



SUPPLIER & PARTNER CODE OF CONDUCT

GTT Group

July 2026

FOREWORD



For nearly 60 years, the GTT Group has been developing industry-leading technologies for maritime transportation, onshore storage, and offshore storage of liquefied gases and cryogenic fluids. Recognized for their safety, performance, and reliability, these solutions support the long-term evolution of the energy sector.

As a responsible company, the GTT Group pursues its development in line with a sustainable approach driven by its purpose, vision, and values. This commitment is reflected in its day-to-day business conduct through ethical practices, compliance with applicable laws and regulations, and a constant commitment to acting with integrity, transparency, and accountability towards all its stakeholders.

The trust we build with our customers, partners, and suppliers is a fundamental driver of the GTT Group's long-term performance and sustainability. Accordingly, all GTT Group employees are required to carry out their activities in accordance with the highest standards of ethics, compliance, and sustainable development. We expect our Suppliers and Partners to uphold these same standards and to commit to the shared principles set out herein.

This Supplier & Partner Code of Conduct defines the standards and commitments expected by the GTT Group with respect to business ethics, compliance, respect for human rights, environmental protection, and responsible business practices. It forms part of our continuous improvement approach and our commitment to creating sustainable value for the benefit of our entire ecosystem.

By adhering to this Code, our Suppliers and Partners contribute to strengthening a relationship built on trust, responsibility, and sustainable performance.

François MICHEL

Chief Executive Officer



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INTRODUCTION

GTT's purpose, vision, and values underpin the commitment of Gaztransport & Technigaz "GTT", its subsidiaries, and its representative offices (hereinafter the "Group") to contributing to a sustainable and responsible world.

As part of this commitment, the Group actively promotes sustainable development. In particular, the Group adheres to the 10 principles of the United Nations Global Compact and supports the United Nations 2030 Sustainable Development Goals.

This Supplier & Partner Code of Conduct of the GTT Group (hereinafter the "Code") reflects these commitments. It sets out the Group's principles and expectations regarding social and environmental responsibility, business ethics, and the prevention of corruption.

At every level of its organization, GTT is committed to conducting its business with integrity and in compliance with applicable laws and regulations. The Group expects its Suppliers and Partners to uphold the same standards.

This Code forms part of the GTT Group's Ethics and Compliance program. It defines the minimum rules and standards with which Suppliers and Partners must comply, regardless of the country in which they operate.



A. SCOPE AND IMPLEMENTATION OF THE SUPPLIER & PARTNER CODE OF CONDUCT

1. SCOPE OF APPLICATION

This Code applies to all Suppliers and Partners that are contractually engaged with any entity of the Group, including suppliers, subcontractors, service providers, consultants, commercial agents, resellers, and joint venture partners (collectively or individually referred to as “Suppliers & Partners”).

2. IMPLEMENTATION OF THE CODE

The Group requires its Suppliers & Partners to commit to complying with this Code by signing the acknowledgment and commitment form.

By signing this Code, accepting a purchase order subject to the Group’s general purchasing conditions, or entering into a contract referencing this Code, Suppliers & Partners undertake to comply with its provisions. This commitment applies to all activities and services performed within the framework of their relationship with the Group.

The Group also requires its Suppliers & Partners to apply these principles within their own organizations and to communicate them to their own suppliers and business partners.

Suppliers & Partners are further expected to demonstrate transparency with regard to compliance with this Code.

As part of its corporate social responsibility (CSR) strategy and its commitments to combating corruption and influence peddling, the Group may implement any measures it deems necessary to verify and assess the actions taken by Suppliers & Partners to meet the requirements of this Code.

Such verifications may be carried out during the selection process as well as throughout the business relationship. They may include questionnaires or audits conducted by the Group or by a third party appointed by the Group. Suppliers & Partners undertake to cooperate fully and transparently in these verification processes.

Following such verifications, the Group may take appropriate measures. While the Group recognizes that certain Suppliers & Partners may require support in improving their practices, it is prepared to accompany them through awareness-raising and training initiatives as part of a continuous improvement approach.

However, failure to comply with the requirements of this Code, as well as the absence of corrective action, may result in exclusion from the selection process or, where applicable, suspension and/or termination of the business relationship with the Group.

