

Getlink



Communication on progress

GC Advanced Level

November 2021

1, Declaration of continued support by the CEO

By signing the UN Global Compact in 2013, Getlink has openly undertaken to apply the Compact's founding principles in terms of respect for human rights, international labour standards, environmental protection and the fight against corruption, and to ensure that its stakeholders were made aware of them.

These principles have been woven at the heart of the organisation, its strategy and its culture, notably through an exemplary ethical approach based on a Code of Ethics and Behaviour, a human resources policy focusing on the development and fulfilment of its employees and a strong commitment towards energy and environmental transition. In 2019, aware of the transformation taking place involving the Group's companies and the rapidly changing expectations of its stakeholders, the Group updated its materiality analysis, a key stage in its Corporate Social Responsibility approach. To drive this approach even further, we have also selected the 10 Sustainable Development Objectives which best chime with our business model, activities and material challenges. In 2021, aware of the climate emergency, Getlink had its 2025 carbon trajectory validated by the STBTi (Science Based Targets Initiative). The Group has committed to reducing its greenhouse gas emissions by 30% for scopes 1 and 2 by 2025 and by 7.5% for scope 3 for the same period compared to the reference year 2019.

Getlink remains committed to strengthening its approach to Corporate Social Responsibility each year, in line with the expectations of all its stakeholders, so that its growth can be achieved in accordance with the United Nations Global Compact Principles.

This presentation describes the commitments and actions implemented by the Group and its teams to integrate these objectives at the heart of the organization.

I am delighted to reaffirm Getlink's continued support for the UN Global Compact and to renew its commitment to make its principles an integral part of its strategy, its daily operations and organizational culture for the year 2021.

A handwritten signature in black ink, consisting of stylized, overlapping loops and strokes, likely representing the name Yann Leriche.

Yann Leriche, CEO of Getlink SE, November 2021

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 the United Kingdom.

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 of reporting and social and environmental information. In 2020, the audit was carried out by the firm Mazars. The 2020 report made it possible to assess the compliance of the Non-financial Performance Assessment 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 2020 financial year, which is published in the Group's 2020 Universal Registration Document. [Universal Registration Document](#)

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

Getlink's social and environmental reporting approach is based on the transparency principles of the Global Reporting Initiative (GRI) and aims to comply with the regulatory obligations relating to the non-financial performance statement provided for in Articles R. 225-105, R. 225-105-1 and L. 225- 102-1 of the French Commercial Code.

In paragraph 6.10 of Chapter 6 of its Universal 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 GRI standards.

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). In 2019, considering the changes in the activities of its subsidiaries and the expectations of its stakeholders, the Group updated its materiality analysis. The materiality analysis remains valid in 2020. The group plans to update it, to consider future internal and societal developments.

The following indicators have been audited by an independent third party, with 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 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
Number of work-study contracts and trainees transformed into permanent/ fixed-term contracts	X	X
Part of local recruitment	X	X
Subcontractors' work-related accidents		X

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

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

See our list of social and environmental indicators in our 2020 URD

See section “6.11 - List of non-financial indicators”, p303 to 306

[Getlink Unique Registration Document 2020 - URD](#)

SDG & MATERIALITY ANALYSIS

The vocation of a CSR approach is to influence all the company's activities and businesses to have a positive impact on all of its stakeholders and on all the pillars of sustainable development. A CSR policy is particularly effective when it is supported and fed by all employees. Everyone can contribute at his or her own level to the development of professional practices, whether they concern the core business, quality of life at work, the environment, purchasing or many other subjects. Below you will find the most relevant CSR issues for the Getlink Group and the UN Sustainable Development Goals selected for the CSR strategy review.

I. The materiality analysis of the Getlink Group

To adapt and respond to the challenges of the Group's transformation, in a rapidly changing context, Getlink is attentive to its stakeholders (employees, customers, suppliers, shareholders, local communities, etc.) to better meet their expectations, to foster the creation of shared value and to strengthen the overall performance of the Group. As early as 2015, Getlink had carried out a first materiality analysis. In 2019, considering the changes in the activities of its subsidiaries and the expectations of its stakeholders, the Group updated its materiality analysis. This important step enabled us to check the relevance of the priority issues and to secure the Group's future work in the review of its CSR strategy, its commitments, and the objectives to be defined. These elements will also contribute to prioritise the actions to carry out and select the issues and data to consider for its communications and reporting. The materiality analysis remains valid in 2020. The group plans to update it, to consider future internal and societal developments.

Methodology:

Conducted with the support of a benchmark consulting firm, the update was carried out in three steps:

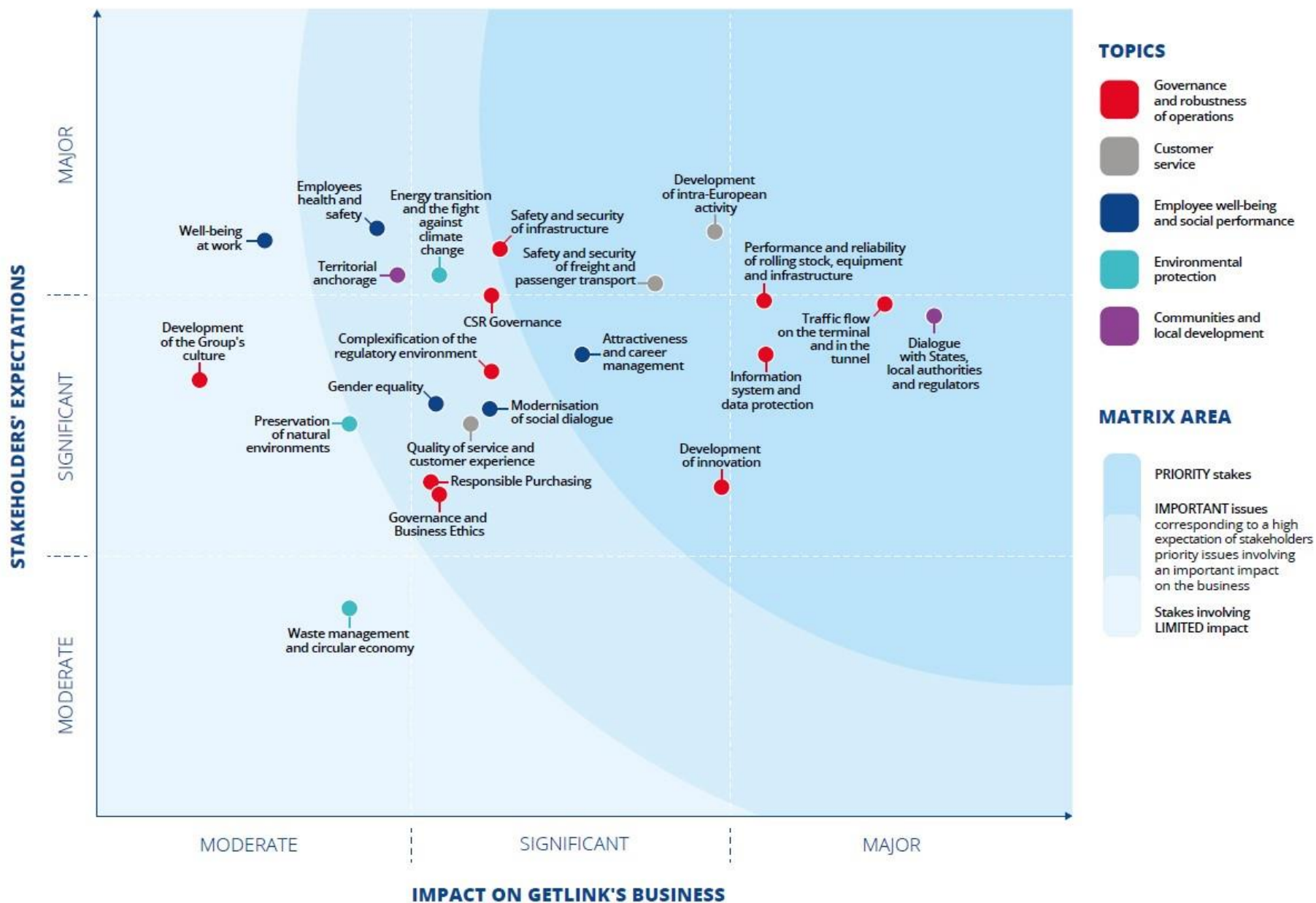
- Diagnosis and analysis: 57 key issues for the Group's activity have been identified based on an internal and external document analysis and of the industry trends.

