

*Getlink*

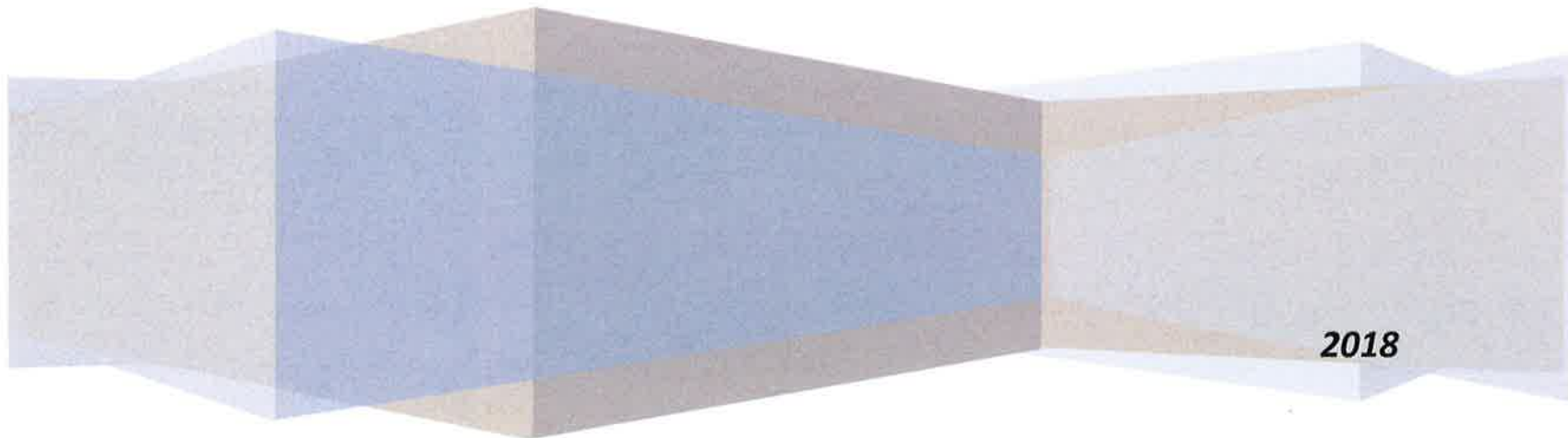


COMMUNICATION ON  
PROGRESS

# *Communication on progress*

**GC Advanced Level**

Chaker LAJILI



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

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

*These principles are integrated at the heart of the organisation, its policy and its culture, particularly in its Code of Ethics and Behaviour, a human resources policy focusing on the effective management of human capital, and the Code of Relations for responsible suppliers to which the Group has adhered since 2012. This presentation describes the commitments and actions implemented by the Group and its teams so as to integrate these principles at the heart of the organisation.*

*In order to go even further with this approach, we published, in particular, a new Code of Ethics and Conduct in 2018, which is more illustrative and instructive. Based on 13 principles and rules of conduct, it serves as a guide for each Group employee to commit to an exemplary ethical approach. The Code launches the "Get Compliant" programme, which will take place throughout the year 2019.*

*Our commitment remains to strengthen each year our approach to social responsibility so that our growth can be achieved in accordance with the United Nations Global Compact Principles.*

*I am delighted to reaffirm the ongoing support of Getlink for the UN Global Compact and to renew its commitment to making its principles an integral part of its strategy, its daily operations and its organisational culture for 2018.*



Jacques Gounon, Chairman and Chief Executive Officer

3 April 2019

## **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 Getlink 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?*

Getlink 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 2018, the audit was undertaken by the firm Mazars. The 208 report made it possible to assess the compliance of the Extra Financial Performance Declaration with the regulatory provisions. It has also ensured that it presents the business model and the main risks related to the activity of all entities included in the scope of consolidation, including, where relevant and proportionate, risks created by its business relationships, products or services, and policies, actions and results, including key performance indicators. This COP covers the data and information relating to the 2018 financial year, which is published in the Group's 2018 Registration Document.

<https://www.getlinkgroup.com/uploadedFiles/assets-fr/Actionnaires-Investisseurs/Publications/Doc-Reference/Document-de-reference-2018-Getlink-SE.pdf>

*3, Does your COP incorporate high standards of transparency and disclosure?*

Getlink'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 6.5 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 G4.

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

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

<b><u>Social indicators</u></b>	<b>Opinion on honesty</b>	<b>Reasonable assurance report</b>
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 training hours	X	X
Average training hours per employee	x	x
Frequency of workplace accidents	X	X
Absenteeism rate	X	X
Number of trainees and those on work-study contracts	X	X

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

<b><u>Societal indicators</u></b>	<b>Opinion on honesty</b>	<b>Reasonable assurance report</b>
Composite CSR performance index	X	X

*CSR social and environmental indicators for the 2018 financial year*



Environmental  
Data.pdf



Social Data.pdf

**I. Implementing the ten principles into strategies and operations**




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

<p><b>The good practices in place within the Group</b></p>	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>Getlink 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 are defined each year and form part of the objectives assigned to the directors and managers of the various entities of the Group.</p>	<p><i>Reg. Doc. Chapter 6.2. p.198</i></p>
	<ul style="list-style-type: none"> <li>➤ Giving executive responsibility for the CSR strategy to the relevant departments.</li> </ul>	<p>The Group’s strategic CSR commitments and their implementation are presented to the Corporate Committee and the Board of Directors.</p> <p>The composition of the Board of Directors reflects the commitment to diversity and complementary skills to benefit corporate strategy. Board members and members of specialised committees are selected based on a skills matrix (presented in chapter 4 of this Registration Document) which can be used to identify recognition of skills relating to economic, environmental and social impacts through “CSR-governance”, “human resources” and “risk management” criteria. Specifically, in terms of the CSR skills of the current board member.</p> <p>The Corporate Committee is responsible for regularly examining the performance of the Group in environmental matters and the strategic initiatives designed to promote environmental management, protect natural resources and limit the impact of the Group’s activities on the environment.</p> <p>In 2015, the Nomination Committee decided to create a stable, relevant and balanced CSR performance composite index: the Group asked an external consultancy firm to create a benchmark for the business practices of CAC 40 companies, and then conducted a qualitative study with its internal and external stakeholders. This initiative helped identify</p>	