B. STANDARDS AND PRINCIPLES

1. COMPLIANCE WITH APPLICABLE LAWS, REGULATIONS, AND WITH THE GTT GROUP SUPPLIER & PARTNER CODE OF CONDUCT

The Group expects its Suppliers & Partners to comply with all applicable local and international laws and regulations relating to their activities, as well as with the provisions of this Code.

2. PROTECTING HUMAN RIGHTS AND RESPECTING LABOR STANDARDS

2.1 Human Rights

The Group is committed to protecting and respecting the human rights of every individual, wherever they may be, and adheres to the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

GTT expects its Suppliers & Partners to comply with all applicable laws and regulations, as well as with local and international human rights standards, in every country in which they operate.

Suppliers & Partners undertake not to engage in or be complicit in any human rights violations and, where applicable, to prevent and remedy any adverse impacts that their activities may cause in the context of their relationship with the Group.

2.2 Prohibition of child labor

Suppliers & Partners undertake to comply with ILO Conventions No. 138 and No. 182 concerning child labor and minimum working age.

Suppliers & Partners must neither engage in nor permit, including within their supply chain, any form of child labor in connection with their activities. No person may be employed under the age of 15 (or 14 where permitted by local law). Workers aged 16 to 17 must not perform work which, by its nature or the conditions in which it is carried out, is likely to endanger their health, safety, or psychological well-being.

2.3 Prohibition of forced labor and human trafficking

Suppliers & Partners must neither engage in nor permit, including within their supply chain, any form of forced or compulsory labor in connection with their activities. They must not use forced labor, including servitude (in particular debt bondage), involuntary prison labor, slavery, or any other form of forced labor in the course of their operations.



Suppliers & Partners are required to exercise due diligence over any third party involved in the recruitment or hiring of employees in order to ensure that job seekers are not subjected to forced labor through coercion, deception, intimidation, or as a penalty for holding or expressing political opinions.

Suppliers & Partners must comply with all applicable laws and regulations relating to working hours, wages, minimum wage requirements, overtime, and employee benefits, regardless of where they operate.

All work must be performed on a voluntary basis, and employees must remain free to terminate their employment relationship subject to reasonable notice and in accordance with applicable local laws.

2.4 Inclusion, non-discrimination, and diversity

Suppliers & Partners must neither engage in nor tolerate, including within their supply chain, any form of discrimination, moral and/or sexual harassment, or sexist behaviour in connection with their activities.

Any discriminatory practice based on personal characteristics such as nationality, age, social origin, ethnicity, gender, sex, political opinions, trade union membership, health condition, disability, family situation, sexual orientation, or any other status or characteristic protected under applicable laws and regulations is strictly prohibited.

Suppliers & Partners undertake to promote diversity and equal opportunity. They are also expected to foster the inclusion of individuals who are distant from employment, in particular people with disabilities, regardless of the country in which they operate.

2.5 Prohibition of illegal, clandestine and undeclared work

Suppliers & Partners must neither engage in nor permit, including within their supply chain, any form of illegal, clandestine, or undeclared work in connection with their activities, regardless of the country in which such activities are carried out.

2.6 Freedom of association

Suppliers & Partners undertake, in compliance with applicable laws and regulations, to recognize and respect their employees' right to form or join trade unions of their choice, as well as to engage in collective bargaining to protect and promote their interests.

Suppliers & Partners also undertake not to discriminate against any employee on the basis of trade union membership or activities, regardless of the country in which they operate.

2.7 Local communities

The Group pays particular attention to local development, notably by promoting local recruitment and proximity-based partnerships. At the international level, it contributes to the economic development of the territories in which it operates. As a key player in the LNG value chain, the Group also supports the indirect employment of several thousand people worldwide who contribute to the development of certain Group activities.

The Group expects its Suppliers & Partners to demonstrate a similar commitment to local communities, as well as transparency regarding the initiatives implemented to contribute to the development of these territories in the areas where they operate.

3. PROTECTING OCCUPATIONAL HEALTH AND SAFETY

The Group expects its Suppliers & Partners to implement management systems and operational practices equivalent to those adopted by the Group and, wherever possible, aligned with ISO standards appropriate to the regulatory environment of the countries in which they operate.

3.1 Occupational Health and Safety

Suppliers & Partners undertake to implement a management system based on hazard identification, risk assessment, and the implementation of appropriate preventive measures.

