers. On-site water consumption is limited and monitored by flowmeter reading. The water used in the laboratory is purified and then re-used in a closed loop for the tests. Contamination risks are monitored regularly with periodic analyses; to date, pollutant concentrations have remained below regulatory thresholds.

Circular economy

The level of performance required for electrolyzers does not currently allow the use of by-products. However, R&D programmes are under way to consider the possibilities for re-use and reconditioning of components, as well as the recycling of end-of-life membranes and catalysts. Metal waste generated on site is sent to the recycling chain. In general, the Group has implemented systems for the selective sorting, collection and recycling of its waste.

Pollution prevention

The analysis conducted in 2025 confirmed that none of the substances listed in the Appendix on pollution avoidance are present in the electrolyzers.

Biodiversity

The Elogen sites are located in urbanised industrial areas and are not situated near biodiversity-sensitive areas. Biodiversity considerations are therefore not material for this activity.

Revenue

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

In 2025, CapEx related to activity 3.2 fell by 63% as a result of Elogen's restructuring. This change therefore contributes to the increase in the share of CapEx not eligible at Group level, presented in section 3.3.2.4 of this document.

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 2025, GTT continued to assess the compliance of vessels with the EEDI criterion using the same rigorous methodology as in 2024, based on the selection of a representative vessel in terms of vessel type and the analysis of its energy performance. It confirmed that the vessels concerned perform significantly above the requirements, 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 Annex *relating to climate change mitigation*, 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 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]* 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.

At its sites, the Group has implemented selective sorting and collection systems to direct waste to the appropriate recycling channels. In addition, GTT conducts confidential R&D programmes related to the circular economy principles.

Pollution prevention

GTT designs LNG fuel solutions and approves the materials used in its technologies. However, the Group is not involved in manufacturing, the production of materials or the marketing of the final product; these stages are the responsibility of shipyards and their suppliers.

With regard to research and development activities carried out at its sites, substances used in laboratory work are not covered by the Appendix relating to pollution prevention of the Delegated Act, and are used in compliance with the applicable regulatory thresholds. Chemical waste generated by the tests is subject to specific collection and treatment in accordance with the regulations.

Biodiversity

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

As indicated in section 3.1.4.1 – *Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]* 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.

At the end of 2025, 2.4% of revenues, 6.7% of the CapEx and 1.8% of the OpEx in this business were considered aligned.

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 2025, the Group continued the energy renovation work at its head office to improve its energy efficiency and reduce its Scope 1 emissions.

These efforts were in line with 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 3.2.2.1 – *Description of the*

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 Climate 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.

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

processes to identify and assess material climate-related impacts, risks and opportunities [ESRS 2 IRO-1 and SBM-3] of the Sustainability Report.

Pollution prevention

The construction components and materials used were the subject of a literature review. The analysis conducted on the technical specifications and declarations of conformity of the main products confirms compliance with the criteria in Appendix C of the Delegated Act.

Revenue

Activity 7.3 is deemed to comply with technical criteria. In 2025, expenditure associated with activity 7.3 accounted for 2.1% of the total capital expenditure described in note 20.3 of section 5.1.5 – *Notes to the consolidated financial statements* of this document.

Activity 9.1 – Research, development and innovation

As of December 31, 2025, 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.

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.

It should be noted that in 2025, in accordance with the Delegated Act of July 4, 2025, the Group applied the materiality threshold of 10% to eligible activities representing less than 10% of each of the three metrics. These activities have not been the subject of a detailed alignment analysis (see section 3.3.1.1 – *Regulatory framework*).

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. In 2025, the Group conducted an in-depth analysis with the support of an external service provider, aimed at identifying the risks of failure to respect human rights within its activities and defining action plans to prevent these risks. 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
Human rights due diligence	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"> • Code of Conduct • Ethics Charter • Internal procedures relating to Ethics & Compliance • Procedure for avoiding conflicts of interest • Procedure for collecting and processing reports
Human rights conviction	In 2025 the Group was not the subject of any conviction related to human rights.
Anti-corruption procedures	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:
Corruption conviction	In 2025 the Group was not the subject of any conviction related to corruption.
Tax governance	The Group has not set up a tax governance procedure.
Tax penalties	In 2025 the Group was not the subject of any conviction related to tax penalties.
Open competition procedure	The Group has not set up a free-competition procedure.
Free-competition conviction	In 2025 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 are 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 is included under the heading "Acquisitions of non-current assets" in the statement of cash flows from investing activities (see note 20.3 in 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.

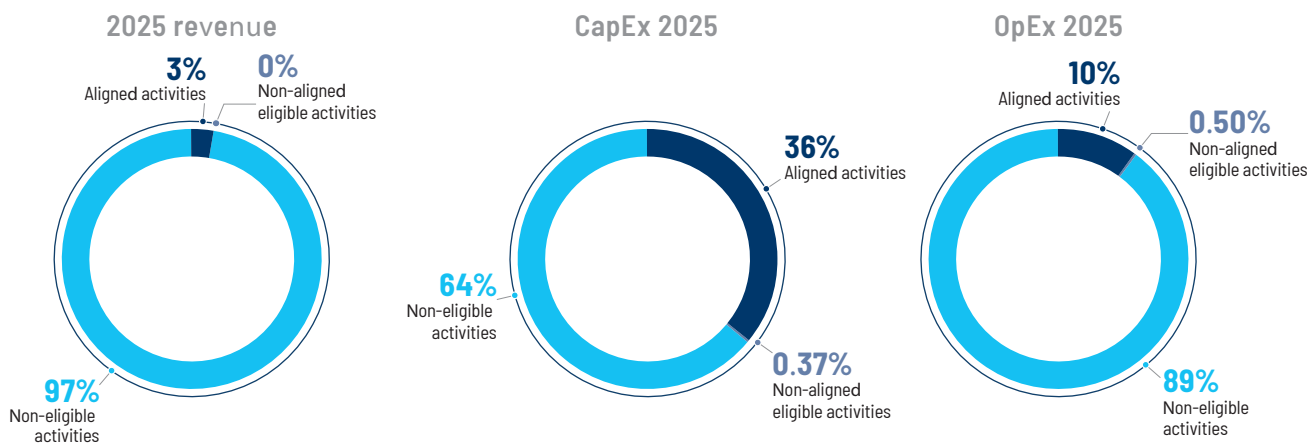
OpEx covers direct non-capitalised costs relating to the day-to-day servicing of assets of property, plant, and equipment by the undertaking or by the third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets. This OpEx is exclusively 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:

	2025 revenue	CapEx 2025	OpEx 2025
Eligible activities	3%	36%	11%
of which aligned activities	3%	36%	10%
Non-eligible activities	97%	64%	89%



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 revenue, CapEx and OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – Disclosures covering 2025

2025 financial year					Breakdown by environmental objectives of Taxonomy-aligned activities										
	Total (thousands of euros) (2)	Proportion of Taxonomy-eligible activities (3)	Taxonomy-aligned activities (thousands of euros) (4)	Proportion of Taxonomy-aligned activities (5)	Climate change mitigation (6)	Climate change adaptation (7)	Water (8)	Circular economy (9)	Pollution (10)	Biodiversity (11)	Percentage of enabling activities (12)	Percentage of transitional activities (13)	Not assessed activities considered non-material (14)	Taxonomy-aligned activities 2024 (thousands of euros) (15)	Proportion of Taxonomy-aligned activities in the 2024 financial year (16)
Revenue	803,039	3.0%	23,791	3.0%	3.0%	-	-	-	-	-	3.0%	0%	<10%*	42,258	6.6%
CapEx	40,280	35.7%	14,387	35.3%	35.3%	-	-	-	-	-	35.3%	0%	<10%*	37,404	61.0%
OpEx	252,465	10.5%	26,545	10.0%	10.0%	-	-	-	-	-	10.0%	0%	<10%*	50,075	20.0%

* Only the total revenues of digital activities are disclosed in the financial statements. GTT cannot disclose financial information specific to weather routing in chapter 3. Nevertheless, GTT has made sure that the materiality threshold of 10% is respected.

Proportion of revenues from products or services associated with Taxonomy-aligned economic activities – Disclosures covering 2025

KPI reported	Revenue		Environmental objective of Taxonomy-aligned activities										
2025 financial year													
Economic activities (1)	Code (2)	Proportion of Taxonomy-eligible revenue (3)	Taxonomy-aligned revenue (thousands of euros) (4)	Proportion of Taxonomy-aligned revenue (5)	Climate change mitigation (6)	Climate change adaptation (7)	Water (8)	Circular economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of aligned activities in eligible activities (14)
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	0.6%	4,612	0.6%	0.6%	-	-	-	-	-	E	-	100%
Manufacture of low-carbon technologies for transport	CCM 3.3	2.4%	19,179	2.4%	2.4%	-	-	-	-	-	E	-	100%
Sum of alignment per objective		-	-	-	3.0%	-	-	-	-	-			
TOTAL REVENUE		3.0%	23,791	3.0%	3.0%	-	-	-	-	-	-	-	100%

Proportion of CapEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – Disclosures covering 2025

KPI reported	CapEx		Environmental objective of Taxonomy-aligned activities					Enabling activity (12)		Transitional activity (13)	Proportion of aligned activities in eligible activities (14)		
2025 financial year													
Economic activities (1)	Code (2)	Proportion of Taxonomy-eligible CapEx (3)	Taxonomy-aligned CapEx (thousands of euros) (4)	Proportion of Taxonomy-aligned CapEx (5)	Climate change mitigation (6)	Climate change adaptation (7)	Water (8)	Circular economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of aligned activities in eligible activities (14)
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	26.5%	10,688	26.5%	26.5%	-	-	-	-	-	E	-	100%
Manufacture of low-carbon technologies for transport	CCM 3.3	6.7%	2,705	6.7%	6.7%	-	-	-	-	-	E	-	100%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	2.1%	844	2.1%	2.1%	-	-	-	-	-	E	-	100%
Research, development and innovation (RD&I) to reduce, prevent or eliminate GHG emissions	CCM 9.1	0.4%	150	-	-	-	-	-	-	-	-	-	-
Sum of alignment per objective					35.3%	-	-	-	-	-	-	-	-
TOTAL CAPEX		35.7%	14,387	35.3%	35.3%	-	-	-	-	-	-	-	99%

Proportion of OpEX from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – Disclosures covering 2025

KPI reported					Environmental objective of Taxonomy-aligned activities								
2025 financial year	OpEX												
Economic activities (1)	Code (2)	Proportion of Taxonomy-eligible OpEx (3)	Taxonomy-aligned OpEx (thousands of euros) (4)	Proportion of Taxonomy-aligned OpEx (5)	Climate change mitigation (6)	Climate change adaptation (7)	Water (8)	Circular economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of aligned activities in eligible activities (14)
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	8.2%	20,658	8.2%	8.2%	-	-	-	-	-	E	-	100%
Manufacture of low-carbon technologies for transport	CCM 3.3	1.2%	4,617	1.8%	1.8%	-	-	-	-	-	E	-	100%
Research, development and innovation (RD&I) to reduce, prevent or eliminate GHG emissions	CCM 9.1	0.5%	1,269	-	-	-	-	-	-	-	-	-	-
Sum of alignment per objective					10%	-	-	-	-	-			
TOTAL OPEX		10.5%	26,545	10%	10%	-	-	-	-	-	-	-	95%

3.4 Own workforce [ESRS S1]

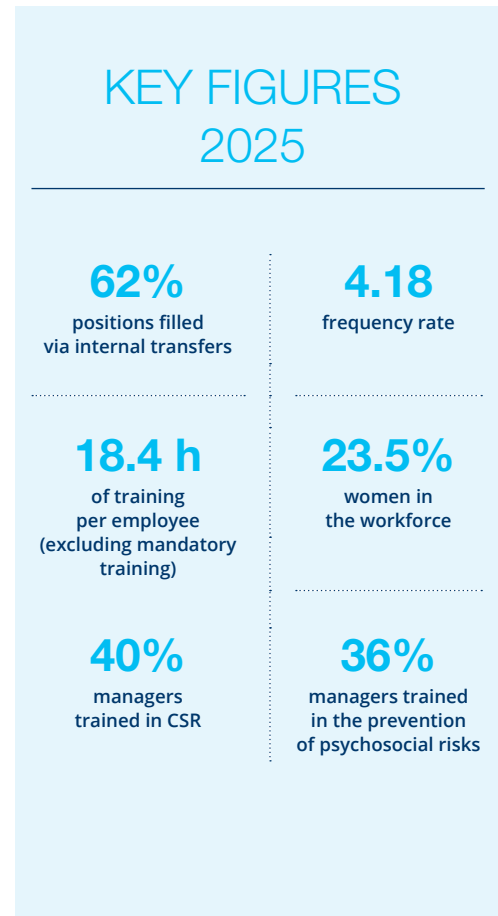
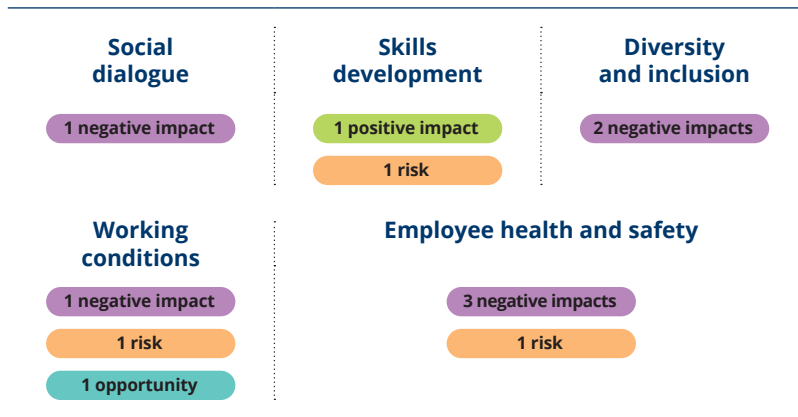
ESRS S1

Own workforce

Human capital is key to GTT's strategy. The Group's social policy is built around five fundamental commitments – social dialogue, skills development, diversity and inclusion, working conditions and health and safety – steered by the Human Resources Division.

This section sets out the policies, actions and results for financial year 2025, as part of the Group's commitment as a responsible employer, as well as the associated monitoring metrics and indicators.

SOCIAL MATTERS



3.4.1 Strategy

3.4.1.1 Interests and views of stakeholders [SBM-2]

GTT maintains its commitment to incorporate the rights, interests and viewpoints of its employees at the heart of its strategy and business model. Social dialogue is an essential pillar to ensure the active involvement of employees in decision-making processes and the alignment of the Group's priorities with those of its internal stakeholders.

Organisation of social dialogue

In 2025, 70% of GTT's headcount was represented by an employee representative body or trade union, with the remaining employees covered by the legal provisions applicable to employee representation in their home country. This coverage ensures respect for the fundamental rights of employees while providing a structured framework for discussions between management and staff representatives.