- Identification, adaptation, and rating of key issues: 21 interviews have been carried out based on a representative sample of internal and external stakeholders located in France and in the United Kingdom. As a result, 23 CSR material challenges have been identified for the Group.
- Prioritisation of the CSR material challenges. To facilitate reading and appropriation, the selected material challenges have been prioritised by considering both the importance for stakeholders and the impact on the Group's activity, which was assessed using the methodology developed for its risk analysis.

Results and materiality matrix:

The result of the analysis is presented in the form of a matrix combining in ordinate the level of expectation of internal and external stakeholders with the impact on the Group in abscissa; the material challenges for Getlink classified into 5 themes are positioned according to priority levels:

- 9 priority stakes
- 10 important issues
- 4 stakes involving limited impact



Some issues remain intangible and are the subject of high expectation from some stakeholders such as the health and safety of employees or the safety and security of the infrastructure, transport, goods, and customers. Many mechanisms have been implemented to cover risks associated with these challenges, but their potential impact on the Group remains significant. Other issues have become more significant under pressure from external stakeholders or from breaking news. Thus, the growing complexity of the regulatory landscape echoes uncertainties surrounding Brexit. The quality of service and the customer experience are becoming increasingly significant. The energy transition and the fight against climate change represent an unavoidable issue for stakeholders and encompass several dimensions: energy consumption and the use of renewable energies. The environmental protection issue also includes the preservation of natural environments, the management of waste and the circular economy. Faced with challenges of renewing its workforce, recruiting experts in high-pressure jobs and, despite a dynamic policy in recent years, themes linked to human resources have thus been revised upwards. This is particularly the case for the attractiveness and the management of careers or for the necessary modernisation of the social dialogue. Gender equality now appears as one of the major challenges and this evolution reflects a strong expectation from internal and external stakeholders. The strong commitment of the Group to be a major player in the local regions in several areas (support for local employment, solidarity and education, support for the development of local startups...) strengthens the weight of the regional rooting. In connection with all these different challenges, the need for a constructive dialogue with both States, local authorities and regulators is therefore strengthened.

II. Sustainable Development Goals of the United Nations

Getlink considers itself fully conscious of the global challenges of sustainable development and is committed to ensuring that its growth considers these guidelines, in conjunction with the 17 Sustainable Development Goals of the United Nations. Getlink selected 10 SDGs, which are the most relevant to its business model, its activities, and its material challenges.



SUSTAINABLE DEVELOPMENT GOALS



Committed to low-carbon transport and in view of these complementary elements, the Group intends to consolidate its medium-term view by capitalising on its strengths and combining the service provided to customers with a resolute action for the climate and the environment.

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	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Getlink has set up a formal CSR policy, supported and sustained at the highest level of the organisation by the Chief Executive Officer and by the Chairman of 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>In 2020, Getlink also identified 10 Sustainable Development Goals (SDG) that are particularly relevant to its material challenges. These 10 SDGs are derived from the 17 defined by the UN for the 2015-2030 period. These elements feed the update process of the Group's CSR strategy planned for 2021 and constitute performance levers. Combined with the materiality analysis, these 10 SDGs, backed to the Group's material challenges, are presented in this Universal Registration Document.</p> <p>Universal Registration Document</p>	
	<p>➤ Giving executive responsibility for the CSR strategy to the relevant departments.</p>	<p>The Group's strategic CSR commitments and their implementation are presented to the ethics and CSR committee and to 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.</p>	

		<p>It is expected that Directors should have the following essential qualities:</p> <ul style="list-style-type: none"> ▪ to be mindful of the interests of the company ▪ to be a good judge, in particular of situations, strategies and people, based primarily on their experience ▪ to be able to anticipate so as to identify risks and strategic issues; and ▪ to have integrity, be present, active and involved <p>The Ethics and CSR committee is responsible for regularly examining the performance of the Group regarding environmental issues 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>More specifically, the Committee's mission is to ensure that CSR issues are taken into account in the definition of Getlink's strategy, to examine CSR opportunities and risks related to Getlink's activities, to review policies in these areas, as well as the objectives set and results achieved, more specifically in terms of investment, to ensure that merger/acquisition processes integrate the performance of CSR due diligence, ensure that non-financial reporting, evaluation and control systems are in place to enable Getlink to produce reliable non-financial information, review the non-financial information published by Getlink in its annual report, review and monitor the ratings obtained from non-financial agencies, and review the monitoring and implementation of applicable regulations in these areas.</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 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 to calculate an achievement rate with respect to the composite index,</p>	<p><i>See URD. p. 200</i></p> <p><i>See URD. p. 220</i></p>
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		<p>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 Chief Executive Officer through his annual bonus have direct responsibility over CSR challenges: the CSR composite index is used to calculate 10% of the 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 the reference text to inspire employees' choices, guide their daily actions and enable them to build stakeholder confidence every day, a major lever for creating value for the Group.</p> <p>In 2020, the CSR department was integrated into the Group's administrative and financial division. It worked to strengthen the Group's CSR approach, to make it clearer and to increase its impact by addressing the various fields of CSR in relation to the ISO 26000 standard.</p>	
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	<p>➤ Aligning strategies, targets, and forms of incentive with the CSR strategy.</p>	<p>For 2020, 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 & safety, social climate, GHG emissions, and customer satisfaction. For each of these areas, indicators and targets were established 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 CEO and 10% of the performance-related plans to allocate free shares. The composite index was audited in 2019 as part of the audit of corporate information by the auditors.</p>	
	<p>➤ Allocating responsibility for CSR to an individual or group within each unit or subsidiary.</p>	<p>At the Group's Executive Committee, the Administrative and Financial Director is responsible for CSR issues. All aspects of environmental policy are supported by the Group Environment Director who reports to her. The CSR department has been attached to the Administrative and Financial Department in September 2020.</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's CSR Department. Universal Registration Document</p>	

	<ul style="list-style-type: none"> ➤ Ensuring that the various departments within the company coordinate their activities to maximize performance and avoid negative impacts. 	The Group's CSR Department, which reports to the Group administrative and financial director, member of the executive committee, oversees all CSR contributions and actions within the various subsidiaries.	
Criterion 2: The COP describes value chain implementation			
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 aims to formalise the result of dialogue at different levels of its organisation. In 2019, considering the changes in the activities of its subsidiaries and the expectations of its stakeholders, the Group updated its materiality analysis. The material issues have been published in the annual report and are accessible to all internal and external stakeholders. The work undertaken with the purchasing and customer departments fully integrates these issues.	
	<ul style="list-style-type: none"> ➤ Analysing each segment of the value chain. 	The materiality analysis, which included a consultation process of 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.	
	<ul style="list-style-type: none"> ➤ Communication of policies and expectations to suppliers and other partners. 	<p>In representing the Group's CSR values and commitments, the procurement departments of the various entities of the Group have taken actions that, beyond providing the Code of Ethics and Conduct when new contracts are signed, require suppliers and subcontractors to comply with the Group's fundamental principles in terms of CSR.</p> <p>Health & safety, environment and quality questionnaires were sent by the procurement departments to candidate subcontractors and suppliers. Their responses were taken into consideration in the selection process. Now a system of consultation framework – that has to be signed by the supplier and the purchasing department before each consultation - refers to the policies to be considered.</p>	

