

Statement of non-financial performance 2022

Extract from the 2022 Universal Registration Document



GTT

Technology for a sustainable world

STATEMENT OF NON-FINANCIAL PERFORMANCE

3

3.1 NOTE ON METHODOLOGY 70

3.2 BUSINESS AND VALUE CREATION MODEL 70

3.2.1	Mission Statement	71
3.2.2	GTT's sustainable development approach	71
3.2.3	Role of stakeholder dialogue	72
3.2.4	CSR governance	73

3.3 GTT GROUP'S RISKS AND CHALLENGES 74

3.3.1	Risk identification methodology	74
3.3.2	Risks and opportunities identified	75

3.4 PEOPLE-DRIVEN INNOVATION AND GROWTH 77

3.4.1	An evolving Group	77
3.4.2	Attracting and managing talent	80
3.4.3	Highly qualified employees and skills development	81
3.4.4	Compensation and benefits policy	83
3.4.5	Employee savings	83
3.4.6	Social relations	86
3.4.7	Health & Safety and well-being in the workplace	86
3.4.8	Diversity and equal opportunity	88

3.5 ENVIRONMENTAL CHALLENGES 91

3.5.1	Environmental performance of materials	91
3.5.2	challenges linked to climate change (in line with the TCFD recommendations)	91
3.5.3	GTT's direct environmental impact	98

3.6 VALUES EMBODIED BY ETHICAL AND RESPONSIBLE BEHAVIOUR, A CULTURE OF INTEGRITY AND TRANSPARENCY AND CONTINUOUS RELATIONSHIPS OF TRUST WITH ITS STAKEHOLDERS 99

3.6.1	Ethics and compliance	99
3.6.2	A commitment to safety in the downstream value chain	101
3.6.3	Intellectual property	102



 Elements of the annual financial report are identified in the table of contents by the following pictogram

3.1 NOTE ON METHODOLOGY

Particular context of the Statement of Non-Financial Performance

With the entry into effect of Order no. 2017-1180 of July 19, 2017, regarding the publication of non-financial information, and setting the thresholds for listed companies, GTT is no longer subject to Article L. 225-102-1 of the French Commercial Code.

GTT is still required to present non-financial information, particularly information regarding environmental and employee issues (CSR), in its management report (Article L. 225-100-1, I, 2°, of the French Commercial Code), but the presentation of this information is no longer subject to verification by an independent third party.

In order to comply with the highest standards of non-financial information, GTT has decided to prepare a Statement of Non-Financial Performance on a voluntary basis. This approach has therefore been adopted in accordance with Article R. 225-105 of the French Commercial Code and its Decree no. 2017-1265 of August 9, 2017, issued pursuant to Order no. 2017-1180 of July 19, 2017.

Reporting scope

Unless otherwise stated, the reporting scope includes the GTT Group (the Company and its subsidiaries).

Method for reporting social, societal and environmental indicators

The social indicators are subject to a precise, uniform definition. The Human Resources Division is responsible for collecting this information. Health and safety indicators are monitored by the operating divisions and by the relevant departments (General Services, Human Resources and Accounting) under the overall responsibility of the HSE department.

Environmental indicators are mainly obtained from supplier data and are consolidated within the internal reporting system. The reporting of environmental indicators is carried out under the responsibility of the General Services department.

3.2 BUSINESS AND VALUE CREATION MODEL

GTT's business and value creation model is described in detail in the introduction to this Universal Registration Document.

This chapter reviews the main salient points for the understanding of the issues at stake, and the Group's approach to sustainable development.

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 license. 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.

In essence, GTT's activity consists of the following:

- engineering studies carried out at its offices;
- R&D, testing and mock-up production, carried out at the Company's Head Office in France;
- services associated with its technologies – in particular, consultancy services and guidance to actors along the value chain.

The Group has also begun diversifying its portfolio of activities, to support the decarbonisation of the shipping and hydrogen sectors:

- in the field of LNG as fuel for merchant vessels;
- in the field of digital services for the shipping industry. In 2018 and 2020, the Group carried out targeted acquisitions (Ascenz, Marorka and OSE Engineering) in order to ramp up the development of this activity;
- and in the field of green hydrogen, with the acquisition of Elogen – a company specialising in the design and assembly of proton-exchange membrane electrolyzers for green hydrogen production.

As Elogen's activities expand, we are likely to see the emergence of new CSR issues, which will be built into the Group's CSR roadmap.

(1) Gravity-based structures.

3.2.1 MISSION STATEMENT

In June 2020, GTT added its mission statement into its bylaws – the result of many months of collaborative work involving both Group employees and external stakeholders.

“Our mission is to conceive cutting-edge technological solutions for an 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.”

3.2.2 GTT’S SUSTAINABLE DEVELOPMENT APPROACH

GTT’s strategy hinges mainly on guiding its customers through their energy transition process. The technological advances which GTT develops are intended to reduce its customers’ environmental impact. The strategy includes:

- contributing, today, to safe access to LNG as a transitional energy source and designing scalable technologies to deliver the energy of tomorrow;
- developing related technologies to step up the decarbonisation of the shipping industry and providing guidance as the shipping industry works to bring down its pollutant emissions;
- anticipating, right now, tomorrow’s needs by developing technologies for a carbon-free future.

Drawing upon its expertise and reputation in the transportation and energy sectors, GTT is pushing forward with its financial development using two main levers:

- value creation from its human capital, which is one of the Group’s key assets; and
- responsible management of its direct and indirect environmental impacts.

The Company has adopted a structure and set of values in keeping with its mission statement. These are set forth in its ethical charter and detailed in section 1.3.1 of this document: **Safety – Excellence – Innovation – Teamwork – Transparency.**

A progress-based approach

Since 2018, GTT’s approach to sustainable development has been in line with the framework defined by the Sustainable Development Goals (SDGs) adopted by the United Nations in 2015. The comprehensive reference framework provided by the SDGs has enabled us to highlight the priority issues and impacts that concern the Group over and above its legal obligations. The materiality assessment conducted in 2019 has guided GTT’s actions in the last few years.

In 2022, GTT began developing a CSR strategy and roadmap for 2023-2026.

The Group’s CSR roadmap is built on three fundamental pillars:

1. social responsibility begins within the Group itself, with a focus on security, promotion of gender equality, creating loyalty among its talented employees, and continuing to combat corruption;

2. environmental issues are a driving force for innovation: the Group’s R&D is increasingly geared toward “zero-carbon” solutions, in line with the decarbonisation strategy;
3. GTT is a responsible company, committed to significantly reducing its emissions. The process of SBTi certification is currently ongoing (full Scope 1, 2 and 3 certification).

The targets and progress indicators associated with the various priority issues are currently being defined. In 2023, the Group will continue with its efforts and will complete the formalisation of its approach around a detailed CSR roadmap.

Highlights

GTT has recently strengthened its CSR approach, in particular in the following areas

- oversight by the Strategic Committee of GTT’s CSR policy and its objectives;
- anti-corruption: renewal of ISO 37001 certification;
- recognition of GTT’s efforts at transparency by CSR ratings agencies – particularly in the area of decarbonisation (CDP B rating in 2022 vs D rating in 2020);

- all of GTT’s indirect emissions (Scope 3) have been listed and will serve as a basis to define the decarbonisation levers and targets, notably in light of the company’s application for certification by the *Science-Based Targets Initiative* (SBTi);
- subscription to the United Nations’ Global Compact to join the international movement of businesses that support the ten principles of the Compact, transparency as to approaches to progress, and contribution of the private sector to the SDGs.

3.2.3 ROLE OF STAKEHOLDER DIALOGUE

For the Group, responsible behaviour and continuous relations with all stakeholders are the basis for durable, sustainable growth. It is for this reason that GTT is particularly attentive to the following commitments:

- transparency of information with respect to key stakeholders;
- customer satisfaction and listening to customers;
- support for innovation by working on research projects in partnership with engineering companies, research centres, universities and engineering schools.

To ensure its long-term development, GTT develops a continuous, constructive dialogue with its professional and economic environment. GTT forms close relationships with a large number of stakeholders including:

- the main new builds and repair shipyards;
- ship-owners;
- terminal operators;
- classification societies;
- gas companies;
- suppliers of the materials used by the Group's technologies (shipyard suppliers);
- Group's suppliers (service providers, suppliers of products and materials);
- maritime regulatory authorities such as the IMO, the United Nations agency responsible for defining the regulatory framework for maritime transportation, both for safety and environmental protection;
- employees, candidates;
- higher education establishments, research institutes;
- media; and
- shareholders, financial institutions, analysts.

For each of these families of stakeholders, GTT implements specific modes of dialogue.

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.

As part of its ISO 9001-certified quality management system, GTT regularly carries out satisfaction surveys with its internal and external customers. GTT carried out an external survey in early 2023 to analyse satisfaction levels among its active license customers (shipyards and outfitters⁽¹⁾).

This survey looked at the quality of service provided by the Company, from upstream (order) to downstream (delivery) with active shipyards. Customers were asked about the entire “engineering project execution process” including the pertinence and quality of deliverables – system plans, calculation notes, reports from deliverables. The challenge is to respect lead-times, remain attentive to quality and the reactivity of responses provided by the GTT teams and always listen to our customers' needs. A customer satisfaction level of 96% was achieved.

Sharing of best practices with stakeholders

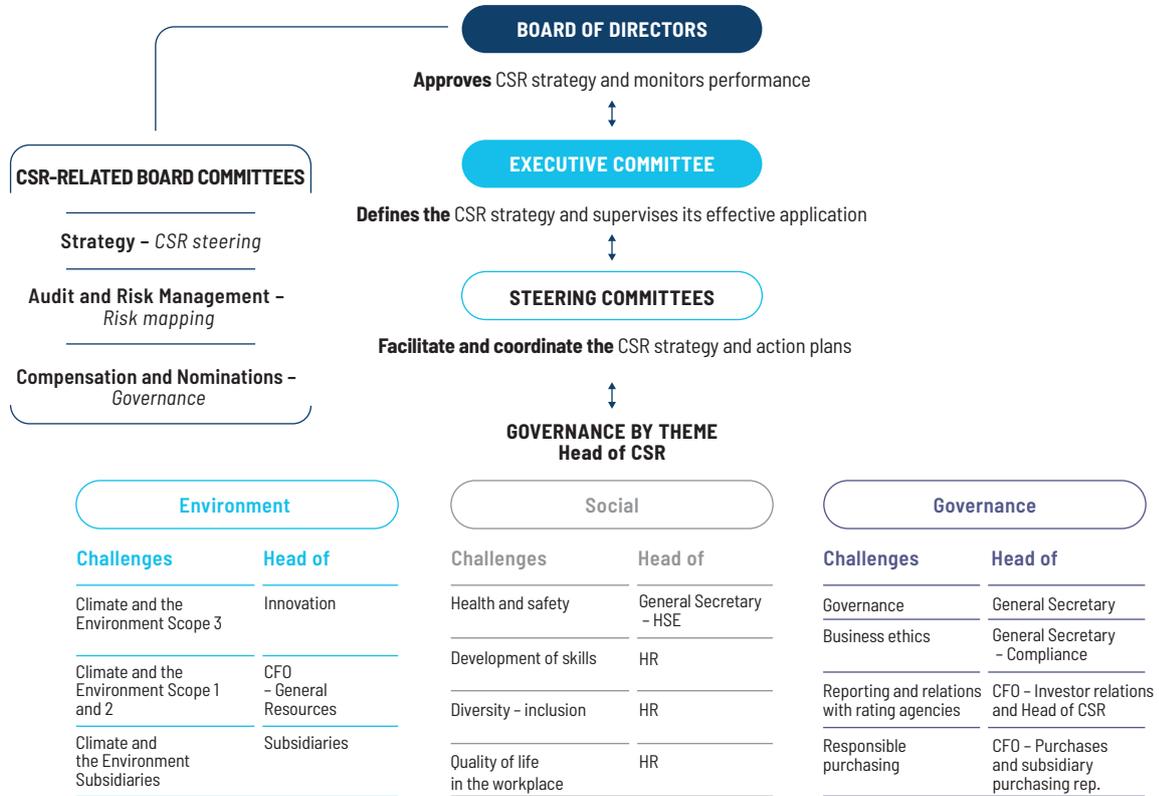
One of the key areas of GTT's dialogue with its stakeholders is to share best practices in terms of efficiency and safety of people and LNG facilities. The Group regularly brings together managers of maritime companies and classification societies to work together constructively, with the aim of continuous improvement.