The methods of representation vary according to the size and geographical location of the Group's entities. GTT S.A., which accounts for the majority of the workforce, has a Works Council composed of 11 full members, supplemented by three employee representatives from the Cryovision subsidiary. The Works Council fully exercises its role in consultation on the strategic orientations, economic situation and social policy of the Company. Elogen has a Works Council composed of three full members, while OSE Engineering's Works Council is composed of two full members and two alternate members. Elsewhere in Europe, such as in Norway (digital business), a representation structure with a union is in place.

GTT ensures accessible and transparent communication as part of its social dialogue policy. Signed agreements are posted on the Intranet and displayed in the Company's communal areas, ensuring optimal visibility of the commitments undertaken. Corporate signage is regularly updated to increase access to information and strengthen the link between management and personnel.

For entities with fewer than 50 employees (in particular certain French and international subsidiaries), complaints relating to working conditions and the application of social regulations are handled through direct discussions between employees and management, in accordance with the legal provisions applicable locally.

Incorporation of employee rights and expectations into the strategy

GTT continues to incorporate employee rights and expectations into its strategic decisions. This approach is based on the engagement survey conducted in November 2024, the results of which continued to inform our actions in 2025, as well as on discussion sessions with General management. These interactions make it possible to shed light on the Group's strategy and business model, ensuring that employees' human rights and interests are effectively taken into account.

Strengthening the strategy for workplace equality and gender diversity

In 2025, the GTT Group strengthened its strategy for gender equality in the workplace, which is seen as a key lever for sustainable performance, attractiveness and retention of talent. This ambition also responds to an operational challenge: in technical positions in which specialised skills are sought, diversity makes it possible to broaden recruitment pools and strengthen the Group's capacity for innovation.

The Group-wide diagnostic work highlighted specific challenges related to career growth, retention and representation of women in positions of responsibility. These findings prompted GTT to develop an approach centred on clear objectives, targeted actions and dedicated management. In the long term, the Group aims to actively pursue its diversity and inclusion efforts, particularly in key positions, with the target of steadily increasing its presence by 2033. More information is available in section 3.4.2.1.3 – *Diversity and inclusion*.

Contribution to the strategy and business model

Regular social dialogue enables GTT to align its economic, environmental and social objectives. In 2025, discussions between staff representatives and management focused on health and safety, training, Group strategic projects (Mergers & Acquisitions), talent management, building renovation programmes and prevention of psychosocial risks.

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

As described in section 3.1.4.1 – *Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]* of this report, the GTT Group identified several impacts, risks and opportunities (IRO) relating to its personnel, following its double materiality assessment. IROs identified as material have a direct influence on the Group's business model and strategy, in relation to its activities, organisation and interactions with its employees.

The Group's interactions with its personnel are a key lever in adjusting its strategic priorities, strengthening its resilience and supporting the implementation of its long-term strategy, while consolidating its commitment to its employees.

Changes in the Group and its scope

In 2025, the Group continued to strengthen its social policy amid significant organisational change, marked both by the integration of Danelec and the restructuring of Elogen's business.

In the context of a slowdown in the green hydrogen market, this development led to the implementation of an employment protection plan (Plan de Sauvegarde de l'Emploi – PSE), which the Group ensured was carried out under the best possible conditions for the employees concerned. A voluntary redundancy plan (Plan de Départ Volontaire – PDV) was offered as a priority, with attractive support terms. Of the 99 employees concerned, 85 have taken voluntary redundancy, representing approximately 97% of eligible employees. In addition, 11 employees have been reassigned within the Group (4 at Elogen, 7 at GTT S.A.).

Employees who opted for the PDV received one-to-one support, managed in partnership with a specialised firm. The measures taken reflect the wide range of career plans: more than half of beneficiaries (54%) joined training or reskilling schemes; 21% pursued a business creation or takeover project; and 14% found a job thanks to the support provided. In addition, nine employees benefited from early external redeployment, outside the scope of the PDV. Above-statutory severance payments complemented the scheme, in recognition of employees' commitment and to support them through their professional transition.

By staggering the departures, Elogen was able to maintain business continuity throughout the restructuring process.

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

The material IROs identified by the Group include:

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

In summary, the GTT Group has identified twelve material impacts, risks and opportunities related to personnel, as presented below.

ESG considerations	Impacts, Risks and Opportunities	Current/ anticipated effects	Value chain	Time horizon	Description
Social dialogue	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
Employee skills development	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
Diversity and Inclusion	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

ESG considerations	Impacts, Risks and Opportunities	Current/ anticipated effects	Value chain	Time horizon	Description
Working conditions	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
Employee Health and Safety	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]

This section describes the policies, actions and objectives implemented by GTT to address the social challenges identified as material through the double materiality assessment. These systems aim to prevent and manage the impacts, risks and opportunities related to the Group's own workforce, in line with its strategy and ambition.

The Group's human resources policies are based on a collection of directives and practices that are aligned with the regulations in force in the areas where it has a presence. In order to guarantee responsible social practices and promote well-being within the Company, GTT relies on a human resources policy aimed at orchestrating an ecosystem of talent around skills development and social impact commitments, with a key focus on diversity, equity and inclusion, and the promotion of occupational health. The implementation and management of this policy is the responsibility of GTT's Human Resources Division.

In the context of the 2024-2026 CSR roadmap, GTT defined social objectives to address the material impacts, risks and opportunities in connection with its own workforce. These objectives cover key issues, especially skills development, talent promotion, diversity and inclusion, and occupational health and safety. Their monitoring is based on dedicated metrics and is the subject of regular reporting.

The definition of these objectives is also based on a structured dialogue with employees and their representatives, which contributes to the identification of priority social issues and the orientation of the actions implemented. These discussions, presented in section 3.4.1 – *Strategy*, made it possible in particular to specify the priorities in terms of working conditions, professional development and well-being, and define targets aligned with GTT's overall strategy. They also enabled the adjustment of actions and objectives, where appropriate, to take account of employee feedback, changing operational circumstances, applicable regulations and industry-specific best practices.

GTT's social performance metrics are monitored annually to ensure their relevance and comparability over time. The undertaking is committed to maintaining a consistent approach to ensure data comparability and effective assessment of the progress made.

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

The Group's social metrics and the progress made in 2025 are presented below.

3.4.2.1.1 Social dialogue

Social dialogue policy

GTT maintains an active dialogue with its employees through various communication channels, as described in section 3.4.1.1 – *Interests and views of stakeholders [SBM-2]*, guaranteeing regular and transparent discussions. Relations between management and Works Council representatives are based on a constructive and open approach, both during regular or mandatory consultations and as part of specific negotiations.

This dialogue especially aims to promote decent jobs and social protection, while enabling Management to understand the expectations of employees, who are considered the Company's primary stakeholders. GTT facilitates 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: occupational health and safety, sustainable development, gender diversity and the policy to support people with disabilities. This approach ensures that social and environmental issues are taken into account at all levels of the organisation.

Actions

In 2025, the works Council met 28 times. In addition to regulatory bodies, a psychosocial risks steering Committee was created, involving the human resources Division, staff representatives, the HSE department,

the occupational health service, the head office nurse and an external firm supporting the work in progress. This Committee monitors the actions resulting from the psychosocial risk diagnostics carried out in October 2024 and manages the implementation of the corrective measures identified.

Targets

Metric	Reference year	Baseline	Target	Timescale	2024 result	2025 result
PROMOTING DIVERSITY AND WELL-BEING						
Well-being at work						
Survey of work/life balance (satisfaction level as a %)	2022	N/A	>70%	2026	82%	N/A

GTT conducts an engagement survey with its employees every two years. The last survey, conducted in November 2024, was sent to all GTT employees who have been with the Group for at least six months, including employees on permanent, fixed-term and work-study contracts.

To ensure the comparability of results over time, the questionnaire used in 2024 was identical to that used in the previous survey conducted in 2022. It included 78 questions divided into 13 sections and 11 topics. The participation rate was 71% in 2024, compared with 76% in 2022. This slight decrease in participation is mainly explained by the large volume of requests addressed to the teams during the year, as well as by the close timing of the engagement survey with a specific survey on psychosocial risks.

The satisfaction rate relating to work-life balance is assessed on the basis of the average of positive responses received to the questions dedicated to this topic within the engagement questionnaire. The next engagement survey will be conducted in 2026, in line with this initiative's biennial frequency.

3.4.2.1.2 Employee skills development

Skills development policy

GTT attaches particular importance to the development of its employees' skills and managing their career paths, in order to respond to changes in its businesses and to support the Company's sustainability performance. The skills development policy aims to propose training courses adapted to the Company's needs, while taking into account employees' individual aspirations.

The training offered is based on a structured common foundation, complemented by targeted initiatives tailored to specific groups and business-specific challenges. In 2025, several structural actions were implemented or consolidated in order to strengthen the accessibility and relevance of training pathways. These include the roll-out of new e-learning modules, the creation of a training catalogue and an enhanced range of cross-functional training on offer, covering CSR, intercultural skills and risk prevention in particular. Dedicated courses have also been developed for managers and technical experts. In addition, specific mechanisms are in place to support employees at key stages in their professional life, in particular employees over the age of 55, who benefit from dedicated support in managing the second part of their career and preparing for retirement.

In 2025, GTT organised a masterclass dedicated to generative artificial intelligence, bringing together 186 participants. This initiative is part of a broader approach aimed at preparing employees for the technological transformations that impact the Group's businesses. These actions reflect GTT's ambition to offer training that provides

a concrete response to the operational needs of the businesses, supports transformations in the workplace and is consistent with the Group's technological and organisational changes.

Skills development is also based on dialogue and support tools, such as People Reviews and Career Talks, which make it possible to identify individual and collective needs, promote internal mobility and build career paths that are consistent with the Company's priorities. GTT also manages international pathways through a dedicated policy, implemented in 2023, harmonising practices within the Group while maintaining market competitiveness. As at December 31, 2025, it involved 112 expatriates.

In a spirit of continuity, the training orientations defined for 2026 aim to strengthen the structuring of training on offer around several key priorities:

- i. business excellence and transformation: in a context where artificial intelligence and digital tools are profoundly transforming working practices, GTT is investing in the acculturation of its teams to emerging technologies and in strengthening managerial and leadership capacities, in order to support its capacity for innovation and maintain the operational excellence of its businesses;
- ii. Group integration and culture: against the backdrop of the Group's external growth and internationalisation, particularly following the acquisition of Danelec in 2025, integration programmes, intercultural skills and the bolstering of language skills are a priority in order to promote team cohesion and facilitate collaboration between entities;
- iii. social responsibility and quality of life at work: training courses dedicated to health, safety, prevention of psychosocial risks, and diversity and inclusion, are in line with the commitments of the Group's 2024-2026 CSR roadmap.

Recruiting policy

Given the prospects for diversification of its activities and its continued growth trajectory, GTT attaches particular importance to the creation of teams combining mature skills and the development of new talents, with a view to transmitting knowledge and perpetuating key skills.

The Group's recruitment and talent management policy is thus part of an intergenerational approach, aiming to promote the complementarity of profiles and the diversity of backgrounds at all levels of the organisation. As a result, the workforce structure reflects a relatively young population, with 82% of employees under the age of 50 and an average age of 39.5. This dynamic is a key driver in supporting the evolution of the Group's businesses, while enhancing its attractiveness.

At the same time, GTT ensures that it values the experience and expertise of its most experienced employees, by promoting the transmission of knowledge, the sharing of key skills and career support. This approach helps to secure the Group's strategic know-how and to strengthen the continuity of skills in a context of business transformation and organisational evolution.

The integration of Danelec in 2025 and the strengthening of the Group's international presence have led GTT to adapt its recruitment policy. The challenge is to attract diversified profiles, in line with the expansion of the portfolio of activities, while ensuring that the Group's cultural cohesion and values are preserved.

Actions

In 2025, GTT implemented a series of actions aimed at strengthening the Group's attractiveness, supporting the development of employees and adapting talent management to the context of transformation.

Attractiveness and recruitment

The integration of Danelec and the strengthening of the Group's international dimension are accompanied by an ongoing commitment to attracting talent. These developments have led to the adaptation of recruitment dynamics, with a particular focus on the diversity of profiles and the complementarity of skills. The Group participated

in eight forums and career days organised by engineering schools in France, including Centrale Nantes, ENSTA Paris, ENSAM, Centrale Lyon, Grenoble INP and IMT Atlantique. In 2025, GTT also continued to host interns (college students, secondary school students, and students nearing graduation).

Development of skills and expertise

The Archimède network, which brings together the Group's experts and technical specialists (11 experts and 49 specialists at the end of 2025), has continued its structuring and integration into talent management processes. Its scope was expanded with the creation of a new field dedicated to liquid hydrogen containment technologies and the appointment of three new experts. The network actively contributes to the Group's strategic development projects and the identification of innovations in partnership with GTT Strategic Ventures.

Career support and talent management

In 2025, the integration of Danelec and the restructuring of Elogen's business led the Group to control its external recruitment, by proposing internal transfers. Despite this context, GTT has maintained its talent management system: eligible employees have benefited from a "People Review", thus ensuring enhanced career path monitoring and anticipation of internal developments.

Targets

Metric	Reference year	Baseline	Target	Timescale	2024 result	2025 result
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	40%
Number of training hours per employee*	2022	N/A	≥10	Annual	16.6	18.4 h**
Career management policy						
Internal mobility/Positions filled (as a %)	2022	23%	30%	2026	39%	62%**
People review vs. eligible population	2022	95%	≥90%	Annual	93%	100%**

* The target covers the entire headcount, except apprentices.

** The results above do not include Danelec at December 31, 2025. The integration work for this entity acquired in 2025, which is currently under way, will enable its full integration into the 2026 financial year reporting.

The Group maintains its commitment to skills development and talent promotion. In 2025, 40% of the Group's managers and 60% of GTT S.A.'s managers received training/awareness-raising in CSR.

With regard to training, the metric of the number of hours per employee was 18.4 hours in 2025, above the target of 10 hours per year. Training actions focused mainly on technical skills, managerial support, intercultural skills and digital acculturation.

In terms of internal mobility, the rate of internally filled positions reached 62% in 2025. This development is partly explained by the particular approach taken in the financial year, with priority given to internal redeployment and limited use of external recruitment, as part of the implementation of the Elogen's workforce reduction plan.

Lastly, 100% of eligible employees benefited from a People Review in 2025, thus exceeding the 90% target. This strategic exercise enables us to better monitor career paths, anticipate internal development and secure succession plans.

3.4.2.1.3 Diversity and inclusion

Diversity and inclusion policy

The Group strongly believes that the plurality of profiles, experiences and careers is a determining factor for collective performance and innovation. Building on this vision, GTT places the promotion of diversity and inclusion among its strategic priorities at all levels of the organisation.