They shall provide their employees with a safe and healthy working environment that complies with applicable legal requirements and internationally recognized good practices.

They shall provide appropriate personal protective equipment (PPE), free of charge, in accordance with the identified risks.

Suppliers & Partners undertake to regularly deliver training, information, and awareness programs for their employees and, where applicable, their subcontractors.

Suppliers & Partners also undertake to establish operational procedures, and emergency response plans appropriate to potential emergency situations, including fires, major accidents, and natural disasters. They shall further adopt a continuous improvement approach aimed at preventing occupational accidents, work-related illnesses, and hazardous situations.

They also undertake to remain vigilant regarding psychosocial risks and to promote employee well-being and quality of working life.



3.2 Security and Cybersecurity

Suppliers & Partners undertake to implement organizational, technical, and human measures to ensure a level of cybersecurity that complies with the standards and regulations applicable in the countries where they operate.

They undertake to protect information systems, infrastructure, data, and digital communications against unauthorized access, loss, alteration, or disclosure. They also undertake to ensure the confidentiality, integrity, and availability of any data shared with and/or transferred to the Group.

3.3 Information Security Incident Management and Reporting

Suppliers & Partners undertake to establish processes for the detection, management, and response to cybersecurity incidents.

They undertake to notify the Group without undue delay of any cybersecurity incident or security event that may affect the confidentiality, integrity, or availability of data shared with and/or transferred to the Group.

They further undertake to cooperate fully with the Group in the management, investigation, and resolution of any information security incident.

4. CONTRIBUTION TO CLIMATE AND ENVIRONMENTAL PROTECTION

The Group implements an environmental strategy and works on a daily basis to protect the climate and the environment.

Suppliers & Partners shall seek to prevent, monitor, minimize, and remediate the adverse environmental impacts of their activities, products, and services (including impacts on air, noise, soil, waste management, and water) through a proactive approach and effective management of their environmental responsibilities.

Suppliers & Partners must adopt a proactive approach to preventing environmental incidents and be able to respond appropriately to such events through the implementation of suitable preventive and corrective measures.

The Group also expects its Suppliers & Partners to establish formal environmental policies, to share their environmental data with the Group where necessary or upon request, and to accept independent assessments relating to environmental responsibility.

5. ACTING WITH INTEGRITY AND PROMOTING BEST BUSINESS PRACTICES

The Group places ethics and integrity at the core of the values and principles governing its activities.

It expects its Suppliers & Partners to adopt exemplary standards of integrity in the conduct of their business activities, in particular in the following areas.

5.1 Prevention of fraud, corruption, and influence peddling

The Group applies a zero-tolerance policy towards active or passive corruption, whether direct or indirect, fraud, influence peddling, and more generally any act contrary to integrity in its business relationships with public officials or private-sector actors. The Group and its employees are committed to complying with and enforcing all applicable laws relating to the fight against corruption and influence peddling, regardless of the country in which the Group conducts its activities.

It is strictly prohibited for Suppliers & Partners to give, offer, attempt to offer, authorize, or promise, directly or indirectly, any gift, item of value, invitation, payment, or any other benefit whatsoever to a public or private individual, with the intention of influencing a decision or inducing a person to misuse the authority conferred by their functions, for the purpose of obtaining or retaining any undue advantage for the Group or for themselves.

Accordingly, all forms of corruption, influence peddling, actions that could be construed as such, or inappropriate arrangements involving, directly or indirectly, public officials, customers, Group employees or representatives, or any other counterparty are strictly prohibited.

The Group prohibits facilitation payments as a matter of principle. Such payments made to public officials to expedite the performance of their duties are generally unlawful and may constitute corruption under French law. While regulations may vary across jurisdictions, the Group expects its Suppliers to adhere to this principle and encourages them to contact the Compliance Department in case of any questions (see Section 9 below).

The Group expects its Suppliers & Partners to implement appropriate measures to prevent, detect, and sanction any acts, whether direct or indirect, of fraud, corruption, or influence peddling within the scope of their activities. Suppliers & Partners are also invited to refer to the Group's Ethics Charter, incorporated by reference into this Code, which sets out in detail the principles and conduct required to prevent any act of corruption or influence peddling.

5.2 Prevention of conflicts of interest

The Group is committed to preventing and identifying any situation of conflicts of interest of any nature and therefore expects its Suppliers & Partners to take the necessary measures to avoid such situations.