These meetings are the opportunity to exchange on possible dysfunctions and create working groups to deal with them and resolve them. This feedback is collected in a database accessible by all stakeholders. Information transparency is a key element for GTT. This transparency provides the confidence and search for excellence carried out by the Group.

(1) Subcontractor shipyards.

3.2.4 CSR GOVERNANCE

At the beginning of 2023, as part of the ongoing work to produce the 2023-2026 roadmap, GTT specified and supplemented the organisation, roles and responsibilities for addressing CSR issues in its strategy and practices.



Integration of CSR criteria into pay structure

The compensation paid to the Chairman and CEO of the Group takes CSR-related criteria into consideration. A detailed breakdown is given in section 4.2.1.2 of this document.

Diversity and skillsets in the make-up of the Board

The Company's Board of Directors comprises 44.5% women and 55.5% men.

Details of the make-up of the Board and the skillsets which the various directors bring to the table are presented in section 4.1.3.1 of this document.

3.3 GTT GROUP'S RISKS AND CHALLENGES

The risks and opportunities presented in this chapter relate to the main impacts of the company's activity on social and environmental issues, and how they may affect the company's performance.

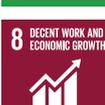
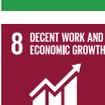
They have been allocated to the different Sustainable Development Goals in order to monitor the Group's contribution in the area of CSR and to assess the associated policies and performance.

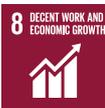
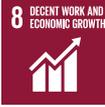
3.3.1 RISK IDENTIFICATION METHODOLOGY

Risks and opportunities related to environmental, social and societal issues were identified on the basis of a context study and the principles of double materiality. This work conducted in the fourth quarter of 2022 and the first quarter of 2023 was based on the following sources:

- **Stakeholder relations**
 - Customer relations and customer interviews
 - Investor relations
 - Employee surveys
 - Interviews with personnel representatives
 - Interviews with representatives of international institutions
 - Interviews with CSR experts
- **Internal interviews** with top management and key functions in relation to sustainability issues
- **Requirements of current and future regulations**, including the draft EU directive on sustainability reporting (CSRD)
- **Voluntary standards:** ISO 26000, UNGPs, GHG protocol, SBTi
- **Sector materiality and ESG ratings:** GRI, SASB, MSCI, CDP
- **Studies and reports:** thematic reports and studies published by civil society organisations or international multi-stakeholder coalitions

3.3.2 RISKS AND OPPORTUNITIES IDENTIFIED

	Impact risk or opportunity (present or potential)	Main SDG impacts	Strategy and performance (reference chapter in this document)	
ENVIRONMENTAL	Climate change mitigation	Impact of the use of our technologies on climate change (Scope 3)	13 CLIMATE ACTION 	3.5.2 Challenges linked to climate change
		Impact of our activities on climate change (Scopes 1 and 2)	13 CLIMATE ACTION 	
		Transitional risk related to the LNG value chain	-	
	Climate change mitigation Air and water pollution	Opportunity to develop hydrogen equipment and infrastructures to help decarbonise the energy mix	7 AFFORDABLE AND CLEAN ENERGY 	3.5.2 Challenges linked to climate change 1.6 Electrolysers for hydrogen production
			9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 	
			13 CLIMATE ACTION 	
Climate change mitigation Air and water pollution	Opportunity to innovate to guide maritime transportation in decarbonising the sector and reducing its pollutant emissions	13 CLIMATE ACTION 	3.5.2 Challenges linked to climate change Chapter 1 Presentation of the Group's activities	
		14 LIFE BELOW WATER 		
Resource use Biodiversity and ecosystems	Impact of our technologies in terms of resource use and environmental impact across their entire life cycle	12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	3.5.1 Environmental performance of materials	
		15 LIFE ON LAND 		
SOCIAL	Working conditions for our personnel	3 GOOD HEALTH AND WELL-BEING 	3.4.7 Health and Safety and well-being in the workplace	
		8 DECENT WORK AND ECONOMIC GROWTH 		
	Working conditions for our personnel	Opportunity to develop quality of life at work	3 GOOD HEALTH AND WELL-BEING 	3.4.2 Attracting and managing talent
			8 DECENT WORK AND ECONOMIC GROWTH 	
	Risk linked to changing social expectations and their impact on our attractiveness as an employer	-		

	Impact risk or opportunity (present or potential)	Main SDG impacts	Strategy and performance (reference chapter in this document)
SOCIAL	Training and skills development for our teams	Risk of insufficient skills development to maintain a high level of innovation, quality and safety.	 3.4.3 Highly qualified employees and skills development
		Opportunity to develop key skills for the transition in the shipping and maritime transportation sectors	
	Equality and diversity in our teams	Risk of discrimination at the point of hire or during the course of employees' careers	 3.4.8 Diversity and equal opportunities
		Opportunity to develop and promote a working framework which spotlights diversity and inclusion	 3.4.2.3 Diversity for enhanced skills and expertise
	Working conditions across the value chain	Risk linked to working conditions in the downstream value chain	 3.6.2.4 Supplier approval
	Client safety	Risk of failure of a piece of technology and its impact on the end customers' safety	 3.6.2.1 Safety of installations and crews 2.2.1 Industrial and technological risks
GOVERNANCE	Business ethics	Risk of failure to comply with anti-corruption and anti-fraud measures	 3.6.1 Ethics and compliance
		Geopolitical risk and risk of failure to comply with international sanctions	 2.2.2.2.1 Risks related to economic or political factors

Results of the GTT Group’s materiality analysis

The sustainability-related challenges that are most material for GTT are as follows:

- **Combating climate change**, by reducing the impact of our products, and the risks and opportunities related to technological innovation to guide other players in decarbonising the energy and maritime transportation sectors.
- **Health & safety** issues, not just for our teams, but also in the downstream value chain, where other players build the technologies designed by GTT, and in the use of the products for end customers.
- **Skills development** for our teams and our **attractiveness as an employer** to allow us to continue making a difference, through our capacity for innovation.
- **Good governance** in relation to geopolitical risk management and responsible conduct.

Tailored risk-prevention policies

The details of the principal risks relating to the Statement of Non-Financial Performance, and the related policies and indicators, are given in sections 3.4 to 3.6 of this document.

3.4 PEOPLE-DRIVEN INNOVATION AND GROWTH

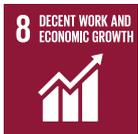
Innovation is a key driver in the development of all of GTT’s business activities and products. This development could not take place without its highly qualified teams which are suited to the specific nature of its activities.

GTT’s success is based on strong, shared human values. This major human asset allows the Group to build long-term relationships with its customers.

The Group pays particular attention to development of its employees, to the transmission of know-how, and to the implementation of a comprehensive, competitive and equitable compensation policy.

With the desire to offer our employees a stimulating environment, conducive to their professional development.

3.4.1 AN EVOLVING GROUP



On December 31, 2022, the Group employed 614 staff, nearly 64% at the head office at Saint-Rémy-lès-Chevreuse in the Paris Region. In addition to the head office, the Group has ten main subsidiaries, seven of which are international.

3.4.1.1 GTT Group headcount

As at December 31, 2022, the Group's total headcount was 614 employees, including 21% outside France.

Headcount	2021	2022
Total employees at 31/12	556	614
Permanent *	463	521
Non-permanent **	93	93

* 478 permanent employees on average over the 2022 financial year.

** Fixed-term contracts, project duration contracts, internships, apprenticeships.

Type of contracts	2021	2022	Percentage change
Permanent (CDI)	463	521	+12.5%
Fixed-term (CDD)	21	13	-38.1%
Project duration (CDC)	53	60	+13.2%
Internships	1	1	-
Work experience/apprenticeship contracts	18	19	+5.6%
TOTAL	556	614	+10.4%

It is important to point out that GTT has "project duration contracts" whose purpose is to support vessel-building projects.

3.4.1.2 Subsidiaries' headcounts and geographical breakdown

As at December 31, 2022, the headcounts of the ten main subsidiaries were broken down as follows:

In France:

- CRYOVISION, set up in 2012: eight employees (based in France) on permanent contracts and one employee on a fixed-term contract;
- OSE Engineering, a company acquired in July 2020: 26 employees, plus one seconded GTT employee;
- Elogen, a company acquired in October 2020: 68 employees plus seven seconded GTT employees.

International:

- GTT North America, set up in 2013: three employees based in Houston, Texas, USA, including one expatriate employee;
- GTT Training Ltd, set up in 2014: six employees based in the United Kingdom;
- GTT SEA PTE Ltd, set up in 2015: three employees;
- Ascenz, a company acquired in January 2018: 13 employees including one GTT expatriate;
- Marorka, a company acquired in February 2020: 13 employees;
- GTT Russia, set up in 2020: four expatriates included in the GTT headcount;
- GTT China, set up in July 2021: eight employees, including two expatriates.



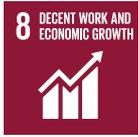
- Fixed-term contracts abroad (USA, Russia, China, Singapore and South Korea)
- International subsidiaries
- GTT in France (Head office and subsidiaries)

3.4.1.3 Breakdown of employees by status

	2021	2022
Non-executive	169	177
Executive	387	437
TOTAL	556	614

It should be noted that at GTT S.A.'s head office in France 71.7% of the total headcount are executives and are covered by the collective agreement for metallurgy engineers and executives and non-executive employees are covered by the collective agreement for metallurgy industries (workers, technicians and supervisors) applicable to the Paris region.

3.4.2 ATTRACTING AND MANAGING TALENT



GTT's people are a major asset the Group. Their commitment to GTT and our ability to develop skills are a major objective of our growth.

Our HR ambition is to recruit potential and the best experts and to set up training plans to develop competences of all our staff.

3.4.2.1 Internal and external recruitment policy

GTT's recruitment policy has two components, mobility and external recruitment.

The core of the recruitments concerns technical experts, technicians or engineers who are capable of working in fields such as naval architecture, fluid mechanics and others. The Group also sets out to recruit talent capable of supporting the technical teams in their success.

We also have a career management policy to promote the development of our employees and encourage internal and international transfers.

The Group seeks both people with technical experts (engineers and technicians in areas of instrumentation process, fluids mechanics, calculation, etc.) and people with a general background. Engineers are mainly graduates from the top engineering schools or scientific universities. Technicians contribute expertise in computer-assisted design, drawing or laboratory tests.

To respond to these various recruitment requirements, the Group has a dedicated team within the Human Resources Division.

The Group's expertise in its area of activity, combined with its multicultural dimension, contributes to building its reputation and attractiveness. In parallel, the Group carries out targeted actions to enhance its image as an employer, increase its visibility and help attract talent.

3.4.2.2 Recruitment and departures

Recruitment	2021	2022
Permanent	55	99
Non-permanent *	28	47
TOTAL RECRUITMENT	83	146

* Excluding interns (as opposed to the other indicators in this report).

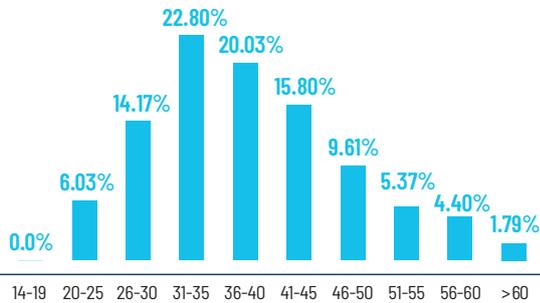
Departures	2021	2022
Permanent	51	41
Non-permanent *	57	47
TOTAL DEPARTURES	108	88

* Non-permanent contracts: including summer jobs and fixed term/project duration contracts, excluding interns (as opposed to the other indicators in this report).

The number of departures is explained by the natural attrition inherent to the Group's activities, and the expiry of Non-permanent contracts (CDD/CDC). The rate of voluntary departures (permanent positions) in 2022 was less than 5% at Group level, well below the average for the engineering sector, which is around 15%, reflecting the attractiveness of employees for GTT.