The Group has identified the risk of discrimination as a major issue and applies a zero-tolerance policy against any differential treatment based on gender, age, origin, physical appearance, religious or political beliefs, sexual orientation or disability. This approach aims to transform individual uniqueness into a collective asset, cultivating a work environment based on openness, mutual respect and goodwill.

The Group is implementing concrete initiatives based on two key priorities: on the one hand, guaranteeing equal opportunities for women and men at all stages of their careers; and on the other hand, promoting the integration and retention of employees with disabilities in employment.

The development of this policy is based on careful consideration of the expectations of candidates and employees, as well as changes in the regulatory framework. This approach ensures that practices comply with legal requirements while meeting contemporary societal challenges. In the interests of transparency, GTT regularly reports on its commitments and their progress, in particular through its single occupational risk assessment document (DUERP) and its CSR roadmap.

Governance

The 2025 financial year marks a defining stage in the organisation of diversity and inclusion management within the Group. Dedicated governance has been put in place for each of the two priority areas: gender equality in the workplace and the inclusion of people with disabilities.

A Diversity coordinator was appointed in 2025 to oversee all related initiatives and monitor indicators at Group level. With the support of a specialised firm, a new framework agreement on workplace equality was drawn up, based on an in-depth analysis and a consolidated action plan. In early 2026, a diversity Committee was set up to formally oversee the implementation of the plan.

In 2024, a Disability coordinator was appointed who completed a professional training course provided by AGEFIPH, a partner of the Group over a period of two years. A disability Committee, meeting three times a year, brings together the key functions (HR, training, purchasing, communication, CSR), representatives from the Works Council and the occupational health service. The action plan, structured around four aspects (communication, awareness-raising, recruitment, retention in employment), was presented to the Works Council.

Diversity and inclusion actions

In 2025, the Group conducted a set of initiatives aimed simultaneously at ensuring fair and inclusive working conditions, and at controlling risks while seizing the opportunities associated with these matters.

Combating discrimination and preventing bias

The prevention of discrimination in hiring remains a priority. Recruitment professionals and managers benefit from the "Recruiting without discrimination" programme, designed to neutralise unconscious biases that may influence decisions and ensure equal treatment of applications. This approach is extended with the dissemination of an e-learning module dedicated to diversity and inclusion, accessible to all employees. This educational journey aims to deconstruct stereotypes and raise awareness of cognitive mechanisms that can affect professional interactions. As at December 31, 2025, 80% of GTT S.A. staff had completed this module.

In 2025, GTT commissioned an external firm to conduct an in-depth analysis of the challenges related to diversity and workplace equality. Conducted according to an approach combining documentary analysis and interviews with key players in the organisation, this analysis reviewed seven key points: employment, training, career promotion, actual remuneration, working conditions, health and safety at work, as well as work/life balance. It made it possible to objectify the Group's situation in each of these areas, to identify the priority levers and to contribute to the drafting of the new equality agreement, aimed at amplifying the progress made and achieving the female representation targets set by 2033.

Promotion of diversity and gender equality in the workplace

In 2025, the Group's efforts to promote diversity and gender equality in the workplace will focus on three key areas: increasing the Group's attractiveness to female talent, raising awareness among all employees, and supporting women's career advancement to leadership positions.

Attractiveness and visibility

In terms of partnerships, the Group has joined the "Elles Bougent" network and formed a pool of around ten mentors, supplemented by the recruitment of support staff and committed employees. A time allocation scheme facilitates the investment of these ambassadors. The School Relations teams also maintain close contact with engineering schools, offering students the opportunity to learn about career prospects within the Company.

The collaboration with the Yvelines branch of the Fondation Agir contre l'Exclusion (FACE Yvelines) resulted in several initiatives during the financial year. GTT participated in the career forum, bringing together more than 200 young people, including college and secondary school students, and raising their awareness about opportunities in the naval engineering and energy sectors. A CV writing workshop was also led by GTT employees for a year 10 class, promoting the professional integration of those struggling to find work.

These partnerships converged on Industry Discovery Day 2025, when the Group welcomed 45 young female students to its Saint-Rémy-lès-Chevreuse site in partnership with Elles Bougent and FACE Yvelines. This day brought together college and secondary school students from several establishments in Yvelines for visits to laboratories (mechanical tests, liquid movements, industrialisation, materials), workshops in the form of speed talks with "Elles Bougent" mentors to discuss technical trades and careers, and virtual reality sessions to explore technologies in an immersive way.

In addition, job posts have been reviewed to facilitate accessibility for as many people as possible, ensuring that their wording does not exclude any profiles.

Awareness-raising within the Company

Internal communication campaigns against everyday sexism were rolled out once again, particularly on the dedicated national day in January 2025. The visibility of diversity matters has been increased through key events programmed for spring and autumn, which are also promoted in our internal "GTT Link" newsletter. Portraits of female employees illustrating the diversity of careers within the Group were showcased to highlight the wealth of professional experiences offered by the Group.

Mandatory training on the prevention of sexist behaviour and sexual harassment remains available to all employees. It provides the keys to understanding the legal framework, presents the resources that can be used when faced with a problematic situation and aims to enable teams to understand and identify sexist behaviour and sexual harassment in the workplace. In 2025, 90% of GTT S.A. employees completed this training.

The Group provides employees with an external reporting system accessible through a dedicated platform (GTT.integrityline.fr) and continued its poster campaign on GTT S.A. premises to mark France's National Anti-Sexism Day on January 25, 2025.

Career support for women and the role of managers

GTT launched the Empow'her programme in autumn 2025, the first training scheme devoted to the Group's female talent. Designed to accelerate the career development of female employees and strengthen their leadership skills, this programme involved a first cohort of 11 participants, who were supported through a structured and personalised course over a three-month period. Building on this first experience, the Group plans to renew and enrich the programme in 2026, expanding its scope under the new workplace equality agreement. Highlighting female profiles during People Reviews also contributes to this dynamic, by ensuring structured monitoring of their career development trajectories.

Inclusion of people with disabilities

The 2025 financial year marked a major structuring phase for the disability policy. Following the maturity diagnosis initiated at the end of 2024 with the AGEFIPH, a multi-year action plan was formalised around four areas and presented to the Works Council:

- communication with a dedicated area on the Intranet (documentation, FAQs) and regular inclusion in the internal newsletter;
- awareness-raising, in the form of an educational programme for all stakeholders;
- recruitment, by increasing the inclusiveness of job offers;
- retention in employment, thanks to personalised support (disabled worker status ("RQTH") application, work station adjustments, individual follow-up).

There were significant developments in awareness-raising actions in 2025:

Awareness-raising programme: two webinars were organised with the AGEFIPH, in June 2025 for managers and in September for all employees, in addition to the associated existing e-learning courses including the "managing disability" module. During European

Disability Employment Week (EDEW) in November, a thematic workshop raised awareness among employees about DYS disorders (dyslexia, dyspraxia, dyscalculia) and ADHD (attention deficit disorder with or without hyperactivity), offering insights into adapting practices.

Kit manager: a kit was designed in 2025 and distributed at the beginning of 2026, gathering information on disability types, recommendations for recruitment and integration, identification of resource contacts, detection of weak signals and recommendations on appropriate attitudes.

Partnership with the protected sector: collaboration with the Aigrefoin work assistance organisation (ESAT) has been strengthened, particularly through the maintenance of green spaces, orders for fruit and vegetable baskets and the promotion of their activities.

This structured approach has fostered a climate of trust conducive to the recognition of the quality of work of disabled workers (RQTH). The number of employees reporting a disability doubled from two to four. This increase is partly the result of declarations by employees already in their position, encouraged by the existence of an identified discussion framework and the visibility of the Disability coordinator.

Targets

Metric	Reference year	Baseline	Target	Timescale	2024 result	2025 result
PROMOTING DIVERSITY AND WELL-BEING						
Gender equality						
Percentage of women in the workforce	2022	21%	>25%	2033	25%	23.5%
% of female hires	2022	31%	>35%	2033	30%	23.1%
Percentage of female Executive Committee members	2022	29%	40%	2030	13%	13%
Female representation in management positions	2022	N/A	≥25%	2033	22.2%	23%
Inclusion						
Adoption and implementation of a disability inclusion plan	2022	N/A	Adoption of a plan	2026	in progress	Plan approved and implemented for GTT S.A. (see section 3.4.2.1.3)

The Group has maintained sustained momentum across all diversity metrics integrated into its CSR roadmap. Actions to promote workplace equality aim in particular to increase the presence of women in technical roles and to boost the representation of women in positions of responsibility.

In 2025, women accounted for 23.5% of the Group's workforce, down slightly from 2024. The female recruitment rate was 23.1%, compared with 30% the previous year. These changes are mainly explained by Elogen's employment protection plan, which has led to departures affecting the composition of the workforce, and the integration of Danelec, whose workforce is predominantly male. 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.

Female representation in management positions did however increase to reach 23%, compared to 22.2% in 2024, with a target of exceeding 25% in 2033. Management positions are defined as those involving the management of a team.

The proportion of women on the Executive Committee was 13% in 2025: one woman occupying the position of General Secretary sat on the Executive Committee as at December 31, 2025. The actions in favour of diversity described in this same section of the report aim to accelerate progress towards this target.

Finally, with regard to the inclusion of people with disabilities, progress was made in 2025 on the objective of adopting and implementing a dedicated plan. Dedicated governance is now operational with the disability Committee, and the action plan is currently being rolled out. The first awareness-raising and support actions have created a climate of trust, resulting in a doubling of the number of employees having declared a situation of disability.

3.4.2.1.4 Working conditions

Working conditions policy

The Group ensures compliance with applicable regulations on working conditions and prioritises its employees' expectations in terms of well-being, personal growth, and work-life balance. This ambition is reflected in concrete measures aimed at guaranteeing quality working conditions and a flexible approach to the realities on the ground. The collective agreements on remote working and the commitments relating to the right to disconnect illustrate this approach.

Psychosocial risks prevention is an essential part of this policy. The psychosocial risks steering Committee, set up in 2025, monitors this topic and coordinates prevention actions. By 2026, the Group aims to train the entire management team in psychosocial risk prevention.

The Group also relies on an engagement survey conducted every two years, allowing employees to express their experiences in the workplace and contribute to the continuous improvement of practices. The guidelines and progress of this policy are made public via the Universal Registration Document and the CSR roadmap.

Work-life balance and well-being at work

The Group is committed to providing a work environment that fosters the well-being of its employees. On the Saint-Rémy-lès-Chevreuse site, the natural setting allows access to outdoor sports activities; and the mass catering offer favours a balanced diet.

The occupational health system is based on the presence of a nurse at the main site and on a network of first-aiders at work. The development of awareness-raising programmes on regular psychosocial risks complements this system with the help of various tools: support and assistance units, training, internal alert system via the [GTT.integrityline.fr](https://gtt.integrityline.fr) platform.

Since 2024, GTT has undertaken a strong approach in relation to occupation health, strengthened in 2025 through the establishment of the psychosocial risks prevention (PSR) Committee and expanded governance involving multiple stakeholders, to promote several actions that confirm the Group's ambition in its approach to benefits:

- strengthened management of occupational risks and prevention of psychosocial risks;
- awareness-raising and training for all employees, with specific aspects for managers;
- strengthening management through trust;
- aligning missions with CSR values;
- the right to disconnect;
- free access to a nursing service;
- remote working as an organisational standard.

A compensation and benefits policy

The Group wants to recognise, attract and motivate talented individuals by offering competitive pay and a range of benefits.

The GTT S.A. pay policy, revised in 2023 to align it with market levels following an in-depth survey, continues to be in effect. This overhaul, applied to the Group's head office and taking into account the specific features of the Group's businesses and activities, resulted in an average increase in head office wages of more than 10%. In addition, the variable components have been more closely tied to the achievement of individual objectives, thus strengthening the link between performance and remuneration.

The year 2025 marks the full implementation of the open-ended profit-sharing agreement and the three-year agreement on incentives (2023-2025). These schemes, negotiated with the social partners, contribute to involving employees in the Group's results and strengthen their long-term commitment. GTT also supports its employees with a range of qualitative social protection measures, including a supplementary health insurance plan offering several levels of coverage and a personal risk policy covering the risks associated with illness, disability and death, with a larger employer burden in the distribution of contributions.

For the entire Group, staff costs for the year 2025, grouping together the components of wage, pay, employee savings and social security costs, increased by more than 12.5% compared with 2024, including the effect of the integration of Danelec and the increase in personnel expenses outside changes in the Group's scope.

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 2025, the Group rolled out a structured training system for the prevention of psychosocial risks, based on two complementary levels:

- a one-hour awareness-raising module, accessible to all employees, aimed at developing each employee's ability to identify situations of risk and to know the resources that can be used;
- an in-depth module for managers, entitled "Managing psychosocial risks", which focuses on their responsibility in identifying warning signs, supporting employees in difficulty, and implementing prevention measures within their teams.

This approach ensures a shared culture of prevention while giving managers the tools specific to their leadership role.

The Group also continues to roll out several initiatives aimed at improving working conditions, including through actions related to diversity and inclusion, described in section 3.4.2.1.3 – *Diversity and inclusion* of this report.

In June 2025, during the Quality of Life and Working Conditions (QLWC) Week, GTT organised a series of participatory and awareness-raising actions: a remote "Resilience" workshop aimed at giving employees the tools they need to deal with changes and transformations in their working environment, the publication of articles, practical sheets and videos related to well-being at work and prevention of psychosocial risks on the intranet, the introduction of suggestion boxes and the creation of a page dedicated to disability. This initiative was a significant moment of collective mobilisation, in line with the Group's commitment to employee well-being and occupational health and safety.

Awareness-raising initiatives around breast cancer such as "Pink October" awareness month and the "Wear your trainers" charity challenge for the benefit of the ELA association were also organised at the Group level in 2025. These actions have helped to strengthen the Company's commitment to the health and well-being of employees, as well as contributing to charitable causes.

OSE Engineering, whose activity is entirely carried out remotely, has adapted its prevention practices to address the specific risks associated with this mode of organisational approach, including occupational isolation and musculoskeletal disorders related to screen-based work. Regular manager/employee monitoring integrating well-being and prevention actions (remote physical activity) complement this system.

Targets

Metric	Reference year	Baseline	Target	Timescale	2024 result	2025 result
PROMOTING DIVERSITY AND WELL-BEING						
Well-being at work						
Training in the prevention of psychosocial risks	2022	N/A	100% Executive Committee (2024)/100% managers (2026)	2026	100% of the Executive Committee trained	36% of managers

Training in the prevention of psychosocial risks is a commitment enshrined in the Group's CSR roadmap. The Executive Committee was trained in December 2024, marking the first stage of this roll-out.