		<p>four themes directly linked to the Group’s activities: health/safety, labour relations, greenhouse gas emissions and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate an achievement rate with respect to the composite index, according to the objectives set for each area.</p> <p>Over the years, the Group’s CSR commitment has become a key part of its economic strategy: executives, through plans to convert preference shares into ordinary shares, and the Chairman and Chief Executive Officer through his annual bonus have direct responsibility over CSR challenges: the CSR composite index is used to calculate 10% of the Chairman and Chief Executive Officer’s annual variable remuneration.</p> <p>Operational action plans include CSR criteria. The CSR objectives are defined each year, and they are included in the objectives assigned to the directors and the heads of various Group entities. They are monitored and assessed during individual annual reviews.</p> <p>CSR operational management has adopted a network-style approach. The CSR reporting process has demonstrated the Group’s willingness to be transparent on these topics for over 10 years. Ethics underpin all management and operational actions. The Ethics Charter is a reference text to inspire employee decisions, guide their day-to-day actions and allow them to build stakeholder trust each day, something which is a major source of value creation for the Group.</p>	<p><i>See. Reg. Doc. p. 199</i></p>
	<p>➤ Aligning strategies, targets and forms of incentive with the CSR strategy.</p>	<p>From a strategic point of view, the Committee examined various projects in 2017 involving developing and monitoring the progress of the project to run high voltage direct current cables through the Tunnel, with interconnection capability between France and the UK.</p> <p>From an environmental point of view, the Committee contributed to formalising the Group’s CSR policy, which determines the environmental priority within a multi-year programme in terms of sustainable development, structured around topics used in the global strategy for social responsibility and which details the objectives and requirements of each proposal.</p>	

		<p>On 18 December 2017, the Committee merged with the Ethics and Corporate Governance Committee to become the Corporate Committee.</p> <p>For 2017, the Nomination and Remuneration Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is based on four topics which are directly linked to the Group's activities: health &amp; safety, social climate, GHG emissions, 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 fixed for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the performance-related plans to allocate free shares. The composite index was audited in 2017 as part of the audit of corporate information by the auditors.</p>	
	<ul style="list-style-type: none"> <li>➤ Allocating responsibility for CSR to an individual or group within each unit or subsidiary.</li> </ul>	<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><a href="https://www.getlinkgroup.com/uploadedFiles/assets-fr/Actionnaires-Investisseurs/Publications/Doc-Reference/Document-de-reference-2018-Getlink-SE.pdf">https://www.getlinkgroup.com/uploadedFiles/assets-fr/Actionnaires-Investisseurs/Publications/Doc-Reference/Document-de-reference-2018-Getlink-SE.pdf</a></p>	
	<ul style="list-style-type: none"> <li>➤ Ensuring that the various departments within the company coordinate their activities to maximise performance and avoid negative impacts.</li> </ul>	<p>The Group Human Resources Department coordinates all CSR contributions and actions within the various subsidiaries.</p>	
<b>Criterion 2: The COP describes value chain implementation</b>			
	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>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</p>	




<b>The good practices in place within the Group</b>		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 <b>Charter of Ethics and Conduct</b> when new contracts are signed, require suppliers and subcontractors to comply with the Group's fundamental principles.  Health & safety, 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.	 <a href="#">Questionnaire Développement...</a>
	➤ 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.	 <a href="#">Questionnaire Sécurité.doc</a>
	➤ Awareness-raising, training and other methods for reinforcing skills with suppliers and other partners.	Getlink 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 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	 <a href="#">Questionnaire qualité.doc</a>

		<p>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 <b><u>'Responsible Supplier Relations' charter and certification</u></b> 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>	
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**Reliable policies and procedures on Human Rights**

**Principle 1:** Business should support and respect the protection of internationally proclaimed human rights  
**Principle 2:** Business should make sure that they are not complicit in human rights abuses

**Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights**

<b>The good practices in place within the Group</b>	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>Getlink has committed to implementing the principles of the UN Global Compact through its <b><u>Charter of Ethics and Conduct</u></b>.</p> <p>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><a href="https://groupeeurotunnel.sharepoint.com/sites/My-Get/en-en/group/Ethics/Documents/Code-Ethics-Conduct-Getlink-2019.pdf?cid=f8a6f493-8002-4b01-bfda-4103c3cfff37f">https://groupeeurotunnel.sharepoint.com/sites/My-Get/en-en/group/Ethics/Documents/Code-Ethics-Conduct-Getlink-2019.pdf?cid=f8a6f493-8002-4b01-bfda-4103c3cfff37f</a></p>	 Code-Ethics-Conduct-Getlink-2019.pdf
	<ul style="list-style-type: none"> <li>➤ Commitment to comply with all applicable laws.</li> </ul>	<ul style="list-style-type: none"> <li>- Since 2013, Getlink has been adhering to the principles of the 1948 Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation (ILO).</li> <li>- The Group applies an equal-opportunities human resources policy in accordance with the law. In particular, it does not permit any</li> </ul>	

		discrimination for illicit reasons such as gender, age, way of life, ethnicity 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"> <li>- In its <b>Code of Ethics and Conduct</b>, the Group underlines that: "Support and promote Getlink's commitments in this area, respect others, reject any form of discrimination, intimidation and harassment against other employees, customers or persons who have a relationship with Getlink and treat our colleagues and trading partners as we would like them to treat us".</li> <li>- Getlink complies with the laws relating to protecting the privacy of its employees, in particular those governing digital files.</li> <li>- The Ethics Code 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.</li> <li>- Getlink signed the Charter for Responsible Supplier Relations in 2012.</li> </ul>	
	➤ Declaration of commitment communicated both internally and externally.	The Group's Ethics Code 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 integrate Human Rights principles**

<b>The good practices in place within the Group</b>	➤ 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 and the Netherlands). The Code of Ethics and Conduct and Human Resources Policies commit all subsidiaries to comply with the rules on respect for human rights	
	➤ Internal awareness-raising and training about human rights.	Internal distribution of the <b>Charter of Ethics ans Conduct</b> 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**

<b>The good practices in place within the Group</b>	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The <b>Charter of Ethics ans Conduct</b> states clearly in its first paragraph that: 'Pursuant to the Global Compact principles in terms of Human Rights, Getlink does not permit any violations of Human Rights'. The Human Resources policy for each subsidiary clearly states that Human Rights principles must be integrated and adhered to.	
	➤ 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 Code.	