		In addition, the Group is currently studying targeted reinforcement of environmental performance into the purchasing selection process.	
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	<p>➤ Implementing supervisory and assurance mechanisms (audits, checks) to ensure compliance of practices.</p>	<p>An Internal audit department is in place within the Group and has the role of ensuring compliance of practices. It integrates CSR compliance and priorities into its processes.</p>	
	<p>➤ Awareness-raising, training, and other methods for reinforcing skills with suppliers and other partners.</p>	<p>Getlink is working to develop the quality of its relations with its suppliers by relying on the Responsible Supplier Relations Charter (a French Charter which 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).</p> <p>The Group is committed to ensuring financial equity towards suppliers and to respecting the principle of transparency, to incorporating environmental issues and to ensuring the territorial responsibility of its company.</p> <p>The charter is backed by the ISO 20400 standard on responsible purchasing.</p>	

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

The good practices in place within the Group	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Getlink has committed to implementing the principles of the UN Global Compact through its <u>Code of Ethics and Conduct</u>. This Code “describes the principles behind actions that must inspire the behaviour of all employees in all circumstances and in all countries”, following in this, the OECD Guidelines for Multinational Enterprises.</p> <p>The first version of the Code was approved by the Group’s Board of Directors in January 2013. Since 2019, a new Code of Ethics, which has a more down-to-earth format containing a greater number of illustrations and offering a practical guide to ethics, forms the bedrock underpinning all internal policies, and specific procedures adopted by Getlink (anti-corruption policy, competition policy and protection of personal data etc.)</p> <p>Code of Ethics and Conduct</p>	
	<p>➤ Commitment to comply with all applicable laws.</p>	<p>- 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).</p>	

		<ul style="list-style-type: none"> - The 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, 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 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 Code of Ethics and Conduct, the Group calls to: "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". - Getlink complies with the laws relating to protecting the privacy of its employees, in particular those governing digital files. - 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. - Getlink signed the Charter for Responsible Supplier Relations in 2012. 	
	➤ Declaration of commitment communicated both internally and externally.	The Group's Code of Ethics is made available internally to all personnel, on the Group intranet and on the intranet of each subsidiary and externally, and on the Group's website.	
	➤ Other good practices	The Group requires that its partners (subcontractors and suppliers) make a commitment to respecting human rights, by accepting the Group's Code of Ethics and Conduct.	

Criterion 4: The COP describes effective management systems to integrate 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 based on criteria which support truly equal opportunities and treatment for all employees. The Group Human Resources Department supervises the application of policies within the subsidiaries and ensures compliance with the principles detailed in those policies.	
	➤ Processes designed to ensure that international human rights are respected.	Almost all 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 Code of Ethics and Conduct on the various intranet sites of subsidiaries (in French and English) and on the Group intranet, and the external distribution on the Group website actively contributes to the raising awareness campaign 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 might experience problems or might have questions about the scope of the Code of Ethics, or how the rules should be implemented. An whistleblowing system is available to any stakeholder, enabling them to alert the ethics officer in the event of doubt or failure to comply with the rules of the Code.	
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 Code of Ethics and Conduct states clearly in its background that: ‘The companies within the Getlink Group comply with applicable laws, regulations and standards, in particular in respect of labour law, in accordance with the principles of the United Nations Global Compact ’. 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.	
	➤ Monitoring of internal and external feedback	Internally, a constructive social dialogue enables regular communication with staff representatives. Through the staff forums, specific to each country, and within the European Company Committee, which brings together representatives of French and British trade unions, social dialogue is regularly implemented.	
	➤ 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 (internal or external) who is experiencing problems or has questions about the scope or application of the rules laid down in the Code of Ethics. The e-mail address of the Ethics Officer is communicated in the Ethics Charter and is thus accessible to any internal or external stakeholder.	

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>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<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>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 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 center, 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"> • In 2020, 66 374 hours were devoted to employee vocational training, representing an average of 19 training hours per employee. The cost of training, which accounted for nearly 1,9% of the total wage bill, stood at € 2 991 539 in 2020, compared to € 4 504 344 in 2019. <p>The human resources policies recognize each employee's contribution, taking account of that employee's qualifications, level of responsibility and individual performance.</p>	<p><i>See URD, Chapter 6.6 .5, p.281</i></p>
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	Getlink ensures that all its subsidiaries comply with their legal and contractual obligations regarding working hours.	
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	<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 is committed to, ensures, and controls the legal working conditions of its suppliers and subcontractors, in particular through compliance with the obligation of vigilance (France) and the annual declaration on modern slavery (United Kingdom).</p>	
	<p>➤ Company policy written in order to comply with national labour rights, comply with international standards in international activities, and engage in</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>dialogue with employee representatives (international, national or sector-based).</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 per year) based on individual contracts and agreements in place with the labour union Unite and the staff representative bodies.</p> <p>In France, employees' working hours (except for 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 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 contain references to the legal obligations in relation to labour issues which suppliers must comply with, before working with the Group. They also refer to the obligation for suppliers to comply with the fundamental principles of the Code of Ethics and Conduct.</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 the Group operates:</p> <ul style="list-style-type: none"> • <i>In 2020, ESGIE entered discussions to negotiate a collective agreement, which were concluded in February 2020 with the renewal of the professional equality collective agreement. This action affirms Getlink's desire to promote women and to put in measures to raise awareness as an extension of the proposed Charter on professional equality. In 2021, ESGIE published the results of its workplace equality index, which at 86/100 was above the 75-point threshold. To improve this result, the business has developed an action plan with progress targets regarding female promotion (women to account for at least 25% of total promotions over three years) and equal pay, ensuring that men and women with equivalent jobs, experience, and education receive the same pay.</i> 	

		<p>Moreover, a Group workplace equality charter was signed in July 2020. In developing this charter, male and female team members were involved in its development including attending a workshop, in which specific actions to reduce gender inequality at work were proposed and discussed.</p> <ul style="list-style-type: none"> • In the United Kingdom, the 'Rate for the Job' remuneration system and the HAY method ensure fair remuneration. ESL publishes an annual report on equal pay for women and men. • In October 2020, Getlink's IT department and the Maison du Numérique et de l'Innovation (digital and innovation centre) in the Calais area collaborated to offer two workshops to introduce girls aged 11 to 13 to computer programming and the creation of video games. 	<p>See URD, 6.6.3, p. 277</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>Disability is another important dimension of the Group's diversity policy, which supports the integration, vocational training, and job retention of workers with disabilities.</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.</p> <p>On 23 July 2013, a partnership framework agreement has been signed with APF (the French association for people suffering from paralysis). Within this partnership, work was contracted to APF frequently in 2017 for various services. This collaboration provides to date full-time posts for more than five people on permanent contracts.</p>	<p>See URD, 6.8 .2;</p> <p>p.296</p>

Criterion 7: The COP describes effective management systems to integrate the labour principles

<p>The good practices in place within the Group</p>	<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 or to propose solutions if the company's position deteriorates.</p>	<p><i>See URD, 4.2.5; p.219</i></p>
	<p>➤ Evaluations of risks and impacts concerning work standards.</p>	<p>A Safety and Security Committee is responsible for monitoring safety and security issues in each of the Group's entities.</p> <p>The Safety and Security Committee reviews all matters concerning safety and security within the company or the Group and reports to the Board.</p> <p>The remit of the Safety and Security Committee is to:</p> <ul style="list-style-type: none"> ▪ Regularly examine all matters concerning the safety or security of (i) the operation of the transport system, including the services of the national railways during their crossing of the Tunnel, and, separately, (ii) the activities of the railway subsidiaries. This review includes issues that may have a significant impact on the environmental performance of the company and the Group ▪ Review reports on any incidents or accidents and ensure that appropriate action has been taken, or appropriate recommendations have been implemented by the national railways ▪ Regularly review response procedures and the implementation of recommendations made to prevent the recurrence of similar events ▪ Receive reports of any incidents or accidents occurring in other transportation systems or in other industries that are similar to the company's or the Group's system and to recommend appropriate action 	