In 2025, the system was expanded with the provision of two separate training modules: one for all employees and the other specifically designed for managers, in order to assist them in identifying and managing risk situations.

By the end of 2025, 36% of managers had completed the module dedicated to the prevention of psychosocial risks.

3.4.2.1.5 Employee health and safety

Employee health and safety policy

The health and safety of employees is a priority issue for the GTT Group. Although the risk of serious accidents is limited in its engineering activities, the Group is exposed to specific risks in certain laboratory, technical assistance and supervision activities carried out on construction, installation or repair sites. The Group is responsible for determining potential risks and hazards at each of its sites and for assessing their impact on employee health and safety.

In this context, GTT is responsible for the annual determination of the occupational risks that its employees are exposed to by (i) identifying the hazards and potential risks associated with their activities, (ii) estimating the impacts on the health and safety of employees, and (iii) defining and implementing appropriate prevention measures. The nature and level of risks to which employees are exposed vary according to the activities carried out and the intervention environments.

The main risks are:

- 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 full remote working activity for the OSE Engineering subsidiary: occupational isolation, musculoskeletal disorders (MSDs) related to prolonged screen-based work;
- risks related to the use of machines, test benches and chemicals in the case of GTT and Elogen employees;
- risks related to liquid nitrogen (anoxia, burns) in the case of GTT laboratories;
- risks related to commuting accidents.

The identification of occupational risks that Danelec employees are exposed to and their integration into the Group's overall risk mapping was launched in 2025 and will be completed in 2026.

The Group's Health, Safety, Environment and Security (HSES) management system includes all the mechanisms necessary to prevent work-related accidents and protect its employees and, where applicable, those of subcontractors working at its sites or shipyards. Particular attention is paid to the management of near-accident situations, with a continuous improvement and prevention process, and a proactive rather than reactive approach.

Specific safety procedures have been developed, adjusted and rolled out within the departments and activities which are most exposed to risk, taking account of changes in regulatory and technical developments: the research and testing laboratories for fluid dynamics tests (hexapods), the test laboratory dedicated to characterising the thermal and mechanical properties of materials under cryogenic conditions, the joinery and metallurgy workshops, and the industrialisation tooling development laboratory.

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 as early as possible in its purchasing and operating practices; any decision includes an analysis of health and safety impacts in advance.

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; and a continuous improvement plan to optimise HSE management.

In 2025, the HSE function continued its assignments as part of a permanent improvement approach. Entities that are predominantly operational, which operate directly in the field, receive increased attention. Cryovision, whose teams conduct ballast tank inspections, updated its Health, Safety and Environment policy in 2025 in line with the Group-level HSE commitments. This policy sets out the principles and objectives applicable to all the subsidiary's activities and is based on the systematic analysis of assignment feedback and HSE events.

In addition, the effective rollout of HSE policies and procedures by employees of the various Group sites and/or entities is audited in accordance with an annually defined audit plan. In 2025, the activities of Cryovision were reviewed, as well as the activities of GTT's teams deployed to construction sites in Korea and China. The findings of the review were satisfactory. Areas of improvement were identified and action plans drawn up; these are due to be rolled out in 2026.

HSE culture: Actor, Contributor, Leader

The Group's Health and Safety, policy rolled out in 2024, is based on compliance with legal obligations and the ISO 45001 standard. It specifies the central role of health and safety in the Group's culture and defines three levels of involvement:

- **Actor:** each employee is the primary actor in their own health and safety at work, through in-depth knowledge of the risks linked to their activity and permanent compliance with the safety measures and procedures. This level covers the fundamental principles of risk prevention and control barriers affecting health and safety;
- **Contributor:** employees participate in collective protection (shared vigilance) by adopting a responsible attitude and by complying with the rules. They share risks, experiences and best practices. This pillar addresses the human factor and the keys for effective intervention to correct behaviour presenting a risk;
- **Leader:** the employee takes the initiative to preserve or improve everyone's health and safety, convinced that these take precedence over any other consideration. This level develops the vital benefits of prevention and the six key skills of safety leadership.

Health and safety governance

The 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 Board of Directors approves the HSE policy and the main performance indicators, in particular the frequency rate 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]*).

In 2025, GTT decided to strengthen the Group's HSE governance by creating an integrated Group HSE department reporting directly to the Chief Executive Officer. This change took place in early 2026.

In order to ensure appropriate working conditions and support the implementation of health and safety policies, since 2018 GTT has been relying on a network of health and safety coordinators deployed at each of the shipyards involved in shipbuilding and repair, i.e. GTT's customers. This system ensures that on-site GTT employees have dedicated prevention and safety contacts.

An HSE Committee meets monthly, bringing together ad hoc correspondents from each shipyard and, depending on the items on the agenda, certain shipyard and construction site managers. At the level of each subsidiary, coordination mainly takes the form of a monthly consolidation of HSE metrics and, depending on the nature of their 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 and Ascenz Marorka.

For example, within Ascenz Marorka and Elogen, HSE governance is based on an internal QHSE manager supported, as needed, by the Group HSE department. Coordination takes the form of quarterly steering committees and half-yearly management reviews that take stock of audits, metrics and the action plan.

Finally, the Group HSE department supports 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.

Occupational risk assessment

The single occupational risk assessment document (DUERP) forms the foundation of the prevention approach. In 2025, GTT S.A. embarked on a methodological overhaul of its DUERP, by carrying out a more detailed risk assessment of each unit and workstation. The document covers all of the Group's sites and working situations, including construction sites abroad and remote working situations.

The assessment methodology is based on the occupational risk assessment proposed by French national institute for research and safety (INRS), to which three additional risks have been added to better reflect the specific features of the Group's activities: risks related to co-activity with external companies, work-related hazards in isolated environments and work-related hazards in confined environments.

The new approach is based on a "position-by-position" review to be more comprehensive, to reflect the reality of granular action plans and to better track risks and prevention measures at the operational level. The main risks dealt with include:

- falls from a standing position and from a height;
- risks associated with manual and mechanical handling;
- chemical hazards;
- gas hazards (including liquid nitrogen that may cause anoxia and burns);
- fire and explosion hazards;
- psychosocial risks.

This document is regularly updated and defines the methodological framework applicable to the Group as a whole. Operational subsidiaries have their own single document, updated according to the evolution of their activities and the risks identified. Coordination under the aegis of GTT's HSE department ensures that prevention approaches are consistent across the Group.

The 2025 action plan in relation to the DUERP includes the actions to be processed, with monitoring by area, theme, pilot and target date. In 2025, GTT S.A. has been supported by a specialist occupational risk prevention consultancy firm, which contributes to updating the annual programme for the prevention of occupational risks and the improvement of working conditions. This programme outlines all the prevention actions planned and implemented in the Company during the year 2025.

The QUARKS Safety software, rolled out in 2025 (gradually replacing the SEIRICH software), which is used for managing chemical product Safety Data Sheets (SDS) and is operational. All employees have access to it. The on-site product inventory and chemical risk assessment (EVRC) are operational in some of our laboratories and are expected to be completed in 2026. The software is monitored and populated by the HSE experts.

The follow-up of corrective actions resulting from the 2024 audits continued throughout the financial year.

Incident prevention and management

When an incident occurs, GTT implements appropriate corrective measures to limit the consequences and prevent their recurrence. These actions are based on analysis of the causes, feedback and, where appropriate, the development of specific action plans, including the support of the employees concerned.

To strengthen prevention and consideration of risk situations, Cryovision rolled out HSE feedback sheets in 2025 to collect feedback from the field at the end of each assignment. These tools include elements relating to operators' perceptions of safety, health and well-being, and may lead, where appropriate, to the definition of corrective action plans and their follow-up.

The effectiveness of the HSE management system is assessed through regular internal and external audits, focusing on risk management, adherence to procedures, and regulatory compliance. These audits feed into continuous improvement plans and help certain subsidiaries maintain their ISO 45001 certifications.

ISO 45001 certification and Integrated Management System

In 2025, the subsidiary Ascenz Marorka completed a structural project to set up an Integrated Management System (IMS) covering quality and health and safety. Launched in 2024, this project led to the creation of all QHSE processes and procedures, including a Quality & Health and Safety manual and documented procedures, as well as HSE job sheets and the responsibility matrix. Dual ISO 9001 and ISO 45001 certification was obtained in March 2025.

Cryovision maintained its ISO 9001 and ISO 45001 certifications, following a monitoring audit carried out at the end of 2025, attesting to the compliance of the management system with the requirements of the applicable standards, particularly the effectiveness of the steering and risk monitoring systems.

Prevention and security at GTT S.A. sites

In 2025, several actions were implemented at the main site of Saint-Rémy-lès-Chevreuse in order to strengthen risk prevention and the safety of the installations:

- fire safety: addition of charging cabinets for lithium batteries (reduction of fire risk), overhaul of the fire system, upgrading of the associated devices (fire hydrants, area equipment);
- security: reinforcement of site access control systems;
- management of chemical products: roll-out of a digital platform centralising Safety Data Sheets, which are now accessible to all the employees concerned, improving the traceability and security of the use of chemical substances in laboratories. In addition, a dedicated room for the storage of chemicals is also operational.

HSE training and awareness-raising

In line with the actions undertaken in previous years, GTT continued its training and awareness-raising actions in the field of health and safety at work in 2025, in order to prevent occupational risks and strengthen the prevention culture within the Group.

During the 2025 financial year, 469 employees were involved in at least one training or health and safety awareness action, representing 65% of the workforce (excluding Danelec, whose integration into the reporting is in progress). These actions covered a range of topics adapted to the risks identified and the Group's activities, including in particular:

- golden rules and ACL (Actor, Contributor, Leader);
- 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;
- wearing of RPE (respiratory protection equipment) with an assisted motor;
- chemical products and CMRs (carcinogenic, mutagenic and reprotoxic substances).

These actions are part of a continuous prevention approach and aim to adapt the skills and behaviour of employees to the specific risks associated with the intervention environments and changes in the Group's activities.

In addition to ongoing training and awareness-raising actions, GTT implemented new initiatives in 2025 to strengthen risk prevention and maintain a high level of collective vigilance in terms of occupational health and safety.

As such, an e-learning training module dedicated to gas and liquid nitrogen risks was developed in collaboration with a specialised company and rolled out in 2025. This module is mandatory for some employees depending on their position and available to all employees for information purposes.

In addition, on-site training was conducted, particularly at the Beauplan site, led by the Asia HSE Manager. These actions are complemented by regular communications aimed at disseminating best practices and reinforcing a culture of safety, through management seminars, internal newsletters, and dedicated webinars.

Prevention at shipyards

At shipyards, primarily located in Asia, the Group is implementing a strengthened prevention system. The HSE Manager in place in Asia conducts a structured programme of technical support visits to all construction sites in China and Korea, in conjunction with the on-site GTT teams and the HSE contacts of the partner shipyards. These visits, which include a significant proportion of field inspections, are intended to ensure close monitoring, make recommendations and gather information on the shipyards' prevention needs. The main risks identified are falling objects, working on scaffolding and access to work areas.

Any gaps identified during these inspections result in formal reports, which are sent to the relevant shipyards for the implementation of corrective measures. An assessment of this activity is consolidated in monthly reports and is the subject of an annual GTT Asia HSE report, which identifies areas for improvement by shipyard and is a tool for managing regional HSE performance.

In addition, specific training tools (e-learning and guides) have been rolled out and the HSE dimension is now integrated into relations with partner shipyards.

Audits and checks

Internal audits follow a structured format, focused on job-related risks, control of procedures (evacuation, isolated workers) and working practices. Regulatory checks are regularly reviewed with General services team, supplemented by HSE reminders via news flashes. In 2025, Ascenz Marorka conducted a full cycle of audits that resulted in dual certification (ISO 9001 and ISO 45001).

For subsidiaries and new activities within the Group (digital activities), the priorities are to consolidate the HSE culture within the new merged entity and maintain legal compliance through the DUERP and internal audits.

Targets

Metric	Reference year	Baseline	Target	Timescale	2024 result	2025 result
GUARANTEEING THE HEALTH AND SAFETY OF OUR TEAMS						
Health and Safety						
0 fatalities	2022	0	0	Annual	0	0
Number of workplace accidents with lost time	2022	4	3	Annual	4	8
Frequency rate of workplace accidents	2022	3.75	< 2.65	Annual	2.64	4.18

The situation in the 2025 financial year remained stable for GTT S.A. in terms of accidents with lost time compared with 2024, with four workplace accidents. Elogen recorded a slightly higher accident rate in 2025, in a context of reorganisation, with two low severity accidents with lost time recorded during the financial year. Cryovision reported one accident related to the handling of a trolley. GTT China reported one low-severity accident on a shipyard site.

In 2025, the methodology for calculating the frequency rate was updated to include more detailed assumptions about hours worked and to take into account interns. The objective of the CSR roadmap remains unchanged compared to the one defined in 2024 for the 2024-2026 period. A new objective will be set as part of the definition of the next CSR roadmap for the 2027-2029 period. 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]

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, of which there were three, and includes apprentices, of which there were 23 at the end of 2025. 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.

Table 1 – Employees by gender

Gender	Workforce		Change
	2024	2025	
Male	669	658	-2%
Female	219	204	-7%
TOTAL	888	862	-3%

As of December 31, 2025, GTT employed a total of 862 people, 23.5% 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

Country	2024	2025	Change
	Workforce		
France	809	572	-29%
United Kingdom	8	8	0%
Iceland	13	6	-54%
United States	2	2	0%
Qatar	1	2	+100%
Singapore	21	21	0%
China	9	40	+344% ⁽¹⁾
South Korea	-	65	- ⁽¹⁾
Germany	6	11	+83% ⁽²⁾
Denmark	19	92	+384% ⁽²⁾
Greece	-	6	-
Norway	-	37	- ⁽²⁾
TOTAL	888	862	-3%

(1) In 2025, 96 expatriate employees in China and South Korea were counted as belonging to their country of employment, instead of being linked to France as they were in 2024.

(2) Employees of the subsidiary Danelec, which was included in the reporting scope in 2025.

At the end of 2025, France accounted for 66% of the Group's workforce, compared with 91% in 2024. This change is mainly explained by three factors: the integration of the new Danelec subsidiary into the Group's scope; the adjustment of headcount within Elogen during the financial year; and the reclassification of expatriate employees in China and South Korea, now attached to their country of employment (95 employees).

Due to its activities, the majority of GTT employees are engineers. In particular, 27% of Group employees work in innovation jobs, mainly at the undertaking's registered office in France. In addition to the head office located in France, the Group has eleven main subsidiaries, seven of which are international. As at December 31, 2025, 112 GTT S.A. employees are expatriates.