	<ul style="list-style-type: none"> <li>➤ Monitoring of internal and external feedback.</li> </ul>	<p>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 code.</p> <p>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.</p>	
	<ul style="list-style-type: none"> <li>➤ Complaint procedures that are lawful, accessible, regular, fair, transparent, compatible with the law, sources of continuous learning, based on commitment and dialogue.</li> </ul>	<p>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.</p>	

**Reliable policies and procedures on labour**

- Principle 3: Business should uphold the freedom of association and the effective recognition of the right to collective bargaining*
- Principle 4: Business should support the elimination of all forms of forced and compulsory labour*
- Principle 5: Business should support the effective abolition of child labour*
- Principle 6: Business should support the elimination of discrimination in respect of employment and occupation*

***Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour***

<p><b><i>The good practices in place within the Group</i></b></p>	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>As a responsible employer, Getlink seeks to promote the personal fulfilment and development of its employees, which it considers a key factor in its corporate strategy.</p> <p>Its human resources policies have been developed in order to foster equal opportunities and treatment for all Group employees throughout their careers.</p>	
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		<p>The main focus of Getlink’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"> <li>• <i>In 2018, nearly 108,000 hours were devoted to employee vocational training, representing more than 30 training hours per employee. The cost of training, which accounted for nearly 3.2% of the total wage bill, stood at € 4,973,086 in 2018, compared to €4,441,494 in 2017.</i></li> </ul> <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>Getlink ensures that all its subsidiaries comply with their legal and contractual obligations regarding working hours.</p>	<p><i>See Registration Document, Chapter 6.3.2; p.201</i></p>
	<p>➤ Reference to international conventions and standards.</p>	<p>Getlink’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 multi-national companies, and the principles of the United Nations Global Compact. Getlink supports, adheres to and actively participates in the World Forum for a Responsible Economy and the values it promotes.</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>Getlink 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</p>	

		<p>per year) based on individual contracts and agreements in place with the labour union <b>Unite</b> and the staff representative bodies.</p> <p>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>Getlink'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>Getlink 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"> <li>• <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, ESGIE will enter, in 2019, into discussions to negotiate a collective agreement, which will lead to the renewal of the professional equality collective agreement currently in force. This action affirms Getlink's desire to promote women and to put in measures to raise awareness as an extension of the Charter project relating to professional equality.</i></li> <li>• <i>In 2018 Socorail and Europorte France signed agreements relating to professional equality between men and women. Those subsidiaries also intend to take concrete and effective steps in favour of women in order to guarantee pay equality in comparable cases.</i></li> </ul>	

		<ul style="list-style-type: none"> <li>• <i>In the United Kingdom, the ‘Rate for the Job’ remuneration system and the HAY method ensure fair remuneration.</i></li> <li>• <i>Since 2015, the Group has put in place a <b>partnership with the ‘Capital Filles’ association</b>, 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 2018, 3 mentoring opportunities of this kind were established at the Calais high school, lycée Léonard de Vinci (HQE).</i></li> </ul> <p>Getlink 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"> <li>• <i>Since 2014, with the <b>Réseau Alliances</b> (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></li> <li>• <i>Eurotunnel welcomed some girls aged between 8 to 10 at a beginners’ programming workshop. This initiative was aimed at awakening an interest in computing careers from the earliest age.</i></li> </ul>	<p><i>See Registration Document, Chapter 6.2.4; p.201</i></p> <p><i>Registration Document, Chapter 6.4; p.203</i></p>
	<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, Getlink 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 <b>AFAPEI (Association Frontalière des Parents et Amis de l’Enfance Inadaptée)</b>. On 23 July 2013, a partnership framework agreement was signed with <b>APF (the French association for people suffering from paralysis)</b>. Within this partnership, work was contracted to APF frequently in 2017 for various services. This collaboration provides full-time posts for four people on permanent contracts.</p>	



		<p>As was the case in 2017, in 2018 the Group conducted several in-house awareness-raising actions on disability with the specialist company 'Made in TH', which included appointing a dedicated ambassador, setting up a monthly stand-by on site, conducting interviews and establishing support measures. In addition, a training initiative was established as part of a partnership between Getlink and a temporary employment agency which specialises in supporting disabled workers. In parallel, another initiative was carried out with the Hauts de France Regional Office for Business, Competition, Consumer Affairs, Work and Employment (DIRECCTE), which enabled a disabled worker to be taken on for a one-year service contract.</p>	
<b>Criterion 7: The COP describes effective management systems to integrate the labour principles</b>			
<p><b>The good practices in place within the Group</b></p>	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<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><i>See Registration Document, Chapter 4.2.5; p.169</i></p>
	<ul style="list-style-type: none"> <li>➤ Evaluations of risks and impacts concerning work standards.</li> </ul>	<p>A Safety and Security Committee is responsible for monitoring safety and security issues in each of the Group's business sectors. The Committee monitors personal and collective safety indicators along with the corresponding action plans. The Committee also monitors the indicators for workplace accidents involving employees of the Fixed Link and sub-contractors present on site; it supports the initiatives launched to improve results in this area, in particular those which aim to develop a safety culture within the company. Security matters (such as preventing illegal attempts to cross the Channel or illegal entry to the Coquelles site, coordination with government authorities to reinforce checks, cyber-security) are still a major concern for the Committee.</p> <p>In 2018 the Committee met five times on topics relating to the Concession, twice on topics related to Europorte. Between the beginning of the year and February 20, 2019, the committee met twice, with one meeting relating specifically to ElecLink in order to consider the effort</p>	

