

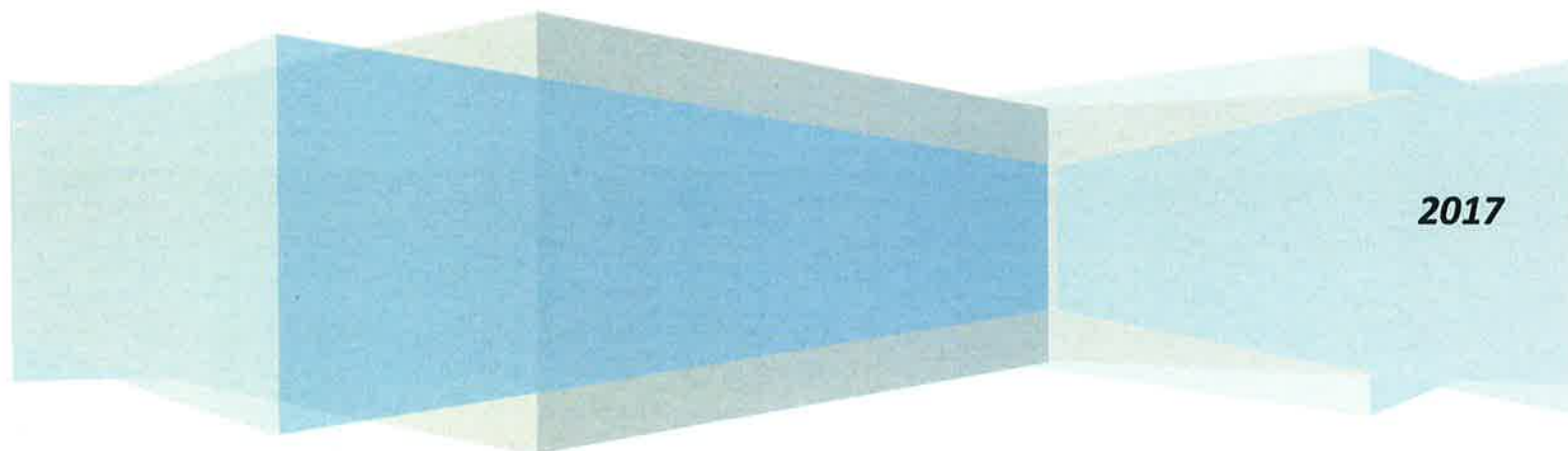
Eurotunnel Group



COMMUNICATION ON
PROGRESS

Communication on Progress

GC Advanced Level



1. Declaration of continued support by the Chairman and Chief Executive Officer

By signing the UN Global Compact in 2013, Eurotunnel Group openly undertook to apply the Compact's founding principles, grouped into four fundamental principles: human rights, employment conditions, environment and anti-corruption.

This commitment reflects our determination to promote these principles in the areas in which we operate and to put them at the heart of our strategy, our actions and our collective behaviour.

These values have been integrated into the culture of the Group, notably through its Charter of Ethics and Behaviour, which is known and shared by all personnel, but also through a human resources policy predicated on criteria that foster a process of full equality of opportunity and treatment for all employees and, lastly, through the Charter for Responsible Supplier Relations, which Eurotunnel Group signed up to in 2012.

During 2016, the Group implemented a number of actions integrating the UN Global Compact Principles and reinforced its ambitious commitment to a social responsibility policy, which seeks to reconcile financial performance, social equity and environmental protection, within a framework of continuous improvement. In an accountable and transparent manner, we made public, in our Annual reviews and our Registration document, the result of these actions which underscore our progress and measure our advances.

Our will remains to strengthen our CSR approach every year so that our growth can be achieved in accordance with the UN Global Compact Principles.

I am delighted to reaffirm the ongoing support of Eurotunnel Group for the UN Global Compact and to renew its commitment to making the principles of that Compact an integral part of its strategy, its daily operations and its organisational culture for 2016.



Jacques Gounon, Chairman and Chief Executive Officer

20 April 2017

PRELIMINARY QUESTIONS ABOUT YOUR ORGANISATION

1. Does your COP contain, if relevant, a description of policies and practices related to your company's core business operations in high-risk and/or conflict-affected areas?

None of the operations of Eurotunnel Group are undertaken in high-risk and/or conflict-affected areas. The bulk of the Group's activities are performed in France and in England.

2. How is the accuracy and completeness of information in your COP assessed by a credible third party?

Eurotunnel Group makes every effort to provide reliable information and asks for an opinion each year from an independent third party on the quality of its procedures for reporting and feedback of social and environmental information. In 2016, the audit was undertaken by the Mazars. The 2016 assurance statement expresses reasonable assurance about the three environmental indicators, ten social indicators and one societal indicator (information identified by the sign v in the Registration Document) and limited assurance for the other relevant information provided in Chapter 6 of the Registration Document.

This COP covers the data and information relating to the 2016 financial year, which is published in the Group's 2016 Registration Document.

<mailto:http://www.eurotunnelgroup.com/uploadedFiles/assets-uk/Shareholders-Investors/Publication/Registration-Doc/2016-Registration-Document-GET-SE.pdf>

3. Does your COP incorporate one of the following high standards of transparency and disclosure?

The Eurotunnel Group's social and environmental reporting approach is based on the social, environmental and societal information required under Article 225 of French Law No 2010-788 of 12 July 2010, the so-called Grenelle 2, and on the transparency principles laid down by the Global Reporting Initiative (GRI).

In paragraph 6.6 of Chapter 6 of its Registration Document, the Group details the existence of the various indicators using a cross-reference table to ensure that the information published can be clearly read and understood and that it is in line with the requirements of Grenelle 2 and GRI principle G3.1.

The Group conducted a materiality analysis in 2015, in accordance with the recommendations of the International Integrated Reporting Council (IIRC) and the Global Reporting Initiative (GRI).

I –CSR CONTRIBUTION TO THE COMPANY ECONOMIC PERFORMANCE

➤ Economic performance indicators

Nature		Amount (€)
Revenue	2016	1 023 000 000
Revenue	2015	1 222 000 000
Revenue	2014	1 206 713 000
Revenue	2013	1 092 000 000
Revenue	2012	993 148 000

II – OTHER PERFORMANCE INDICATORS

➤ HUMAN RESSOURCES

○ Female / male distribution

	Female					Male					Total				
	2012	2013	2014	2015	2016	2012	2013	2014	2015	2016	2012	2013	2014	2015	2016
Workforces to December	754	777	808	812	780	2908	2967	3341	3180	2556	3662	3744	3949	3992	3336

○ Employment of young and older workers

	2012	2013	2014	2015	2016
Number of permanent Work contracts under 25	146	145	197	184	134
Number of permanent Work contracts over 50	932	1000	1106	1170	1032

○ **Loyalty - Turn over – Health & Safety**

	2012	2013	2014	2015	2016
Turn Over	5,5	5	5,2	5,4	7,1
Frequency rate	10,8	6,5	8	9,8	8,6
Severity rate	0,4	0,4	0,4	0,5	0,6
Absenteeism rate	3,3	3,5	3,9	4,05	4,5

○ **Participation & Profit- sharing**

	Yes	No
Do you offer participation to your employees?	x	
Do you offer profit-sharing? (premium, ..) ?	x	
Do you offer an Incentive Plan?	x	
Do you offer a share ownership?	x	

○ **Social climate**

	Yes	No
Do you have indicators?	x	
Did you conduct Survey?	x	
If yes, what was the participation rate?	> 50 %	

○ **Staff representative bodies**

	Yes	No
Have you :	x	
- Representatives of trade unions?	x	
- Representatives of staff?	x	
- Works Councils?	x	
- Health and Safety committee ?	x	

➤ **ENVIRONMENT**

○ ***Natural resources***

	2012	2013	2014	2015	2016
Water from public network (Cubes)	287 620	272 228	282 072	298 253	248 588
Ground water (Cubes)	43 451	38 046	31 368	34 275	34 908
CO2 (tco2)	87 764	103 693	88 460	96 647	84 846
Electricity (kwh)	532 943 872	516 570 194	515 533 979	533 498 858	561 376 759
Natural gas (kwh)	11 430 457	10 985 673	8 856 540	8 565 506	7 691 510

The following indicators have been audited by an independent third party, being classified as providing a reasonable level of assurance