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

	2024			2025			Change
	Male	Female	Total	Male	Female	Total	
Number of employees – Headcount	669	219	888	658	204	862	-3%
Number of permanent employees (CDI) – Headcount	544	194	738	548	184	732	+1%
Number of fixed-term employees (CDD) – Headcount	125	25	150	110	20	130	-13%

As of December 31, 2025, over 85% of the Group's employees were permanent (CDI) employees, including 92% 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			2025		
	Number of employees – Headcount	Number of permanent employees (CDI) – Headcount	Number of fixed-term employees (CDD) – Headcount	Number of employees – Headcount	Number of permanent employees (CDI) – Headcount	Number of fixed-term employees (CDD) – Headcount
France	809	670	139	572	538	34
United Kingdom	8	8	0	8	8	0
Iceland	13	13	0	6	6	0
United States	2	2	0	2	2	0
Qatar	1	1	0	2	2	0
Singapore	21	21	0	21	21	0
China	9	2	7	40	6	34
South Korea	0	0	0	65	6	59
Germany	6	6	0	11	11	0
Denmark	19	15	4	92	89	3
Greece	0	0	0	6	6	0
Norway	0	0	0	37	37	0
TOTAL	888	738	150	862	732	130

The changes in the geographical distribution of the workforce seen in 2025 vs 2024 are due to: the integration of Danelec, a new subsidiary of the Group, whose headcount has increased, particularly in Denmark and Norway; the reduction in Elogen's headcount in France as part of the redundancy plan; and the change in the country expatriate employees are linked to, as they are now counted in their country of employment in China and South Korea, instead of being linked to France as they were in 2024.

In 2025, GTT hired 67 employees in total, including 45 permanent, 10 fixed-term, and 12 apprenticeship. Approximately 82% of these new recruits were hired in France.

Furthermore, in 2025, 112 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			2025			Change
	Male	Female	Total	Male	Female	Total	
Voluntary departures (resignations)	22	9	31	20	4	24	-23%
Voluntary departures (mutual terminations)	13	6	19	59	34	93	+389%
Retirement	2	0	2	0	1	1	-50%
Redundancies	1	2	3	7	2	9	+200%
Other departures	13	5	18	16	12	28	+56%
TOTAL NUMBER OF DEPARTURES	51	22	73	102	53	155	+112%

In 2025, the Group recorded 155 departures of permanent employees, compared with 73 in 2024. This rise was mainly due to an increase in mutual terminations, particularly as part of Elogen's restructuring plan, which represented 93 departures in 2025 compared with 19 the previous year. In contrast, voluntary resignations decreased to 24 in 2025, down from 31 in 2024, indicating a relatively stable level of departures on the employee's own initiative.

- Retirements (1 employee) and redundancies (9 employees) remained limited. Other departures (28 employees) consist of various situations, such as the end of probationary periods, the end of contracts, or transfers between the Group's companies.

Table 6 – Turnover rate

			2024			2025		Change
	Male	Female	Total	Male	Female	Total		
Turnover rate (headcount)	7.6%	10.0%	8.2%	15.5%	26.0%	18.0%	+9.8 pp	
Voluntary turnover including retirement	5.5%	6.8%	6.2%	12.2%	19.1%	13.7%	+7.5 pp	

In 2025, the Group's workforce turnover rate was 18% (15.5% for men and 26% for women), compared with 8.2% in 2024. The voluntary turnover rate (including retirements) was 13.7% (12% for men, 19% for women). This increase is largely due to the mutual terminations agreed under the employment protection plan put in place at the Elogen subsidiary. The Group has ensured that this is implemented under the best possible conditions for the employees affected, including by means of a voluntary redundancy plan with attractive terms and one-to-one support. Details of this plan can be found in section 3.4.1.1 of this document.

Alongside departures, GTT experienced a slowdown in recruitment activity for the same reason. On the other hand, GTT's employer promise is illustrated by targeted actions in schools. The increase in the number of forums and ambassador involvement in conferences have enhanced the Group's employer brand. The co-optation programme, continued in 2025, also contributed to enriching the Group's talent pool.

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

Table 7 – Rate of non-employees

	2024	2025	Change
Number of non-employees – Headcount	391	235	-40%
% of non-employees	31%	21%	-10 pp

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 2025, GTT relied on 235 non-employee workers, representing 21% of the total workforce, compared with 391 in 2024. This change reflects an adjustment in the use of external resources, consistent with changes in the Group's scope during the financial year. These non-employee workers still include highly qualified engineers and specialists, essential for R&D projects and shipyard assignments.

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

Table 8.1 – Collective bargaining coverage

	2024	2025	Change
% of employees covered by collective bargaining agreements	91%	66%	-25 pp

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. In 2025, the coverage rate through collective bargaining agreements was 66%, compared

with 91% in 2024. Above all, this change reflects a change in scope: the proportion of French employees, fully covered by collective bargaining agreements, was higher in 2024, mainly due to the integration of Danelec and the reduction in Elogen's headcount in 2025.

Furthermore, employees of GTT S.A., OSE Engineering and Elogen are represented by a Works Council which ensures the collective expression of employees' interests in various areas.

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

	% of employees covered by collective bargaining agreements (EEA, applicable only to countries accounting for at least 10% of the Group's headcount)			
	2024		2025	
	France	Denmark	France	Denmark
Coverage Rate	100%	0%	100%	0%
0-19%	-	0%	-	0%
20-39%	-	-	-	-
40-59%	-	-	-	-
60-79%	-	-	-	-
80-100%	100%	-	100%	-

100% of French employees remain covered by collective bargaining agreements. GTT complies with applicable social dialogue practices in all the countries where it operates.

Table 9 – Workers' representatives

	% of employees represented by workers' representatives (EEA, applicable only to countries accounting for at least 10% of the Group's headcount).			
	2024		2025	
	France	Denmark	France	Denmark
Coverage Rate	100%	0%	100%	0%
0-19%	-	0%	-	0%
20-39%	-	-	-	-
40-59%	-	-	-	-
60-79%	-	-	-	-
80-100%	100%	-	100%	-

In France, 100% of employees are represented by employee representatives. Other Group locations in the EEA do not have workers' representatives in line with local regulations. 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 is an integral part of GTT's culture. In 2025, women accounted for 23.5% of the Group's workforce. Formally committed to gender equity, GTT aims to accelerate the gender parity programme

for key positions by 2033. 23% of these positions were held by women in 2025, compared with 22.2% in 2024.

Table 10 – Top management distribution by gender

	2024			2025		
	Male	Female	Total	Male	Female	Total
BoD members	5	3	8	5	4	9
% CA	63%	38% ⁽¹⁾	-	56%	44% ⁽¹⁾	-
Executive Committee Members ⁽²⁾	7	1	8	7	1	8
% Executive Committee ⁽²⁾	87.5%	12.5%	-	87.5%	12.5%	-

(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.

(2) 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	2025	Change
Less than 30 years old	172	138	-20%
Between 30 and 49 years old	599	568	-5%
50 years old or more	117	156	+33%
TOTAL	888	862	-3%

In 2025, in terms of distribution by age group, the proportion of those aged less than 30 fell to 16% (compared with 19% in 2024), while the proportion of those aged 50 years old or more rose to 18% (compared with 13% in 2024). This change was mainly explained by the integration of the Danelec subsidiary, where the average age is

higher, and by the change in the workforce of Elogen, which represented a younger population within the Group.

In 2025, the global average age is 39.5 years old, 38.8 for men and 39.8 for women. In 2025, the global average length of service duration is 7 years, 7.6 for men and 5 for women.

Table 12 – 2025 EGAPRO Index

	Score obtained	Scale
(1) pay gap (%)	37	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
INDEX OUT OF 100 POINTS	82	100

GTT S.A. scored **82/100** in the 2025 workplace equality index, up one point from 2024.

This increase is due to the reduction of the gender pay gap and to the promotion rate for women, which continued to achieve the maximum score. The metric relating to pay rise gaps remains the main

lever for progress: the gap observed is partly explained by non-eligibility for pay reviews due to length of service (less than one year) under the 2025 wage policy.

In 2025, the French average was 88/100 and 86.9/100 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 pay. 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 with the support of the Mercer firm, in order to align wages with market levels while considering the specific features of the Group's businesses. This dynamic continued in 2025 through regular adjustments and the optimisation of variable components, in order to better value the individual and collective performance of employees, and 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 wage, pay, employee savings and social security, increased by more than 12.5% in 2025 compared with 2024, including the effect of the integration of Danelec and the organic increase in personnel expenses.

Beyond wages, GTT ensures that it involves its employees in the undertaking's results. In addition to the mandatory profit-sharing applicable to French companies with 50 employees or more, GTT S.A. and its subsidiaries in France (Elogen, Cryovision and OSE Engineering) also have an employee incentive agreement, enabling employees to benefit directly from the Company'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.

Likewise, 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.

In France, 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.

In other countries where GTT operates, it does not offer company health insurance, but employees are eligible for the public social protection schemes in place locally.

In Denmark, Danelec employees are covered by the Danish model based on public social security (health, unemployment, basic pension). In Norway, the national system covers health, retirement, disability and parenting. In China, all employees are covered through mandatory salary contributions and supplementary medical insurance arranged by GTT. In Germany, employees are affiliated with the compulsory social security scheme. This includes statutory health insurance, care insurance, workplace accident insurance, pension insurance and unemployment insurance, providing extensive coverage of the main social risks. In Singapore,

employees are covered by a specific scheme in which there are no compulsory employers' or employees' social security contributions comparable to European systems. Social protection schemes are mainly based on mechanisms specific to the local system.

For other countries of operation, coverage depends on the applicable public schemes.

GTT supports employees with disabilities individually in the set-up of their work stations, in conjunction with the occupational nurse and the AGEFIPH.

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			2025			Change
	Male	Female	Total	Male	Female	Total	
% of employees	0.3%	0.0%	0.2%	0.2%	1.5%	0.5%	+0.3 pp

At the end of the 2025 financial year, four Group employees reported a disability situation, thus doubling the number compared to the previous year. This significant increase reflects the first effects of the initiative to introduce a more structured inclusion approach described in section 3.4.2.1.3. The establishment of an identified framework for dialogue and the visibility given to the role of Disability coordinator have helped to encourage employees already employed to engage in a recognition process.

The Group has taken a decisive step towards achieving its objective of establishing a comprehensive inclusion system by 2026. The disability action plan has been formally adopted. This commitment is one of the priorities of the CSR roadmap. Operational governance was introduced with the establishment of a disability Committee, and an awareness-raising programme was rolled out. All of these elements are presented in section 3.4.2.1.3 – *Diversity and inclusion*.

3.4.3.8 Training and skills development metrics [S1-13]

Table 14 – Performance evaluation and career development

	2024			2025			Change
	Male	Female	Total	Male	Female	Total	
Number of employees who had an annual interview – Headcount	544	166	710	640	196	836	+18%
Number of permanent employees (CDI) who had an annual interview	455	162	617	613	182	795	+29%
Number of fixed-term employees (CDD) who had an annual interview	89	4	93	27	14	41	-56%
% of employees who participated in regular performance evaluations and career development	81.3%	75.8%	80%	97%	96%	97%	+17 pp

In 2025, 97% of the Group's eligible employees participated in a performance evaluation with their immediate superior via People Reviews, Career Talks and annual performance appraisals (for further information, see section 3.4.2.1.2 – *Employee skills development [S1-1]*).

Table 15 – Training

	2024			2025			Change
	Male	Female	Total	Male	Female	Total	
Number of training hours	13,784	5,303	19,087	10,690	4,358	15,047	-21%
Number of training hours per employee (excluding mandatory training)	10,391	4,364	14,755	8,904	4,338	13,242	-10%
Average number of training hours per employee	20.6	24.2	21.5	18.8	25.0	20.3	-6%
Average number of training hours per employee (excluding mandatory training)	15.5	19.9	16.6	15.7	24.9	17.8	+7%

The success of GTT is largely based on the commitment of its staff, their expertise and their involvement in the projects of the undertaking. In a 2025 context marked by the expansion of the Group's scope and a partial recomposition of the workforce, the human resources teams maintained a sustained effort to support employees, working closely with leaders and managers to implement actions aligned with the Group's strategy.

In this regard, GTT consistently prioritises its employees' career management and skills development, to offer them careers that are in line with their aspirations and the Company's needs – including in newly integrated entities.

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 2025, a total of 98 employees benefited from personalised career guidance and 89 internal transfers were recorded;
- the involvement of its management community, through annual talent reviews (97% of employees had an annual appraisal in 2025), succession planning (for the Group's key positions), promotion and access to executive status (three promotions approved in 2025), plus biennial assessment interviews;
- the ramp-up of the Archimède Community of Experts, created in 2024. At the end of 2025, it brought together 11 experts and 49 specialists in 12 areas of expertise.

Training* (in millions of euros)	2022	2023	2024	2025	Change
Training costs	1.6	2.1	2.1	1.8	-14%
Group payroll	95.6	112.4	112.4	126.3	+12%
Share of training expenditure relative to payroll (%)	1.7%	1.8%	1.8%	1.4%	-4 pp

* 2025, 2024 and 2023 = Group scope; 2022 = GTT S.A. head office scope.

In 2025, investment in training at Group level exceeded 1.8 million euros, or 1.4% of payroll. More information on the training plan put in place is available in section 3.4.2.1.2 – Employee skills development [S1-1].

The training-related metrics above do not include Danelec. The ongoing integration work for this entity acquired in 2025, will enable its full integration into the 2026 financial year reporting.

3.4.3.9 Health and safety metrics [S1-14]

Table 16 – Health and safety

	2023	2024	2025	Change
Percentage of employees covered by the health and safety management system	100%	100%	100%	-
Number of deaths due to workplace accidents and occupational illnesses	0	0	0	-
Number of workplace accidents with lost work time	1	4	8	+100%
Rate of workplace accidents (frequency rate: number of accidents per 1 million hours of work)	0.78	2.64	4.18	+58%
Number of cases of occupational illnesses counted (subject to legal restrictions on data collection)	0	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)	20	140	256	+83%
	0.02	0.09	0.13	+46%

In 2025, the Group recorded 8 workplace accidents with lost time (compared to 4 in 2024), bringing the frequency rate to 4.2 compared to 2.6 in 2024. Of these accidents:

- GTT S.A. recorded four accidents, which is a similar result to 2024;
- Elogen recorded two accidents with lost time, in a context of restructuring of the subsidiary in 2025;
- Cryovision recorded one accident related to the handling of a trolley;
- GTT China recorded one low-severity accident on a shipyard site.

The Group remains committed to its HSE culture: 331 man-days of HSE training were provided (+4% compared to 2024), and the number of near-accident reports remained stable (58 reports in

2025 compared with 59 in 2024). The absenteeism rate rose to 3.6% in 2025 (compared with 2.7% in 2024), due in particular to a higher number of parental leave absences (maternity and paternity). No deaths or occupational illnesses were recorded.