		<p>made by the business in respect of research and studies for the security and safety of the whole project. It should also be noted that:</p> <ul style="list-style-type: none"> <li>• <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></li> <li>• <i>All safety events are recorded and analysed in order to issue recommendations and produce action plans.</i></li> <li>• <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 and / or its economic performance.</i></li> </ul>	
	<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. During the 2018 financial year, <b>19 majority agreements</b> were signed by the Group's subsidiaries covering topics such as gender equality, end of working live agreement or wage negotiations. <b>8 agreements</b> were signed at Group level.</p>	<p><i>See Registration Document, Chapter 6.3.2; p.201</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.  With regard to health, hygiene and safety, the Safety Department in each Group subsidiary, the Social and Economic committee, through the</p>	

		<p>Health, Safety and Working Conditions Committee (CSSCT) 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 2018, Getlink continued its actions in favour of health and safety by conducting awareness-raising sessions and training for its employees:</p> <ul style="list-style-type: none"> <li>▪ <i>An awareness raising campaign, entitled “Safety takes to the screen”, was launched by the general management of Eurotunnel in 2016 and continued in 2018 with the title “The safety minute”. Based on short-format videos broadcast on the corporate intranet, this campaign aims to achieve greater awareness of safety issues and to promote and share best practices.</i></li> <li>▪ <i>The safety week organised in June 2018 across all Europorte sites focussed this year on “safety at work”, and more specifically occupational accidents and the implementation of an action plan to reduce them.</i></li> </ul> <p>Getlink continue this progress through the following actions:</p> <ul style="list-style-type: none"> <li>▪ <i>Training aiming to promote a shared safety culture and by organising dedicated training for Group team members. Over 23,000 hours of training were dedicated to safety in 2018.</i></li> <li>▪ <i>Innovation and technical progress: Getlink gives its team members the means to work safely, thanks to equipment, high-performance systems and innovations.</i></li> <li>▪ <i>Greater involvement of line management and monitoring, listening and prevention actions put in place by the occupational health service.</i></li> </ul>	<p><i>See Registration Document, Chapter 6.3.1; pp.199-200</i></p>

	<ul style="list-style-type: none"> <li>➤ Active engagement with suppliers concerning the challenges relating to work standards.</li> </ul>	<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>Health/safety questionnaires are sent to suppliers and subcontractors during tenders.</p>	
<b>Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration</b>			
<b>The good practices in place within the Group</b>	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>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.</p>	
	<ul style="list-style-type: none"> <li>➤ System for tracking and measuring performance.</li> </ul>	<p>Each subsidiary has its own system for entering corporate indicators, which are consolidated by the Group Human Resources Department.</p>	
	<ul style="list-style-type: none"> <li>➤ Dialogue with the representatives of employee organisations to verify the progress made and identify priorities for the future.</li> </ul>	<p>In France, all subsidiaries have its <b><u>Social and Economic Committee and its Safety, Health and Working Conditions Committee</u></b>, which meet according to the specific operational rules governing each committee.</p> <p>In the United-Kingdom, the <b><u>Company Council and the Safety, Health and Environment Committee</u></b> are the two organisations for ESL employees with which permanent dialogue has been established.</p>	
	<ul style="list-style-type: none"> <li>➤ Audits or other measures to monitor and improve work standards in companies in logistics chains in line with international work standards.</li> </ul>	<p>Audits are undertaken regularly by the quality audit departments of the various subsidiaries.</p>	

## **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.**

<b><i>The good practices in place within the Group</i></b>	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>Getlink 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 are defined each year and form part of the objectives assigned to the directors and managers of the various entities of the Group.</p>	
	<ul style="list-style-type: none"> <li>➤ Reference to international conventions and other international mechanisms.</li> </ul>	<p>Getlink’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 multi-national companies, and the principles of the United Nations Global Compact. Getlink supports, adheres to and actively participates in the World Forum for a Responsible Economy and the values it promotes.</p>	
	<ul style="list-style-type: none"> <li>➤ Discussion on the relevance of sustainable environmental management for the company.</li> </ul>	<p>On the basis of the materiality analysis conducted by KPMG, the general environmental policy is classified among Getlink’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"> <li>▪ <i>The general policy for environmental management and in particular, training of employees in environmental issues;</i></li> <li>▪ <i>The management of energy consumption and the increased use of renewable energies;</i></li> <li>▪ <i>The circular economy policy and waste management.</i></li> </ul>	

*See Registration Document, Chapter 6.5*

	<p>➤ Written company policy on sustainable environmental management.</p>	<p>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.</p>	 <p>Questionnaire Développement dur</p>
	<p>➤ Integration of minimum environmental standards into contracts with suppliers and other partners.</p>	<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. A 'Sustainable Development' questionnaire is sent to suppliers and subcontractors during tenders. An article on '<b>Environmental Requirements</b>' has also been inserted into subcontractor contracts.</p>	
	<p>➤ Specific commitments and objectives for given years.</p>	<p>In its CSR Policy, Eurotunnel Group is committed, for 2017, to acting in line with the principles of sustainable development and in accordance with the three principles of the Global Compact relating to the environment. In order to achieve this, the Group has four commitments:</p> <ul style="list-style-type: none"> <li>• <i>to reduce the environmental impact of its own operations by focusing on reducing greenhouse gases, reducing its energy consumption, increasing its fleet of electric vehicles and optimising waste management;</i></li> <li>• <i>to raise awareness amongst staff of their responsibilities as eco-citizens;</i></li> <li>• <i>to choose innovative and environmentally friendly products;</i></li> <li>• <i>to strengthen actions which support the protection of diversity.</i></li> </ul> <p>In addition to these commitments, Getlink pays special attention to the environmental approach of its suppliers and asks them to implement actions which support the protection of the environment.</p>	