3.4.2.3 Diversity for enhanced skills and expertise

Distribution of employees by age group



GTT is committed to recruiting skills and potential in order to maintain the expected level of excellence. For this, cultural diversity is crucial and the Group acts to recruit people of all backgrounds. The solutions that the Group seeks to support its

activities, and GTT's requirements for development, lead us to seek mature skills. For this reason, the Group is committed to an inter-generational management policy for GTT employees. 88% of the Group's headcount are employees aged under 50 and the average age is 38 years. Whilst this youth constitutes a vital force of GTT, it is also necessary to capitalise on the knowledge of seniors and pass on know-how and key skills.

As at December 31, 2022, GTT had 71 employees aged 50 years or more, i.e. more than 11.5% of the headcount.

A two-tier policy has been in place since 2019. GTT sought to recruit experts to handle the new challenges of its business, while retaining an active policy to recruit profiles aged under 30. In 2022, they represented 46% of the volume of the Group's recruitments.

GTT is also committed to developing a work experience policy to develop young talent. The intern headcount in 2022 was largely unchanged at 20 vs 18 in 2021 (see section 3.4.1.1 – *GTT Group headcount* of this Universal Registration Document).

3.4.2.4 Career management policy

The success of GTT is largely based on the commitment of its staff, their expertise and their involvement in the current and future projects of the Company.

The Group considers that the management of the careers of its employees is very important, in order to retain talent, develop key skills and offer careers that are in line with the aspirations of employees and the requirements of the Company.

Different systems are used to hold discussions with employees on their development: professional interviews, individual career interviews with dedicated HR staff and, to support their development in terms of responsibilities, process of promotion and access to managerial status.

A more comprehensive career management is also carried out across the GTT Group, including a full *People Review* and the definition of a succession plan for the main positions within the Group.

Since 2019, the development strategy for adjacent businesses has enabled GTT to diversify its range of professions and offer career opportunities and increased responsibilities in these new areas.

Our objective is to maintain and develop the same level of expertise while retaining excellence at all levels of the Company.

The Group also continues to promote international transfers, offering secondment to shipyards abroad and transfers between sites and subsidiaries.

3.4.3 HIGHLY QUALIFIED EMPLOYEES AND SKILLS DEVELOPMENT



3.4.3.1 Training strategy

Training is a major objective to support the growth of GTT and the development of its employees.

GTT sets out to develop the employability of all by implementing a skills development plan to serve the Group's strategy.

A driver of the development and professionalisation of GTT's staff, the training strategy responds to numerous key issues and objectives:

- enable employees to maintain and develop their professional skills;

- enable employees to adapt to the requirement to remain at the leading edge of new technologies and developments in our specific fields;
- strengthen and develop practices in project management and leadership.

To do this, GTT has allocated 4.7% of its payroll to training, with a budget of 516,153 euros in 2022. GTT employees thus received 12,800 hours of training.

Once again, this year, the Group put special efforts into organising:

- in-house training courses, led by experts in each of our businesses;
- bespoke group training courses, dispensed by expert training organisations;
- individual training courses designed to cater for our employees' specific needs.

GTT ensures that all of its employees have access to training activities. As a result, at least 92% of employees received non-mandatory training over the last three years.

At Group level, subsidiaries continued to invest in training for employee development, mainly through the Elogen subsidiary in France, where more than 95% of employees received training.

Training indicators	2021	2022
Amount of training costs	€456,865	€516,153
Salary costs for the trained employees	€450,020	€531,203
Training costs/MS	4.52%	4.72%
Compulsory FPC contribution paid to the OPCA	€284,917	€314,710
Number of training hours *	10,237	12,800
Number of employees trained *	395	449
<i>Executive</i>	286	319
<i>Non-executive</i>	109	130

* Mandatory training included.

GTT is diversifying the types of training offered to employees, with a growing focus on distance learning, *via* virtual classes and/or *e-learning*.

The Company focused on the following training sessions:

- technical, software or oil and gas environmental training, which represent nearly half of the budget allocated: high level bespoke training programs were discussed and designed with qualified organisations to enable the Company's technicians and engineers to develop and improve their discipline-specific skills;
- practical training, with courses dedicated to cargo operations on simulator;
- the creation of a specific training program for project managers aimed at acquiring and adopting new project management tools and methodology;
- anti-corruption training in order to raise the awareness of all of the Company's employees and to reinforce the current ethical policy;

- educational programs to develop employees' language skills;
- intercultural training focused on collaboration, communication and business relationships with customers or counterparts from different cultures;
- personal development actions, on topics such as public speaking, sales presentations, communication and tutoring, etc.;
- as safety is a core concern for us, training for registered office employees (training in chemical risks, electrical certifications etc.) and for employees working at shipyards or at sites (survival at sea, work in confined spaces, first aid training etc.);
- General Data Protection Regulation (GDPR) awareness-raising and training for all employees in the context of the new regulation and cybercrime awareness programs.

3.4.3.2 Innovation momentum

Engineers make up a significant proportion of the teams, whose expertise and experience constitutes the Group's added value. 160 people, or 26% of the workforce, work within the Innovation Division. In 2022, research and development expenditure represented 29% of GTT's operating expenditure.

The basis of this upstream innovation activity is primarily internal creativity. A cross-departmental process called "Innovation Dynamic", driven by the Innovation Division, promotes the proliferation of ideas and their transformation into new products and services or patents. Employees are invited to submit their ideas *via* a dedicated platform. Each idea is reviewed by the Arbitration Committee which proposes an initial evaluation of its relevance and which methodologically oversees its further examination so as to refine this evaluation and quantify the value of the idea or concept for the business.

As part of this cross functional approach, several initiatives were organised to maintain and improve the culture of innovation within the Group. The main examples of this are brainstorming sessions, training courses, conferences and internal challenges.

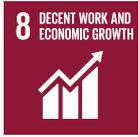
In addition, directed creativity processes, which target requirements and issues identified by customers, are organised to take advantage of the expertise of GTT's engineer-researchers and provide customers with appropriate responses.

As at December 31, 2022, GTT owned 2,831 patents that were active or in the process of being filed in almost 60 countries, corresponding to 478 inventions. The average term of validity of patents in the portfolio is 16 years.

An incentive policy to reward inventions has also been introduced. It has been promoted significantly towards employees and facilitates the emergence and maturing process for new ideas.

For more information please refer to section 1.3.3 – *Innovation at the heart of the strategy* of this Universal Registration Document.

3.4.4 COMPENSATION AND BENEFITS POLICY



In 2022, GTT decided to shift its compensation policy, the general principle being to strike a balance between the individual and collective portions of compensation, with a view to healthy management of internal equality, to provide career guidance and planning, and make GTT more competitive on the recruitment market.

The general rationale behind this shift is to allow GTT to reward its talents, and make the Company more attractive in terms of recruitment in areas with a major focus on technology, engineering and technical work.

This new compensation policy at GTT, which will take effect in 2023, should be composed of:

- solid individual compensation, both in terms of fixed salary and variable compensation, aligned with market levels, with the job grading tool being used by the HR Department;
- competitive collective compensation including profit-sharing, incentive schemes and employer top-up;
- financing social security coverage (payment of part of the health insurance contributions and almost all of the personal risk insurance contributions);
- performance shares, through various allocation plans for employees.

3.4.5 EMPLOYEE SAVINGS

The profit-sharing and incentive schemes in force at GTT are intended to have employees share in the profits of the Company in order to strengthen their involvement in the corporate project. Employees can also subscribe to the Group savings scheme.

As at December 31, 2022, 675 employees still in employment or who had left the workforce held rights in the corporate unit trust (FCPE) of the Group savings scheme and 288 in the PERCOG.

3.4.5.1 Group savings scheme

A Group savings scheme was set up on March 26, 2012, for an indeterminate period, pursuant to the provisions of Articles L. 3331-1 et seq. of the French Labour Code. It cancelled and replaced the previous scheme dated May 26, 2000. The Group savings scheme covers GTT and all GTT Group companies in which GTT directly or indirectly holds or will hold 50% of the share capital.

All employees with at least three months' service with the Company and any retirees or early retirees who still hold shares may participate in the scheme.

Former employees who have left the Company while affiliated to the scheme following retirement or early retirement may continue to make payments to the PERCOG as long as the payments are made to the scheme before the date of retirement and their accounts have not been settled. These payments cannot be topped up by the Company.

3.4.4.1 Salary and bonus policy

In 2022, the salary policy was managed in the traditional way, with all employees having their salaries reviewed, in line with individual assessment interviews. Budgets are set aside for annual salary increases in line with inflation, and for performance-related bonuses.

3.4.4.2 Personal risk insurance coverage

As part of its overall compensation policy, GTT supports its employees through improved social welfare measures that are advantageous and based on:

- additional health insurance offering the freedom to choose from several levels of cover; and
- a benefit agreement covering risks of illness, disability and death. GTT offers a contribution split that is very advantageous for employees.

3.4.4.3 Time savings plan associated with a collective retirement savings plan

The introduction of a CET from 2011 allows the Group's employees to transfer days which may then be topped up at 35% and paid to employees upon their request.

In line with the CET, GTT introduced a collective retirement savings plan at Group level (PERCOG) as of March 26, 2012.

Former employees of the Company who left for a reason other than retirement or early retirement may continue to make new and voluntary payments to the present scheme. However, this possibility is not open to employees who have access to a collective retirement plan (PERCO/PERCOI – inter-company) in the new company where they are employed. These payments do not receive any top-up that may be paid by the employer (see Article 3.4 of the scheme) and the expenses for their management are exclusively payable by the former employee who makes these payments.

When profit-sharing or incentive schemes are paid pursuant to the last period of activity of employees and these payments are made after their departure from the Company, these payments may be assigned to the scheme. The payment of the incentive bonus or profit-sharing entitlement is not subject to any top-up paid by the employer.

The Group savings scheme may be used to invest the following sums:

- i. voluntary payments by beneficiaries;
- ii. amounts contributed by the Company and a complementary "top-up" payment equal to less than 8% of the annual social security ceiling per year and per employee, and less than three times the amount of the beneficiary's voluntary contributions. The employee savings scheme dated March 26, 2012 is adjusted to the legal ceiling, i.e. an annual top-up of 300% of the voluntary contributions of employees (incentive bonus and profit-sharing entitlement included);
- iii. the transfer of sums held in another employee savings plan or time savings plan.

Sums deposited in the Group savings scheme are invested in shares of a corporate mutual fund (FCPE). Employees may choose between five FCPEs, including one socially responsible fund as required by the provisions of Article L. 3332-17 of the French Labour Code.

The shares of FCPE are locked up for a period of five years although early release is possible in certain specific circumstances set out in the applicable laws and regulations.

3.4.5.2 Group collective retirement savings plan

A Group collective retirement savings plan (PERCOG) was concluded on February 27, 2012 for an indeterminate period. It cancelled and replaced the previous scheme dated September 5, 2011. The Group savings scheme covers GTT and all GTT Group subsidiaries in which it directly or indirectly holds or will hold 50% of the share capital.

All employees with at least three months' service with the Company and any retirees or early retirees who still hold shares may participate in the scheme.

Payments may be made to the PERCOG by:

- i. voluntary payments by beneficiaries;
- ii. contributions from the Company, the complementary payment of a "top-up" fixed at:
 - 25% of amounts paid (giving entitlement to the top-up) arising from payments from the transfer of days of paid leave, extra days off pursuant to the French law on the reduction of working time, days when on-site representatives are stood down, and days of compensatory leave for the current year not taken from the employees time savings account. They are limited to 14 days per year,

3.4.5.3 Employee incentive agreement

The 2022 financial year is covered by an employee incentive agreement within GTT SA, CRYOVISION, Elogen and OSE Engineering. Any beneficiary employee may allocate all or part of their incentive bonus to the Group savings scheme (PEG) or the Group retirement savings plan (PERCOG).

3.4.5.3.1 For GTT SA

GTT concluded an employee incentive agreement dated March 22, 2022, effective on January 1, 2022 for a term of one year and ending on December 31, 2022. All employees with at least three months' service as of December 31, 2022 are entitled to benefit from this agreement. The aggregate incentive entitlement is allocated on the basis of salary corresponding to an effective length of service. The incentive entitlement is allocated to beneficiaries subject to a certain level of net income and provided that at least one objective is achieved from among seven objectives relating to:

The Group savings scheme was amended in order to allow the implementation of the capital increase reserved for employees, the procedures of which are described in the prospectus accompanying the Company's initial public offering.