		<ul style="list-style-type: none"> ▪ <i>Receive reports on the safety consequences of any major changes in the transport system procedures or design, and to provide advice, if necessary, in the context of submissions to the Safety Authority of the IGC</i> ▪ <i>More generally, take, within the scope of its powers, any initiative to be presented to the Board aimed at improving the current levels of performance of the company, in particular by updating the risk prevention and management strategies</i> ▪ <i>Ensure, with regard to occupational health and safety, that any person affected by the safety implications of an operating procedure or a change in such a procedure must be able to make his or her opinion known; and</i> ▪ <i>Report regularly to the Board.</i> <p>In 2020, the Committee met five times on matters relating to the Concession, with an attendance rate of 100%.</p> <p>The Committee monitors individual and collective safety and performance indicators for the corresponding action plans. The Committee also monitors workplace accident indicators for Fixed Link employees and sub-contractors present on the site; it supports measures launched to improve results in this area and, in particular, those aimed at developing a safety culture within the organisation.</p> <p>The Committee dedicated a significant amount of its activity discussing the safety of the ElecLink project and its interface with the Concession, both during the works phase and during the future operation of the cable; the topic has been the subject of several independent expert reports.</p> <p>The Committee also met twice to consider Europorte matters: it monitors the safety indicators and the employee training and awareness actions implemented. The Committee also analyses the key incidents affecting operations and considers remedies.</p> <p>It should also be noted that:</p>	<p><i>See URD, Chapter 4.2.5;p.219</i></p>
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		<ul style="list-style-type: none"> ▪ Each Group subsidiary has its own safety department which works to promote a culture of prevention in terms of safety, with the aim of gradually achieving a safe and healthy working environment. Thus, each entity regularly monitors safety performance as part of a quest for continuous improvement and the deployment of any necessary corrective actions. ▪ All safety events are recorded and analyzed to form the basis of recommendations and action plans. ▪ A materiality analysis, which included consultation with the Group's main internal and external stakeholders, made it possible to identify and prioritize the Group's main internal and external CSR challenges. It also made it possible to identify present and future opportunities and risks likely to have a significant impact on the Group's stakeholders, environment and/or economic performance. 	
	➤ Mechanisms for dialogue with labour unions.	<p>The implementation of efficient forms of dialogue with employees was identified as a highly important challenge in the materiality analysis conducted by Mazars. 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 2020 financial year, 16 majority agreements were signed by the Group's subsidiaries covering topics such as gender equality, professional equality, incentive schemes or wage negotiations. .</p>	URD,6.6.5, p.281
	➤ Allocation of responsibilities relating to work standards in the organisation.	<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>Regarding health, hygiene, and safety, the Safety Department in each Group subsidiary, the Social and Economic committee, through the 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 these entities</p>	

		<p>work to ensure the protection of the health and safety of employees, and the improvements in their working conditions. They analyze 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 2020, 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"> ▪ A “road safety” campaign conducted in 2020 by Europorte's top management at all Europorte sites. ▪ A rerun in 2020 of the awareness raising campaign, entitled “Safety goes to the movies”. 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. ▪ A Safety Forum was held in Folkestone in January 2020, bringing together 80 British and French employees from all divisions. Its aim was to highlight the company's leadership and safety culture. ▪ Training: The Group has decided to place the emphasis on a shared safety culture by organising dedicated training for Group team members. Although the number of hours of training was lower in 2020 than in the previous year, due in particular to the public health crisis, the number of hours devoted to safety remained at the same level as in 2019. In fact, more than 16,300 hours of safety training were provided in 2020, representing 25% of the total number of training hours (compared to 16% in 2019). ▪ Innovation and technical progress. The existing use of connected equipment (such as telephones, tablets, computers, and so on) have enabled the company to adapt very quickly to the context of the public health crisis, to deploy remote working very widely and to set up the appropriate arrangements for lockdowns thus strengthening the resources available to its team members to enable them to work safely. 	

See URD,
6.6.4, p.278

		<p>.</p> <p><i>An enhancement of the dialogue with teams working remotely in the context of the public health crisis through the involvement and call to action of local line managers, which completed the prevention, listening and monitoring actions implemented by the occupational health department.</i></p>	
	<p>➤ Active engagement with suppliers concerning the challenges relating to work standards.</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 Code of Ethics.</p> <p>Health/safety questionnaires were sent to suppliers and subcontractors during tenders.</p>	

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

The good practices in place within the Group	➤ 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.	
	➤ System for tracking and measuring performance.	Each subsidiary has its own system for entering corporate indicators, which are consolidated by the Group CSR Department.	
	➤ Dialogue with the representatives of employee organisations to verify the progress made and identify priorities for the future.	In France, all subsidiaries have their own <u>Social and Economic Committee and their Safety, Health and Working Conditions Committee</u> . The committee works according to its specific operational rules. In the United-Kingdom, the <u>Company Council and the Safety, Health and Environment Committee</u> are the two organisations for ESL employees with which permanent dialogue is being established.	
	➤ Audits or other measures to monitor and improve work standards in companies in logistics chains in line with international work standards.	Audits are undertaken regularly by the SQE departments (SQE stand for Safety, Quality and Environment) of the various Europorte subsidiaries and by the Safety and Transversal Processes department for the Fixed Link.	

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>	➤ Pertinent policies, procedures and activities planned to meet this criterion.	Getlink has set up a formal CSR policy, supported and sustained at the highest level of the organisation by the 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.	<i>See URD, P 265</i>
	➤ Reference to international conventions and other international mechanisms.	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. The group fully integrates and adheres to national and international commitments in terms of climate ambition (notably the French national low-carbon strategy and the European climate law endorsing the objective of carbon neutrality by 2050. Getlink also identified in 2019 10 Sustainable Development Goals (SDG) that best reflect its most material challenges out of the 17 SDGs defined by the UN for the 2015-2030 period. These elements - combined with the materiality analysis – feed the updating process of the Group's CSR strategy, and will drive performance. SDG #13 "Action on climate change" and SDG #15 "Life on earth" are part of the 10 SDGs selected by the Group.	
	➤ Discussion on the relevance of sustainable environmental management for the company.	The update of the materiality analysis carried out in 2019 by Mazars identified three issues relevant to the environment among 23 CSR material issues:	

		<ul style="list-style-type: none"> ▪ The energy transition and the fight against climate change are key issues for stakeholders; classified as important, these issues cover several dimensions including energy consumption and the use of renewable energies ▪ The preservation of natural environments, is considered a moderate issue ▪ Waste management and the circular economy are considered as a moderate issue. <p>The Group's environmental commitment focuses on these issues, which are the most material, as identified in the materiality analysis. A Group environmental strategy with medium-term objectives will be finalized and disclosed in 2021.</p>	CSR Charter Engl. version
	<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; GRI, ISO 26000). Among these major challenges, the environmental challenge has been identified as a priority.</p> <p>Committed to "low carbon" transport, the Group is pursuing an ambitious strategy that combines the development of its core business, cross-Channel transport, and external growth, beyond the Fixed Link, in its two main businesses and areas of expertise: infrastructure management and rail operations.</p> <p>Prior to the construction of the Tunnel, expense was incurred to prevent the harmful consequences of business activities for the environment. As an example, there are two separate sewer systems for storm water and wastewater, retention ponds, treatment stations, etc.</p>	