		<p>The Group has set a recovery target of <b>over 95% for 2019 like-for-like</b>.</p> <p>The Group promotes a digitalisation plan to work towards a paperless workplace.</p> <p>Eurotunnel has set a target to implement a plastic cup recycling plan at the office buildings of the French part of the Concession.</p> <p>To monitor changes to its greenhouse gas emissions, Getlink established an indicator to ascertain the greenhouse gas to revenue ratio for the Group. Getlink has set a target to reduce this ratio by a minimum of <b>5% in five years like-for-like and at constant exchange rates</b></p>	<p><i>See Registration Document, Chapter 6.5;p.206</i></p>
<b>Criterion 10: The COP describes effective management systems to integrate the environmental principles</b>			
<b>The good practices in place within the Group</b>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Getlink 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>Getlink is The <b>Carbon Trust Standard</b> certified since 2009. This independent organisation audited the Group’s management of greenhouse gas emissions in 2011 and set the baseline level for greenhouse gas emissions for the whole of the Group’s activities at 2010 levels. <b>In 2017, the Group’s Carbon Trust Standard certification was renewed</b> in respect of the Fixed Link in recognition of its carbon footprint reduction policy for the 2015-2016 period. <b>The renewal of this certificate for the 2017-2018 period</b> will be audited during the second half of 2019.</p>	<p><i>See Registration Document; paragraph 6.5, p.205</i></p>
	<p>➤ Evaluations of environmental risks and impacts.</p>	<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 France Manche 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>➤ Evaluations of the impact of product life cycle, providing green management policies.</p>	<p>As an innovative rail company and responsible infrastructure manager from the very beginning, Getlink 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"> <li>• <i>the Tunnel runs entirely underground and does not interfere in any way with the marine environment;</i></li> <li>• <i>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 <b>8.8 kg of CO<sub>2</sub> compared to 158 kg</b> on a ferry);</i></li> <li>• <i>the electric traction system adopted is a major factor in reducing the Group's carbon footprint and greenhouse gas emissions;</i></li> </ul>	<p><i>See Registration Document; Chapter 6, paragraph 6.4, p.200</i></p>



		<ul style="list-style-type: none"> <li>• <i>a policy of daily electricity savings (with the use of electric power for which 90% is of nuclear or hydraulic origin, which therefore does not release CO2);</i></li> <li>• <i>The implementation of actions to improve energy performance, as identified in the comprehensive energy audits of the Concession's operations.</i></li> <li>• <i>Partnership between France Manche and EDF to encourage energy saving.</i></li> <li>• <i>The purchase of new wagons to transport road trailers on rail motorways is considered an energy-saving action within this context.</i></li> <li>• <i>The entry into service of the first new Shuttle, made of 32 rail motorway wagons at the end of December 2017, contributed to the granting of Certificats d'Économie d'Énergie (CEEs, energy savings certificates) as part of the "Rail Motorway Wagon" CEE project.</i></li> <li>• <i>Since 2016, after the installation of new generation electronic variable speed drives which use less energy, the business can modulate the speed of the cooling fans.</i></li> <li>• <i>At the end of 2018, the fleet of 100% electric vehicles operating on the Concession terminals had grown to 38 vehicles.</i></li> <li>• <i>Europorte France has set up an eco-driving initiative to increase awareness among main line train drivers of the impact of their driving style on fuel consumption. This initiative also involves the installation of technical equipment designed to reduce the fuel consumption of locomotives as well as driver assistance systems, depending on the nature of the network and the train, to help drivers to adopt a more environmentally friendly driving style. Europorte France has used seven medium horsepower locomotives of a new model (Vossloh DE18), which provide a 15% to 20% reduction in fuel consumption for an equivalent level of use thanks to a start &amp; stop system and next generation engines.</i></li> </ul> <p>According to the findings of the materiality analysis, the circular economy policy and waste management were included among the important challenges for Getlink. 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><i>See Registration Document; Chapter 6, paragraph 6.5.1, p.206</i></p>
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		<p>The French part of Eurotunnel sorts non-hazardous industrial waste, 97% of which is recycled into briquettes for industrial boilers. This process was made possible by the emergence of new solid fuel recovery channels.</p> <p>In keeping with the 1992 Montreal protocol, actions were implemented to reduce emissions of all gases leading to ozone layer depletion. Halon is in the process of being dismantled from Fixed Link infrastructures. The refrigerants used in the cooling ducts in Sangatte and Shakespeare Cliff have also been replaced in full on the French side, and 50% on the UK side, by new cooling units which are more energy-efficient and have no significant negative impact on the environment.</p> <p>Since 2015, Getlink has provided 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 has increased from 800 in 2015, to more than 4750 in 2017 and around 10 000 in 2018.</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"> <li>• In France: The '<b>Jardins Ordonnés</b>', with their seven-hectare lake, are a much-used haven for migrating species and an essential nest-building site for many birds.</li> <li>• In the United Kingdom, the nature reserve of <b>Samphire Hoe</b> attracts over 80,000 visitors each year.</li> </ul>	<p><i>See Registration Document; Chapter 6, paragraph 6.5.1, p.207</i></p>
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	<ul style="list-style-type: none"> <li>➤ Allocation of responsibilities within the organisation.</li> </ul>	<p>The various <b><i>Safety and Sustainable Development Departments</i></b> within the subsidiaries monitor energy consumption.</p> <p>The <b><i>Strategy and Sustainable Development Committee within the Board of Directors</i></b> 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 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>	
	<ul style="list-style-type: none"> <li>➤ Internal awareness-raising and training about sustainable environmental management for executive management and employees.</li> </ul>	<p>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.</p>	
	<ul style="list-style-type: none"> <li>➤ Other good practices</li> </ul>	<p>An ‘eco-comparer’ is available on the Le Shuttle website so that passengers can calculate the average CO<sub>2</sub> emissions saved by using the Passenger Shuttles.</p> <p><a href="https://www.eurotunnel.com/fr/professionnels/autocaristes/eco-comparateur/">https://www.eurotunnel.com/fr/professionnels/autocaristes/eco-comparateur/</a></p>	
<b>Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship.</b>			
	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>As early as 2002, Eurotunnel Concessionaires installed an environmental management system based on the requirements of the <b><i>ISO 14001 standard</i></b>.</p>	<p><i>See Registration Document; Chapter 6,</i></p>