In particular, Article 6 of the Group savings scheme on the use of amounts paid to the Group savings scheme was completed to include a Company-dedicated FCPE entitled "GTT Actionnariat". A new article relating to the capital increase proposed to employees at the Company's market introduction was created. Article 7 on the capitalisation of revenues was modified to specify the consequences of the employee's choice for the payment of dividends or their capitalisation in the FCPE in Company securities.

Employees who have left the Company (other than retirees or early retirees) may no longer make voluntary contributions to the scheme but may still contribute their incentive bonus or profit-sharing entitlement. In this case, neither the incentive bonus nor the profit-sharing entitlement will be eligible for the employer's top-up.

- 100% of voluntary payments from employees limited to 100 euros;
- iii. the transfer of sums held in another employee savings plan or time savings plan.

The amounts thus paid to the PERCOG are invested in units of a corporate mutual fund. Employees may choose between five FCPEs, including one socially responsible fund as required by the provisions of Article L. 3332-17 of the French Labour Code. The holders of units can choose between free administration or managed administration.

The corporate mutual fund units are unavailable until the unit holder's pension is settled, but early redemption may occur in the case of the occurrence of specific events specified by the applicable legal and regulatory provisions.

- objective no. 1: the market share in LNG carriers over 50,000m³;
- objective no. 2: patents filed;
- objective no. 3: Customer Satisfaction;
- objective no. 4: order intake for *LNG-Fuelled Ships* (LFS);
- objective no. 5: consolidated income of the *Digital Services Business*;
- objective no. 6: renewal of ISO 9001 certification with no major points of non-compliance;
- objective no. 7: frequency of workplace accidents.

If all objectives are achieved, the maximum amount that may be released stands at 10% of the payroll expense. In application of the agreement of March 22, 2022, the gross amount of the incentive which must be paid for the financial year ended December 31, 2022 amounts to 1,992,686 euros gross.

A new employee incentive agreement has been negotiated with effect from January 1, 2023 for a period of one year, expiring on December 31, 2023.

3.4.5.3.2 For CRYOVISION

CRYOVISION entered into a new employee incentive agreement on April 22, 2022 with effect from January 1, 2022 for a period of one year, expiring on December 31, 2022. All employees with at least three months' service as of December 31, 2022 are entitled to benefit from this agreement. The aggregate incentive entitlement is allocated on the basis of salary corresponding to an effective length of service. Incentive payments are distributed to beneficiaries on the condition that the company achieves at least one of five goals related to:

- TAMI revenue;
- revenues from other activities;
- net income;
- quality management within the company (maintenance of ISO 9001 certification);
- the maintaining of OHSAS 18001 certification (ISO 45001 certification).

If all objectives are achieved, the maximum amount that may be released stands at 10% of the payroll expense. In application of the agreement of June 29, 2021, the gross amount of the incentive which must be paid in respect of the financial year ended December 31, 2022 amounts to 27,472 euros gross.

A new employee incentive agreement has been negotiated with effect from January 1, 2023 for a period of one year, expiring on December 31, 2023.

3.4.5.3.3 For Elogen

Elogen entered into an employee incentive agreement on June 20, 2022 with effect from January 1, 2022 for a period of one year ending on December 31, 2022. All employees with at least three months' service as of December 31, 2022 are entitled to benefit from this agreement. The aggregate incentive entitlement is allocated on the basis of salary corresponding to an effective length of service. Incentive payments are distributed to beneficiaries on the condition that the company achieves at least one of six goals related to:

- IPCEI;
- order intake and sales of Open Power;
- progress of Stacks projects and intellectual property creation;
- performance of projects;
- Polaris project and ISO 9001 objective;
- HSE: *goal* = zero accidents.

If all objectives are achieved, the maximum amount that may be released stands at 10% of the payroll expense. In application of the agreement of June 20, 2022, the gross amount of the incentive which must be paid in respect of the financial year ended December 31, 2022 amounts to 154,379 euros gross.

A new employee incentive agreement has been negotiated with effect from January 1, 2023 for a period of one year, expiring on December 31, 2023.

3.4.5.3.4 For OSE Engineering

OSE Engineering signed a first employee incentive agreement on April 21, 2022 with effect from January 1, 2022 for a period of one year ending on December 31, 2022. All employees with at least three months' service as of December 31, 2022 are entitled to benefit from this agreement. The aggregate incentive entitlement is allocated on the basis of salary corresponding to an effective length of service. Incentive payments are distributed to beneficiaries on the condition that the company achieves at least one of three goals related to:

- Net Profit;
- Revenue from activities with businesses outside of the GTT Group;
- Revenue from activities with businesses within the GTT Group.

If all objectives are achieved, the maximum amount that may be released stands at 35% of the net income. In application of the agreement of April 21, 2022, the gross amount of the incentive which must be paid in respect of the financial year ended December 31, 2022 amounts to 26,217 euros gross.

A new employee incentive agreement has been negotiated with effect from January 1, 2023 for a period of one year, expiring on December 31, 2023.

3.4.5.4 Profit-sharing agreement

GTT entered into a voluntary profit-sharing agreement on March 6, 2000. An alternative formula to the legal benchmark formula is used to calculate the amount of the special profit-sharing reserve. The agreement was amended on March 26, 2012 to transform the Company agreement into a Group agreement to include CRYOVISION. On April 13, 2012, after a referendum, CRYOVISION became a party to the profit-sharing agreement as established pursuant to the amendment dated March 26, 2012, it being effective for the first time as of 2012. This agreement was concluded for a term of one year with effect from January 1, 2012, renewal by tacit agreement and by financial year.

As part of an overall review of the compensation strategy, with the objective of increasing the individual variable component, which will take effect in 2023, the special profit-sharing agreement signed in March 2000 was terminated in early 2022. As at the date of filing this document, a new profit-sharing agreement is still being negotiated with social partners.

In respect of the financial year ended December 31, 2022, the gross amount which must be paid for the constitution of a company profit-sharing reserve amounted to 5,003,320 euros, of which 4,899,622 euros for GTT and 103,698 euros for CRYOVISION. As is the case for the incentive agreement, the employees concerned must have been present in the Company in 2022 and benefit from a minimum of three months of seniority as of December 31, 2022. Beneficiaries represent 498 employees at GTT and eight employees at Cryovision. The breakdown of the amount of the special profit-sharing reserve between the beneficiaries was made in proportion to the gross salaries reported to the administration by the two entities (GTT and CRYOVISION). The breakdown thus made corresponds to 18.01% of the amount of salaries thus recorded for each beneficiary.

3.4.6 SOCIAL RELATIONS

3.4.6.1 Social dialogue

As the terms of office of the members of the works council expired at the end of April 2022, elections for new representatives were organised. The new Council is made up of 12 full members and 11 substitutes. Trade union representation changed once again, because a list of candidates put forward by the CFDT came in ahead of the UNSA's list of candidates, with a ratio of 50.23 to 49.77%, respectively. The two newly designated union representatives following this election are the privileged interlocutors of General Management in the negotiations carried out each year between unions and management. In particular, they have taken over and continued the negotiations ongoing since January 2022 on the establishment of a specific participation agreement to replace the previous agreement, which was terminated in January 2022.

The dialogue established between the management and the representatives within the Works Council always takes place as part of a constructive and open process, in both routine or mandatory consultations and negotiations covering specific issues, as was the case in 2022 for the signing of an agreement on pay rises and bonuses.

There are no personnel representative bodies in the other Group subsidiaries, with the exception of Elogen, which also has a works council. However, the personnel of CRYOVISION benefit from the social work of GTT's Economic and Social Council.

3.4.6.2 Organisation of work

Employees located in France, except for executive directors, had the benefit of "RTT days" involving reductions in working time.

In 2022, 96% of the total headcount of the GTT Group was working full-time. Employees who work part-time do so at their own request.

Organisation of working time	2021	2022	%
Number of full-time contracts women	100	114	18.6%
Number of full-time contracts men	432	481	78.3%
Number of part-time contracts women	14	13	2.1%
Number of part-time contracts men	10	6	1.0%

3.4.7 HEALTH & SAFETY AND WELL-BEING IN THE WORKPLACE

3.4.7.1 Health and safety of the Group's employees (excluding employees seconded abroad)

Whilst the risk of serious accidents is limited due to the type of activity at GTT (mainly engineering studies carried out in offices using IT tools), as in all activities, the Group is responsible for identifying the potential dangers and risks present on each of its sites, and evaluating their impact on the health of employees.

The Group's HSE management system – hygiene, safety and environment – includes all aspects necessary to prevent work-related accidents and protect its employees and those of subcontractors. There is a particular focus on the management of near misses, following a policy of prevention rather than cure.

The CRYOVISION subsidiary is ISO 45001 certified. CRYOVISION employees carry out checks inside tanks, work with high temperatures and come into contact with ballast water and other sludges that may be contaminated. There are more risks associated with their activities and a recommendation was made to secure this certification. Nevertheless, a portion of the Group's HSE policy is founded on ISO 45001.

The CSSCT and HSE department work to identify and assess high-risk activities, in particular. These checks include:

- procedures;
- work instructions;
- specific risk awareness-raising activities; and
- regular HSE meetings.

The single general risk assessment document is updated on an annual basis. The Group has identified the nature of the risk for each work unit, process or machine. Preventive measures associated with action plans are implemented for each work unit.

Likewise, an assessment of chemical risks is carried out periodically, in particular by means of an inventory, locating of chemical products on the GTT site, the use of the software, Seirich, and the sampling of air in the laboratories. Part of this specific evaluation is added to the fire service file, forwarded to the fire stations liable to intervene on the GTT site. The fire-fighters from the fire station responsible for GTT's site make periodic visits to improve their intervention procedure and knowledge of the GTT site. This visit was particularly important given the frequent turnover of volunteer personnel working as fire-fighters.

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

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

In 2022, to prevent the risks of accidents or injuries in line with 2021, following the risk assessment, the Group implemented action plans, including:

- a specific process sent to all employees in geographical areas subject to periodic atmospheric pollution;
- continuously improving workstations subject to chemical risks (drafting of a dedicated procedure for managing chemical risks, continuous revision of workstation profiles, provision of personal protective equipment and dedicated training);
- the reinforcement of prevention measures in chemical product storage areas, in particular the installation of additional individual and collective protective equipment;

- the performance of periodic evacuation tests in buildings subject to gas risk, in line with 2021;
- Explosion risk awareness sessions.

In 2022, 136 man-days HSE training were provided, i.e. 172 people trained in workplace health and safety. Training focused on the following topics:

- first-aiders at work;
- fire protocols and fire-extinguisher handling;
- fire evacuation: leading and rear fire wardens;
- explosion risks: protocol and regulation;
- control of the chemical risk at the workstation;
- use of liquid nitrogen;
- understanding of safety sheets;
- the fundamentals of procedural safety;
- working at heights;
- working in confined spaces;
- BOSIET (Basic Offshore Safety Induction and Emergency Training);
- oxygen balaclava handling;
- electrical and recycling accreditation;
- accreditation for using overhead cranes;
- using pallet trucks;
- using slings and hoists.

With respect to near misses, 24 reports were filed in 2022, giving rise to 21 action plans. The management of near-misses is the foundation of the performance of any safety management system because it makes it possible to implement appropriate preventive actions.

3.4.7.2 Health and safety of employees seconded abroad

As at December 31, 2022, 84 employees were posted outside France, mainly to South Korean and Chinese construction sites; and some to Chinese provinces (cities of Tianjin and Cangzhou) for the construction of onshore LNG storage tanks. Health and safety risks related to working conditions on shipyards or other construction sites (onshore tanks) are identified and addressed each year by the CSSCT and the HSE department.

Health and safety policies vary from one site to another; the ship-owners support the shipyards in their application. In order to ensure the best possible working conditions for its employees and to support local policies, since 2018 GTT has deployed a network of health and safety managers at each shipyard whom GTT employers can ask for advice. Regular meetings take place involving all of those managers and GTT's Head of HSE, who exchange information about accidents/near misses which have occurred, to ensure continuous improvement.