<u>Social indicators</u>	Opinion on honesty	Reasonable assurance report
End-of-period staff numbers, distribution by gender	X	X
Mean age	X	X
Staff-manager ratio	X	X
Level of uncertain employment	X	X
Number of students-apprentices and employee on work-experience	X	X
Number of training hours	X	X
Frequency of workplace accidents resulting in time off	X	X
Severity rate of work-related accidents resulting in time off	X	X
Absence rate	X	X
Training costs	X	X

<u>Environmental indicators</u>	Opinion on honesty	Reasonable assurance report
Water consumption	X	X
Greenhouse gas emissions	X	X
Wastes produced (hazardous, non-hazardous)	X	X

<u>Social indicators</u>	Opinion on honesty	Reasonable assurance report
Composite index	X	X

I. Implementing the ten principles into strategies and operations

Criterion 1: The COP describes mainstreaming into corporate functions and business units

The good practices in place within the Group	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	<p>Eurotunnel Group has set up a formal CSR policy, supported and sustained at the highest level of the organisation by the Chairman and Chief Executive and the Board of Directors. This policy came into force in 2015, and dictates the Group's principles, challenges and commitments.</p> <p>The CSR objectives will be defined each year and will be included in the objectives assigned to the directors and managers of the various entities of the Group.</p> <p>http://www.eurotunnelgroup.com/uploadedFiles/assets-fr/Le_Groupe/Developpement-Durable/Charte-RSE-2015.pdf</p>	<i>Reg. Doc. Chapter 6.7. pp.228-231</i>
	<ul style="list-style-type: none"> ➤ Giving executive responsibility for the CSR strategy to the relevant departments. 	<p>The Strategy and Sustainable Development Committee within the Board of Directors examines the issues relating to the company or Group environmental guidelines and reports on these to the Board of Directors. The Committee is responsible in particular for examining the Group's performance in relation to the environment and the strategic guidelines intended to promote good environmental management, conserve national resources and limit the impact of the Group's activities on the environment.</p> <p>The Committee met once in 2016, and the attendance rate of the Committee was 100%.</p>	
	<ul style="list-style-type: none"> ➤ Aligning strategies, targets and forms of incentive with the CSR strategy. 	<p>The Committee oversees the establishment of the Group's CSR policy and receives reports from the various managers of the company's 'green plan', which sets down the environmental priority of a multi-year programme on sustainable development, structured around the themes included in the global CSR policy.</p>	

		<p>For the year 2016, the Nomination and Remuneration Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is structured around four areas that are directly linked to the Group's activities: safety / security, labour relations, GHG emission and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate a completion rate with respect to the composite index, according to the objectives set for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the free share grant plans subject to performance conditions. The composite index was audited in 2016, as part of the audit of social information by the statutory auditors.</p>	
	<p>➤ Allocating responsibility for CSR to an individual or group within each unit or subsidiary.</p>	<p>The Executive Management of each of the Group entities is responsible for the verification, collection and transmission of CSR information to Corporate Executive Management.</p> <p>The data are checked and validated by the Group entities and consolidated for the entire Group perimeter by the Group Human Resources Department.</p> <p>http://www.eurotunnelgroup.com/uploadedFiles/assets-fr/Actionnaires-Investisseurs/Publications/Doc-Reference/Document-de-reference-2015-Groupe-Eurotunnel-SE.pdf</p>	
	<p>➤ Ensuring that the various departments within the company coordinate their activities to maximise performance and avoid negative impacts.</p>	<p>The Group Human Resources Department coordinates all CSR contributions and actions within the various subsidiaries.</p>	

See, Methodical note, Reg Doc 6.8, pp. 6. pp.231-232

Criterion 2: The COP describes value chain implementation

The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The Group aims to formalise the results of dialogue at different levels of its organisation. In 2015, the Group conducted a materiality analysis to determine its most significant ethical, social and environmental challenges, both internal and external to the company, in the light of the potentially major impact on its stakeholders, its environment or its economic performance.	
	➤ Analysing each segment of the value chain.	The materiality analysis, which included consulting the main stakeholders within and outside the Group, made it possible to identify and establish the hierarchical order of the Group's primary CSR challenges, both internal and external. It also allowed the Group to identify present and future opportunities and risks that could have a significant impact on its stakeholders, its environment or its economic performance.	
	➤ Communication of policies and expectations to suppliers and other partners.	In representing the Group's CSR values and commitments, the Procurement Departments of the various Group entities have taken actions that, beyond providing the Charter of Ethics and Behaviour when new contracts are signed, require suppliers and subcontractors to comply with the Group's fundamental principles. Health, safety and security, environment and quality questionnaires are sent by the Procurement Departments to candidate subcontractors and suppliers. Their responses are taken into consideration in the selection process.	
	➤ Implementing supervisory and assurance mechanisms (audits, checks) to ensure compliance of practices.	An Internal Audit Department is in place within the Group and has the role of ensuring compliance of practices.	
	➤ Awareness-raising, training and other methods for reinforcing skills with suppliers and other partners.	Eurotunnel Group has been a signatory of the Charter for Responsible Supplier Relations since January 2012. This charter is broken down into ten commitments for responsible procurement, ensuring a genuine	

		<p>partnership between customers and their suppliers with due regard to their respective rights and obligations. The Group is committed, in particular, to ensuring financial equity towards suppliers, to respecting the principle of transparency, to incorporating environmental issues and even to ensuring the territorial responsibility of its company. It thereby represents a measure intended to prevent corruption.</p> <p>The Group is also a member of the steering committees for the <u>'Responsible Supplier Relations' charter and certification</u> and has clearly demonstrated its wish to be part of this certification process, as an extension of the implementation of the charter's ten commitments.</p>	
<p align="center"><u>Reliable policies and procedures on Human Rights</u></p> <p><u>Principle 1:</u> Business should support and respect the protection of internationally proclaimed human rights</p> <p><u>Principle 2:</u> Business should make sure that they are not complicit in human rights abuses</p>			
<p align="center"><i>Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights</i></p>			
<p><i>The good practices in place within the Group</i></p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Eurotunnel Group has committed to implementing the principles of the UN Global Compact through its <u>Charter of Ethics and Behaviour</u>. This charter 'describes the principles behind actions that must inspire the behaviour of all employees in all circumstances and in all countries, particularly the OECD Guidelines for Multinational Enterprises'.</p> <p>The Charter was approved by the Group's Board of Directors in January 2013.</p> <p>http://www.eurotunnelgroup.com/uploadedFiles/assets-fr/Fournisseurs/pdf/Charte-Ethique-EN-Groupe-Eurotunnel.pdf</p>	
	<p>➤ Commitment to comply with all applicable laws.</p>	<p>- Since 2013, Eurotunnel Group has been adhering to the principles of the 1948 Universal Declaration of Human Rights</p>	

		<p>and the fundamental conventions of the International Labour Organisation (ILO).</p> <ul style="list-style-type: none"> - Eurotunnel Group applies an equal-opportunities human resources policy in accordance with the law. In particular, it does not permit any discrimination for illicit reasons such as gender, age, way of life, race or nationality, disabilities, religious, political or trade union opinions or commitments. 	
	➤ Declaration of commitment to respecting and supporting human rights approved at the highest level.	In his declaration of support, the Chairman and CEO formally expressed the Group's commitment to complying with the ten key principles of the UN Global Compact, including those relating to human rights.	
	➤ Declaration of commitment to personnel and stakeholders in respect of human rights.	<ul style="list-style-type: none"> - In its <i>Charter of Ethics and Behaviour</i>, the Group underlines that: 'All moral, sexual or, in a more general sense, unlawful pressure, pursuit or persecution is prohibited'. - Eurotunnel Group complies with the laws relating to protecting the privacy of its employees, in particular those governing digital files. - The Ethics Charter is presented when a contract is signed with a supplier, a subcontractor or an employee, and those entities and individuals are required to comply with the associated principles. - Eurotunnel Group signed the Charter for Responsible Supplier Relations in 2012. 	
	➤ Declaration of commitment communicated both internally and externally.	The Group's Ethics Charter is made available internally to all personnel on the Group intranet and the intranet of each subsidiary and externally on the Group's website.	