<b>The good practices in place within the Group</b>		<p>With the <u>SQAS Rail (Safety and Quality Assessment System)</u> assessment 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>At Socorail, the Europorte subsidiary specialising in logistics management at industrial sites, the progress made in terms of environmental protection and safety have been rewarded with renewal of ISO 9001 (Quality management), MASE (Company Safety Improvement Manual) and SQAS (Safety &amp; Quality Assessment for Sustainability) certifications. The Socorail Infrastructure Management branch launched a MASE certification project in 2018 for planned certification in 2019.</p>	<a href="#">paragraph 6.5.1 p.206</a>
	➤ 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>Corporate Committee</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.	Since 2016 the Group has worked to put in place actions to improve energy performance identified during full energy audits of Concession activities.	
	➤ 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	

		<p>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.</p> <p>No fine of any nature has been imposed on the Group and nor has it been reported for non-compliance of its operations.</p>	
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**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**

<p><b>The good practices in place within the Group</b></p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>In its <b><u>Charter of Ethics and Behaviour</u></b>, Getlink lays down clear common rules for prevention of corruption.</p> <p>The <b>Code of ethics</b> presents in a pedagogical way the rules and the behaviours to be adopted by all, illustrated by concrete examples. It also specifies the roles of managers and employees in the implementation of the Charter on a daily basis. It is supplemented by an alert system (whistle-blower policy) set up for employees to enable them to report directly to the Compliance Officer of the Group, any suspicion of violation of applicable rules or to obtain help and advice relating to its content and its application.</p> <p><b>The ACHA 0019 procedure (professional ethics code)</b> 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> <p><a href="http://www.myget.eurotunnel.org/en/governance/charter-of-ethics">http://www.myget.eurotunnel.org/en/governance/charter-of-ethics</a></p>	<p><b>See Code of Ethics and Conduct above</b></p>  <p><b>ethical code.pdf</b></p> <p><b>See Registration Document; Chapter 6, paragraph 6.3.4 p.200</b></p>
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		<p>An Anti-Corruption Policy is in place within the Group, on which the Board of Directors Ethics and Governance Committee, followed by the Board of Directors themselves, have had input, and which aims to strengthen the dissemination of rules of conduct on which the integrity and ethics of the group are based. Anti-corruption training, in the form of a digital course to raise awareness of and implement best practice in terms of anti-corruption, was established in 2017. It was made available to all Group employees.</p>	
	<p>➤ Support from executive management in preventing corruption.</p>	<p>The Charter of Ethics 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><b><u>The Code of Ethics</u></b> states the following in particular: ‘No Getlink 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 Getlink 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"> <li>• <i>Each Group buyer or other employee undertakes to abide by the professional ethics code and to seek suppliers who share these commitments.</i></li> <li>• <i>The tender process in place within the Group guarantees the fair treatment of suppliers during consultations.</i></li> </ul>	

		<ul style="list-style-type: none"> <li>• Failure by employees of the Group to abide by the ethical rules or the ethics code can lead to disciplinary action.</li> <li>• The Procurement Divisions of the various entities have taken actions that, beyond referring to Getlink’s Code of Ethics and Behaviour in all new contracts, require their suppliers to comply with its fundamental principles and to sign the <b><u>Compliance Policy (Article 23)</u></b>. Article 23.2.1 requires that suppliers ‘comply with the French regulations on corruption, as well as UK corruption laws, notably the <b><u>Bribery Act 2010</u></b>.</li> </ul>	<p>See Registration Document; Chapter 6, paragraph 6.3.4, p.200</p>
	<p>➤ Other good practices</p> <p>Getlink has been a signatory of the <b><u>Charter for Responsible Supplier Relations</u></b> 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>Getlink is also a member of the steering committees for the <b><u>‘Responsible Suppliers Relations’ charter and certification</u></b> 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>		
<b>Criterion 13: The COP describes effective management systems to integrate the anti-corruption principles</b>			
<b>The good practices in place within the Group</b>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>In addition to its publication on the internet and intranet sites of Getlink entities, the <b><u>Code of Ethics and Conduct</u></b> given to all new employees, suppliers and subcontractors when their contracts are signed.</p>	
	<p>➤ Human Resources procedures supporting the anti-corruption commitment or policy.</p>	<p>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 to understand and observe those rules. It states the policies and laws that all members of staff are required to know so</p>	

		<p>that they can perform their professional activities correctly and it describes the company policy in relation to fraud.</p> <p>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.</p> <p>The Group is also working to set up digital CSR training, the purpose of which will be to raise awareness among all employees about the actions undertaken in the fields of social responsibility and the challenges the Group faces.</p>	
	<ul style="list-style-type: none"> <li>➤ Communication channels and tracking mechanisms for reporting concerns or requesting advice.</li> </ul>	<p>The Code of Ethics specifies the whistleblowing methods available to employees.</p>	
<b>Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.</b>			
<p><b>The good practices in place within the Group</b></p>	<ul style="list-style-type: none"> <li>➤ Pertinent policies, procedures and activities planned to meet this criterion.</li> </ul>	<p>This annual risk review also covers this issue.</p>	<p><i>See Code of Ethics and Conduct, page 31</i></p> <p><i>See Registration Document; Chapter 6, paragraph 6.4.2; p.203</i></p>
	<ul style="list-style-type: none"> <li>➤ Process for management of incidents.</li> </ul>	<p>An internal whistleblowing mechanism and an ethics officer are in place to address any risk of corruption.</p> <p>An e-mail address (<a href="mailto:contact.ethic@getlinkgroup.com">mailto:contact.ethic@getlinkgroup.com</a>) is available for any stakeholders encountering any difficulties or with queries as to the boundaries or application of the rules laid down in the Code of Ethics.</p>	
	<ul style="list-style-type: none"> <li>➤ Other good practices</li> </ul>	<p>An Anti-Corruption Policy is in place within the Group, on which the Board of Directors Ethics and Governance Committee, followed by the Board of Directors themselves, have had input, and which aims to strengthen the dissemination of rules of conduct on which the integrity and ethics of the group are based. Anti-corruption training, in the form of a digital course to raise awareness of and implement best practice in terms of anti-corruption, was established in 2017. It was made available to all Group employees.</p>	