Personal interests of an employee or of a Supplier & Partner must not influence or interfere with any relationship with the Group or its employees.



As part of the due diligence process carried out by the Group during supplier selection and throughout the term of any contract concluded with the Group, potential Suppliers & Partners may be required to disclose any personal relationships with Group employees or service providers.

In the event of any doubt regarding a potential conflict of interest, the Group encourages its Suppliers & Partners to promptly inform the Compliance Department in order to assess the situation.

5.3 Compliance with export controls and international sanctions

Suppliers & Partners must comply with all applicable laws, regulations, orders, directives, and decisions relating to economic sanctions, export controls, and embargoes, including those issued by the European Union, the United Kingdom, the United States, the United Nations, or any other relevant jurisdiction.

In addition, Suppliers & Partners certify that they are not listed on any sanctions list and undertake to notify the Group without delay should they become subject to any such listing during the term of any contract concluded with the Group.

5.4 Prevention of money laundering and terrorist financing

Suppliers & Partners must comply with all applicable laws and regulations relating to money laundering and must implement all necessary procedures within their organization to prevent any money laundering activities, financing of illegal activities, or terrorist financing, in particular through their own operations.

Suppliers & Partners undertake to take all appropriate measures and to exercise particular vigilance to ensure that they do not become involved in any transaction that could expose them or the Group to a breach of the aforementioned laws and regulations.

5.5 Compliance with competition law

The Group is committed to conducting its activities in accordance with the principle of fair and free competition, in compliance with the laws and regulations in force in the countries in which it operates. The Group applies the same requirement to its Suppliers & Partners.

Accordingly, the Group's Suppliers & Partners must refrain from entering into or implementing any agreement aimed in particular at fixing prices, establishing production limitations or quotas, allocating markets, engaging in any discriminatory practices, or taking any direct or indirect action intended to restrict, distort, or eliminate fair competition.

5.6 Assessing and monitoring third parties

The Group implements strict, risk-based assessment and due diligence procedures in the field of anti-corruption and influence peddling, in order to ensure that it works exclusively with third parties that share equivalent standards and requirements.

The Group expects its Suppliers & Partners to implement similar procedures to assess third parties involved in their supply chain, as well as, more broadly, any stakeholders engaged in their activities.

Depending on the size and nature of their operations, Suppliers & Partners must also establish monitoring and management systems to ensure compliance with applicable laws and regulations, as well as with the requirements of this Code.

They are further encouraged, on this basis, to adopt their own formalized code of conduct and to communicate its principles to their own suppliers and business partners.

5.7 Conflict minerals

Conflict minerals refer to tin, tantalum, tungsten, and gold originating from conflict-affected and high-risk areas, as defined by the European Union under Regulation (EU) 2017/821.

The Group recognizes that revenues derived from the extraction and trade of these conflict minerals may, directly or indirectly, finance armed groups, contribute to forced labor, and support other human rights abuses commonly associated with conflict-affected and high-risk, resource-rich areas.

The Group promotes an ethical and responsible sourcing policy and prohibits any sourcing practices that directly or indirectly contribute to the outbreak, perpetuation, or financing of armed conflicts or to their adverse impacts.

Accordingly, the Group expects its Suppliers & Partners to ensure and demonstrate that the materials and/or products supplied to the Group originate from responsible and conflict-free sources and are fully traceable.

The Group reserves the right to conduct audits of the sourcing practices implemented by its Suppliers & Partners, as well as the due diligence measures, they have undertaken to ensure that their supply chains exclude conflict minerals and comply with the requirements of this Code.

6. CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

6.1 Confidentiality

Suppliers & Partners must respect the Group's intellectual property rights and implement all necessary measures within their organization to ensure compliance.

In the context of their business relationship with the Group, Suppliers & Partners may receive or hold information of any nature relating to the Group's activities. Whether commercial, technical, legal, or otherwise, any information relating to the Group's business that is not publicly disclosed must be considered confidential information.

The Group encourages Suppliers & Partners working on its premises to comply with the Group's IT charter and to liaise with their designated contacts in order to comply with any specific rules established by the Group relating to the protection of such confidential information.

Suppliers & Partners must not, directly or indirectly, trade GTT securities on regulated markets using confidential information obtained in the context of their business relationship with the Group.