The health and safety policy, described in section 3.4.2.1.5 – *Employee health and safety*, 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].

Metric	2023	2024	2025	Change
Number of man-days of occupational health and safety training	143	317	331	+4%
Number of people trained in health and safety	358	485	469	-3%
Near-miss reports	63	59	58	-2%
Number of action plan generated following near-miss declarations	58	56	57	+2%
Number of hours worked	1,278,550	1,516,515	1,914,246	+26%
Number of occupational illnesses	0	0	0	stable
Absenteeism rate ⁽¹⁾				
<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>	2.4%	2.7%	3.6%	+0.9 pp

(1) Data on absenteeism presented covers 80.2% 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			2025			Change
	Male	Female	Total	Male	Female	Total	
% of employees entitled to family-related leave	100.0%	100.0%	100%	100%	100%	100%	stable
% of employees who took family-related leave	6.0%	8.2%	6.5%	7.1%	9.8%	7.8%	+1.3 pp

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 Remuneration metrics (pay gap and total remuneration) [S1-16]

Table 18 – Differences in pay

Entity	Gender pay gap (fixed compensation)			Change
	2024	2025		
GTT S.A.	1.7%	5.4%		+3.7 pp
Elogen	5.1%	11.0%		+5.9 pp
OSE	0.8%	5.0%		+4.2 pp
VPS	21.5%	15.0%		-6.6 pp
Ascenz Marorka Singapore	16.3%	22.8%		+6.5 pp
GTT China	53.3%	52.8%		-0.5 pp

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 pay 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 headcount that was too small as at December 31, 2025: Ascenz Marorka France, Ascenz Marorka Iceland, GTT Training, GTT SEA, GTT Middle East, GTT NA, Cryovision.

Table 19 – Ratio of the highest pay to the median

	2024			2025			
	GTT S.A.	OSE	Elogen	GTT S.A.	OSE	Elogen	
The highest pay	€900,629 (Chairman and CEO)	€1,163,381 (CEO)	€68,940	€176,339	€844,800	€70,009	€180,801
Median pay	€89,221	€89,221	€56,171	€59,029	€82,076	€52,263	€45,569
ANNUAL TOTAL REMUNERATION RATIO OF THE HIGHEST PAID TO THE MEDIAN ANNUAL TOTAL REMUNERATION TO ALL EMPLOYEES (EXCLUDING THE HIGHEST)	10.09	13.04	1.23	2.99	10.29	1.34	3.97

The ratio of the highest pay 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, VPS. The table above takes into account the separation of roles and the appointment of a Chief Executive Officer in 2024. 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 Chief Executive Officer. For the median pay of employees, the components correspond to fixed and variable compensation and value-sharing mechanisms (profit-sharing and incentives).

The changes recorded between 2024 and 2025 stem from factors specific to each entity. For GTT S.A., the decrease in median compensation is linked in particular to the transfer of the contracts of expatriate employees in China to the local entity. For OSE Engineering, the change reflects a decrease in variable compensation in 2025, against a backdrop of sustained R&D investment that negatively impacted profits for the financial year.

The two tables above do not include Danelec. The ongoing integration work for this entity acquired in 2025, will enable its full integration into the 2026 financial year reporting.

Table 20 – Profit sharing, incentives and employee saving schemes

<i>(in millions of euros)</i>	2022	2023	2024	2025*	Change
Profit sharing	5.9	5.1	4.7	6.3	+34%
Incentives	2.2	2.2	4.7	4.5	-3%
Employee savings scheme matching contribution	1.8	1.8	1.9	1.6	-15%
TOTAL	9.1	9.1	11.3	12.4	+10%

* Amounts paid in year 2025 for year 2024

All French undertakings with 50 or more employees are required to set aside a special profit-sharing reserve enabling employees to share in the undertaking'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]

GTT has a structured system in place for collecting and processing reports – GTT Integrity Line – which is accessible to all employees and external partners. Each report is reviewed confidentially and impartially by the ethics Committee, which may initiate an investigation. Where applicable, the sponsor Committee validates the action plans and brings them to the attention of General Management and/or the Board of Directors. If a violation is found, disciplinary action is the responsibility of the human resources Department. This system, in accordance with the Sapin II law and certified ISO 37001, demonstrates GTT's desire to process every report rigorously, with respect for the persons concerned.

In 2025, two reports relating to social subjects were identified and processed according to this procedure. No serious human rights incidents were recorded, and no fines or penalties were imposed.

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.

	2023	2024	2025	Change
Number of reports relating to employment-related issues (including harassment, discrimination, working conditions)	1	-	2	+100%
Amount of fines, penalties and compensation resulting from incidents and complaints (discrimination and harassment)	€0	€0	€0	-
Number of serious human rights incidents	-	-	-	-

3.5 Business conduct [ESRS G1]

ESRS G1

Business conduct

Having been ISO 37001 certified since 2018, GTT has implemented an Ethics & Compliance programme and has a zero tolerance policy for any form of fraud or corruption.

This section sets out the Group's policies and actions in the areas of business ethics, corruption prevention, responsible supplier management and personal data protection.

GOVERNANCE MATTERS

Business ethics

2 negative impacts

3 risks

Responsible purchasing

1 opportunity

KEY FIGURES 2025

ISO 37001 certification

Renewed in 2025

95%

Exposed employees
given anti-corruption
training

65%

Suppliers
who have signed
the code of conduct

3.5.1 Governance

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

GTT has introduced an Ethics & Compliance programme in line with the international standards, texts and regulations applicable to it. The programme is based on three pillars:

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

The Board of Directors, in particular the Audit and Risk Management Committee, oversees the definition and deployment of the Group's ethics and compliance strategy to ensure that best practices are followed. 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 programme, 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.

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 Group 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 respect for all ethics and compliance norms and standards.

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 a double materiality assessment based on corruption 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;
- risks of 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.

Following the acquisition of the Danelec Group in 2025, and to fully comply with applicable regulatory requirements, a new corruption risk mapping exercise was initiated in January 2026. GTT also assesses the particular features of the markets where the Group 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 process 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 the Company 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]

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.

GTT has implemented a comprehensive, structured anti-corruption programme that reflects its commitments, rights and obligations. GTT has thus created a set of guidelines, policies and procedures that define its principles, general orientations and its operating methods. The programme takes different forms, including charters, codes of conduct and practical guides, aimed at clarifying and providing a framework for the rules applicable to all of its employees and stakeholders, particularly in the area of anti-corruption, third-party assessment, management of conflicts of interest and gifts and tokens of hospitality, as well as donation, sponsorship and patronage, and lobbying.

The corporate culture in terms of ethics and compliance 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 expresses its commitment in various statements and communications, including at eachtown hall meeting bringing together all of the Group's employees. In December 2025, the Group held a Compliance Week to coincide with International Anti-Corruption Day. The Chief Executive Officer voiced his support in a speech on the importance of compliance and business ethics 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 redesigned and rolled out in late 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. In this regard, two awareness-raising events were organised in March and October 2025 to boost employees' understanding and ownership of the principles set out in the Ethics Charter. These awareness-raising actions took the form of a series of questions on each of the themes of the Ethics Charter, proposed through scenarios and practical cases inviting participants to reflect on the expected behaviours. At the end of each event, the three collaborators who obtained the best results were rewarded with a symbolic prize, thus recognising their commitment to the Group's ethical principles.

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.

The Group has put in place a system of sanctions applicable in the event of a proven breach of internal procedures or of the rules set out in its Ethics Charter. When a situation is brought to the Group's attention, if the eligibility criteria are met, the Ethics Committee may decide to open an investigation to establish the facts and determine whether it is indeed categorised as a breach. If the breach is confirmed following this analysis, a decision on any disciplinary sanction as well as potential legal proceedings will be taken by General Management, with the support of the departments concerned.

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", which provided access to resources (procedures, useful contacts,

Group procedures

In order to reinforce its Ethics and Compliance programme, the GTT Group has established specific procedures regarding assessment of third parties, conflicts of interest, whistleblowing, gifts and tokens of hospitality, donations, patronage and sponsorship, and lobbying and participation in trade associations.

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

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 the "GTT Link" newsletter.

During 2025, the Group conducted several internal communication campaigns focusing on Ethics and Compliance. In March and October 2025, events dedicated to the Ethics Charter were organised, bringing together more than 200 employees on each occasion and demonstrating a high level of commitment. These awareness-raising actions took the form of a series of questions on each of the themes of the Ethics Charter, proposed through scenarios and practical cases inviting participants to reflect on the expected behaviours. At the end of each event, the three employees who obtained the best results were rewarded with a symbolic prize, thus recognising their commitment to the Group's ethical principles.

In December 2025, for International Anti-Corruption Day, the Group also organised Compliance Week, as its main annual internal communications campaign on these topics. This event gave rise to a presentation by General Management, the organisation of several fun activities around compliance procedures and the annual raffle. These initiatives sparked significant participation and demonstrated a particularly high level of employee engagement.

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. Employees considered to be exposed to the risk of corruption — i.e. those who, in the course of their duties, have decision-making powers, such as members of General Management, members of the Executive Committee or departmental directors for instance — are required to complete in-person anti-corruption training every two years.

As of 31 December 2025, 94.9% of employees exposed to corruption risks and 95.1% of employees not exposed to corruption risks under GTT S.A. contracts who were required to be trained completed their respective training programmes (see section 3.7.5.2 – *Training*).

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.

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.

The procedure was updated in 2025, including in particular a rewriting in plain language, a clarification of the role of the ethics Committee and the sponsor Committee in handling reports, as well as the integration of the outsourced reporting platform into the system to strengthen accessibility and traceability.

The members of the ethics Committee are trained by the Group Compliance Officer in handling whistleblower reports, in accordance with the rules in force (Sapin II Law, Wasserman Law and Directive (EU) 2019/1937 on the protection of whistleblowers), as well as in conducting internal investigations. There are provided with an internal audit guide for this purpose; it is also made available to anyone asked by the ethics Committee to conduct fact checking or interviews as part of an investigation.

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 sponsor committee** 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.

The findings of the processing of whistleblowing reports are subject to a structured and transparent monitoring process. Each year, an annual review is presented to the members of the Executive Committee as well as to the Audit and Risk Management Committee. This report summarises in particular the total number of reports received during the previous year, the nature of the allegations, the number of reports considered admissible, as well as the nature of the investigations carried out for the reports deemed to be justified. It also specifies the conclusions of the investigations conducted, indicating whether the allegations have been validated or invalidated, and, where appropriate, whether disciplinary or corrective measures have been taken. This system, in which each whistleblower report is handled confidentially and impartially by the Ethics Committee in accordance with the applicable legal deadlines, helps to strengthen the governance, compliance and ethical culture of the Group.

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.

This procedure was updated in 2025, incorporating a review of the applicable thresholds and the introduction of criteria for the acceptability of gifts and invitations, with the aim of strengthening the assessment framework and ensuring more effective prevention of corruption and conflict of interest risks.

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 2025 the GTT Group put in place a procedure for donations, patronage and sponsorship. This procedure strictly governs the Group's commitments in order to ensure they are in line with its values and corporate social responsibility strategy. In particular, it defines the categories of activities that can be supported, giving priority to organisations whose mission is to create opportunities for young people, in particular through education, professional and social integration, and the development of sustainable careers. Conversely, the procedure clearly specifies the situations in which the Group refuses to provide its support, in particular to organisations that discriminate in any way against specific groups, political causes, candidates and their parties, as well as to local, regional or national sports teams. Donations, patronage and sponsorship are governed by sound practices, including in particular a risk assessment and specific due diligence. This approach aims to ensure the transparency, integrity and positive impact of the Group's support actions.

Lobbying and trade associations procedure

The GTT Group belongs to several trade associations in order to interact with industry players, contribute to discussions in the sector and defend its positions in technical, economic and regulatory debates. While this involvement strengthens its expertise and influence, it may also involve risks such as the sharing of sensitive information, conflicts of interest or failure to comply with transparency obligations.

The lobbying and trade association procedure introduced in 2025 aims to regulate lobbying activities and trade association memberships to ensure transparent, compliant and secure management, while improving the coherence of our relationships with public institutions and representative bodies.

The procedure also aims to clarify regulatory responsibilities and obligations (in particular those related to the representation of interests), to prevent the risks associated with the sharing of sensitive information and to ensure the traceability of memberships through a centralised register to monitor financial contributions, contractual commitments and internal beneficiaries.

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;

Supplier CSR evaluation system

As part of its responsible purchasing policy, GTT enforces the consideration of environmental, social and governance (ESG) criteria in the supplier selection process. These criteria are incorporated into the tender evaluation grids established by the purchasing procedure and are adjusted according to the nature of the purchases (CSR weighting of the overall score, thresholds etc.).

Membership of the EcoVadis platform

In 2025, GTT joined the EcoVadis platform in order to have a structured and recognised framework to assess the CSR performance of its suppliers. This membership serves a dual purpose: to provide an objective evaluation of suppliers' ESG practices based on an independent, third-party methodology, and to support them in their ongoing improvement efforts. On this occasion, the Group made available on the platform a charter outlining the criteria to which it pays particular attention, including CO₂ emissions and business ethics.

Supplier evaluation criteria

The CSR score allocated to suppliers through EcoVadis is based on four key concepts:

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

- 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.

GTT's responsible purchasing policy takes the form of purchasing procedures that cover, in particular, tender processes, supplier referencing and continuous improvement of recurring suppliers with supplier assessment on the EcoVadis platform, to which GTT subscribed in 2025.

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 2025.

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.

- 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.

Training buyers and launching the evaluation campaign

To ensure ownership of this approach, all the Group's buyers were trained in the use of the EcoVadis platform in 2025, in order to include CSR assessment in supplier selection and monitoring. A first assessment campaign was launched with strategic suppliers, with the objective of renewing this assessment in a three-year cycle. This approach is part of an approach based on supporting existing suppliers.

Commitment to sustainable purchasing

In 2025, the calls for tenders initiated as part of the renovation of GTT's head office incorporated criteria relating to waste treatment, the use of eco-responsible materials and the control of carbon emissions.

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

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 or subsidiary 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.

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 & 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 required to take an e-learning course to raise awareness of the Ethics & Compliance

programme, which covers each of the compliance procedures of which it is composed.

The Ethics & Compliance programme is also supplemented by specific procedures relating to facilitation payments, 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 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 available on the Group's website. 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.

Mapping of corruption risks

GTT's exposure to corruption risks is regularly updated in the corruption risk mapping, at least every three years, and after any significant event affecting the Group's structure or activities. The most recent was carried out in 2023 on the entire Group 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. All the action plans defined at the end of this exercise had been implemented by the end of 2025. These actions focused primarily on strengthening purchasing procedures, supervising lobbying activities and updating and disseminating the Group's Ethics Charter.