	➤ Other good practices	The Group requires that its partners (subcontractors and suppliers) make a clear commitment to respecting human rights.	
Criterion 4: The COP describes effective management systems to integrates the human rights principles			
The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The human resources policies of the various Group subsidiaries are developed on the basis of criteria which support truly equal opportunities and treatment for all employees. A Group Human Resources Department supervises the application of policies within the subsidiaries and ensures compliance with the principles laid down in those policies.	
	➤ Processes designed to ensure that international human rights are respected.	Almost all of the Group's employees are stationed in France and in the United Kingdom. The few persons who are not employed in those two countries work in other European countries (Germany, Spain, the Netherlands).	
	➤ Internal awareness-raising and training about human rights.	Internal distribution of the Charter of Ethics and Behaviour on the various intranet sites of subsidiaries (in French and English) and on the Group intranet, and the external distribution on the Group website contributes to this campaign of raising awareness undertaken by the Group.	
	➤ Operational complaint procedures for stakeholders potentially affected by the company's activities.	An Ethics Officer has been appointed by the Group to assist any stakeholder who is experiencing problems or has questions about the scope or application of the rules laid down in the Ethics Charter.	
Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration			
The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The Charter of Ethics and Behaviour states clearly in its first paragraph that: 'Pursuant to the Global Compact principles in terms of Human Rights, Eurotunnel Group does not permit any violations of Human Rights'. The human resources policies of all subsidiaries clearly require the inclusion of and respect for principles associated with human rights.	

	➤ System for monitoring the effectiveness and implementation of human rights policies.	The various Human Resources Departments of the subsidiaries and the Group Human Resources Department guarantee and monitor the implementation of the policies relating to respect for human rights and application of the Group Ethics Charter.	
	➤ Monitoring of internal and external feedback.	Audits and checks are performed by the Safety, Sustainable Development and Procurement Departments on suppliers and service providers to ensure compliance with the Group's charter. Internally, constructive social dialogue enables regular communication with personnel representatives both in the staff forums specific to each country and within the European Company Committee, which brings together representatives of French and British trade unions.	
	➤ Complaint procedures that are lawful, accessible, regular, fair, transparent, compatible with the law, sources of continuous learning, based on commitment and dialogue.	An Ethics Officer has been appointed by the Group to assist any stakeholder who is experiencing problems or has questions about the scope or application of the rules laid down in the Ethics Charter.	
<u>Reliable policies and procedures on labour</u>			
<u>Principle 3: Business should uphold the freedom of association and the effective recognition of the right to collective bargaining</u>			
<u>Principle 4: Business should support the elimination of all forms of forced and compulsory labour</u>			
<u>Principle 5: Business should support the effective abolition of child labour</u>			
<u>Principle 6: Business should support the elimination of discrimination in respect of employment and occupation</u>			
<i>Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour</i>			
<i>The good practices in place within the Group</i>	➤ Pertinent policies, procedures and activities planned to meet this criterion.	As a responsible employer, Eurotunnel Group seeks to promote the personal fulfilment and development of its employees, which it considers a key factor in its corporate strategy.	

		<p>Its human resources policies have been developed in order to foster equal opportunities and treatment for all Group employees throughout their careers.</p> <p>The main focus of the Group's training policy is to maintain a high level of operational performance within teams, enabling them to contribute to the development of the business.</p> <p>The Group has a training centre, the Opal Coast International Railway Training Centre (CIFFCO), which provides professional training services essentially devoted to activities in the rail sector.</p> <ul style="list-style-type: none"> • <i>On 3 July 2014, the train driver training conducted by CIFFCO was officially registered in the French national directory of professional certifications, RNCP (Repertoire National des Certifications Professionnelles Français). This will therefore allow it to issue a recognised professional qualification. CIFFCO is now the first, and only, private training organisation with the capacity to deliver this qualification alongside the French public operator.</i> • <i>In 2016, more than 84 000 hours were devoted to employee vocational training, representing an average of just over 25 training hours per employee. The cost of training, which accounted for nearly 2.75% of the total wage bill, stood at €4, 024, 579, compared to €6, 119, 050 in 2015 and €5, 094, 498 in 2014 with constant perimeter.</i> <p>The human resources policies recognise each employee's contribution, taking account of that employee's qualifications, level of responsibility and individual performance.</p> <p>The Eurotunnel Group ensures that all its subsidiaries comply with their legal and contractual obligations regarding working hours.</p>	<p><i>See Registration Document, Chapter 6.2.5, p.211 & 6.3.2, p.214</i></p>
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	<p>➤ Reference to international conventions and standards.</p>	<p>Eurotunnel Group's CSR policy is in line with the observance of fundamental rights as defined in the major international principles – the 1948 Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, OECD guidelines for multinational companies, and the principles of the United Nations Global Compact. Eurotunnel Group supports, adheres to and actively participates in the World Forum for a Responsible Economy and the values it promotes.</p>	<p><i>See above, CSR Charter</i></p>
	<p>➤ Company policy written in order to comply with national labour rights, comply with international standards in international activities, and engage in dialogue with employee representatives (international, national or sector-based).</p>	<p>All Group employees have staff representative bodies, with which the various Human Resources Departments, the Group Human Resources Department and the Group departments maintain constructive dialogue.</p> <p>The Eurotunnel Group ensures that all its subsidiaries comply with their legal and contractual obligations regarding working hours. In the United Kingdom, the average working week for ESL employees is 37 hours (i.e. 1,924 hours per year) based on individual contracts and agreements in place with the labour union Unite and the staff representative bodies. In France, employees' working hours (with the exception of certain senior managers and directors) are organised on a weekly basis, and must not exceed an average of 35 hours a week over the year, and in any event, not more than 1,600 hours per year.</p> <p>The Group's CSR policy, signed by the Chairman and CEO, states that the Group has made 'the issue of improving security and health at work a major concern with the renewed and expressed target of zero accidents'.</p>	
	<p>➤ Integration of references to the principles of labour law into contracts with suppliers and other partners.</p>	<p>The general procurement conditions (Point 17) contain references to the legal obligations in relation to labour issues and note the obligation for suppliers to comply with the fundamental principles of the Charter of Ethics and Behaviour.</p>	

	<p>➤ Specific commitments and human resources policies in line with the Group's priorities for national development or priorities relating to decent employment in the countries where it operates.</p>	<p>Eurotunnel Group is committed to promoting diversity as a key driver of performance to better reflect the society in which it operates:</p> <ul style="list-style-type: none"> • <i>Professional equality between men and women is a particularly important lever in the Group's diversity policy. Its adherence to the principles of gender equality is reflected in the application of an equal opportunities policy in recruitment, access to training, remuneration and promotion. As part of this process, an <u>agreement on professional equality</u> to do away with wage gaps between men and women was signed in 2009 with the labour unions in France for an indefinite period. This was reinforced by a plan of action signed in July 2013 for a period of 12 months, which is in line with continued development of the human resources policy aimed at guaranteeing non-discrimination and gender equality.</i> • <i>In the United Kingdom, the 'Rate for the Job' remuneration system and the HAY method ensure fair remuneration.</i> • <i>Since 2015, the Group entered into a <u>partnership with the 'Capital Filles' association</u>, which organises mentoring of young girls in technical high schools by female professionals to promote accessibility by women to traditionally male-dominated job sectors. In 2016, 12 mentoring opportunities of this kind were established at the Calais high school, lycée Léonard de Vinci (HQE).</i> <p>Eurotunnel Group is committed to promoting diversity as a key driver of performance to better reflect the society in which it operates. This can be seen in its commitments:</p> <ul style="list-style-type: none"> • <i>From January 2014, with the <u>Réseau Alliances</u> (Lille Alliances Network), to promote an employment support programme specifically aimed at disadvantaged young people seeking jobs. Known as the Groupe de Dynamique d'Embauche (GDE), this programme calls for the involvement of Eurotunnel Group employees who volunteer over a nine-month period to mentor these young people.</i> • <i>To support the first-time employment, professional training and continued employment of disabled people. This commitment was formalised in France through an agreement signed in 2010 with the</i> 	<p><i>Cf. Reg.Doc, 6.2.4 ; p.208</i></p> <p><i>Cf. Reg.Doc, 6.2.4 ; p.207</i></p>
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		<p>trade union organisations for a term of three years, covering the period from 2011 to 2013. Negotiations are due to be held this year for its renewal.</p> <ul style="list-style-type: none">• A training program was set up within the framework of a partnership between the Eurotunnel Group and a temporary employment agency specialising in helping disabled people. As part of this partnership, CIFFCO organised the training of 12 people as reception agents in 2016. At the same time, another action was carried out with the Direccte of the Hauts-de-France, which allowed the insertion of a handicapped worker for a one-year service contract.	Cf. Reg.Doc, 6.2.4 ; p.209
	<p>➤ Participation and leadership in wider efforts by employer organisations (both international and national) to collectively meet the challenges in terms of work standards in the countries where it operates, where applicable as part of a tripartite approach (companies, labour unions, governments).</p>	<p>Together with its actions in promoting the continued employment of disabled people, the Group works hand in hand with the sheltered and supported sectors by using employment agencies for disabled workers. An agreement was therefore signed in 2010, and is still in place, between the Group and the AFAPEI (Association Frontalière des Parents et Amis de l'Enfance Inadaptée). On 23 July 2013, a partnership framework agreement was signed between Eurotunnel Group and APF (the French association for people suffering from paralysis). Within this partnership, work was contracted to APF frequently in 2014 for various services, contributing to an exponential increase in the value of these services, which grew to five times the figure reported for 2013.</p>	
Criterion 7: The COP describes effective management systems to integrate the labour principles			
The good practices in place within the Group	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The Group Human Resources Department has introduced monthly monitoring reports on all company indicators (health, safety, security, absenteeism, turnover, training, etc.), which involves all Group subsidiaries. This allows the Group to measure the progress made in relation to the objectives set or to propose solutions if the company's position deteriorates.</p>	