6.2 Protection of personal data

Suppliers & Partners who, in the context of their business relationship with the Group, are required to collect, process, use, or transfer personal data on behalf of the Group must comply with all applicable laws and regulations on personal data protection, in particular those of the European Union.

Suppliers & Partners must implement appropriate technical and organizational security measures to prevent any unlawful processing of personal data collected or processed on behalf of the Group, and to protect such data against unauthorized access or disclosure, theft, alteration, or accidental or unlawful destruction.

In the event of any breach or suspected breach affecting personal data collected or processed on behalf of the Group, Suppliers & Partners must notify the Group's Data Protection Officer (DPO) immediately and in any case within a maximum of 48 hours at the following address: **DPO@gtt.fr**.

The Group encourages its Suppliers & Partners to contact the Compliance Department and/or the Group's DPO for any questions relating to the collection, processing, or transfer of personal data carried out on behalf of the Group.



7. AUDIT RIGHT

Each entity of the Group reserves the right to audit compliance with the principles and/or commitments set out in this Code by its Suppliers & Partners. Such audits may be conducted by the Group entities themselves or by duly authorized third parties.

Suppliers & Partners undertake to cooperate fully and transparently and to facilitate the audit process under the best possible conditions. In particular, they must maintain sufficient records to demonstrate their compliance with this Code and make complete and accurate documentation available to the Group's auditors.

Suppliers & Partners must commit to improving their processes where audit findings indicate that such improvements are necessary and, where applicable, to addressing any identified non-conformities.

The Group entities may also support Suppliers in implementing enhanced standards to remediate such non-conformities.

8. HANDLING OF REPORTS AND PROTECTION OF WHISTLEBLOWERS

The Group expects its Suppliers & Partners to ensure that appropriate and effective management systems, policies, procedures, and training are in place to guarantee ongoing compliance with the provisions of this Code.

Suppliers & Partners who become aware of any actual or potential breach of this Code, of the Group's principles or policies, and/or of applicable laws and regulations are encouraged to raise their concerns with their designated contact(s) within the Group entity or entities with which they maintain a business relationship.

The Group has also established a whistleblowing system accessible to its employees and stakeholders. It encourages its Suppliers & Partners to speak up by reporting any actual or suspected breach of applicable laws and regulations, the Group's Ethics and Compliance policies, or this Code, at the following address:

[Gtt.integrityline.fr](https://gtt.integrityline.fr)

This online platform enables good-faith reporting of such violations in a confidential and secure manner. It is also accessible via the GTT website at GTT.fr.

No retaliation may be taken against a whistleblower acting in good faith. A good-faith report of a potential violation by a Supplier & Partner shall not affect the business relationship between that Supplier & Partner and the Group.

GTT invites its Suppliers and Partners to consult the GTT website to review the procedures for handling reports that are deemed admissible in accordance with applicable regulations.



Suppliers & Partners must also provide their employees and stakeholders with the means to raise any ethical or compliance concerns without fear of retaliation or adverse consequences. They must ensure that appropriate training is provided so that their employees are familiar with the whistleblowing system and understand the process for handling their reports.

9. CONTACT

For any questions relating to the GTT Group Supplier & Partner Code of Conduct, or to the Group's Ethics and Compliance expectations towards its Suppliers & Partners, or in the event of any doubt regarding the appropriate conduct to adopt or decision to take in light of the rules set out in any of the GTT Group's Ethics and Compliance policy documents, you may contact the Compliance Department at the following address: Ethics@gtt.fr



APPENDIX 1 – ACKNOWLEDGMENT & COMMITMENT FORM

This commitment document (« **Acknowledgement & commitment form** ») is signed by :

Company: _____

Registered office: _____

Registered under (Company register or equivalent): _____

Duly represented by: _____, acting in the capacity of

Hereinafter referred to as the « **Supplier** ».

The Supplier hereby declares that it has received and reviewed the :

« **GTT Group Supplier & Partner Code of Conduct** »

And undertakes vis-à-vis GTT Group to comply with all its provisions.

Place, date

Signature,

Name (CAPITAL LETTERS), Position, Company stamp

This document must be signed by a duly authorized representative of the Supplier and returned to GTT – Direction des Achats – 1, route de Versailles 78740 St-Rémy-Lès-Chevreuse



Technology for a sustainable world