3.4.7.3 Performance of GTT's health and safety policy

GTT measures the performances in terms of safety by the frequency of work-related accidents with lost time.

In 2022, these indicators included employees (on permanent, temporary and project duration contracts), temporary workers and interns of GTT SA, and also all Group subsidiaries. Nine commuting accidents (including one with lost time) and eight workplace accidents (including four with lost time) were recorded. Of the four accidents with lost time, two were related to poor posture when handling loads at GTT headquarters. The Group immediately increased employee awareness of appropriate postures and, more generally, of the safety rules.

HSE indicators	Definition	2021*	2022**
Number of hours worked	Hours	821,351	1,066,217
Number of workplace accidents with lost time	Scope including temporary workers, unlike the social indicators	2	4
Number of commuting accidents		6	9
Number of occupational illnesses		0	0
Frequency rate of accidents with lost time	Number of accidents with lost time/hours worked x 1,000,000	2.44	3.75
Severity rate of accidents with lost time	Number of days lost/hours worked x 1,000	0.005	0.045
Number of employees seconded outside France	As at December 31	72	84
Number of man-days of safety training		119	136
Number of near-miss declarations		30	24
Number of action plan generated following near-miss declarations		25	21

* GTT S.A. scope.

** GTT Group scope.

3.4.7.4 Well-being at work

The well-being of employees is a major priority for GTT. Well-being at work is a motivating factor for any employee and benefits the competitiveness and performance of the business.

The HSE department and the CSSCT also work with the occupational health service to improve quality of life and prevent psycho-social risks and occupational diseases.

3.4.7.5 Absenteeism

The rate of absenteeism at GTT S.A. in 2022 was 3.2%. This rate is the result of measures taken internally regarding working conditions.

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.

3.4.7.6 Combatting sexual harassment and sexist behaviour

In 2022, GTT appointed a specialist advisor for combatting sexual harassment and sexist behaviour. Her main role is to ensure awareness-raising and training are put in place for employees and managers, and to provide guidance to employees to help them comply with the internal procedures.

3.4.8 DIVERSITY AND EQUAL OPPORTUNITY



GTT is faithful to its fundamental values which include diversity and respect for others. GTT is committed to promoting diversity within the business.

This commitment is led by its General Management and the Executive Committee.

The Group's multicultural dimension contributes to its wealth of diversity. In 2022, the Group employed more than 24 different nationalities.

GTT wishes to be a responsible employer and is committed to actions to support:

- workplace equality;
- access to employment for everybody.

3.4.8.1 Representation of women at GTT

Traditionally, the engineering professions have had a relatively low proportion of female employees. This low representation can be explained by the low number of women graduating from engineering schools, from which the majority of employees come.

The agreement signed in 2018 has expired and, as projected in the corporate calendar, a new agreement on gender equality at work was struck in 2022. This new agreement still aims to ensure that men and women are treated on an equal footing within GTT, and to develop actions to maintain this equality. A certain number of monitoring indicators have been defined, and will make it possible to better verify the effectiveness of the actions undertaken.

The 2022 agreement focuses on the following objectives:

- recruitment;
- access to training;
- professional training;
- working conditions;
- effective compensation.

GTT's diversity policy

Since the Company's initial public offering in 2014, women's representation on the Executive Committee, which is GTT's main management body, has thus ranged between 30 and 50%. Following a number of organisational changes, it reached 25% in December 2022. This remains in line with the gender parity ratios in GTT (21%) and the industry.

Keen to pursue human resources development policies aimed at fostering the emergence and development of talent, especially women, GTT has adopted a pro-active policy to encourage diversity and at all levels of responsibility.

In this context, the Group has made the following decisions since 2020 regarding the diversity policy of its governing bodies:

- to gradually increase female representation on the Executive Committee to at least 30% by 2023 and 40% by 2026. As at

December 31, 2022, including the Chairman and Chief Executive Officer, female representation stood at 25%, this percentage being stable compared to December 31, 2021. However, excluding the Chairman and Chief Executive Officer, in line with the definition of a management body provided for in Article L. 23-12-1 of the Commercial Code⁽¹⁾, this percentage is 29%, very close to the target of 30%;

- increase the representation of women in the top 10% of positions of responsibility – i.e. the members of the Executive Committee and managers under the direct supervision of the members of the Executive Committee – so that this group has 23% women by 2023 and over 25% by 2026. In 2022, already 26% of these positions were held by women (compared with 21% in 2021), which confirms the Group's commitment to promote and ramp up women's presence among the top managerial positions.

To achieve these objectives, GTT intends to pursue a human resources policy to develop and retain talent in order to support the succession plans of senior management bodies. GTT conducts a committed policy to combat discrimination in all its forms and promote equal opportunities. Like in 2021, an action plan based on these elements was approved by the Board of Directors in 2022, on the proposal of the Compensation and Nominations Committee. For example, we continued to develop international skills with the relocation of five women to China and Korea.

The achievement of these targets concerns recruitment, women's promotion within the Group and compensation. The Group has thus undertaken to have at least one female applicant for any management job opening, to allocate part of its apprenticeship tax to associations supporting women in the field of engineering and to ensure gender equity within the framework of the mandatory annual appraisal meetings.

In 2022, 146 employees were recruited at Group level, nearly 31% of whom were women. The GTT Group has continued with its outreach policy, which has been in place for years, aimed at increasing the number of female Group employees.

Breakdown of employees by gender	2021	%	2022	%
Men	442	79%	487	79%
Women	114	21%	127	21%
TOTAL EMPLOYEES	556	100%	614	100%

Access to identical training for men and women

Access to vocational training is, in effect, a decisive factor in ensuring genuine equal opportunity in people's career paths and the professional development of men and women. The Company ensures that men and women take part in the same types of training both for the development of individual and vocational skills and for adapting to corporate developments.

(1) the Executive Committee "assists" the Chairman and Chief Executive Officer as provided under Article L.23-12-1 of the Commercial Code, which stipulates as follows: "Any body set up within the company, by any act or corporate practice, for the purpose of regularly assisting the bodies responsible for general management in the performance of their duties, shall be considered a management body."

Workplace promotion

In 2022, there were two women Directors, representing 25% of the Executive Committee.

Breakdown of GTT employees by gender and status	2021	2022
Men	442	487
Executive	311	348
Non-executive	131	139
Women	114	127
Executive	76	94
Non-executive	38	33

Workplace equality index

GTT's workplace equality index for 2022 is 86/100.

		Score obtained	Scale
Indicator 1	Difference in compensation	36	40
Indicator 2	Difference in increase rates	20	20
Indicator 3	Difference in promotion rates	10	15
Indicator 4	Percentage of employees having received an increase upon return from their maternity leave	15	15
Indicator 5	Number of employees of the underrepresented sex amongst the 10 highest paid	5	10
TOTAL		86	100

Indicator no. 1: differences in compensation. Our score is 36/40.

The differences stem mainly from the categories of engineers and managers between the ages of 30 and 49.

Indicator no. 2: differences in increase rates. Our score is 20/20.

Of the 375 employees taken into account for this indicator, 323 benefited from an increase during the annual salary review – i.e. 86%.

Indicator no. 3: differences in promotion rates. Our score is 10/15.

The analysis covers people who changed category or coefficient during the year. It thus includes:

- promotions from Employee to Supervisor status: one woman in 2022;
- promotions from Supervisor to Manager status: one man in 2022;
- the automatic change of manager coefficient: 80 people, including 18 women. The collective agreement for managers in

the metal industry provides that the coefficients change every year for the PI position, then every three years for the PII position. Therefore, GTT cannot modify this mechanism.

Indicator 4: percentage of employees having received an increase upon return from their maternity leave. Our score is 15/15.

100% of employees returning from maternity leave got a salary increase

Indicator no. 5: highest compensation. Our score is 5/10.

In 2022, three women are among the 10 highest-paid employees.

GTT is pursuing its equity policy within the framework of its gender diversity policy, and concluded a Gender Equality Agreement in 2022, reinforcing the performance monitoring indicators in this area.

3.4.8.2 Integration of disabled workers

GTT rejects all types of discrimination during the recruitment process and is committed to allowing access for disabled workers to all positions open to recruitment. The Group had two disabled employees at the end of 2022.

For several years, GTT has been working in partnership with a sheltered workshop, ESAT Aigrefoin (workers with disabilities) to maintain the green spaces in the head office in the municipality of Saint-Rémy-lès-Chevreuse.

In 2022, the Company also organised two market garden and artisanal product sales from this ESAT, enabling employees at GTT's headquarters to meet and discuss with these disabled workers.

3.5 ENVIRONMENTAL CHALLENGES

3.5.1 ENVIRONMENTAL PERFORMANCE OF MATERIALS

The principal materials used in GTT membranes

The specialised qualification service for suppliers' products allows GTT to offer a range of quality products with a lower environmental impact.

The membranes developed by GTT are composed of different materials selected by GTT's teams for their technical and environmental performance. The membranes have a lifespan equivalent to that of an LNG carrier, namely 40 years.

End-of-life management of products is the responsibility of the ship-owner, who has a green book provided by GTT listing all materials and products relating to the containment system on the vessel.

Polyurethane foams (R-PUF)

These foams make it possible to reduce the thermal conductivity in the tanks and hence the loss of LNG. They contain blowing agents and GTT is monitoring technical and regulatory developments related to them, in order to offer better solutions in terms of performance and environmental impact.

For example, R-PUFs with latest generation HFO blowing agents are already approved and offered in GTT technologies while R-PUFs expanded with HCFC-141b have been removed from the range.

Work has been carried out during production over recent years on reducing loss rates from foams. The loss rate has dropped from 25% to 5%. This improved process has been offered for sale to the principal shipyard suppliers.

The foams are top of the range materials whose performance will not change over a 40-year period (the lifespan of an LNG carrier). There is no recycling stream for them and they cannot be reused. However, fibre reinforced foams can be incinerated, with the smoke being treated, and can therefore be used as fuel in some cases. Suppliers have adjustable furnaces intended for this purpose.

Plywood

GTT uses suppliers from northern Europe and ensures that deforestation is offset by responsible and sustainable operations, by buying wood from environmentally accredited forestry concerns that are PEFC and FSC certified.

Metallic membranes

The metallic membranes in GTT tanks are made from Invar (Fe-36%Ni) and stainless steel (Fe-Ni-Cr). One of the main suppliers, APERAM, is ISO 14001 certified and produces 100% recyclable Invar and stainless steel in accordance with European standards. Metal materials are recycled by the suppliers whose policy is to buy back metal sheets at raw material cost.

Other products used

Chemical products, such as adhesives, mastics, paints, etc., are also used. These products are subject to:

- a complete assessment that is recorded on Material Safety Data Sheets (MSDS);
- a central record of the risks recorded on MSDS;
- easy access to MSDS for all employees through the internal documentation system;
- the automatic inclusion of complete MSDS in an appendix to materials accreditation reports;
- a reminder in pictogram form at the beginning of reports;
- a follow-up with suppliers in order to reduce the risk level;
- the replacement of products containing materials identified as carcinogenic (CMR);
- alternative solutions being proposed to the extent this is possible.

In addition, within the chemical testing laboratory, a collection tank with a sufficient depth has been installed to avoid all leaks into the soil.

3.5.2 CHALLENGES LINKED TO CLIMATE CHANGE (IN LINE WITH THE TCFD RECOMMENDATIONS)

3.5.2.1 Governance

Climate-related risks and opportunities are at the forefront of GTT's mission: *"Technology for a sustainable world"*. The Group is a key partner in meeting the transformative challenges facing players in the maritime transportation industry, and helping them reduce their environmental and carbon footprint, in line with the

International Maritime Organization and European Union's long-term objectives. Issues linked to climate change, therefore, are addressed at the highest level of the organisation, by the Board of Directors and Executive Committee.

Oversight by the Board of Directors

The Board of Directors ensures that climate-related challenges are built into the Group's strategy. Each year, the Board of Directors assesses the main challenges linked to the risks and opportunities related to the climate transition as part of the review of the Group's strategic prospects, and approves an updated risk map. At this strategic session, the market prospects for LNG are examined, as is the role of LNG in the energy transition process. More specifically, the Board of Directors assesses whether the current strategy is wise, looking at one business line at a time, and identifies opportunities for years to come. One of the key objectives is to identify how the Group's current and future technologies can help push forward and accelerate the energy transition and meet the challenges of decarbonisation.