		<p>Given the material environmental challenges, the Group's environmental policy comprises three pillars that contribute to the Group's ambition to consolidate its position as a key player in eco-responsible transport:</p> <ul style="list-style-type: none"> • Pillar 1: Energy transition and climate • Pillar 2: Preservation of natural environments (protecting natural areas) • Pillar 3: Waste management and the circular economy 	
	<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 Code of Ethics (including environmental preservation).</p> <p>The purchasing department is currently considering sending CSR requirements to suppliers on a systematic basis, with a level of adaptation according to the impacts associated with the purchasing category.</p>	<p>URD, p.282</p>
	<p>➤ Specific commitments and objectives for given years.</p>	<p>In its CSR Policy, Eurotunnel Group is committed, for 2020, to acting in line with the principles of sustainable development and in accordance with the principles of the Global Compact relating to the environment. To achieve this, the Group has four commitments:</p> <ul style="list-style-type: none"> ▪ <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 optimizing waste management,</i> ▪ <i>To raise awareness amongst staff regarding their responsibilities as eco-citizens,</i> ▪ <i>To choose innovative and environmentally friendly products,</i> ▪ <i>To strengthen action plans, which support the protection of diversity.</i> 	

		<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>In 2019, Eurotunnel implemented a plastic cup recycling plan at the office buildings of the French part of the Concession; stock stood at 15 cubic meters in 2020 and material recovery is conducted by a partner.</p> <p>At Europorte, almost all the waste produced comes from the maintenance of rolling stock and rail infrastructure. At industrial sites, waste management procedures are generally held by clients. Europorte applies its own waste management procedures to its port rail infrastructure services and Europorte's locomotive maintenance workshop at Arc-lès-Gray. Waste is sorted internally for both these activities. A dynamic waste recovery campaign was launched at headquarters with the implementation of six selective sorting categories. This approach has been shared with the regions and has been (partially) duplicated at some sites. The management of the Covid-19 crisis in 2020 did not allow Europorte to introduce the new planned sorting bins (cardboard, glass, light bulbs / electrical equipment); it nevertheless was possible to increase dematerialisation of everyday operational documents (such as numerous authorisations).</p> <p>In line with the challenge of this pillar in the Group's environmental policy, Getlink committed to reduce its direct emissions (Scopes 1 and 2 in tons of CO2 equivalent) by 15% by the end of 2023 compared to its 2019 emissions (like-for-like, which means that the figures take account of active companies). This is a new milestone in the trajectory that the Group is taking to clarify its climate ambitions. Since 2020 was not sufficiently representative of activity levels, the Group has chosen 2019 as the reference year for its direct emissions (Scope 1 and Scope 2 as defined by the GHG Protocol).</p> <p>Compared with the Group's previous target of 5% over 5 years, this new target represents more than a three-fold increase in terms of ambition.</p>	<p><i>URD, 6.7.4 ; p.293</i></p> <p><i>URD, 6.7.2, p.289</i></p>
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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>Getlink has developed a policy for monitoring and managing the greenhouse gas emissions of its subsidiaries in anticipation 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 Carbon Trust Standard certified since 2009.</p>	
		<p>In 2019, the Group's Carbon Trust Standard certification was renewed for Eurotunnel in recognition of its carbon footprint reduction policy for the 2017-2018 period. As part of this certification, Eurotunnel, which is the main contributor to the Group's emissions, must reduce its emissions per euro of revenue by 2.5% per year.</p> <p>The renewal of this certificate for the 2019-2020 period will be audited in 2021.</p> <p>Getlink has also been ranked fifth, in the Challenges/Statista "Les champions du climat"¹ 2020, which acknowledges the Group's efforts to reduce GHG emissions in recent years from among hundreds of companies across all business sectors. Since 2019, to ensure comprehensive and proactive consideration of development and environmental issues, Eurotunnel has also reorganised its management of environmental challenges by placing them in a project department which has a transversal role across the departments of the Concession. All projects are classified according to their environmental issues and an extended analysis of major projects is conducted encompassing the Corporate Social Responsibility pillars.</p>	<p>URD ; 6.6.1 p.234</p> <p>URD;6.6.5,p.282</p>

¹ www.challenges.fr/classements/champions-du-climat/2020/transport-et-logistique.

	<p>➤ Evaluations of environmental risks and impacts.</p>	<p>A risk review is conducted each year on all the activities of the Group and its subsidiaries by the internal audit and risk management departments. These risks are described in Chapter 3 of the Universal 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 have 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, based on 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 authorization 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>URD, 6.7.3,p.291</i></p>
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	<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 with its own sustainable development approach, that seeks to reconcile financial performance, social equity, and environmental protection:</p> <ul style="list-style-type: none"> ▪ <i>The Tunnel runs entirely underground and does not interfere in any way with the marine environment,</i> ▪ <i>A transport, that limits, by nature, impacts on the environment (with much lower CO2 emissions compared to ferries. Transported on-board a shuttle, a lorry releases 12 times less CO2 emissions, and a passenger vehicle releases 73 times less CO2 emissions, compared to the Channel crossing via a ferry);</i> ▪ <i>The electric traction system adopted is a major factor in reducing the Group's carbon footprint and greenhouse gas emissions,</i> ▪ <i>The programme to replace the halon, used as an extinguishing agent, is now completed in the Tunnel's plant rooms and at the French and British terminals. The programme involving 57 locomotives ended in 2019. The removal of halon from carrying wagons represents 58.320 tons. The project will take place as part of an overall Shuttle renovation programme. This mid-life Passenger Shuttle programme includes the replacement of our Passenger Shuttles' main systems: fire detection and extinguishing, air conditioning and ventilation, fire doors, networks and wiring. In 2019, halon emissions represented 5,197 T CO2 for the Group. Until then, the Group, which received confirmation from the European Union in 2020 of the extension of Eurotunnel's authority to use halon, has proposed a new protocol for monitoring possible halon leaks to prevent them to the greatest extent possible, by establishing more demanding criteria than European and national legislation require.</i> ▪ <i>Similarly, the replacement of refrigerant gases with lower emission solutions was launched several years ago. In particular, the R22 used in the Tunnel cooling system was replaced in 2018 with an HFO fluid. The last of the R22 will be removed from locomotives in 2021. R407C fluid present in Shuttles and responsible for 4,439 tons of emissions in 2019 will be substituted by a fluid producing threefold lower emissions under the mid-life programme referred to above.</i> ▪ <i>The levers for reducing the impact of electricity consumption on Eurotunnel's activities are two-fold: energy efficiency and low-carbon electricity purchases. As for the first one, the load factor is a key driver to optimise</i> 	<p><i>URD, 6.7.2 , p.290</i></p>
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		<p>consumption relating to Shuttle traction but other energy efficiency measures focusing on consumption generated by processes, heating and lighting at both terminals will continue to be implemented (more than €800,000 costs are engaged to change to LED lighting in the workshops). In addition, energy gains associated with the use of new Truck Shuttles (eligible for the Energy Saving Certificate Programme) and fan optimisation measures at the Tunnel cooling plant are well established and will continue to contribute to frugal consumption levels. As for the second lever, a certified zero-carbon contract in the United Kingdom on 1 January 2018 (the “Blue for Business” 100% nuclear power supply contract) has led to zero direct emissions from electricity consumed in the United Kingdom. To increase the share of low-carbon electricity and to contribute to national renewables targets, the Group will launch a study to analyse and prioritise the various possible initiatives: renewable energy capabilities on a self-consumption or power purchase agreement basis, guaranteed source purchases and so on. The study will be conducted in 2021 to ensure the implementation of the recommended tools before the end of the current supply contracts (31 December 2022).</p> <ul style="list-style-type: none"> ▪ Raising awareness of rail freight and Shuttle drivers regarding eco-friendly driving styles. ▪ Modulating the power of fans in the Tunnel cooling plant, following the installation of cutting-edge electronic controllers in 2016 which consume less energy. ▪ Since 2015, the Group has provided a universal and free of charge recharging facility at the Eurotunnel sites in Coquelles (Pas-de-Calais) and Folkestone (Kent) for customers with electric cars. The number of 100% electric vehicles using Passenger Shuttles increased from 40 in 2014 to more than 6,700 in 2019 and close to 8,300 in 2020. ▪ The Europorte employee awareness initiative which started in 2018 regarding eco-citizen initiatives (waste management, eco-friendly actions and water management) continued throughout 2019 and 2020, via themed articles suggesting specific Sustainable Development initiatives, distributed through a monthly in-house newsletter. This awareness initiative was reinforced in 2020 by compulsory talks on the environmental impacts of local activities and on the management of accidental spills. 	<p><i>URD,6.7.2, p.288</i></p> <p><i>URD,6.7.1, p.283</i></p>
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		<p>Aware of the need to accelerate environmental transition, in September 2018, Getlink launched the issue of Green Bonds for a principal amount of €550 million, increased to €700 million in October 2020. The net proceeds of this issue after the redemption of the Green Bonds issued in 2018 were used to finance investments related to the ElecLink project, as well as other eligible environmental projects.</p> <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>For the whole of France, the non-hazardous industrial waste is sorted to be recovered at nearly 91 %.</p> <p>The Group is currently working to establish a benchmark in the United Kingdom to enable the recovery, recycling, and reuse rates to be compared using a robust methodology in terms of traceability and compatibility with the regulatory requirements applicable on both sides of the Channel.</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.</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>	<p><i>URD, 6.7.4, p.294</i></p>
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		<ul style="list-style-type: none"> • In France: The 'Jardins Ordonnés', with their seven-hectare lake, are a rest area highly appreciated by migratory species, and an essential nesting spot for many birds. • In the United Kingdom, the Samphire Hoe site is a specific example of the Group's intention to support biodiversity and protect the environment. A nature reserve covering around thirty hectares at the base of the white cliffs of Dover, Samphire Hoe was created by reusing five million cubic metres of chalk and marl extracted from the Channel when drilling the Tunnel. This strip of land was gradually transformed into a nature reserve. The everyday management of this protected space is entrusted to the White Cliffs Countryside Partnership (WCCP), which receives the support of various volunteers from the county of Kent. The partnership between the Concessionaires and the WCCP received its 15th Green Flag Award in 2020, recognising the excellent environmental quality of this nature reserve. 	<p><i>URD, 6.7.3, p.291</i></p>
	<p>➤ Allocation of responsibilities within the organisation.</p>	<p>The various <u>Safety and Sustainable Development Departments (renamed from 2020 Safety and Transverse Process and QSE Departments)</u> within the subsidiaries monitor energy consumption.</p> <p><i>The Ethics and CSR Committee</i></p> <ul style="list-style-type: none"> ▪ Ensures that CSR issues are considered in the definition of Getlink's strategy, ▪ Examines CSR opportunities and risks related to Getlink's activities, review policies in these areas, as well as the objectives and results, more specifically in terms of investment, ▪ Ensures that merger/acquisition processes include the performance of CSR due diligence, ▪ Ensures that non-financial reporting, evaluation and control systems are in place to enable Getlink to produce reliable non-financial information, ▪ Reviews the non-financial information published by Getlink in its annual report, reviews and monitors the ratings obtained from non-financial agencies and reviews the monitoring and implementation of applicable regulations in these areas. 	<p><i>URD, 6.3,p.268</i></p>