	<p>➤ Evaluations of risks and impacts concerning work standards.</p>	<p>Within the Board of directors, the Safety and Security Committee ensures that the appropriate systems to protect the safety of customers, employees, subcontractors and all stakeholders are in place.</p> <ul style="list-style-type: none"> • <i>Each Group subsidiary has its own Safety Department, which endeavours to promote a culture of prevention in relation to safety, with the aim of creating a safe, healthy work environment over time. Performance in matters of safety is monitored regularly by each of these entities as part of the continuous improvement process, with appropriate corrective actions taken as needed.</i> • <i>All safety events are recorded and analysed in order to issue recommendations and produce action plans. Various safety indicators are monitored continuously and systematically, notably by the Safety and Security Committee within the Board of Directors, in order to ensure improved overall performance.</i> • <i>A materiality analysis, which includes consulting with the main stakeholders within and outside the Group, has made it possible to identify and establish the hierarchical order of the Group's primary CSR challenges, both internal and external. It also allowed the Group to identify present and future opportunities and risks that could have a significant impact on its stakeholders, its environment or its economic performance.</i> 	<p><i>Cf. Reg.Doc, 6.2.1 ; p.202</i></p>
	<p>➤ Mechanisms for dialogue with labour unions.</p>	<p>The implementation of efficient forms of dialogue with employees was identified as a highly important challenge in the materiality analysis conducted by KPMG. Labour relations are very important for the Group, particularly negotiations with staff representative bodies. The Group has always strived to establish long-term and constructive relationships with all its employees.</p> <p>During the year 2016, 16 company-level agreements were signed by the Group's subsidiaries on topics such as profit-sharing, the strategic workforce planning (GPEC) and wage negotiations. Two agreements introducing a Savings Plan for collective retirement and a Group Savings Plan were also signed at Group level on 7 March 2016. An amendment to the PEG was also signed on 7 March 2016.</p>	

			<p><i>Cf. Reg.Doc, 6.2.1 ; p.203</i></p>
	<p>➤ Allocation of responsibilities relating to work standards in the organisation.</p>	<p>The Human Resources Departments of the subsidiaries, backed by the Group Human Resources Department, are responsible for defining and implementing the employment policy.</p> <p>With regard to health, hygiene and safety, the Safety Department in each Group subsidiary, the committees on hygiene, safety and working conditions (CHSCT) or the Occupational Health Service in the United Kingdom and the occupational healthcare professionals cooperate in this process. All of these entities work to ensure the protection of the health and safety of employees, and the improvements in their working conditions. They analyse occupational risk and ensure – through means including surveys and inspections – compliance with the regulations in place.</p> <p>Within the Board of directors, a Safety and Security Committee ensures that the appropriate systems and procedures to protect the safety of customers, employees, subcontractors and all stakeholders are in place.</p>	
	<p>➤ Internal awareness-raising and training about work standards within the organisation.</p>	<p>In 2016, the Eurotunnel Group also continued its actions in favour of health and safety by conducting awareness-raising and training sessions for its employees:</p> <ul style="list-style-type: none"> ▪ <i>Europorte organised the 5th edition of the Safety Week on the theme of safety at work and the sharing of feedback, based on the main causes of workplace accidents in the company. In 2016, Europorte's CODIR carried out 59 site visits, during which the statistics were presented and examined in the context of extensive exchanges.</i> ▪ <i>An awareness-raising campaign, entitled "Safety makes its cinema", was launched by the general management of the Fixed Link in 2016 and will continue in 2017. Based on short format videos broadcast on the corporate intranet, this campaign aims to achieve greater awareness of security issues and to promote and share best practices.</i> ▪ <i>As in 2015, the Group conducted in 2016, a number of disability</i> 	<p><i>Cf. Reg.Doc, 6.2.1 ; p.203</i></p>

		awareness campaigns with the specialist company " Made in TH ", including a dedicated ambassador, the organization of a monthly on-site Conducting interviews and implementing accompanying measures	
	<ul style="list-style-type: none"> ➤ Active engagement with suppliers concerning the challenges relating to work standards. 	The general procurement conditions, along with tenders and specifications, contain references to the applicable legal obligations in terms of employment and to compliance with the fundamental principles of the Group's Ethics Charter. Health/safety questionnaires are sent to suppliers and subcontractors during tenders.	<i>Cf. Reg.Doc, 6.2.1 ; p.217</i>
Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration			
The good practices in place within the Group	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	The Group's control framework and procedures for reporting and information on corporate indicators are regularly reviewed and updated. These procedures define the roles and responsibilities of each player in the reporting process, the methods for collection of information, the necessary checks, and the consolidation and evaluation of the information sent by the various Human Resources Departments of the subsidiaries.	<i>See Methodological note, Reg Doc, 6.8,pp.231-232</i>
	<ul style="list-style-type: none"> ➤ System for tracking and measuring performance. 	Each subsidiary has its own system for entering corporate indicators, which are consolidated by the Group Human Resources Department.	
	<ul style="list-style-type: none"> ➤ Dialogue with the representatives of employee organisations to verify the progress made and identify priorities for the future. 	In France, all subsidiaries have a Works Council and a Health and Safety Committee, which meet according to the specific operational rules governing each committee. 12 meetings were held during 2016 between ESGIE management and HSC and 11 with Works Council members In the United Kingdom, the Company Council and the Safety, Health and Environment Committee are the two organisations for ESL employees with which permanent dialogue has been established. These two committees meet once every two months. The Company Council met	<i>See Reg.Doc, 6.2.3 ; p.205</i>

		<i>six times</i> in 2016, and the Safety, Health and Environment Committee met <i>six times</i> during the same year.	
	<ul style="list-style-type: none"> ➤ Audits or other measures to monitor and improve work standards in companies in logistics chains in line with international work standards. 	<p>Audits are undertaken regularly by the quality audit departments of the various subsidiaries.</p> <p>Each year, targeted audits are carried out in France and the United Kingdom by the safety and sustainable development department; in 2016, <i>eight internal audits</i> were carried out – one in the operational divisions and seven on subcontractors.</p>	<i>See Reg.Doc, 6.4.1 ; p.218</i>

Reliable policies and procedures on protection of the environment

Principle 7: Business should support a precautionary approach to environmental challenges

Principle 8: Business should undertake initiatives to promote greater environmental responsibility

Principle 9: Business should encourage the development and diffusion of environmentally friendly technologies

Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship.