The Board of Directors also examines the Group's sustainability strategy, its targets for reducing greenhouse gas (GHG) emissions, and its performances on a yearly basis. In 2021, the Board of Directors approved the Group's Climate Ambition 2025, covering its aim to reduce its Scope-1, 2 and 3 GHG emissions by 2025.

Two committees under the Board of Directors deal specifically with climate-related challenges:

1. The Strategic and CSR Committee is notably in charge of examining Group strategy in relation to new activities, market

trends and R&D programmes. The main driving force behind the Group's diversification and its growth opportunities is that it provides technological solutions which help the maritime transportation industry to reduce its carbon impact and to develop the production, transportation and storage of green hydrogen. The Strategic and CSR Committee meets as often as necessary and, in any event, at least twice a year.

2. The Compensation and Nominations Committee, each year, examines the CSR criteria built into the short- and long-term variable compensation of the Chairman and Chief Executive Officer of the Group, and assesses performance in relation to those criteria.

Role of management

The Executive Committee is in charge of assessing and managing the risk of climate transition, whilst remaining within the bounds of the long-term strategic guidelines defined by the Board of Directors. It identifies the opportunities to diversify the Group's activities and develops the personnel's technological expertise in connection with the prospects of the coming energy transition. In addition, the Executive Committee is responsible for managing the Group's sustainable development strategy, including climate-related matters. It sets the Group's objectives in terms of reducing CO₂ emissions and plans of action as to how to achieve them, under the oversight of the Strategic and CSR Committee.

3.5.2.2 Strategy

3.5.2.2.1 Identification of climate-related risks and opportunities

GTT provides design and consultancy services on membrane containment systems, but does not actually manufacture them. The Group does not consider that it is directly exposed to the physical impacts of climate change in the short and medium term. However, risks such as extreme weather events (risks of tsunami, rise in water levels, etc.) could impact certain key partners (shipyards, maritime transportation in particular).

In addition, GTT may be affected by transitional risks, because the company designs solutions that are mainly used to store and transport liquefied gas – LNG in particular. In its climate-related risk assessments, GTT looks at the following types of risks:

1. Current regulations

The new regulations imposed by the International Maritime Organization (IMO) on GHG emissions for the maritime transportation industry will impact the use of LNG as fuel, and on the level of GHG emissions in the shipping sector.

2. Future regulations

An increasing number of countries are likely to adopt policies at limiting activities which contribute to climate imbalance. Often, natural gas is viewed as a transition energy source. However, its use may be affected by political measures, including, for example, a carbon tax to speed up the transition to a low-carbon economy. This may come to have an impact on GTT's activities and financial situation, because there may be a drop in demand for LNG.

3. Market development

Future LNG demand may be influenced by a variety of factors, such as political measures taken by governments, increased awareness of climate change both among civilians and businesses, and the use of gas as a transition fuel – in particular for maritime transportation.

GTT believes the main climate-related risk it faces lies in future market developments. In 2022, 91% of GTT's income came from activities in the LNG value chain. As a result, changes in levels of demand may have a major impact on the company's activities. Climate change also affords multiple opportunities for GTT. The drive to decarbonise the shipping sector will necessitate the use of digital solutions to optimise vessel energy efficiency and the use of lower-emissions energy sources. The global energy transition also provides major opportunities in the green hydrogen value chain, from the assembly of electrolyzers for hydrogen production to membrane-based systems to transport it in liquid form. GTT is well positioned to draw on these opportunities.

3.5.2.2.2 Impact of climate-related risks and opportunities

In line with its objective of contributing to a sustainable world, the Group is working in multiple areas. In this context, the main challenges facing the Group are:

- reducing the climate impact of its activities and technologies;
- developing related technologies to step up the decarbonisation of the shipping industry;
- facilitating the global energy transition and anticipating tomorrow's needs today by developing technologies for a carbon-free future.

Reducing the climate impact of our activities and technologies

GTT's direct and indirect energy-related emissions

GTT provides design and consultancy services on membrane containment systems, but does not actually manufacture them. Thus, the company's direct emissions and indirect energy-related emissions (Scope 1 & Scope 2) are limited, stemming mainly from energy consumption, either for electricity and heating, or for GTT's vehicle fleet.

Energy consumption at the Saint-Rémy-lès-Chevreuse site includes office heating, lighting and air conditioning. With the exception of Elogen (electricity consumption of 23.9 tCO₂eq and 27.2 tCO₂eq in 2021 and 2022, respectively), the subsidiaries account for a non-significant portion of energy consumption.

Consumption of heating and electricity in permanent installations

	2020	2021	2022	Change
Electricity (kWh)	3,784,813	3,824,000	3,708,359	-3.0%
Gas (kWh)	2,404,608	2,268,951	2,420,418	6.7%
Fuel oil (litres)*	3,768	4,000	4,000	-

* Volume estimated based on invoicing. Does not take account of emergency diesel generator consumption.

GTT's vehicle fleet includes 13 company cars. In addition, four vehicles have been provided for employees on the Saint-Rémy-lès-Chevreuse site for professional travel essentially in the Paris region.

Furthermore, in order to encourage employees to limit the use of their personal vehicles for journeys to work, a carpooling system is offered via the Group's Intranet site. In addition, since 2015, a shuttle bus service has been in place for employees between the regional express metro station (RER) and the site. A second shuttle bus was also introduced between the Versailles-Chantier station and the site.

In order to limit scope 1 and 2 emissions, the Group has undertaken an approach to favour low-carbon energy sources and gradually change its fleet of company vehicles.

Indirect emissions

In 2022 and 2023, GTT undertook a full and detailed assessment of greenhouse gas emissions throughout the life cycle of its products and technologies (Scope 3). This assessment will allow GTT to focus on making those technological improvements which will have the greatest impact on direct greenhouse gas emissions by the Group's customers. Around half of all indirect emissions

GTT aims to implement more efficient management of its consumption via the following measures:

- raising awareness of employees of eco-gestures;
- installing presence detectors;
- improving office layouts to limit energy consumption; and
- using low energy-consumption light bulbs.

In 2022, GTT recorded less electricity consumption than that of 2021 (-3.0%). Gas consumption rose by 6.7% (in 2021, by comparison, the heating of buildings during lockdown periods had been optimised) and fuel oil consumption was stable.

are linked to the use of sold products (Scope 3, category 11 in the GHG Protocol). These are mainly emissions from the evaporation (or boil-off) of the liquefied gas, which is not used to feed the motor, and must either be re-liquefied or burnt. The second major source of indirect GHG emissions are the materials used to manufacture GTT's solutions. Due to the significant emissions of the blowing agent, used in the foams which reduce heat conduction in the tanks and thus reduce LNG boil-off, this category represents around 30% of all Scope-3 emissions.

Higher-performance technologies

The technologies developed by GTT allow ship-owners to optimise the thermal performance and safety of the membrane tanks that transport or store LNG. The continuous improvement of these technologies has made it possible to reduce the boil-off rate of cryogenic membrane systems by more than 50% in ten years. The decrease in the boil-off rate represents a real added value for gas companies and ship-owners, in that such a decrease substantially reduces the operating costs of vessels. There is also a very significant reduction in CO₂ emissions per cubic metre transported (-47% in 11 years). The boil-off rate of LNG is one of the parameters for assessing the operating performance of a ship's LNG containment system.

Comparison of two LNG carriers in 2011 (Steam Turbine) and 2022 (MEGI/XDF) – Source GTT

Engine type	LNG containment technology	Boil-off per day	Size	Daily consumption	Savings of CO ₂ per m ³ transported
Steam Turbine	Mark III	0.15%	145,000 m ³	110 tonnes	-
MEGI/XDF	Mark III Flex+	0.07%	174,000 m ³	70 tonnes	47%

By providing increasingly high performance and robust technology, GTT is reducing its customers' energy losses, and this improvement was made possible by being continuously innovative in terms of the products in the technologies on offer.

BOR reduction target

In 2022, the Group has set itself an annual target for reducing greenhouse gas emissions from LNG carriers equipped with GTT technologies. Calculated on the basis of total emissions from vessels, the target is to reduce emissions, measured in grams of CO₂, by 0.5% per year per tonne of LNG transported per nautical mile. This target is in line with the IMO strategy to gradually reduce greenhouse gas emissions by 2030⁽¹⁾.

Stepping up the decarbonisation of the shipping industry

In keeping with its mission statement, GTT intends to support its customers and other players in the sector in achieving the goal set by the International Maritime Organization, consisting of halving GHG emissions from international maritime transportation by 2050, in comparison with 2008. The Group is working on various developments to help in the sector.

LNG fuel: a real environmental challenge

The Group's development efforts in the burgeoning LNG as fuel market will significantly contribute to reducing the greenhouse gas emissions generated by merchant vessels, thanks to the replacement of oil by LNG.

For example, CMA CGM estimates the improvement in the energy efficiency index of a vessel fuelled with LNG compared to a vessel using fuel at 20%.

Energy transition plan instigated by the shipping sector

These development efforts are in line with the energy transition plan instigated within the shipping sector. Since 2008, the International Maritime Organization (IMO) has been introducing pollution reduction initiatives that are gradually entering into force worldwide, particularly on the coasts of North America and Europe (Baltic Sea, North Sea and the English Channel).

SO_x/NO_x

In late 2016, the IMO confirmed that the 'Global Sulphur Cap' would be enacted in January 2020, limiting emissions of sulphur oxides (SO_x) to 0.5% across all the world's oceans. In 2016, the IMO also extended NO_x controls from the "North America" ECA to the "Northern Europe – Baltic" ECA.

In addition, all new vessels whose keels were laid after January 1, 2021 (vessel construction phase) must comply with the control of nitrogen oxide emissions (NO_x Tier III) in the North Sea and Baltic Sea. This regulation will therefore apply to some of the vessels under construction and to all future orders.

CO₂

In 2021, the IMO passed regulations that will regulate CO₂ emissions from 2023 via two tools:

- the Energy Efficiency of Existing Ships Index (EEXI) for existing vessels;
- the Carbon Intensity Index (CII), which is an indicator of carbon efficiency in operation.

Regarding the EEXI, vessels in service must have the same efficiency as new buildings, already subject to the Energy Efficiency Design Index (EEDI) regulation since January 1, 2013.

The CII determines the annual reduction factor aimed at guaranteeing a continuous improvement of the vessel's operational carbon intensity within each rating level.

The annual operational CII obtained must be documented and checked against the annual operational CII required, to give a rating for operational carbon intensity. Ratings range from A to E, indicating a performance that is significantly higher, slightly higher, average, slightly lower or lower than the required level. The level of performance should be included in the vessel's energy efficiency management plan (SEEMP).

A vessel with a D rating for three consecutive years or an E rating shall draw up a corrective action plan to achieve the required annual operational CII. Otherwise, if no corrective action is taken after one year, the vessel will no longer be able to sail.

The initial CII trajectory defined by the IMO indicates that the criteria for obtaining ratings will be tightened each year and be reduced by 11% between 2019 and 2026, and that the course of action from that point on will be decided upon by 2026.

These measures are the practical application of the IMO's long-term objectives (not binding), announced in April 2018, to gradually reduce greenhouse gas emissions:

- to reduce CO₂ emissions from all international maritime transport, by an average of 40% by 2030 and 70% by 2050, compared with 2008;
- to reduce the total volume of annual GHG emissions by at least 50% by 2050, compared with 2008.

The advantages of LNG as fuel

Amongst the solutions proposed, the conversion of merchant vessels to LNG propulsion is an alternative way of complying with current regulatory and environmental provisions.

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.⁽²⁾

By way of illustration, GTT considers that choosing LNG to propel a large container vessel can result in savings of 30,000 tonnes of CO₂ a year.

(1) Target of reducing CO₂ emissions from transport for all international maritime transportation by an average of 40% by 2030 compared with 2008.