Following the acquisition of the Danelec Group in 2025, and to fully comply with applicable regulatory requirements, a new corruption risk mapping exercise was initiated in January 2026.

Compliance internal control system

In 2025, the Group undertook the implementation of a structured internal control system dedicated to Compliance, aimed at strengthening risk control, particularly in terms of anti-corruption. To this end, a framework for financial and non-financial controls was developed. These guidelines list all the key controls resulting from compliance procedures as well as those from other departments whose activities fall within the scope of corruption prevention and detection systems. The key controls identified are grouped into six topics: the commitment of the management

body, the mapping of corruption risks, the Ethics Charter and the associated compliance procedures, training, and evaluation of third parties, as well as the whistleblowing and disciplinary sanctions system. In total, the guidelines include more than twenty key compliance controls. They aim to ensure traceability, harmonisation of control practices and more effective monitoring of the application of the measures provided for in the Group's policies and procedures. Completion of the roll-out of this Compliance internal control system is planned for 2026.

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 complies with the requirements of the General Data Protection Regulation (GDPR).

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.

A dedicated governance structure is in place, including a Group Data Protection Officer (DPO) and an external GDPR expert, under the responsibility of the Group Compliance Officer. GTT

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

- training and awareness campaigns, and in particular specific training on dealing with major data protection issues, which is mandatory for Group employees in Europe and for key functions;
- processing registers;
- an internal data privacy policy;
- a mechanism for managing data breaches and a notification process.

3.5.7 Metrics and targets

3.5.7.1 Incidents of corruption [G1-4]

To date, the GTT Group has not received any convictions, fines or penalties for an offence against anti-corruption legislation or for acts of corruption, as shown in the table below.

	2023	2024	2025	Change
Number of cases of corruption	0	0	0	-
Amount of fines, penalties and compensation resulting from corruption offences	€0	€0	€0	-

3.5.7.2 Training

Training courses on corruption prevention

	2024		2025	
	Exposed personnel*	Non-exposed personnel*	Exposed personnel*	Non-exposed personnel*
Participants:				
• Total	142	451	157	427
• Total receiving training	127	369	149	406
Format and duration:				
• Classroom training	yes	no	yes	no
• Online training	yes	yes	yes	yes
Topics covered:				
• Definition of corruption	yes	yes	yes	yes
• Procedures on suspicion/detection	yes	yes	yes	yes

* Personnel under contract at GTT S.A.

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 is subject to non-financial ratings by several specialised agencies. These assessments enable investors and stakeholders to assess the Group's environmental, social and governance performance.

	2023	2024	2025	Comments
MSCI	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 2025, GTT maintained its BBB rating.
Sustainalytics	18.8 <i>low risk</i>	18 <i>low risk</i>	17.5* <i>low risk</i>	The Sustainalytics rating assesses the degree of financial risk related to ESG factors. In 2025, the ESG risk rating improved to 17.5, i.e., low risk, with the Company being ranked 5th out of 105 companies in its sector.
EthiFinance	48/100	54/100	62/100	EthiFinance ESG Ratings assesses undertakings according to a framework of approximately 140 criteria divided into four pillars: Environmental, Social, Governance and External Stakeholders (ESG-ESH). In 2025, EthiFinance changed its rating methodology and retrospectively recalculated the scores from previous years. On this new basis, GTT reached 62/100 in 2025 (+8 points), with an improvement in the Environment, Governance and Stakeholders pillars. No major controversies were identified.
ISS	C+ <i>prime</i>	C+ <i>prime</i>	C+ <i>prime</i>	GTT maintained its prime status in 2025, being rewarded namely for its actions in terms of transparency and sustainability within its sector of activity.
CDP Climate	B	B	B	In 2025, GTT filled out CDP's Climate questionnaire and received a "B" rating for the fourth consecutive year.
Global Compact	N/A	CoP available	CoP available	As a member of the Global Compact since 2023, GTT submitted its Communication on Progress (CoP) to the Global Compact in 2025, in line with its commitment to transparency towards its stakeholders.

* Rating at the date this document was published

3.7 Additional information

In 2024, GTT's Board of Directors approved the Group's first CSR roadmap, the result of work initiated at the end of 2022 to update the Company's sustainability strategy and meet stakeholder expectations. Structured around 3 pillars, 9 commitments and 24 key metrics, the 2024-2026 roadmap is a strategic management tool illustrating the

Group's commitment to its CSR approach. The year 2025 saw the continuation and strengthening of the actions undertaken in 2024.

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

Pillar 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	2025 result
Reduction of Scope 1 emissions	Tonnes of CO ₂ eq Scope 1 emitted	2021	1,037	-55%	2033	680	686
Reduction of Scope 2 emissions	Tonnes of CO ₂ eq Scope 2 emitted	2021	522	-55%	2033	122	252
Reduction of Scope 3 emissions	Tonnes of CO ₂ eq Scope 3 (restricted) emitted	2021	12,237,038	-33%	2033	11,418,667	14,498,503

* Reference values updated as part of the methodological review carried out in the first half of 2025. More information is provided in section 3.2.5.4

Commitment 2 – Decarbonising the maritime sector

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result	2025 result
Developing a robust methodology for assessing our contribution to the decarbonisation of our customers (avoided emissions)	Construction of a methodology to quantify avoided emissions	N/A	2022	Disclosure of avoided emissions	2026	Definition of quantification methodology	See below

As part of its commitment to contribute to the decarbonisation of maritime transportation, GTT has initiated the construction of a robust methodology to assess its contribution to the reduction of the emissions of its customers and other stakeholders downstream

of its activities. This approach aims to highlight the environmental benefits associated with the technologies developed by GTT, for which the avoided emissions indicator is a relevant tool for analysing the climate impact of its R&D and innovation work.

► Definition

According to the guidelines of the World Business Council for Sustainable Development (WBCSD) (2023), avoided emissions correspond to the positive impact resulting from the comparison of greenhouse gas (GHG) emissions over the entire life cycle of a solution with those of an alternative scenario known as the “reference scenario”, in which the solution under consideration would not be implemented.

Avoided emissions are a different indicator to induced emissions (scopes 1, 2 and 3) and must be strictly separated from the Company’s carbon footprint, including in reporting.

► Methodology

GTT developed its methodology in line with the WBCSD guidelines published in 2023, in collaboration with a specialised external firm.

The study is based on a complete life cycle analysis of the LNG carrier, covering:

- the production of the raw materials necessary for construction;
- the vessel’s manufacturing processes;
- the use phase;
- and the end of life, including dismantling and waste treatment, based on an average lifetime of 25 years.

Most of the data provided consists of operational data from Group feedback on its technologies, along with internal simulations. Residual contributions upstream (raw materials, manufacturing) and downstream (end-of-life) were quantified from secondary data.

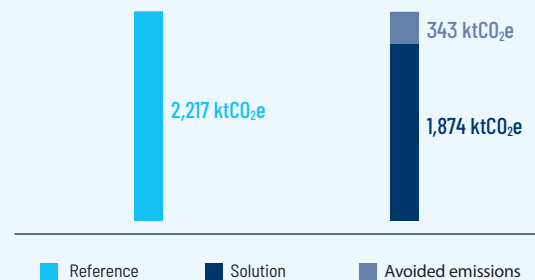
Given GTT’s position in the LNG value chain and its leadership position in the design of cryogenic containment systems, the reference scenario selected relates to a reference technology developed and sold by the Group.

The solution analysed corresponds to an innovation developed by GTT: a 3-tank LNG carrier, equipped with GTT NEXT1 technology, with a “slow steaming” profile, designed to reduce CO₂ emissions per voyage while maintaining a high level of operational and economic performance.

Solution analysed	Reference scenario	Key parameters evaluated
<ul style="list-style-type: none"> • LNG carrier, 3 tanks • GTT NEXT1 technology • Capacity: 200,000 m³ • Slow steaming 	<ul style="list-style-type: none"> • LNG carrier, 4 tanks • NO96 PL03+ technology • Capacity: 174,000 m³ • Standard speed 	<ul style="list-style-type: none"> • Boil-off rate • Volume of steel per kWh transported • Energy consumption of cooling operations

► Revenue

The study reveals a potential benefit of 343 ktCO₂e avoided through the use of the solution analysed, compared to the reference scenario.



These initial results highlight the impact and benefit of optimising the surface-area-to-transported-volume ratio and the proposed reduced speed profile.

Combining the expertise of our research and development teams with sixty years of feedback from around the Group enables us to offer solutions that optimise economic, operational and environmental performance.

This dynamic continues in particular through the R&D work undertaken to adapt GTT technologies to alternative fuels and identify solutions presenting the highest decarbonisation potential.

Commitment 3 – Building a sustainable world

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024	2025 result
Contributing to a low-carbon world	Number of patents filed in low-carbon energy	2022	19%	28%	2026	29%	40%
Biodiversity & Environment	Number of actions to promote biodiversity and the environment	2022	1	3	Annual	3	4

GTT's goal of implementing three actions a year to support biodiversity and the environment reflect its commitment to contribute to issues of high added value for the environment, although non-material within the meaning of the CSRD. In 2025, four actions were carried out:

- **Participation in World Cleanup Day in September 2025**

As part of World Cleanup Day, GTT organised waste collections at three sites simultaneously: Saint-Rémy-lès-Chevreuse (France), Farum (Denmark) and Shanghai (China). Conducted for the third consecutive year, this initiative demonstrates the Group's ability to deploy coordinated environmental actions on an international scale.

- **Implementation of biodiversity actions at head office**

As a continuation of the ecological survey conducted in 2024 at the Beauplan site, GTT continued to implement developments favourable to local wildlife. After openings in the fences along the forest were created to allow small wildlife – such as hedgehogs – to pass through, chipotera shelters were installed in November 2025 to better accommodate bats, which are an increasingly endangered species.

- **Partnership with *Fondation de la Mer***

In line with its positioning in the maritime industry, GTT has entered into a partnership with *Fondation de la Mer* by supporting a project to restore *Posidonia* sea grass beds off the French Riviera. This endemic marine plant plays a key role in the Mediterranean ecosystem as a habitat for marine fauna, a breeding area and a carbon sink. To raise employees' awareness about marine biodiversity, a webinar was held in December 2025 to highlight the Foundation's actions and the sea grass bed conservation project.

- **Conducting life cycle analyses**

Life cycle analyses (LCAs) were conducted on ethane-based technologies, fuel supply vessels, floating liquefied natural gas units (FLNG) and floating storage systems (LFS), allowing for an objective assessment of the environmental impact of GTT solutions and the identification of areas for improvement from an eco-design perspective.

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 and liquid movements, and is also 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.

Water consumption decreased in 2025 compared with 2024 due to the repair of the leaking fire protection system and the installation of rainwater harvesting systems.

(in m ³)	2023	2024	2025	Change
Water consumption *	6,516	6,913	5,995	-13%

* GTT S.A., Cryovision, Ascenz Marorka France and Elogen only. The other subsidiaries are non-material with regard to this metric.

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 practices and behaviours in terms of traceability and waste management. In 2025, the total amount of waste generated decreased by 21%. As part of the opening of the new staff

restaurant in 2025, the service provider selected by GTT implemented actions leading to better food management and a reduction in the associated waste.

A computer hardware replacement campaign took place in 2025, which explains the increase in electronic and electrical equipment waste. Finally, the amount of metal, wood and foam waste is directly correlated to the progress of material testing campaigns and trials.

Waste	Unit	Description	2023	2024	2025	Change
Food and organic waste	kg	-	54,488	36,894	19,491	-47%
Office waste	kg	Paper, cardboard	1,352	11,118	8,273	-26%
Packaging waste	kg	Plastics, glasses	60	16,673	10,481	-37%
WEEE	kg	-	4,998	1,176	2,580	+119%
Metal waste	kg	-	11,520	13,040	19,230	+47%
Wood waste	kg	-	21,774	21,880	13,802	-37%
Foam pieces	kg	-	N/A	41,240	44,940	+9%
Miscellaneous waste	kg	Office furniture, asbestos waste, ordinary industrial waste, polluted water	59,030	39,365	24,852	-37%
TOTAL	KG		153,222	181,386	143,649	-21%

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 increase in the volume of hazardous waste in 2025 was due to cleaning and sorting

operations involving laboratory product inventories and an increased need for bonding tests. The volume of non-hazardous waste generated in 2024 was related, in particular, to the ad-hoc replacement of sloshing testing equipment.

Waste	Unit	Description	2023	2024	2025	Change
Laboratory waste	<i>metric tonnes</i>		7.7	7.81	6.14	-20%
<i>o/w non-hazardous</i>	<i>metric tonnes</i>	<i>Resins, batteries, Plexiglas</i>	4.9	3.3	0.61	-82%
<i>o/w hazardous</i>	<i>metric tonnes</i>	<i>Hydraulic oils, batteries, paints</i>	2.7	4.51	5.53	+23%

Pillar 2 – A responsible employer

Commitment 4 – Guaranteeing health and safety of our teams

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result	2025 result
Guaranteeing the health and safety of our teams	0 fatalities	2022	0	0	Annual	0	0
	Number of workplace accidents with lost time	2022	4	3	Annual	4	8
	Frequency rate of workplace accidents	2022	3.75	< 2.65	Annual	2.64	4.18

Details of GTT's health and safety policy and associated metrics 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	2025 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	40%
	Number of training hours per employee – excluding mandatory training*	2022	N/A	≥10	Annual	16.6	18.4 h**
Career management policy	Internal mobility/ Positions filled (<i>as a %</i>)	2022	23%	30%	2026	39%	62%**
	People Review vs eligible population	2022	95%	≥ 90%	Annual	93%	100%**

* The target covers the entire headcount, except apprentices.

** The results above do not include Danelec as at December 31, 2025. The ongoing integration work for this entity acquired in 2025, will enable its full integration into the 2026 financial year reporting.

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	2025 result
Gender equality	Percentage of women in the workforce	2022	21%	>25%	2033	25%	23.5%
	Percentage of female hires	2022	31%	>35%	2033	30%	23.1%
	Percentage of female Executive Committee members	2022	29%	40%	2030	13%	13%
	Female representation in management positions	2022	N/A	≥ 25%	2033	22.2%	23%
Inclusion	Adoption and implementation of a disability inclusion plan	2022	N/A	Adoption of a plan	2026	In progress	Plan adopted for GTT S.A. (see section 3.4.2.1.3)
Well-being at work	Training in the prevention of psychosocial risks	2022	N/A	100% Executive Committee (2024)/100% managers (2026)	2026	100% of the Executive Committee trained	36% of the managers trained
Well-being at work	Work/life balance survey (satisfaction level as a %)	2022	N/A	>70%	2026	82%	N/A

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.