<i>The good practices in place within the Group</i>	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	Eurotunnel Group has set up a formal CSR policy, supported and sustained at the highest level of the organisation by the Chairman and Chief Executive and the Board of Directors. This policy came into force in 2015, and dictates the Group's principles, challenges and commitments. The CSR objectives will be defined each year and will be included in the objectives assigned to the directors and managers of the various entities of the Group.	<i>See above, CSR Charter</i>
	<ul style="list-style-type: none"> ➤ Reference to international conventions and other international mechanisms. 	Eurotunnel Group's CSR policy is in line with the observance of fundamental rights as defined in the major international principles – the 1948 Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, OECD guidelines for multinational companies, and the principles of the United Nations Global Compact. Eurotunnel Group supports, adheres to and actively	

		participates in the World Forum for a Responsible Economy and the values it promotes.	<p><i>See, Reg.Doc, 6.4;p.218</i></p> <p><i>See above, CSR Charter</i></p>
	➤ Discussion on the relevance of sustainable environmental management for the company.	<p>On the basis of the materiality analysis conducted by KPMG, the general environmental policy is classified among the Group's priority challenges and the training of employees in environmental issues among the important challenges.</p> <p>The Group's environmental commitment is focussed on the challenges that have been deemed the most material in the materiality analysis:</p> <ul style="list-style-type: none"> ▪ <i>The general policy for environmental management and in particular, training of employees in environmental issues;</i> ▪ <i>The management of energy consumption and the increased use of renewable energies;</i> ▪ <i>The circular economy policy and waste management.</i> 	
	➤ Written company policy on sustainable environmental management.	In its CSR Charter, the Eurotunnel Group has identified five major challenges which correspond to core issues set out in the major founding texts and the various international frameworks and standards (Global Compact; GRL, ISO 26000). Among these major challenges, the environmental challenge has been identified as a priority.	
	➤ Integration of minimum environmental standards into contracts with suppliers and other partners.	<p>The general procurement conditions, along with tenders and specifications, contain references to the applicable legal obligations in terms of employment and to compliance with the fundamental principles of the Group's Ethics Charter.</p> <p>A 'Sustainable Development' questionnaire is sent to suppliers and subcontractors during tenders.</p> <p>An article on 'Environmental Requirements' has also been inserted into subcontractor contracts.</p>	

		more than 3,500 in 2016. This number is expected to reach 5,000 in 2017.	
Criterion 10: The COP describes effective management systems to integrate the environmental principles			
The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	<p>Eurotunnel Group has developed a policy for monitoring and managing the greenhouse gas emissions of its subsidiaries in anticipation of the publication of the implementing regulations for Article 228-II of the Grenelle 2 Law regarding the disclosures required from any entity providing transport services or organising the provision of transport services, on the quantity of carbon dioxide emitted by the mode(s) of transport used to carry out that service.</p> <p>Eurotunnel Group is certified as The Carbon Trust Standard since 2009. In 2011, the Group's management of greenhouse gas emissions was audited by this independent organisation, which set the baseline level of greenhouse gas emissions for the whole of the Group's activities at 2010 levels. In 2015, for the Fixed Link scope, Eurotunnel Group's Carbon Trust Standard certification was renewed in recognition of its carbon footprint reduction policy for the period 2013-2014. . An audit is scheduled for the spring of 2017, for the purpose of renewing certification for the period 2015-2016.</p> <p>Furthermore, the Eurotunnel Group is the sole cross-Channel operator to have conducted and published a carbon footprint assessment. In France and the United Kingdom, an exhaustive carbon footprint assessment of the Fixed Link was performed in 2007, using the method developed by ADEME. This carbon footprint assessment identified the Fixed Link's primary sources of greenhouse gas emissions. This was followed by the implementation of an action plan focused on two factors that accounted for 80% of the emissions, namely the use of energy provided by electricity and fossil fuels, and refrigeration fluid leakages.</p>	See Registration Document; Chapter 6, paragraph 6.4.2,p.219

	➤ Evaluations of environmental risks and impacts.	<p>A risk review is conducted each year on all of the activities of the Group and its subsidiaries by the internal audit and risk management departments.</p> <p>These risks are described in Chapter 4 of the Registration Document.</p> <p>Pursuant to French Law No 76-663 of 19 July 1976 relating to installations classified for the protection of the environment (ICPE), both terminals in Coquelles and Sangatte are designated ICPE sites due to the potential dangers and risks that their activities may pose to the surrounding area and to health, safety, nature and the environment, such as refrigeration, air-conditioning, storage and use of flammable liquids, workshops and paints. These activities are set out in a list which, on the basis of the severity of the dangers or risks that they may represent, requires Eurotunnel Group to either report to or request authorisation from the Prefecture of Pas-de-Calais in respect of the activities concerned. These activities are monitored by the regional authority for the environment, planning and housing (DREAL). Similarly, pursuant to French Law No 92-3 of 3 January 1992 on water, the Concessionaire FM must request authorisation from the relevant administrative authority for any proposed construction, works or activities to be carried out outside the ICPE area, which may pose a danger to public health and safety, endanger the free flow of water, reduce the availability of water, substantially increase the risk of floods or seriously damage the quality or diversity of the marine environment.</p>	<p><i>See Registration Document; Chapter 6, paragraph 6.4.1, p.219</i></p>
	➤ Evaluations of the impact of product life cycle, providing green management policies.	<p>As an innovative rail company and responsible infrastructure manager from the very beginning, Eurotunnel Group has set itself apart by means of its sustainable development approach, which seeks to reconcile financial performance, social equity and environmental protection:</p>	

		<ul style="list-style-type: none"> • the Tunnel runs entirely underground and does not interfere in any way with the marine environment; • a transport that by its very nature limits impacts on the environment (it pollutes twenty times less than ferries: a lorry transported on-board a shuttle releases <u>8.8 kg of CO2 compared to 158 kg</u> on a ferry); • the electric traction system adopted is a major factor in reducing the Group's carbon footprint and greenhouse gas emissions; • a policy of daily electricity savings (with the use of electric power <u>90% of nuclear or hydraulic origin, which therefore does not release CO2</u>); • Increase from <u>30 to 32 wagons</u> on a Truck Shuttle without significant additional electricity consumption; • the <u>replacement of diesel locomotives</u> for works and maintenance by wagons that are now automatic thanks to battery-powered electric drives; <ul style="list-style-type: none"> ▪ the development, in early 2013, <u>of more fuel-efficient driving of shuttles</u>, with a simulator equipped with a module dedicated to ecodriving. <p>According to the findings of the materiality analysis, the circular economy policy and waste management were included among the important challenges for Eurotunnel Group. The Group has a waste collection and treatment strategy that prioritises recovery or reuse. Most waste products come from industrial activities and vary in type and quantity from year to year depending on the projects being undertaken.</p> <p>In France, the Fixed Link segregates non-hazardous industrial waste, <u>94% of which is recycled</u> as briquettes used in industrial boilers. This process could be implemented following the emergence of new solid-recovered fuel (SRF) sectors. There are three ways of recovering waste: improved segregation; waste buy-back and outlets; and recycling or free take-back.</p>	<p>See Registration Document; Chapter 6, paragraph 6.4.</p>
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		<p>In keeping with the 1992 Montreal protocol, actions were implemented to reduce emissions of all gases leading to ozone layer depletion. Halon is being dismantled from the infrastructures of the Fixed Link. Also, the refrigerants used in the cooling ducts in Sangatte and Shakespeare Cliff were also entirely replaced for the French portion and for half of the British portion with new cooling units that are more energy-efficient and have no negative impact on the environment.</p> <p>Tests have been carried out, since 2015, to equip the on-board air conditioning systems with GSM datacards that will take readings, every two hours, of the pressure and temperature of the generators. This will minimise leakage by making detection easier and quicker. We are moreover considering replacing some of these on-board air-conditioning systems.</p> <p>An investment in 2016 and 2017 is moreover allocated to the purchase of new HVAC (heating, ventilation and air conditioning) units for the Passenger Shuttles (150 out of a fleet of 450) in order to overcome the ageing of this equipment.</p> <p>Since the commissioning of the Truck Shuttles, the Eurotunnel Group has enabled savings of nearly 3.7 million tonnes of CO₂ compared to ferries, and since 2006, the Group's carbon footprint and GHG emission levels have fallen by 55%.</p> <p>From the time the Truck Shuttles were put into service, Eurotunnel has enabled savings of nearly <u>3.4 million tonnes of CO₂ compared to ferries, and since 2006, the Group's carbon footprint and GHG emission levels have fallen by 55%.</u></p> <p>At the end of 2016, the fleet of 100% electric vehicles operating on the Concession terminals reached 37 vehicles. 12 other vehicles have been ordered and have been delivered in March 2017.</p>	<p><i>See Registration Document; Chapter 6 paragraph 6.4.2, pp.220-221</i></p>
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		<p>Europorte France has set up an eco-driving initiative to increase awareness among high-main line installation of technical equipment to cut down fuel consumption by locomotives, as well as driver assistance systems depending on the railways network and the train, so that drivers can adopt a more environmentally-friendly driving style. In 2015, Europorte France also commissioned – a first in France – seven medium horsepower locomotives in a new model (Vossloh DE18) which, for an equivalent level of use, provide a 15% to 20% reduction in fuel consumption.</p> <p>The Group's GHG emission levels decreased 12% compared to the previous year on a like-for-like basis.</p> <p>The Concessionaires have large land reserves in France and the United Kingdom and have, since the Tunnel's construction, created several dozen hectares of nature reserves for the conservation and development of biodiversity.</p> <ul style="list-style-type: none"> • In France: The '<u>Jardins Ordonnés</u>', with their seven-hectare lake, are a much-used haven for migrating species and an essential nest-building site for many birds. • In the United Kingdom, the nature reserve of <u>Samphire Hoe</u> attracts over 80,000 visitors each year. Eurotunnel Group won an twelfth successive <u>Green Flag</u> Award in 2016, recognising the high ecological quality of this nature reserve. 	<p><i>Chapter 6 paragraph 6.4.2, pp.220</i></p>
	<p>➤ Allocation of responsibilities within the organisation.</p>	<p>The various <u>Safety and Sustainable Development Departments</u> within the subsidiaries monitor energy consumption.</p> <p>The <u>Strategy and Sustainable Development Committee within the Board of Directors</u> examines the issues relating to the Group's environmental guidelines and reports on these to the Board of Directors. The Committee is responsible in particular for examining the Group subsidiaries' performance in relation to the environment and the</p>	