**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><b>The good practices in place within the Group</b></p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The strategic vision of Getlink, 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; GRI, ISO 26000). These challenges can be split into several categories: social, regional, environmental, economic and ethical.</p> <ul style="list-style-type: none"> <li>• Social challenges: respect the rights of employees.</li> <li>• Regional challenges: develop close links with the region.</li> <li>• Environmental challenges: reduce the impact of the business activity on the environment.</li> <li>• Economic challenges: manage relationships with customers</li> <li>• Ethical challenges: continue with policy development and value sharing within the Group in connection with stakeholders.</li> </ul> <p>Answering these challenges has been and remains a priority for Getlink 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><i>See CSR Charter</i></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 will be phased out in 2016 from the Fixed Link infrastructures and rolling stock. 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, the Group has provided a fast and free of charge recharging facility at the Fixed Link sites in Coquelles (Pas-de-Calais) and Folkestone (Kent) for customers with electric cars. In thirty minutes, they can charge</p>	

		<p>80% of the battery capacity (universal battery chargers). The number of customers using the Passenger Shuttle in electric cars increased from 40 in 2014, 800 in 2015, 5,696 in 2017 and around 10,000 in 2018.</p> <p>The Group is continuing to improve its social responsibility programme by encouraging its employees to commute to Coquelles by other means. It has launched three initiatives from its Business Travel Plan: namely, a shuttle bus between the high-speed train station at Calais Fréthun and the Coquelles terminal, a web-based Eurotunnel car-sharing community, incentives for the use of electric vehicles and information on public transport. The arrangements already in place include bicycle racks, fleet of electric vehicles and recharging points and a remote-working trial. In Folkestone, 130 employees have already signed up for the government “Cycle to Work” scheme set up in 2016 and some of them joined in the national day organised each summer. These initiatives contribute to minimise the business’s carbon footprint and to promote employees’ well-being.</p> <p>To support specific sustainable development initiatives, various Europorte team members took part in workshops and challenges during the second Green Week, around the theme of eco-citizen action (waste management, eco-actions and water management). At Socorail, the Europorte subsidiary specialising in logistics management at industrial sites, the progress made in terms of environmental protection and safety have been rewarded with renewal of ISO 9001 (Quality management), MASE (Company Safety Improvement Manual) and SQAS (Safety &amp; Quality Assessment for Sustainability) certifications. The Socorail Infrastructure Management branch launched a MASE certification project in 2018 for planned certification in 2019.</p> <p>Since 2016, the company has been able to modulate the variation of cooling fans, with the installation of new generation, more energy efficient electronic variators. Lastly, at the end of 2015, the fleet of 100% electric vehicles operating on the Concession terminals reached 39 units.</p>	
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**Criterion 16: The COP describes strategic social investments and philanthropy**

<p><b>The good practices in place within the Group</b></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 fulfils its social responsibility through concrete commitments and actions to support the community:</p> <ul style="list-style-type: none"> <li>▪ <i>Payment since 2010 of 10% of the land rental income from 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 Eurotunnel and Secours Populaire was renewed for two more years (2019-2021).</i></li> <li>▪ <i>Active support for 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></li> <li>▪ <i>The ESGIE Social and Economic Committee regularly backs good causes actively supported by colleagues.</i></li> </ul> <p>Getlink financially supports the <b><u>World Forum for a Responsible Economy in Lille</u></b>. 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 paragraph 6.4.1, p.203</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 encouraging young people into the world of work:</p> <ul style="list-style-type: none"> <li>▪ <i>Training diploma in railway engineering and maintenance professions set up and developed by Europorte in close collaboration with the Conservatoire National des Arts et Metiers (CNAM);</i></li> <li>▪ <i>Partnerships with the Institut Catholique des Arts et Métiers (ICAM) and the Institut d’Administration des Entreprises (IAE), two Lille institutions, to develop a new approach to the maintenance trade;</i></li> <li>▪ <i>Participation since November 2016 in the “Professeurs en entreprise” operation initiated by the Fondation C Génial, a foundation for scientific and technical culture. This operation is aimed at secondary school</i></li> </ul>	<p><i>See paragraph 6.4.1, p.203</i></p>

		<p><i>teachers (and other members of the national education system) 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 Eurotunnel rolling stock managers took part in this activity.</i></p>	
	<p>➤ Other good practices.</p>	<p>Getlink also offers its expertise in managing transport infrastructures and rail activities to various public bodies at European, national and regional levels. The Group is:</p> <ul style="list-style-type: none"> <li>▪ <i>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 work presided over by the Group led to proposals for the French state to recognise different professions in this developing sector.</i></li> <li>▪ <i>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 that aims to make existing training more consistent with the industry’s expectations, creating a pool of expertise in the region and developing high quality higher education with international influence.</i></li> <li>▪ <i>As a partner of the École des Ponts et Chaussées, in July 2018 Getlink renewed the “Rail transport sciences” fellowship for five years. This partnership aims to make progress in rail science by studying the whole scope of the activity, as well as the sustainability of facilities and technologies in place.</i></li> </ul>	<p><i>See paragraph 6.4.1, p.203</i></p>
<p><b>Criterion 17: The COP describes advocacy and public policy engagement</b></p>			
<p><b>The good practices in place within the Group</b></p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The Group’s Charter of Ethics and Conduct and CSR Charter takes a clear position in support of the principles of the United Nations.</p>	
	<p>➤ Public commitment to the importance of acting on one or more United Nations themes.</p>	<p>Getlink 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.</p>	