		<p>Regarding environment, the Committee's purpose is:</p> <ul style="list-style-type: none"> ▪ to regularly review the performance of the subsidiaries and of the Group, ▪ to receive assurance about the Group's actions towards the environment and climate and the strategic orientations designed to promote environmental management, preserve natural resources and limit the impact of the company's and the Group's activities on the environment. <p>The Group Human Resources Department monitors and consolidates the environmental data from the various Group subsidiaries. This role is now performed by the Group's CSR Department, created in December 2019, in conjunction with the Group's subsidiaries.</p> <p>In 2020, the CSR department was attached to the Group's administrative and financial management, member of the executive committee. It worked to strengthen the Group's CSR approach, to make it clearer and to increase its impact by addressing the various fields of CSR in relation to the ISO 26000 standard.</p>	
	➤ Internal awareness and training on sustainable environmental management for management and employees	<p>. Each new employee is informed about the company's environmental policy, its objectives and the organization implemented to minimize the impact of its activity on the environment and can access any useful information referenced in the Universal Registration Document.</p> <p>. Members of the Executive Committee and the Board of Directors are regularly informed of the development of issues and the progress of internal policies.</p>	
	➤ Other good practices	<p>An 'eco-comparer' is available on "Le Shuttle" website so that customers (passengers) can calculate the average CO₂ emissions saved by using the Passenger Shuttles (compared to the same trip via ferries).</p> <p>Carbon Counter</p>	

Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship.

<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>As early as 2002, Eurotunnel Concessionaires installed an environmental management system based on the requirements of the <u>ISO 14001 standard</u>.</p> <p>Europorte has implemented a continuous improvement approach, by setting up the <u>SQAS Rail</u> assessment procedure (<u>Safety and Quality Assessment System</u>). All entities of this subsidiary are assessed every three years, since 2014. This assessment comes in addition to the <u>MASE and ISO 9001 certifications</u>.</p> <p>At Socorail, the Europorte subsidiary specialized 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 & Quality Assessment System) certifications. The Socorail Infrastructure Management branch obtained a MASE notably for the Southern region in 2020 for a four-year period. Socorail's Infrastructure Management branch has also been MASE certified since 2019 and has been included in the ISO 9001 certification scope in early 2021. Europorte France renewed its Safety & Quality Assessment for Sustainability (SQAS) certification for its headquarters and is currently renewing certification in the regions.</p> <p>The Environment 2025 plan (planned for Semester 1, 2021) includes the objective of ISO 14000 certification for 100% of the Group's sites.</p>	<p><i>URD; 6.7.1 p.282</i></p>
	<p>➤ System for tracking and measuring performance.</p>	<p>All environmental indicators are monitored by the various subsidiaries and by the Group CSR Department, and are published once a year in the Unique Registration Document, in the non-financial performance statement section.</p>	

	<p>➤ Examination of executive management for monitoring and improvement of results.</p>	<p>The Ethics and CSR Committee is responsible for examining the Group subsidiaries' performance in relation to the environment as well as the strategic guidelines, which intend to promote good environmental management, conserve national resources, and limit the impacts of the Group's activities on the environment.</p>	
	<p>➤ Audits or other measures to control and improve labor standards in line with labor standards international work</p>	<p>Since 2016, the Group has been working on implementing actions to improve energy performance identified during energy audits carried out periodically.</p>	
	<p>➤ Results of integration of principles relating to the environment.</p>	<p>The Group has made no provisions against environmental risks, nor did it pay out any court-ordered compensation for environmental damage during 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.</p>	