		<p>strategic guidelines intended to promote good environmental management, conserve national resources and limit the impacts of the Group's activities on the environment.</p> <p>The Group Human Resources Department monitors and consolidates the environmental data from the various Group subsidiaries.</p>	
	➤ Internal awareness-raising and training about sustainable environmental management for executive management and employees.	As part of their induction to the company, all new employees learn about the company's environmental policy, its targets, and the organisation put in place to minimise the environmental impacts of its activity.	
	➤ Other good practices	<p>An 'eco-comparer' is available on the Le Shuttle website so that passengers can calculate the average CO₂ emissions saved by using the Passenger Shuttles. https://www.eurotunnel.com/fr/professionnels/autocaristes/eco-comparateur/</p> <p>Since 2015, Eurotunnel Group provides passengers with electric cars with a fast recharge facility free of charge, at the Fixed Link sites in Coquelles (Pas-de-Calais) and in Folkestone (Kent). –In thirty minutes, they can charge 80% of the battery capacity (universal battery chargers) with a range of over 250 km. There are sixteen dedicated points that can be used simultaneously at the two terminals of the Channel tunnel. These are the only sites in Europe to provide such a comprehensive offering. The number of customers using the Passenger Shuttle in electric cars increased from 40 in 2014 to 800 in 2015 and more than 3, 500 in 2016. This number is expected to reach 5,000 in 2017.</p>	
Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship.			
	➤ Pertinent policies, procedures and activities planned to meet this criterion.	As early as 2002, Eurotunnel Concessionaires installed an environmental management system based on the requirements of the <u>ISO 14001 standard</u> .	

The good practices in place within the Group		<p>With the <u>SQAS Rail (Safety and Quality Assessment System) assessment</u> procedure every three years since 2014 for the entire scope of its French subsidiaries, Europorte implements a continuous improvement procedure. This assessment supplements the <u>MASE and ISO 9001 certifications</u>.</p> <p>Within the framework of the regulatory developments arising from France's Grenelle Environment Round Table programme, <u>in 2013</u>, Socorail <u>obtained EcoPhyto certification</u> for weeding activities conducted on the rail networks of certain ports and industrial sites. The system implemented is intended to limit the use of crop protection products and better control their impact.</p>	<i>See Registration Document; Chapter 6, paragraph 6.4.1</i>
	➤ System for tracking and measuring performance.	All of the environmental indicators are monitored by the various Safety and Sustainable Development Departments within the subsidiaries and by the Group Human Resources Department, and are published once a year in the Registration Document, the Annual Report and the CSR Report for the Group.	
	➤ Examination of executive management for monitoring and improvement of results.	The <u>Strategy and Sustainable Development Committee within the Board of Directors</u> is responsible for examining the Group subsidiaries' performance in relation to the environment and the strategic guidelines intended to promote good environmental management, conserve national resources and limit the impacts of the Group's activities on the environment.	
	➤ Audits or other measures to monitor and improve work standards in line with international work standards.	Comprehensive energy audits spanning the full range of energy consumption for the Concession's operations – going beyond the regulatory requirements – were conducted in 2015 by an external auditor. The conclusions rendered in 2016, suggest various actions for energy performance as well as paths for improvement for further environmental gains.	<i>See Registration Document; Chapter 6,</i>

		In 2016, eight internal audits were carried out – one in the operational divisions and seven on subcontractors.	paragraph 6.4.1,p.218
	➤ Results of integration of principles relating to the environment.	The Group has made no provisions against environmental risks, nor did it pay out any court-ordered compensation for environmental damage during the course of the year. The obligation to establish a financial guarantee against any environmental damage, as defined in Article L. 516-1 of the French Environmental Code, does not apply to the Group's activities. No fine of any nature has been imposed on the Group and nor has it been reported for non-compliance of its operations.	See Registration Document; Chapter 6, paragraph 6.4.1,p.219

Reliable policies and procedures on preventing corruption

Principle 10: Business should work against corruption in all its forms, including extortion and bribery

Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

<i>The good practices in place within the Group</i>	➤ Pertinent policies, procedures and activities planned to meet this criterion.	<p>In its <u>Charter of Ethics and Behaviour</u>, Eurotunnel Group lays down clear common rules for prevention of corruption.</p> <p>http://www.myget.eurotunnel.org/en/governance/charter-of-ethics</p> <p><u>The ACHA 0019 procedure (professional ethics code)</u> sets out the Group's ethics standards. These standards not only ensure compliance with applicable laws and regulations, but, beyond legal criteria, they make it possible to build a climate of trust in exchanges between Group representatives and third parties. Each Group buyer or other employee undertakes to abide by the professional ethics code and to seek suppliers who share these commitments. The tender process is designed to guarantee the fair treatment of suppliers during consultations.</p>	See Charter of Ethics and Behaviour above
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	<p>➤ Support from executive management in preventing corruption.</p>	<p>The Ethics Charter was validated by the Board of Directors in January 2013.</p> <p>The Procurement and Legal Departments and the Group's Executive Management actively support measures and policies to prevent corruption and pay very close attention to the application of the policies and procedures in place.</p>	
	<p>➤ Formal, public zero-tolerance policy in respect of corruption.</p>	<p><u>The Ethics Charter</u> states the following in particular: 'No Eurotunnel Group employees may directly or indirectly give undue advantages to third parties, of any type and by any means, in order to obtain or maintain a commercial transaction or favourable treatment. All kinds of corruption of public officials are forbidden'.</p> <p>The relationships between Eurotunnel Group and its suppliers go beyond the mere purchasing of goods and services. The ACHA 0019 procedure (professional ethics code) sets out the Group's ethics standards. These standards not only ensure compliance with applicable laws and regulations, but, beyond legal criteria, they make it possible to build a climate of trust in exchanges between Group representatives and third parties.</p> <ul style="list-style-type: none"> • <i>Each Group buyer or other employee undertakes to abide by the professional ethics code and to seek suppliers who share these commitments.</i> • <i>The tender process in place within the Group guarantees the fair treatment of suppliers during consultations.</i> • <i>Failure by employees of the Group to abide by the ethical rules or the ethics code can lead to disciplinary action.</i> • <i>The Procurement Divisions of the various entities have taken actions that, beyond referring to Eurotunnel Group's Charter of Ethics and Behaviour in all new contracts, require their suppliers to comply with its fundamental principles and to sign the <u>Compliance Policy</u></i> 	

		<u>(Article 23)</u> . Article 23.2.1 requires that suppliers 'comply with the French regulations on corruption, as well as UK corruption laws, notably the <u>Bribery Act 2010</u> .	See Registration Document; Chapter 6, paragraph 6.3.4,p.217
	➤ Other good practices	<p>Eurotunnel Group has been a signatory of the <u>Charter for Responsible Supplier Relations</u> since January 2012. This charter is broken down into ten commitments for responsible procurement, ensuring a genuine partnership between customers and their suppliers with due regard to their respective rights and obligations. The Group is committed, in particular, to ensuring financial equity towards suppliers, to respecting the principle of transparency, to incorporating environmental issues and even to ensuring the territorial responsibility of its company. It thereby represents a measure intended to prevent corruption.</p> <p>The Group is also a member of the steering committees for the <u>'Responsible Supplier Relations' charter and certification</u> and has clearly demonstrated its wish to be part of this certification process, as an extension of the implementation of the charter's ten commitments.</p>	
Criterion 13: The COP describes effective management systems to integrate the anti-corruption principles			
The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	In addition to its publication on the internet and intranet sites of Eurotunnel Group entities, the <u>Charter of Ethics and Behaviour</u> is given to all new employees, suppliers and subcontractors when their contracts are signed.	
	➤ Human Resources procedures supporting the anti-corruption commitment or policy.	The HR policies of Group entities contain an ethics code that describes the moral principles and ethical values governing the Group's activities. It defines the behavioural rules that are acceptable in the professional environment and helps us to understand and observe those rules. It states the policies and laws that we are required to know so that we can perform our professional activities correctly and it describes our company policy in relation to fraud.	