Pillar 3 – A corporate citizenship

Commitment 7 – Acting with integrity

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result	2025 result
Anti-corruption	Roll-out of universal ethics guidelines within the Group	2022	N/A	Promotion of a a Group-wide culture of integrity	2026	Adoption of a new Ethics Charter	See below
	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	See below

In 2025, the Ethics and Compliance programme was reinforced through progress in several areas. A quarterly communication plan was rolled out, covering the internal, external and event components. The training system was strengthened, including targeted sessions for the Executive Committee and finance teams.

Compliance audits were conducted in the Group's subsidiaries. Finally, an internal control framework was established, together with the updating of numerous procedures and the development of new procedures in areas such as donations, patronage, sponsorship, and background checks.

The details of GTT's business ethics mechanism are available in section 3.5.3 and the associated metrics in section 3.5.7.

Commitment 8 – Promoting responsible conduct in the value chain

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result	2025 result
Responsible purchasing	Percentage of our suppliers that have signed the Supplier and Partner code of conduct	2022	0	100%	2026	36%	65%

The Group asks its suppliers to sign the Supplier and Partner Code of Conduct when referencing them. As at December 31, 2025, a campaign to sign the Code of Conduct with the suppliers concerned resulted in 65% coverage compared to the 36% achieved the previous year.

Commitment 9 – Having a positive impact on communities

Sub-commitment	Metric	Reference year	Baseline	Target	Maturity	2024 result	2025 result
Having a positive impact on communities	Number of societal actions carried out in response to a local need	2022	1	3	Annual	3	6

GTT's locally rooted actions aim to generate a positive impact in the territories in which the undertaking operates, by contributing to economic dynamism, social cohesion and the preservation of natural and cultural heritage. GTT's structured societal impact approach has enabled the identification of areas for action that align with the Company's strategy and positioning, and the adaptation of actions to local contexts and challenges. This approach is based on three axes: supporting education and employment, enhancing GTT's technical expertise, and supporting local initiatives.

In 2025, six initiatives were undertaken, involving GTT S.A. and its subsidiaries, with partnerships that are intended to endure. Among the year's flagship actions were:

- Support for professional integration – La Cravate Solidaire**
 A work clothing collection was organised at the head office on behalf of La Cravate Solidaire, an association that offers support to jobseekers through career support and image enhancement workshops, aimed at restoring their confidence and giving them an understanding of the working world. Thanks to the efforts of employees, 85kg of clothing, shoes and accessories was collected.

- Transmission of technical know-how – Coubertin Foundation**

The partnership initiated in 2024 with the Coubertin Foundation, located in Saint-Rémy-lès-Chevreuse, was continued and enriched in 2025. GTT had transferred nearly 4 tonnes of stainless steel sheets to the Coubertin Foundry – materials that are now used for the arts and crafts training courses provided by the foundation. In particular, the sheets were used by metal-working locksmiths, who worked on them using the gas shielded welding process (TIG – Tungsten Inert Gas). This technique is also used in the welding of membranes in GTT's Mark III technology. In July 2025, GTT welcomed the students of the Foundry for a visit to the welding laboratory, thus enriching the discussions between employees and apprentice craftspeople around common professional practices.

- Support for the professional integration of young people – FACE 78**

GTT continued its partnership with the Yvelines branch of the Fondation Agir contre l'Exclusion (FACE 78), through several actions aimed at bringing young people from priority neighbourhoods closer to the business world. As part of Industry Week, 25 students visited the Saint-Rémy-lès-Chevreuse head office, where they toured the laboratories and engaged in discussions with employees. Workshops to prepare for professional integration were also run at a secondary school in the Yvelines department.

3.8 Annexes

Table - Incorporation of information by reference

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

Disclosure requirement	Section and page of the sustainability report where the reference is used	Chapter, section and page of the reference used
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 2025 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 2025 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 2025 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 1.6 – <i>Marines and Digital Solutions</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 1.7 <i>Electrolysers for green hydrogen production</i> Page 61
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 [ESRS 2 GOV-3]</i> Page 104	Chapter 4 2025 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	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 3.1.3.2 <i>Interests and views of stakeholders [SBM-2]</i> Page 129	Chapter 4 2025 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 2025 Report on Corporate Governance Section 4.1.2.3 – <i>Gender diversity policy: balanced representation of women and men in positions of greater responsibility</i> Page 163

Table - 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
ESRS 2 GENERAL DISCLOSURES	3.1 General disclosures [ESRS 2]	55
BP-1 General basis for preparation of sustainability statements	3.1.1 Basis for preparation of the sustainability statement	55
BP-2 Disclosures in relation to specific circumstances	-	-
GOV-1 The role of the administrative, management and supervisory bodies	3.1.2 Governance	57
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	-	-
GOV-3 Integration of sustainability-related performance in incentive schemes	-	-
GOV-4 Statement on due diligence	-	-
GOV-5 Risk management and internal controls over sustainability reporting	-	-
SBM-1 Strategy, business model and value chain	3.1.3 Strategy	59
SBM-2 Interests and views of stakeholders	-	-
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	-	-
IRO-1 Description of the process to identify and assess material impacts, risks and opportunities	3.1.4 Impact, risk and opportunity management	69
IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	-	-
ESRS E1 CLIMATE CHANGE	3.2 Climate change [ESRS E1]	77
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	3.2.1 Governance	77
E1-1 Transition plan for climate change mitigation	3.2.2 Strategy	77
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	-	-
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	-	-
E1-2 Policies related to climate change mitigation and adaptation	3.2.3 Policies related to climate change [E1-2]	78
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]	79
E1-4 Targets related to climate change mitigation and adaptation	3.2.5 Metrics and targets	-
E1-5 Energy consumption and mix	-	-
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	-	-
E1-7 GHG removals and GHG mitigation projects financed through carbon credits	-	-

Disclosure Requirements	Paragraphs	Pages
ESRS S1 OWN WORKFORCE	3.4 <i>Own workforce [ESRS S1]</i>	101
ESRS 2 SBM-2	3.4.1 <i>Strategy</i>	101
ESRS 2 SBM-3	-	-
S1-1 Policies related to own workforce	3.4.2 <i>Impact, risk and opportunity management</i>	103
S1-2 Processes for engaging with own workforce and workers' representatives about impacts	-	-
S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns	-	-
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	-	-
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	-	-
S1-6 Characteristics of the undertaking's employees	3.4.3 <i>Metrics</i>	-
S1-7 Characteristics of non-employees in the undertaking's own workforce	-	-
S1-8 Collective bargaining coverage and social dialogue	-	-
S1-9 Diversity metrics	-	-
S1-10 Adequate wages	-	-
S1-11 Social protection	-	-
S1-12 Persons with disabilities	-	-
S1-13 Training and skills development metrics	-	-
S1-14 Health and safety metrics	-	-
S1-15 Work-life balance metrics	-	-
S1-16 Remuneration metrics (pay gap and total remuneration)	-	-
S1-17 Incidents, complaints and severe human rights impacts	-	-
ESRS G1 BUSINESS CONDUCT	3.5 <i>Business conduct [ESRS G1]</i>	121
ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies	3.5.1 <i>Governance</i>	121
ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities	3.5.2 <i>Impact, risk and opportunity management</i>	122
G1-1 Business conduct policies and corporate culture	3.5.3 <i>Business conduct policies and corporate culture [G1-1]</i>	122
G1-2 Management of relationships with suppliers	3.5.4 <i>Management of relationships with suppliers [G1-2]</i>	125
G1-3 Prevention and detection of corruption and bribery	3.5.5 <i>Prevention and detection of corruption [G1-3]</i>	126
G1-4 Confirmed incidents of corruption or bribery	3.5.7 <i>Metrics and targets</i>	127

Table - 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 identified following the double materiality assessment:

Topic	Negative impact metrics	Sections of the Sustainability Statement	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	-
GHG emissions	GHG 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 mix [E1-5]</i>	Material	-	-
	Intensity of energy consumption by high climate impact sector (ESRS E1-5)	Not applicable	Not applicable	-	-
Biodiversity	Activities that have a negative impact on biodiversity sensitive areas (ESRS 2 – IRO 1 – E4)	Non-material	Non-material	-	-
Water	Discharges into water (ESRS E2-4)	Non-material	Non-material	-	-
Waste	Ratio of hazardous waste and radioactive waste (ESRS E5-5)	Section 3.7 <i>Additional information</i>	Non-material	-	-

Topic	Negative impact metrics	Sections of the Sustainability Statement	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 OECD Guidelines for Multinational Enterprises (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</i> [S1-17] Non-material	Material	-	
	Absence of processes and mechanisms of compliance that control respect for the principles of the United Nations Global Pact and the OECD Guidelines for Multinational Enterprises (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</i> [S1-1, S1-4 and S1-5] 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 undertaking'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>Remuneration metrics (pay gap and total remuneration)</i> [S1-16]	Material	-	
	Diversity within governance bodies (ESRS 2 GOV-1)	Section 3.1.2.1 <i>The role of the administrative, management and supervisory bodies</i> [GOV-1]	Material	-	
	Exposure to controversial weapons (anti-personnel mines, cluster weapons, chemical weapons or biological weapons) (ESRS 2 SBM-1)	Not applicable	Not applicable	-	
	Emissions	Emissions of inorganic pollutants (ESRS E2-4)	Non-material	Non-material	-
Emissions of atmospheric pollutants (ESRS E2-4)		Non-material	Non-material	-	-
Emissions of ozone-depleting substances (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	-	-
Energy performance	Breakdown of energy consumption by type of non-renewable energy sources (ESRS E1-5)	Section 3.2.5.3 <i>Energy consumption and mix</i> [E1-5]	Material	-	-

Topic	Negative impact metrics	Sections of the Sustainability Statement	European legislative acts		
			Applicable Sustainable Finance Disclosure Regulation (SFDR) European legislative act	Pillar 3 reference	European law on climate reference
Water, waste and other matter	Water usage and recycling (ESRS E3-4)	Non-material	Non-material	-	-
	Total water consumption in m ³ 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	-	-
	Land degradation, desertification, soil sealing (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	-	-
Social and personnel issues	Deforestation (ESRS E4-2)	Non-material	Non-material	-	-
	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 of whistleblowers (ESRS G1-1)	Section 3.5.3 <i>Business conduct policies and corporate culture [G1-1]</i>	Material	-	-
	Incidents 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 pay (ESRS S1-16)	Section 3.4.3.11 <i>Remuneration metrics (pay gap and total remuneration) [S1-16]</i>	Material	-	-	

Topic	Negative impact metrics	Sections of the Sustainability Statement	European legislative acts		
			Applicable Sustainable Finance Disclosure Regulation (SFDR) European legislative act	Pillar 3 reference	European law on climate reference
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	-	-
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) (ESRS S2-4) (ESRS S3-4) (ESRS S4-4)	Section 3.4.3.12 <i>Incidents, complaints and severe human rights impacts [S1-17]</i> Non-material	Material	-	-
Anti-corruption	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.

3.9 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, 2025

This is a free translation into English of the report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of the Company issued in French and it is provided solely for the convenience of English-speaking users. This report should be read in conjunction with, and construed in accordance with, French law and 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.

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, 2025, included in the management report and presented in section "3 Sustainability Report" of the universal registration document (hereafter the "Sustainability Report").

Our procedures, which relate to this information, have been performed in an evolving context characterized by uncertainties regarding the interpretation of the laws and regulations, and the development of established practices.

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 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 requirements set out in the sustainability reporting standards adopted by the European Commission pursuant to Article 29 b of Directive (EU) 2013/34 of the European Parliament and of the Council of 26 June 2013, as amended by Directive (EU) 2022/2464 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, including, where applicable, the obligation 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 provisions 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 its management 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.

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.

Furthermore, as forward-looking information is inherently uncertain, actual future outcomes may differ, sometimes significantly, from the forward-looking information presented in the management report.

Our engagement 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.

Sustainability information and the information required under Article 8 of Regulation (EU) 2020/852 may be subject to inherent uncertainty arising from the state of scientific knowledge and from the quality of the external data used. Certain information is sensitive to the methodological choices, assumptions and/or estimates applied in preparing it and presented in the management report.

Compliance with the requirements set out in the ESRS of the process implemented by GTT to determine the information reported, including the obligation 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, including the obligation to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code, 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 led to the publication of information disclosed in the Sustainability Report; and
- the information provided on this process also complies with the ESRS.

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.

Elements that received particular attention

Below we present the matters to which we paid particular attention with regard to the compliance with the ESRS of the process implemented by GTT to determine the information disclosed.

Information relating to the update of the double materiality assessment is presented in section 3.1.4.1 of the Sustainability Report.

In this context, we held discussions with the relevant persons in charge and obtained an understanding of the analyses carried out by GTT, in particular the internal and external factors considered in assessing the absence of significant change in the material matters identified, the associated IROs, and their scoring.

Compliance of the sustainability information included in the Sustainability report with the provisions 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, 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, inconsistencies regarding the compliance of the sustainability information included in the Sustainability Report, with the provisions of Article L. 233-28-4 of the French Commercial Code, including the ESRS.

Elements that received particular attention

Information provided in application of environmental standards (ESRS E1 to E5)

The information disclosed with respect to climate change (ESRS E1) is presented in section 3.2 of the Sustainability Report.

Our procedures notably consisted of:

- conducting interviews with the CSR Department, in order to understand the process adopted by the Entity to produce this information, in particular the description of the policies, actions and targets implemented by the Entity;
- defining and implementing appropriate analytical procedures, based on this information and our understanding of the Entity.

With regard to the information presented by the Entity in the Sustainability Report concerning its greenhouse gas ("GHG") emissions, we also:

- obtained an understanding of the procedure used by the Entity to assess total energy consumption and GHG emissions, in particular:
 - assessed the consistency of the scope considered for the assessment of GHG emissions with the scope of the consolidated financial statements, as well as the upstream and downstream value chain;
 - obtained an understanding of the methodology used to calculate estimated data and of the information sources used in preparing the estimates that we considered key, which the Entity relied upon in presenting its GHG emissions in its Sustainability Report;

- performed certain specific controls, in particular based on testing:
 - assessed the emission factors used and the related conversion calculations, as well as the calculation and extrapolation assumptions;
 - reconciled, for directly measurable data such as energy consumption related to scopes 1 and 2 emissions, the underlying data used to assess GHG emissions with the supporting documentation;
- assessed, with regard to scope 3 emissions:
 - the information collection process;
 - the overall consistency of the data and assumptions used, based on additional tests and targeted controls.

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, 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, inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

Elements that received particular attention

We have determined that there are no such elements to include in our report.

Paris-La Défense, April 24, 2026

The Statutory Auditor

French original signed by

ERNST & YOUNG Audit

Stéphane Pédrón



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