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><i>The good practices in place within the Group</i></p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The Group has established a Code of Ethics, which, in application of the United Nations Global Compact, describes the principles of action that must inspire the behaviour of each employee in all circumstances, making reference to the OECD Guidelines for Multinational Enterprises. This Code of Ethics was reviewed in its form following an advice of the Corporate Committee and the Audit Committee and was approved by the Board of Directors on December 2018. The update integrates a more illustrative and concrete form, to be a practical guide to ethics, the foundation on which all internal policies, codes of conduct, specific procedures, adopted by Getlink are based (anti-corruption policy, competition policy, stock market ethics Code, etc.).</p> <p>The Group's Code of Ethics, deployed to all employees and reviewed for the last time in December 2018, formalizes all Getlink's rules of conduct,</p>	<p><i>See Code of Ethics and Conduct above</i></p>
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		<p>giving each employee and to any of the Group's stakeholders a framework to guide him or her in their choices and attitudes by exercising discernment.</p> <p>The Code of Ethics presents in a pedagogical manner the rules and behaviors to be adopted by all, illustrated with concrete examples. It also specifies the roles of managers and employees in implementing the Code daily. It is supplemented by an alert system (whistleblowing system) set up for employees and to any of the Group's stakeholders, to enable them to report directly to the Group Compliance Officer any suspicion of violation of the applicable rules or to obtain help and advice regarding its content and application.</p> <p>As part of a voluntary responsible procurement initiative, Getlink signed the French "Responsible Supplier Relations Charter" in January 2012. This charter includes 10 commitments for responsible purchasing, ensuring a genuine partnership between customers and their suppliers with due regard to their respective rights and obligations. Its commitments include ensuring financial fairness with its suppliers, respecting the principle of transparency, considering environmental challenges, and ensuring that the business is held locally accountable.</p> <p>In 2020, the Group continued its efforts to consolidate its achievements and to develop, implement and maintain an effective long-term responsible purchasing policy. To this end, a pilot campaign to clarify the CSR commitments of Eurotunnel's suppliers in France was launched. This project, which has progressed more slowly because of the public health crisis, will continue in 2021.</p> <p>Getlink has set up a specific program to combat corruption and raise awareness of ethical practices (the Compliance Program "Get Compliant"). This program has been supplemented with risk prevention tools. Led by a multi-disciplinary functional team, this program is based on a system including awareness tools training and an alert system in a prevention and continuous improvement approach.</p>	<p><i>URD, 6.4.8,p.272</i></p>
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	<p>➤ Support from executive management in preventing corruption</p>	<p>The first version of the Code of Ethics was validated by the Board of Directors in January 2013. Since 2019, a new, more illustrative and concrete Code of Ethics has been in place. In the introduction to the Code, a message from the CEO underlines the importance of respecting these commitments for the Group's management.</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>	
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	<p>➤ Formal, public zero-tolerance policy in respect of corruption.</p>	<p>The Code of Ethics states that: "No Getlink employee shall directly or indirectly grant undue advantages of any kind whatsoever to a third party by any means whatsoever to obtain or maintain a business transaction or preferential treatment. Bribery of public officials, in any form, is prohibited.</p> <p>Each year, the Group develops and strengthens its compliance culture, based on its new Code of ethics, which forms the foundation for all internal policies, codes of conduct and specific procedures adopted by Getlink. A strong message, notably of "zero tolerance", particularly regarding the fight against corruption, is conveyed by the Chairman and Chief Executive Officer.</p> <p>In accordance with the "zero tolerance" message promoted by the Chairman and Chief Executive Officer with respect to all types of corruption, the Group, which is subject to the Sapin II law, has defined a rigorous corruption risk prevention programme, which is applicable to all Group entities and is founded on team member training and information campaigns to raise awareness of major fraud and corruption risks. A map of corruption and bribery has been created in conjunction with internal stakeholders in order to identify the types of risks to which the Group could be exposed in the course of its operations. A third-party evaluation procedure has also been developed with several levels of controls. An anti-corruption policy and a whistleblowing system have been implemented. All team members can contact the Group's ethics officer if they consider that communicating information to a line manager could present difficulties or not result in the proper follow-up.</p>	
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	➤ Other good practices	Getlink signed the <u>Charter for Responsible Supplier Relations</u> in 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.	
Criterion 13: The COP describes effective management systems to integrate the anti-corruption principles			
<i>The good practices in place within the Group</i>	➤ Pertinent policies, procedures and activities planned to meet this criterion.	In addition to its publication on the internet and intranet sites of Getlink entities, the <u>Code of Ethics and Conduct</u> is distributed to all new employees, suppliers and subcontractors when their contracts are signed. Every signature of a commercial contract implies a commitment by the supplier to respect the rules of the Code of Ethics and Conduct, including the strict acceptance of Getlink' tolerance zero regarding bribery and corruption.	

	<ul style="list-style-type: none">➤ Human Resources procedures supporting the anti-corruption commitment or policy.	<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 behavioral 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 that they can perform their professional activities correctly and it describes the company policy in relation to fraud.</p> <p>All new employees are provided with information about the HR policies and procedures relating to the Code of Ethics and Conduct, when they start collaborating with the Group.</p>	
	<ul style="list-style-type: none">➤ Communication channels and tracking mechanisms for reporting concerns or requesting advice.	<p>The Code of Ethics specifies the whistleblowing system available to employees and stakeholders.</p>	
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.	<p>This annual risk review also covers the issue of anti-corruption.</p>	See Code of Ethics and Conduct
	<ul style="list-style-type: none">➤ Process for management of incidents.	<p>An internal whistleblowing mechanism and an ethics officer are in place to address any risk of corruption.</p> <p>An e-mail address (mailto:contact.ethic@getlinkgroup.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 Code of Ethics.</p>	
	<ul style="list-style-type: none">➤ Other good practices	<p>Getlink has a specific anti-corruption and ethical awareness programme (the Compliance Programme). This program has been supplemented with risk prevention tools. Led by a multi-disciplinary functional team, this program is based on a system including awareness tools and an alert system in a prevention and continuous improvement approach. With a view to continuous improvement, Getlink deployed a</p>	See URD 3.4.2; p.164

		compliance awareness initiative in 2019 in a program called 'Get Compliant'.	
II. Acting to support the broader objectives of the United Nations			
Criterion 15: The COP describes core business contributions to UN goals and issues			
The good practices in place within the Group	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The strategic vision of Getlink, as this is reflected in its CSR Charter, is aligned 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"> • 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 Getlink which, since its inception, has been committed to a social responsibility policy reconciling economic performance, social equity, and environmental protection as part of continuous improvement approach.</p>	See CSR Code
	<p>➤ Adopting or amending operational procedures to maximize the contribution to United Nations objectives and themes.</p>	<p>In accordance with the 1992 Montreal protocol, actions were implemented to reduce emissions of all gases leading to ozone layer depletion. The halon replacement programme is now complete in the Tunnel's plant rooms and at the French and British terminals (approximately 16 tonnes of halon eliminated). The programme involving 57 locomotives ended in 2019. The removal of halon still present in the Passenger Shuttles will represent 58.3 tons of gaz.</p>	