		As part of their induction to the company, all new employees are provided with information about the HR policies and procedures relating to the ethics code and the Charter of Ethics and Behaviour, which is also provided.	See Charter of Ethics and Behaviour, page 7
	<ul style="list-style-type: none">➤ Communication channels and tracking mechanisms for reporting concerns or requesting advice.	The Ethics Charter specifies the whistleblowing methods available to employees: 'If employees feel that a legal or regulatory stipulation or these rules have not been observed or are on the point of not being observed, they must inform their superior immediately. In the event of any doubts, the legal advisory service, human resources or external facilities may also be consulted. Employees may also use the Group's confidential whistleblowing facility in due observance of the law and rules applicable in the countries in which they are resident or carry out their functions, pursuant to the special authorisation issued by the CNIL data privacy commission in its deliberation No 2005-305 of 8 December 2005, amended by deliberation No 2010-369 of 14 October 2010. This facility is to be used when employees feel that the provision of information to their superiors may entail difficulties, or that this may not be followed up'.	
Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.			
The good practices in place within the Group	<ul style="list-style-type: none">➤ Pertinent policies, procedures and activities planned to meet this criterion.	This annual risk review also covers this issue.	See Charter of Ethics and Behaviour, page 1
	<ul style="list-style-type: none">➤ Process for management of incidents.	An internal whistleblowing mechanism and an ethics officer are in place to address any risk of corruption. An e-mail address (mailto:contact.ethic@eurotunnelgroup.com) is available for any stakeholders encountering any difficulties or with queries as to the boundaries or application of the rules laid down in the Ethics Charter.	
	<ul style="list-style-type: none">➤ Other good practices		

II. Acting to support the broader objectives of the United Nations

Criterion 15: The COP describes core business contributions to UN goals and issues

<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The strategic vision of the Eurotunnel Group, as this is reflected in part in its CSR Charter, is in phase with the objectives and challenges laid down in the UN's Global Compact. In its Charter, the Group has identified five major challenges, which correspond to core issues set out in the major founding texts and the various international frameworks and standards (Global Compact; GRL, ISO 26000). These challenges can be split into several categories: social, regional, environmental, economic and ethical.</p> <ul style="list-style-type: none"> • Social challenges: respect the rights of employees. • Regional challenges: develop close links with the region. • Environmental challenges: reduce the impact of the business activity on the environment. • Economic challenges: manage relationships with customers • Ethical challenges: continue with policy development and value sharing within the Group in connection with stakeholders. <p>Answering these challenges has been and remains a priority for Eurotunnel Group which, since its inception, has been committed to a social responsibility policy reconciling economic performance, social equity and environmental protection as part of a programme of continuous improvement.</p>	<p>See CSR Charter</p>
	<p>➤ Adopting or amending operational procedures to maximise the contribution to United Nations objectives and themes.</p>	<p>In keeping with the 1992 Montreal protocol, actions were implemented to reduce emissions of all gases leading to ozone layer depletion. By the same token, halon has been phased out in 2016 from the Fixed Link infrastructures. Also, the refrigerants used in the cooling ducts in Sangatte and Shakespeare Cliff will be replaced by new cooling units that are more energy efficient and have no negative impact on the environment.</p>	

		<p>Since 2015, Eurotunnel Group provides passengers with electric cars with a fast recharge facility free of charge, at the Fixed Link sites in Coquelles (Pas-de-Calais) and in Folkestone (Kent) – in thirty minutes, they can charge 80% of the battery capacity (universal battery chargers) providing a range of over 250 km. There are sixteen dedicated spots that can be used simultaneously at the two terminals of the Channel Tunnel. These are the only sites in Europe to provide such a comprehensive offering. The number of customers using the Passenger Shuttle in electric cars increased from 40 in 2014 to 800 in 2015, and more than 3,500 in 2016. This number is expected to reach 5,000 in 2017.</p> <p>Other initiatives are under way, notably the purchase of electronic variable speed drives for system engines, as explained in Chapter II of this Registration Document. Wind tunnel studies were also carried out on the rolling stock with a view to replacing the pagodas with reflectors to improve penetration (specific data sheets to be validated by the regional authority DREAL). Lastly, at the end of 2016, the fleet of 100% electric vehicles operating on the Concession terminals reached 37 vehicles. 12 other vehicles have been ordered and have been delivered in March 2017.</p>	<p><i>See, Reg.Doc, chapitre 6.4.2, p.220</i></p>
Criterion 16: The COP describes strategic social investments and philanthropy			
<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>A key player in the natural, economic and human environment, Eurotunnel Group fulfils its social responsibility through concrete commitments and solidarity actions for community support:</p> <ul style="list-style-type: none"> ▪ <i>Payment since 2010 of 10% of the land rental of the wind farm on its Coquelles site to Secours Populaire, which distributes the payments in the form of “energy vouchers” to families in Pas-de-Calais. Following its expiry, the partnership agreement between the Eurotunnel Group and Secours Populaire, was renewed for two more years (2015-2017).</i> 	

		<ul style="list-style-type: none"> ▪ <i>Active support to the French Second Chance Foundation, a recognised public interest group committed to the rehabilitation of people who have faced great difficulties in their lives.</i> ▪ <i>Solidarity actions in favour of Papa Tohanga, an association for social aid to populations of the Democratic Republic of Congo, whose founding chairman is an ESGIE staff member. In 2015, a bus was gifted to the association.</i> ▪ <i>Common actions set up with the French Red Cross for customers in the French terminal of the Concession.</i> ▪ <i>Donations to various associations such as “La Ressourcerie du Calaisis” as part of a crowdfunding campaign conducted by the FACE Calaisis association.</i> <p>The Eurotunnel Group financially supports the <u>World Forum for a Responsible Economy in Lille</u>. Launched by the Réseau Alliances, this organisation aims to promote a responsible global economy, by sharing the best business practices of responsible companies.</p>	<p><i>See, Reg.Doc, 6.3.3, p.216</i></p>
	<p>➤ Seeking social investments and philanthropic contributions linked to core business.</p>	<p>The Group invests heavily in young people and is developing its relationships with universities and schools with the aim of fostering a better understanding of its business and of better integrating young people into the world of work:</p> <ul style="list-style-type: none"> ▪ <i>Training diploma in railway engineering and maintenance professions set up and developed by Europorte in close collaboration with CNAM;</i> ▪ <i>Agreement with the Ecole Nationale des Ponts et Chaussées engineering school to establish an education and research “Railway transport sciences” chair dedicated to the study of railway activity, until the year 2018. The aim of this chair is training and research on the topics associated with infrastructure and transport services. This initiative attests to the Group’s willingness to share its expertise in order to advance science and innovation, and to position the railway industry as a profession of the future;</i> ▪ <i>Partnerships with the ICAM and IAE Lille institutions to develop a new approach to maintenance professions;</i> 	<p><i>See, Reg.Doc, 6.3.2, p.215</i></p>

		<ul style="list-style-type: none"> ▪ <i>Participation in November 2016 in the "Professeurs en entreprises" operation initiated by Fondation C Génial, a foundation for scientific and technical culture. This operation is aimed at teachers (and other members of the national education system) at the secondary level and, in addition to the professional integration of young people, it makes it possible to promote the sectors and the scientific and technical professions of the companies visited. Several managers of the Fixed Link Rolling Stock were mobilised in favour of this action.</i> 	
	➤ Other good practices	<p>Eurotunnel Group offers its expertise in managing transport infrastructures and rail activities to research, to training and to various public bodies at a European, national and regional level.</p> <p>In research and development, Eurotunnel Group is a founding member of Railenium, the European Institute for Technological Research in Rail Infrastructure, located near Valenciennes and chosen by the French State as an 'investment programme of the future'. Since 2015, Eurotunnel has been hosting railways tests in connection with Railenium to accelerate the type-approval of civil engineering structures. The tests are intended to measure the durability of tracks and equipment and will enable preventive maintenance or even self-reparability. The Group is therefore actively participating in the design of a rail infrastructure that is safer and more sustainable, economical and intelligent.</p> <p>Eurotunnel Group is a founding member of the Fer de France association, which was created in 2012 to bring together the leading players in the French railway industry. The works presided over by the Group have led to proposals for the French Government to recognise different professions in this developing sector.</p>	