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

Comparison of emissions for two fuel types

Type of fuel	Energy density Mmbtu/tonne	Engine yield g/kWh	Overconsumption %	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 LNG	NO _x : - 80 to 90%	No particles for the LNG	CO ₂ : - 20 to 25%

(1) Smoke scrubbers

For more information, please refer to section 1.4.4 – Vessels fuelled by LNG of this Universal Registration Document.

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. GTT develops cutting-edge digital technologies to optimise operational costs for its customers, reduce 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, by reducing their GHG emissions.

Supported by its subsidiaries, Ascenz, Marorka and OSE Engineering, the Group pursued its strategy of developing new digital solutions for ship-owners and signed a number of important contracts highlighting the increasing needs of ship-owners in this area.

Facilitating the global energy transition

Hydrogen has a major role to play in the global energy transition to energy sources with low or even zero carbon emissions. GTT is diversifying its field of expertise and taking up position as an important player in the green hydrogen energy chain.

3.5.2.3 Risk management

The risks linked to climate challenges are built into GTT's general risk-management processes. Every year, the Group performs a risk mapping exercise. This review, mainly carried out through interviews with the Executive Committee, can identify and update the main risks to which the Group is exposed and define the

3.5.2.4 Targets and parameters to measure climate-related risks and opportunities

In 2022, GTT undertook to review its climate ambition and decarbonisation targets to, firstly, expand the scope and, secondly, set targets for 2030 as required by the SBTi.

GTT's current objective for its operational emissions (Scope 1 & 2) by 2025 is under review. The Group wishes to extend its target to 2030, and will remain in line with the objective of limiting global warming to 1.5°C, i.e. -4.2% per year vs 2019, and -25.2% by 2025.

Elogen, which has been part of the GTT Group since October 2020, specialises in the design and manufacture of electrolyzers for the production of green hydrogen. With more than 70 employees and annual production capacity of 160 MW, Elogen is currently the only manufacturer of PEM (proton exchange membrane) electrolyzers in France.

In addition, GTT is developing cutting-edge technologies to equip vessels to enable them to store and transport liquid hydrogen (LH2).

The Group is also working on carbon-capture technologies for the shipping industry.

3.5.2.2.3 Resilience of the organisation's strategy

GTT designs solutions that are primarily used to store and transport liquefied gas, including LNG, and may therefore be impacted by global demand for LNG. GTT anticipates risks by analysing the projected scenarios for LNG demand from many companies and institutions, including the International Energy Agency (IEA). In particular, the STEPS and SDS scenarios from the IEA are analysed to anticipate possible shifts in demand in the medium and long term.

In addition, the Group is investing massively in research and innovation to reduce emissions in the LNG value chain, and actively diversifying its operations to include, in its activities related to green hydrogen, smart maritime transportation and low-carbon fuels.

corresponding priority action plans. This map is reviewed yearly by the Audit Committee and by the Board of Directors. Additional information is available in chapter 2 – Risk factors and internal audit – of this Universal Registration Document.

The Company's previous Scope-3 target has, up until now, only looked at a restricted portion of Scope-3 emissions. The complete assessment of greenhouse gas emissions across the life cycle of its products and technologies (Scope 3), carried out in 2022, means that the Company is now able to set itself a more relevant target.

As a reminder, the current target for restricted Scope 3 is limiting global warming to 2.0°C, i.e. -2.5% per year vs 2019, and -15.0% by 2025.

In 2023, GTT will publish its 2030 targets for Scopes 1, 2 and 3, and submit them for approval by the SBTi.

Scope 1	2021		2022	
	kWh	Total tCO ₂ eq.	kWh	Total tCO ₂ eq.
Gas <i>(litres vs kWh)</i>	2,268,951	382.2	2,420,418	407.7
Fuel	4,000	10.9	4,000	10.9
Company cars and vehicles provided	22,031	55.2	19,742	45.3
TOTAL SCOPE 1		448.3		463.9

Scope 2	2021		2022	
	kWh	Total tCO ₂ eq.	kWh	Total tCO ₂ eq.
Electricity	3,824,000	159.8	3,708,359	155.0

Scope 3 Category <i>(GHG Protocol)</i>	Source	2021		2022	
		tCO ₂ e	Scope 3 %	tCO ₂ e	Scope 3 %
Cat. 1: Purchased goods and services	Materials	2,841,239	20%	1,835,264	25%
Cat. 6: Business travel	Plane and car journeys		<1 %		<1 %
Cat. 10: Processing of sold products	Installation of membrane systems	1,720,514	12%	909,656	12%
Cat. 11: Use of sold products and services	2022 Boil-off gas (BOG) burnt (excluding fuel oil) and re-liquefaction of BOG	9,727,120	67%	4,585,920	62%
Cat. 12: End-of-life treatment of sold products	Materials	139,020	1%	85,124	1%
TOTAL		14,427,893	100 %	7,415,964	100 %

GTT's Scope 3 performance is closely linked to the number of deliveries which, in 2022, were particularly low (28 LNGCs vs. 53 in 2021), given the current order book (256 LGNCs at year-end).

3.5.2.5 European taxonomy

The European taxonomy translates the European Union (EU) climate and environmental objectives into criteria for economic activities. These criteria make it possible to define the sustainable activities of companies and have so far been established for the first two environmental objectives relating to climate. The taxonomy provides for three types of activities:

- 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 non-taxonomy-eligible economic activity is one which is not described in the taxonomy.

GTT has analysed its activities with regard to Annexes I and II of the EU regulation. The Group publishes its conclusions, on a voluntary basis, in order to comply with changing standards of non-financial information.

GTT's eligible and aligned activities

On the basis of an assessment of the economic activities in the delegated act, the following activities have been identified as relevant for GTT:

1. data-driven solutions to reduce GHG emissions;
2. manufacture of equipment for hydrogen production and use;
3. manufacture of low-carbon transportation technologies;
4. research, development and innovation (RD&I) to reduce, prevent or eliminate GHG emissions.

GTT's taxonomy-eligible economic activities all contribute to the goal of attenuation of climate change. The Group's main eligible activities are:

- activities linked to digital services;
- activities linked to green-hydrogen infrastructures – in particular, the activities of the Group subsidiary Elogen;
- activities linked to projects on LNG as fuel;

- activities linked to innovative projects aimed at reducing GHG emissions.

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

1. Technical criteria, meaning a "material contribution"

The Group has assessed the technical criteria on material contribution for its taxonomy-eligible activities.

Activities relating to digital services are used mainly to obtain data and analyses with a view to reducing fuel consumption, and thereby, GHG emissions. These solutions are already on the market. GTT believes that its digital activities can be classed as activities making a material contribution to attenuation of climate change. However, the lack of assessment of savings on emissions throughout the life cycle of its solutions in comparison with the best-performing alternative solution on the market means that the Group must class these economic activities as eligible but not aligned.

Elogen's activities linked to hydrogen infrastructures are designed for the production of green hydrogen, whose emissions across its life cycle are estimated to be far below the technical threshold of 3tCO₂e/tH₂. Therefore, these activities are considered to be aligned.

Vessels fuelled by LNG contribute significantly to reducing GHG emissions; the Group estimates that it delivers a 20-25% improvement on a vessel using fuel-oil propulsion. The Group believes it to be a reasonable assumption that, considering a 25% gain, all LNG-powered vessels will have an EEDI that is 10% lower than the EEDI requirements applicable as at April 1, 2022. In addition, GTT's solutions for LNG as fuel enable vessels to run on fuels from renewable (such as eLNG derived from green hydrogen). 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.

The table below shows the portion of eligible, aligned and ineligible economic activities in the form of three indicators: revenue, OpEx and CapEx.

	Revenues	CapEx	OpEx
Aligned activities	4%	24%	15%
Eligible activities	6%	61%	22%
Ineligible activities	94%	39%	78%

Definition of financial indicators

The financial indicators used in the European taxonomy are determined on the basis of the financial data used to prepare GTT's consolidated financial statements in accordance with the IFRS standards.

The revenue corresponds to revenues from operating activities. For more information, please refer to section 6.1 – *Consolidated Financial Statements* of this Universal Registration Document.

The CapEx corresponds to acquisitions of tangible and intangible assets during the financial year in question, before amortisation and before any remeasurement, including remeasurements

A significant number of GTT's innovation projects aim to reduce GHG emissions. In the context of the taxonomy, only innovations linked to eligible economic activities can be considered aligned. Thus, all innovation projects connected to the transportation of LNG (which is not an eligible activity) fail to meet this criterion of a substantial contribution. Other projects have not yet reached the level of maturity required for eligibility. Thus, no innovation projects – apart from ones linked to LNG as fuel which are covered under the category 'Manufacture of low-carbon technologies for transportation' – are considered to be aligned;

2. Environmental criteria, defining technologies which 'do no significant harm';

GTT has committed to limiting its impacts in terms of resource consumption and waste production, in line with its Health, Safety and Environment policy. As to activities linked to digital services and innovation for activities relating to LNG as fuel, GTT draws on its environment policy, and in particular, on its management of the recycling of waste electrical and electronic equipment (digital services) and waste management (innovation for LNG as fuel) to meet this criterion. In addition, GTT mainly provides design and consultancy services relating to LNG as fuel projects, but does not actually make any products. Therefore, the Group does not believe it is exposed to the risk of non-compliance with this criterion for such activities. For activities linked to green hydrogen activities, the Group relies upon Elogen's environment policy.

3. General criteria, known as 'Minimum safeguards'

GTT undertakes to defend and respect the human rights of every individual, wherever in the world they may be. Thus, the Group pursues its activities in compliance with the UN Human Rights Council's Guiding Principles on Business and Human Rights. In addition, GTT has implemented 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.

resulting from reassessments and depreciation reflected in the consolidated statement of financial position. This includes CapEx for research and development. For more information, please refer to section 6.1 – *Consolidated Financial Statements* of this Universal Registration Document.

OpEx is the Operating Expenditure (direct and technical) and commercial, and the non-capitalised costs for research and development (including the reduction of expenses linked to research tax credit). These costs are included in the operating expenses on the consolidated income statement. For more information, please refer to section 6.1 – *Consolidated Financial Statements* of this Universal Registration Document.

3.5.3 GTT'S DIRECT ENVIRONMENTAL IMPACT

3.5.3.1 Consumption of raw materials and water

GTT Group does not consume a significant amount of raw materials and water. This is particularly the case for laboratories located at the registered office. The subsidiaries also consume little raw materials and water.

The Group uses nitrogen in its laboratories to test the resistance of materials in cryogenic conditions. Nitrogen consumption rose (9%) on the year due to R&D.

In litres	2021	2022	Change
Consumption of nitrogen	1,478,709	1,618,325	+9%

Water consumed by GTT's activity includes consumption required to carry out materials testing, but is mainly related to internal use in the Company'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.

In m ³	2021	2022	Change
Water consumption*	6,388	6,584	+3%

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

3.5.3.2 End of life of products and waste

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

This system encourages employees to adopt responsible processes and acts in terms of traceability and waste management.

- **Chemical waste** – glues, aerosols, antifreeze, resins, soiled products, hydraulic oils – are recovered by a specialist partner. This partner created its own materials recycling channel to recycle all types of waste, including hazardous and complex waste.

In 2022, GTT collected 9 tonnes of chemical waste, compared to 3 tonnes in 2021.

- **Organic waste** is collected by a regional organisation, specialising in the collection and treatment of waste.

In 2022, the GTT Group generated 134,230 litres of organic waste (accounted for mainly by GTT S.A. and Elogen), which represents a 40% increase in relation to 2021, which saw a particularly low level due to the Covid crisis. In addition, the Company generated 7,290 kilos of food waste, i.e. an average of 32 kilos per working day. Food waste is composted on site.

- For security and confidentiality reasons, paper is recovered by a specialist partner that destroys and recycles the paper fragments after destruction. Twenty bins are installed on the Saint-Rémy-lès-Chevreuse site for employees to place their documents.

In 2022, approximately 8.3 tonnes of paper was recovered and recycled by the business, compared with 6.5 tonnes in 2021. This change is due in particular to the digitisation and clearance of the archives in the recovered spaces. Each year, the partner provides an environmental certificate mentioning the number of trees spared – 131 in 2022 – thanks to this service.

- **Electrical and electronic equipment waste** are collected and recycled by a specialist partner. This waste concerns essentially fixed and portable computers, servers, printers and copiers and video projectors. In 2022, 92 pieces of equipment were recycled.