	<ul style="list-style-type: none"> <li>➤ Encouraging company executives to participate in summits, conferences and other interactions about public policies in relation to one or more United Nations objectives.</li> </ul>	<p>Getlink 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.</p>	
<b>Criterion 18: The COP describes partnerships and collective action</b>			
	<ul style="list-style-type: none"> <li>➤ Developing and establishing partnerships with public and private organisations.</li> </ul>	<p>Getlink is a partner of the World Forum in Lille, which supports and promotes a responsible global economy.</p>	
	<ul style="list-style-type: none"> <li>➤ Joining industry peers, UN organisations and/or stakeholders in initiatives that contribute to resolving shared challenges.</li> </ul>	<p>Getlink 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.</p> <p>In research and development, Getlink is a <b>founding member of Railenium</b>, 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 <b>railways tests in connection with Railenium</b> 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>Getlink also provides support for the <b>works of the European Committee for Standardisation</b> as part of the working group responsible for drafting a proposed standard for calculating the greenhouse gas emissions of transport services.</p> <p>Getlink is a <b>founding member of the Fer de France association</b>, 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>Getlink is also an <b>active member of I-Trans</b>, the global competitiveness cluster and the reference cluster for railways in France. The Group’s</p>	

		Human Resources Director participates as the controller in the <b>CAPFOR</b> (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.	
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**III. Governance and leadership of Corporate Social Responsibility (CSR)**

**Criterion 19: The COP describes CEO commitment and leadership**

<b>The good practices in place within the Group</b>	➤ Pertinent policies, procedures and activities planned to meet this criterion.	Getlink's <b>CSR Charter</b> 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.	
	➤ The CEO makes an explicit public commitment to CSR and the Global Compact.	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. The charter has been signed by the Chairman and Chief Executive Officer.	
	➤ 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.	For 2018, the Nomination Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is based on four topics which are directly linked to the Group's activities: health & safety, social climate, GHG emissions, 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 fixed for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the performance-related plans to allocate free shares. The composite index was audited in 2017 as part of the audit of corporate information by the auditors.	

**Criterion 20: The COP describes board adoption and oversight**

	➤ The Board of Directors is responsible for and supervises the strategy and long-term performance of CSR.	The Corporate Committee within the Board of Directors examines the issues relating to the company's or Group's environmental guidelines and <b>reports on these to the Board of Directors</b> .	
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	<ul style="list-style-type: none"> <li>➤ The Board of Directors sets up a Monitoring Committee or assigns CSR to a member of the Board.</li> </ul>	<p>The corporate committee's mission is to review the Group's environmental performance and the strategic orientations designed to promote environmental management, preserve natural resources and limit the impact of the Group's activities on the environment.</p>	
	<ul style="list-style-type: none"> <li>➤ The Board (or the Committee) approves the formal CSR reporting.</li> </ul>	<p>Reporting on CSR, coordinated by the Group Human Resources Department, is examined and approved by the Strategy and Sustainable Development Committee.</p>	
<p><b>Criterion 21: The COP describes stakeholder engagement</b></p>			
	<ul style="list-style-type: none"> <li>➤ The company's responsibility publicly acknowledged in terms of its impacts on internal and external stakeholders.</li> </ul>	<p>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.</p>	
	<ul style="list-style-type: none"> <li>➤ Defining sustainable development strategies, objectives and policies in consultation with key stakeholders.</li> </ul>	<p><b>The materiality analysis</b> 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 Getlink (Group 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.</p>	

		<p>By establishing this hierarchical order, it identified a list of challenges arranged in their order of priority (top priority, very important, important):</p> <table border="1" data-bbox="1016 300 1874 807"> <tr> <td data-bbox="1016 300 1200 416">PRIORITY CHALLENGES</td> <td data-bbox="1200 300 1245 416">1</td> <td data-bbox="1245 300 1485 416">Development of the business activity</td> <td data-bbox="1485 300 1874 416">Safety and security of sites</td> </tr> <tr> <td data-bbox="1016 416 1200 533"></td> <td data-bbox="1200 416 1245 533">2</td> <td data-bbox="1245 416 1485 533">Development of the business activity</td> <td data-bbox="1485 416 1874 533">Efficiency and reliability of equipment and infrastructures</td> </tr> <tr> <td data-bbox="1016 533 1200 612"></td> <td data-bbox="1200 533 1245 612">3</td> <td data-bbox="1245 533 1485 612">Investing in our employees</td> <td data-bbox="1485 533 1874 612">Employee safety</td> </tr> <tr> <td data-bbox="1016 612 1200 729"></td> <td data-bbox="1200 612 1245 729">4</td> <td data-bbox="1245 612 1485 729">Development of the business activity</td> <td data-bbox="1485 612 1874 729">Safety of travellers and goods</td> </tr> <tr> <td data-bbox="1016 729 1200 807"></td> <td data-bbox="1200 729 1245 807">5</td> <td data-bbox="1245 729 1485 807">Environmental performance</td> <td data-bbox="1485 729 1874 807">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	<p><i>See Registration Document; Chapter 6, paragraph 6.1.1, p. 197</i></p>
PRIORITY CHALLENGES	1	Development of the business activity	Safety and security of sites																				
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	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, Getlink 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. 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>																					



	<ul style="list-style-type: none"> <li>➤ Establishing communication channels to engage with employees and other stakeholders in order to hear their ideas.</li> </ul>	<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 has always strived to establish long-term and constructive relations with all its employees in France and in the United Kingdom.</p>	<p><i>See Registration Document; Chapter 6, paragraph <a href="#">6.1.1, p. 197</a></i></p>
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