See Registration Document; Chapter 6, paragraph 6.3.2, p.215

Criterion 17: The COP describes advocacy and public policy engagement			
The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The Group's Charter of Ethics and Behaviour and CSR Charter takes a clear position in support of the principles of the United Nations.	
	➤ Public commitment to the importance of acting on one or more United Nations themes.	Eurotunnel Group regularly reasserts its adherence to the Global Compact and its fundamental principles through its Communication on Progress (COP) and the declaration of continued support provided by its Chairman and CEO.	
	➤ Encouraging company executives to participate in summits, conferences and other interactions about public policies in relation to one or more United Nations objectives.	Eurotunnel Group is a partner of the World Forum in Lille. The Group's Chairman and CEO has been involved in the discussions of this Forum in favour of responsible global economy in relation to the objectives of the United Nations.	
Criterion 18: The COP describes partnerships and collective action			
	➤ Developing and establishing partnerships with public and private organisations.	Eurotunnel Group is a partner of the World Forum in Lille, which supports and promotes a responsible global economy.	
	➤ Joining industry peers, UN organisations and/or stakeholders in initiatives that contribute to resolving shared challenges.	Eurotunnel Group offers its expertise in managing transport infrastructures and rail activities to research, to training and to various public bodies at European, national and regional level. In research and development, Eurotunnel Group is a founding member of Railenium , the European Institute for Technological Research in Rail Infrastructure, located near Valenciennes and chosen by the French Government as an 'investment programme of the future'. Since 2015 , Eurotunnel has been hosting railways tests in connection with Railenium to accelerate the type-approval of civil engineering structures. The tests are intended to measure the durability of tracks and equipment and will enable preventive maintenance or even self-reparability. The Group is therefore actively participating in the design of a rail infrastructure that is safer and more sustainable, economical and intelligent.	

		<p>The Eurotunnel Group also provides support for the works of the European Committee for Standardisation as part of the working group responsible for drafting a proposed standard for calculating the greenhouse gas emissions of transport services.</p> <p>The Eurotunnel Group is a founding member of the Fer de France association, which was created in 2012 to bring together the leading players in the French railway industry. The works presided over by the Group have led to proposals for the French Government to recognise different professions in this developing sector.</p> <p>The Eurotunnel Group is also an active member of I-Trans, the global competitiveness cluster and the reference cluster for railways in France. The Group's Human Resources Director participates as the controller in the CAPFOR (training project management and coordination circle) operational group, which aims to make existing training more consistent with the industry's expectations, to create a pool of expertise in the region and to develop high-quality higher education with international influence.</p>	<p><i>See Registration Document; Chapter 6, paragraph 6.3.2, p.215</i></p>
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III. Governance and leadership of Corporate Social Responsibility (CSR)

Criterion 19: The COP describes CEO commitment and leadership

<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The Eurotunnel Group's CSR Charter lays down the challenges, but also the Group's objectives and commitments. For 2015, the Group has committed to acting in line with the principles of the Global Compact.</p>	
	<p>➤ The CEO makes an explicit public commitment to CSR and the Global Compact.</p>	<p>The CSR Charter is supported and sustained at the highest level of the organisation by the Chairman and Chief Executive and the Board of Directors.</p> <p>The charter has been signed by the Chairman and Chief Executive Officer.</p>	

	<ul style="list-style-type: none"> ➤ Integrating sustainable development criteria and the principles of the Global Compact into the objectives and incentive programmes for the Chairman and CEO and the executive management team. 	<p>For the year 2016, the Nomination and Remuneration Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is structured around four areas that are directly linked to the Group's activities: safety / security, labour relations, GHG emission and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate a completion rate with respect to the composite index, according to the objectives set for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the free share grant plans subject to performance conditions. The composite index was audited in 2016, as part of the audit of social information by the statutory auditors.</p>	<p><i>See Registration Document; Chapter 6, paragraph 6.1.4, p.199</i></p>
<p>Criterion 20: The COP describes board adoption and oversight</p>			
	<ul style="list-style-type: none"> ➤ The Board of Directors is responsible for and supervises the strategy and long-term performance of CSR. 	<p>The Strategy and Sustainable Development Committee within the Board of Directors examines the issues relating to the company's or Group's environmental guidelines and reports on these to the Board of Directors.</p>	
	<ul style="list-style-type: none"> ➤ The Board of Directors sets up a Monitoring Committee or assigns CSR to a member of the Board. 	<p>The Strategy and Sustainable Development Committee within the Board of Directors oversees the establishment of the Group's CSR policy and receives reports from the various managers of the company's 'green plan', which sets down the environmental priority of a multi-year programme on sustainable development, structured around the themes included in the global CSR policy.</p>	
	<ul style="list-style-type: none"> ➤ The Board (or the Committee) approves the formal CSR reporting. 	<p>Reporting on CSR, coordinated by the Group Human Resources Department, is examined and approved by the Strategy and Sustainable Development Committee.</p>	

Criterion 21: The COP describes stakeholder engagement			
	➤ The company's responsibility publicly acknowledged in terms of its impacts on internal and external stakeholders.	Group teams, each in its respective area, are listening to their stakeholders and primarily to their clients in order to ensure a correlation between their expectations and the Group's long-term goals.	See Registration Document; paragraph 6.1.2, pp.197-198
	➤ Defining sustainable development strategies, objectives and policies in consultation with key stakeholders.	<p>The materiality analysis consisted in identifying the main CSR challenges for the Group and establishing their hierarchical order, based on its operations and its stakeholders' expectations. This analysis was verified by KPMG and conducted in three main steps:</p> <p>Step 1 – Identification: 57 challenges were identified through internal and external documentary review of Eurotunnel Group (Group's publications and publications by companies in the same sector, analysis of media coverage, and repositories specifications).</p> <p>Step 2 – Assessment by the stakeholders: 25 internal and external stakeholders were polled by an independent third party based on a questionnaire. The top 25 CSR challenges were identified.</p> <p>Step 3 – Prioritising of challenges: this is represented as a materiality matrix that reflects the importance assigned by the respondent stakeholders and the impact that each challenge has on the Group's business. By establishing this hierarchical order, it identified a list of challenges arranged in their order of priority (top priority, very important, important):</p>	

		<table><tr><td rowspan="5">PRIORITY CHALLENGES</td><td>1</td><td>Development of the business activity</td><td>Safety and security of sites</td></tr><tr><td>2</td><td>Development of the business activity</td><td>Efficiency and reliability of equipment and infrastructures</td></tr><tr><td>3</td><td>Investing in our employees</td><td>Employee safety</td></tr><tr><td>4</td><td>Development of the business activity</td><td>Safety of travellers and goods</td></tr><tr><td>5</td><td>Environmental performance</td><td>General policy governing environmental management</td></tr></table>	PRIORITY CHALLENGES	1	Development of the business activity	Safety and security of sites	2	Development of the business activity	Efficiency and reliability of equipment and infrastructures	3	Investing in our employees	Employee safety	4	Development of the business activity	Safety of travellers and goods	5	Environmental performance	General policy governing environmental management	
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	3	Investing in our employees		Employee safety															
	4	Development of the business activity		Safety of travellers and goods															
	5	Environmental performance	General policy governing environmental management																
	<p>➤ Consulting stakeholders about dilemmas and challenges for implementation and inviting them to take part in the performance examination.</p>	<p>In 2015, the Eurotunnel Group conducted a materiality analysis to determine its most significant ethical, social and environmental challenges, both internal and external to the company, in light of the potentially major impact on its stakeholders, its environment or its economic performance. This analysis was conducted in a context that was not yet affected by the migration crisis and its impacts in terms of security, brand image and customer service. This approach included consulting with the main stakeholders within and outside the Group to identify and establish the hierarchical order of the Group's primary CSR challenges, both internal and external. It also allowed the Group to identify present and future opportunities and risks that could have a significant impact on its stakeholders, its environment or its economic performance.</p>																	
	<p>➤ Establishing communication channels to engage with employees and other stakeholders in order to hear their ideas.</p>	<p>The implementation of efficient forms of dialogue with employees was identified as a highly important challenge in the materiality analysis conducted in 2015. Labour relations are very important for the Group, particularly negotiations with staff representative bodies. The Group</p>																	

		has always strived to establish long-term and constructive relations with all its employees in France and in the United Kingdom.	
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