- **Printer and toner cartridges** are also collected by a specialist service provider.

Waste	2021	2022	Change
Chemicals (in tonnes)	3.0	9.0	199%
Organic (in litres)	95,700	134,230	40%
Paper (in tonnes)	6.5	8.3	28%
Electrical and electronic equipment (in units)	122	92	- 25%

3.6 VALUES EMBODIED BY ETHICAL AND RESPONSIBLE BEHAVIOUR, A CULTURE OF INTEGRITY AND TRANSPARENCY AND CONTINUOUS RELATIONSHIPS OF TRUST WITH ITS STAKEHOLDERS



3.6.1 ETHICS AND COMPLIANCE

GTT's mission statement, vision and values drive its commitment to help build a sustainable world.

For GTT, ethical and responsible behaviour, relationships of trust and transparency with all its stakeholders are key to ensuring the sustainable growth of the Group and the fulfilment of this commitment.

GTT places ethics and integrity at the heart of the principles that govern how it conducts its business. These principles are – for everyone, regardless of their role in the group – a standard for behaviour and action, whether collective or individual.

GTT has introduced an Ethics & Compliance policy in line with international standards, texts and regulations, based on three pillars: (i) preventing and combating corruption; (ii) the protection of personal data; and (iii) compliance with international sanctions, export controls and embargo measures.

Governance and commitment of management bodies

GTT's executives are responsible for implementing and overseeing the Group's Ethics & Compliance policy. In particular, GTT has implemented a "zero tolerance" policy for all forms of fraud and corruption, which is regularly reiterated by the CEO, the Executive Committee and all business directors.

The Board of Directors, via 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.

An Ethics & Compliance Committee with membership including a representative of the General Management and, where appropriate, the other departments concerned, in particular the Finance Department and the Human Resources Division, as well as the General Secretary and the Compliance Officer, review the handling of any ethical alerts and makes sure ethical considerations are incorporated into the Group's strategy and operations.

The Compliance Officer, who reports to the Secretary General, is responsible for proposing the Group's policies and procedures, and supporting their effective deployment by all entities via an internal network responsible for relaying and ensuring compliance with all applicable policies and procedures.

Risk assessment

The Group's Ethics & Compliance programme mainly consists of (i) identifying the Group's ethical exposure, which is mainly to corruption risks identified according to the guidelines issued by the French Anticorruption Agency, and to other risks arising from personal data breaches and non-compliance with the General Data Protection Regulation (GDPR) and (ii) preparing appropriate action plans.

The policies concerning export controls and international sanctions constitute an autonomous section, determined from the regular mapping of GTT's direct and indirect partners and the corresponding legal watch.

GTT's ethical risk mapping is regularly reviewed on the basis of a self-assessment carried out by the Compliance Officer in collaboration, for matters relating to the protection of personal data, with the Data Privacy Officer, working closely with the operational functions at the head office and subsidiaries. It is reviewed by an independent third-party expert at least once every two years. This mapping was updated in the first quarter of 2023 with the help of the consulting firm Deloitte Finances, which produced an up-to-date and Group-wide picture.

Third-party valuation

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) regarding their ethics (anti-corruption and embargoes) and vigilance. In 2022, 100% of new suppliers approved and new critical partners were subject to due diligence – the assessment of all existing major suppliers and partners that began in 2022 was completed during the first quarter of 2023 – updating of the 'Purchases' procedure will enable us to ensure that suppliers have been assessed prior to entering into a contract with them.

If the assessment results in a grading below a certain threshold, the continuation of the business relationship may be subject to the performance of due diligence by our external service provider, or to the decision of the Ethics & Compliance Committee, which may decide on specific measures to be implemented, ranging from local monitoring, through the adding specific contractual clauses providing, for example, for regular audits or review, to the suspension of discussions.

Lastly, a specific procedure for the prior assessment of companies (vendors and targets) on ethics issues has been put in place with the department in charge of external growth, which seeks to identify possible risks upstream and any corrective measures to take during the subsequent deployment of the Group's ethics programme. This procedure was implemented during the acquisition of equity interests in 2022.

Reference texts

The Ethics & Compliance policy is organised around an ethics charter, the cornerstone of the programme, which specifies both the Group's fundamental ethical principles and determines their daily implementation. Applicable to all Group employees, the ethics charter is also shared with external stakeholders. Each employee is asked to read the Ethics Charter, to learn and understand its contents, to respect it and to ensure that it is complied with.

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 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.

The Group has also set up a specific procedure, involving a centralised register, for gifts and invitations.

A procedure for managing conflicts of interest has also been introduced.

Finally, the Group is in the process of overhauling the Code of Conduct on relationships with suppliers and the Code of Conduct on lobbying, patronage and sponsorship.

Given the nature and geographic scope of its activities, the Group implements a specific compliance system in terms of embargoes and export controls, which is regularly updated and supplemented by legal monitoring outsourced to specialist law firms. In particular, this system has been implemented in the wake of the various series of sanctions imposed on Russia by the European Union.

Lastly, since 2017, the Group, overseen by the Compliance Officer and Data Protection Officer, has been applying a compliance policy in relation to personal data protection, in accordance with the requirements of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data. In particular, this policy has meant the Company has been able to maintain an up-to-date record of processing and validate contractual clauses on this matter. During 2022, this policy was rolled out to the Group's principal subsidiaries – notably Elogen.

Exposure of employees and other stakeholders - Awareness and training

The Group regularly makes all its employees aware of the risk of fraud and corruption. Employees and certain particularly exposed stakeholders (in particular business consultants) receive in-depth training on the risk of corruption.

In 2021, the Group updated the mapping of its employees' exposure to ethical risks, based on geographical, organisational and operational criteria. In 2022, a procedure developed by the Human Resources Division was added to the employee exposure criteria. A training plan adapted to levels of exposure to the risk of corruption was drawn up. It provides for periodic awareness-raising and/or training, the content of which is adjusted according to the level of exposure. In 2023, in addition to the awareness-raising, personalised e-learning will be offered. This approach will be rolled out across all Group subsidiaries.

Alert procedure

Since 2017, GTT has set up an ethics alert procedure open to all stakeholders, who can raise concerns by emailing in guaranteed confidentiality the following address: ethics@gtt.fr. This system, the description of which is available on the GTT website, complements the other ethics reporting channels available to all employees and to any person outside the Group. This procedure has been updated following the entry into force of the Wasserman Law on whistleblowing, on September 1, 2022. The list of people who may have access to the reports has been updated, to include the special contact person for "Sexual Harassment and Sexist Behaviour", appointed by the General Management – at least, for cases which fall under this category.

In 2022, 100% of alerts received by GTT were processed and closed.

Controls and certifications

The monitoring of the implementation of the ethics and compliance policy is based on annual internal and external audit procedures, a report of which is presented to the Executive Committee and to the Statutory Auditors as part of their work. In 2018, GTT obtained ISO 37001 certification (anti-corruption management systems) from *Ethic'Intelligence, an accredited certification body*. This certification was maintained in 2019 and 2020 following surveillance audits. GTT obtained its second three-year ISO 37001 certification for 2021.

In 2022, a surveillance audit, carried out as part of the procedure for this second certification, showed no deviations.

In addition, Ascenz, an operational subsidiary of GTT based in Singapore and involved in digital activities, also obtained ISO 37001 certification in 2021.

3.6.2 A COMMITMENT TO SAFETY IN THE DOWNSTREAM VALUE CHAIN

3.6.2.1 Safety of installations and crews

There are a number of guidelines and recommendations intended to ensure the safe operation of LNG facilities and personnel in the maritime sector.

Transport safety represents a priority in the liquefied gas industry, due to the high cost of the cargo and the very high level of safety required by maritime authorities. This involves extremely rigorous temperature and pressure checks, continuous monitoring to ensure that there is no oxygen in cargo areas, and strict procedures for inspecting tanks, etc. The running, operation and maintenance of LNG carriers requires great professionalism and a great deal of vigilance on the part of specially trained crews. The safety of people and technologies is at the heart of the concerns of the Group, which invests heavily in R&D to prevent any risks associated with its technologies. As an important player in the LNG sector, GTT is responsible for supplying carriers with optimal transportation conditions, associated with an extremely safe technology.

Since the first LNG carriers were delivered in 1964 by Technigaz, tens of thousands of LNG deliveries have been made without a single incident resulting in a loss of LNG cargo. This is the result of a rigorous risk prevention system, continuous improvement in procedures, and a regular awareness-raising and training program for customers in transporting and handling the LNG cargo.

3.6.2.2 Training offered by GTT Training Ltd

GTT Training Ltd., a subsidiary of GTT, was created in 2014 in order to supervise the Group's external training activities. Piloted by an English-speaking team, this entity is intended to strengthen customers' skills and expertise. It has the task of providing LNG training at the Group's registered office and also at customers' premises internationally.

For more information, refer to section 1.5.3 – *Training services* – of this Universal Registration Document.

3.6.2.3 HEARS® Hotline

In 2014, the Group opened a *hotline* called "HEARS®", which enables ship-owners and operators to call on a dedicated team of GTT specialists 24/7 to respond to emergency situations affecting the systems developed by the Company for the transport of LNG.

These experts have undergone intensive training for two years to prepare for the six incident scenarios identified by GTT, validated by a qualification exam. In-service training, including exercises based on real situations, is then obligatory in order to maintain their qualification. As at December 31, 2022, 192 vessels equipped with GTT technology worldwide were affiliated with HEARS®.

The experts involved are on stand-by duty at home with two on each shift.

3.6.2.4 Supplier approval

GTT provide each manufacturer (particularly shipyards) 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 provided in the materials 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 safety data sheets, the Selection Committee will not propose materials if they are less environmentally friendly than those already available on the market.

For example, the regulation of blowing agents used in polyurethane foams is very closely monitored by GTT. A range of products using the latest generation of blowing agents is already available for GTT technologies.

Number of certified suppliers and materials

	2021	2022
Number of materials suppliers and subcontractors	71	65
Number of component suppliers and subcontractors	14 ⁽¹⁾	17 ⁽²⁾
Number of approved materials	515	537
Number of approved components	71	86
Number of new materials approved by GTT	63	56
Number of new components approved by GTT	19	10

(1) Including six identical materials.

(2) Including eight identical materials.

To date, 602 materials and components have been approved based on GTT requirements to meet the needs of membrane technologies. They involve 74 suppliers: 33 in South Korea, 18 in China, 10 in France, 0 in Japan and 13 in the rest of the world.

Geographical breakdown of suppliers

	2021	2022
Materials suppliers China	12	15
Components suppliers China	5	6
Materials suppliers Korea	29	28
Components suppliers Korea	9	11
Materials suppliers Japan	4	0
Components suppliers Japan	0	0
Materials suppliers France	10	10
Components suppliers France	0	0
Materials suppliers rest of world	16	12
Components suppliers rest of world	0	0

Supplier accreditation is subject to an audit to ensure performance of materials and compliance with social and environmental criteria. According to the results, some audits are repeated and, if the results are not satisfactory, suppliers may be excluded from the list of accredited suppliers.

The accreditation process is carried out well in advance of shipyard construction projects and GTT does not play a part in financial negotiations between suppliers and shipyards. This approach to listing materials has a real leverage effect on shipyards' purchases.

The majority of suppliers are located in Korea and China. For logistical reasons and in order to reduce the transportation of high-volume parts, GTT supports the accreditation of local suppliers.

3.6.3 INTELLECTUAL PROPERTY

Knowing how to protect the Company against any form of malicious attack is a major issue for GTT. The activities of the Group, which are predicated on its know-how and expertise, require protection of its inventions and of all the working documents and information created, classified and exchanged internally *via* its IT network.

The Group's policy is to file new patents on a very regular basis to protect its inventions. Accordingly, in 2022, 63 new inventions were protected.

A confidentiality clause is added to Technical Assistance and Licensing Agreements (TALAs) under which GTT grants its customers rights to its technologies and to a large portion of its know-how. Any disclosure of sensitive information with an external third party is governed by a confidentiality agreement.

For further information please refer to section 1.3.3 – *Innovation at the heart of the strategy* and section 2.2.1.2 *Risks related to the Group's intellectual property and know-how* of this Universal Registration Document.



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