		<p>Since 2015, the Group has provided a fast and free of charge recharging facility at the Eurotunnel sites in Coquelles (Pas-de-Calais) and Folkestone (Kent) for customers with electric cars. In thirty minutes, they can charge 80% of the battery capacity (universal battery chargers). The number of customers using the Passenger Shuttle in electric cars increased from 800 in 2015, close to 8 300 in 2020.</p> <p>The Group continuously improves its social responsibility programme by encouraging its employees to commute to Coquelles by choosing alternative transport means to the individual cars. 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>The Europorte employee awareness initiative launched in 2018 covering eco-citizen initiatives (waste management, eco-friendly actions and water management) continued throughout 2019 and 2020, via themed articles suggesting specific sustainable development initiatives and distributed through a monthly in-house newsletter. This awareness initiative was reinforced in 2020 by compulsory talks on the environmental impacts of local activities and on the management of accidental spills.</p> <p>Since 2014, Europorte’s subsidiaries have been awarded TK’Blue status by the European TK’Blue Agency; this label measures eco-responsible commitment, and helps assess the technical, economic, environmental and social performance of the transport offering. Europorte received the TK’Blue transport company prize at the 2019 Eco-Responsible Transport Awards. This prize recognises Europorte’s commitment to</p>	<p><i>See URD;6.7.2, p.288</i></p> <p><i>URD, 6.7.1, p.282</i></p>
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		<p>sustainable transport that is more environmentally friendly and is at the heart of the Group's overall CSR approach. At Socorail, the Europorte subsidiary specialising in logistics management at industrial sites, progress in environmental protection and safety was rewarded with the renewal of ISO 9001 (quality management) and MASE (Company Safety Improvement Manual) certifications, notably for the Southern region in 2020 for a four-year period. Socorail's Infrastructure Management branch has also been MASE certified since 2019 and has been included in the ISO 9001 certification scope in early 2021. Europorte France renewed its Safety & Quality Assessment for Sustainability (SQAS) certification for its headquarters and is currently renewing certification in the regions.</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.</p> <p>Lastly, at the end of 2020, the fleet of hybrid and electric vehicles represent 9% of the Eurotunnel/Europorte light vehicle fleet (64 vehicles in total).</p>	<p><i>URD;6.7.1, pp.282-283</i></p> <p><i>URD, 6.7.2,p.290</i></p>
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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 fulfils its social responsibility through concrete commitments and actions to support the community:</p> <ul style="list-style-type: none"> ▪ <i>Payment since 2010 of 10% of the land rental income from the wind farm on its Coquelles site to Secours Populaire (French association), which distributes the payments in the form of "energy vouchers" to families in Pas-de-Calais. Following its expiry in 2019, the partnership agreement between Eurotunnel and Secours Populaire was renewed for two more years (ending up in 2021).</i> ▪ <i>Support for project leaders and start-ups in the Calais area through the Maison du Numérique et de l'Innovation (Digital and Innovation Centre), which is chaired by Getlink's Chairman, Jacques Gounon. Opened in October 2019, this new structure is entirely dedicated to new technologies and aims to help a broader audience discover digital technology and digital recent developments. Comprising various rooms for training and an open space for co-working, it also has several 3D printers. In October 2020, Getlink's IT department and the Maison du Numérique et de l'Innovation (digital and innovation centre) in the Calais area collaborated to offer two workshops to introduce girls, aged 11 to 13, to computer programming and the creation of video games. As part of the same partnership, Eurotunnel also worked with Greta (the French national organisation for occupational training) to organise Digital Days (27 January to 7 February 2020) on the theme of "customer relations via digital technology". The aim was to enable people in insecure situations (jobseekers, disabled employees, residents of high-priority disadvantaged areas) to access digital technology, particularly through discovery workshops. To provide a practical illustration of the use of digital technology in companies, a morning session was held at Eurotunnel's premises on 31 January 2020, during which around fifty people with no digital experience attended a presentation of mobile applications used within the company, the skills required, the current and future development of the company in terms of digital.</i> ▪ <i>Commitment to high-priority disadvantaged areas by signing a partnership agreement in July 2019 between Eurotunnel, the Grand Calais Terres et Mers urban area and the State, represented by the Prefect of Pas-de-Calais.</i> 	<p><i>URD, 6.8.2, p.290</i></p>
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	<p>➤ Seeking social investments and philanthropic contributions linked to core business.</p>	<p><i>Despite the current circumstances, the Group has maintained 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:</i></p> <ul style="list-style-type: none"> ▪ <i>Partnership between Europorte and the French Ecole Polytechnique on the predictive maintenance of engines; and</i> ▪ <i>Participation since 2016 in the “Professeurs en entreprises” operation initiated by the Fondation “C Génial”, a foundation for scientific and technical culture. This operation is aimed at secondary school teachers (and other members of the national education system). In addition to encouraging the professional integration of young people, it promotes the sectors and the scientific and technical professions of the companies visited. Several Eurotunnel rolling stock managers took part in this activity.</i> <p><i>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:</i></p> <ul style="list-style-type: none"> ▪ <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 objective of the organisation is to implement actions to enhance and promote the sector. It also offers a platform for discussions between the players to discuss subjects such as the impact of the Covid-19 pandemic. Fer de France lobbies the government on behalf of the sector and supports the European Railway Agency.</i> ▪ <i>Getlink is a member of the UTP - Union des Transports Publics et Ferroviaires (via its subsidiary Europorte in 2020) and participates in the following three committees: railway social affairs, railway system, legislation and European affairs.</i> ▪ <i>In September 2020, Getlink joined forces with the RATP to create a partnership, “Régionéo”, to respond to calls for tender for regional passenger rail transport as part of the opening up of the rail market to competition in France.</i> ▪ <i>In 2020, as part of the recovery plan, the 4F coalition was created, “4F Fret Ferroviaire Français du Futur”. It is an alliance bringing all the players in the railway sector together, including the French Railways Association (AFRA) and Europorte. The aim of this coalition is to promote rail transport and to establish cooperation between companies in the sector. In the United</i> 	<p>URD, 6.8.2,p.296</p>
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		<p>Kingdom, Getlink participates in the RFG - Rail Freight Group, the British equivalent of AFRA. This organisation exchanges on the consequences of Brexit and rail deployment projects.</p> <ul style="list-style-type: none"> ▪ <i>Objectif OFP (Opérateurs Ferroviaires de Proximité), of which Europorte is also a member, aims to facilitate and support the implementation of OFPs in ports and regions on a sustainable economic basis.</i> ▪ <i>An active member of I-Trans, the global competitiveness organisation and the reference organisation for railways in France. The Group's human resources director participates as the coordinator 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 level higher education with international influence.</i> ▪ <i>As a partner of the École des Ponts et Chaussées, in 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> 	
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 Code of Ethics and conduct and the CSR Charter take a clear position supporting the principles of the United Nations.	
	➤ Public commitment to the importance of acting on one or more United Nations themes.	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 CEO.	

	<ul style="list-style-type: none"> ➤ Encouraging company executives to participate in summits, conferences, and other interactions about public policies in relation to one or more United Nations objectives. 	<p>Getlink was a partner of the World Forum in Lille (annual international festival aiming to present the latest update within the responsible economy).</p>	
Criterion 18: The COP describes partnerships and collective action			
	<ul style="list-style-type: none"> ➤ Developing and establishing partnerships with public and private organisations. 	<p>Getlink was a partner of the World Forum in Lille, which supports and promotes a responsible global economy.</p>	
	<ul style="list-style-type: none"> ➤ Joining industry peers, UN organisations and/or stakeholders in initiatives that contribute to resolving shared challenges. 	<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"> ▪ <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 objective of the organisation is to implement actions to enhance and promote the sector. It also offers a platform for discussions between the players to discuss subjects such as the impact of the Covid-19 pandemic. Fer de France lobbies the government on behalf of the sector and supports the European Railway Agency.</i> 	<p><i>URD, 6.8.2,p;296</i></p>

		<ul style="list-style-type: none"> ▪ 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. ▪ Getlink is a member of the UTP - Union des Transports Publics et Ferroviaires (only Europorte in 2020) and participates in the following three committees: railway social affairs, railway system, legislation and European affairs. ▪ In September 2020, Getlink joined forces with the RATP to create a partnership, "Régionéo", to respond to calls for tender for regional passenger rail transport as part of the opening up of the rail market to competition in France. ▪ In 2020, as part of the recovery plan, the 4F coalition was created, "4F Fret Ferroviaire Français du Futur". It is an alliance bringing all the players in the railway sector together, including the French Railways Association (AFRA) and Europorte. The aim of this coalition is to promote rail transport and to establish cooperation between companies in the sector. In the United Kingdom, Getlink participates in the RFG - Rail Freight Group, the British equivalent of AFRA. This organisation exchanges on the consequences of Brexit and rail deployment projects. ❏ Objectif OFP (Opérateurs Ferroviaires de Proximité), of which Europorte is also a member, aims to facilitate and support the implementation of OFPs in ports and regions on a sustainable economic basis. 	<p>URD; 6.8.2, p.296</p>
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III. Governance and leadership of Corporate Social Responsibility (CSR)

Criterion 19: The COP describes CEO commitment and leadership

<i>The good practices in place within the Group</i>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Getlink's CSR Charter lays down the challenges, but also the Group's objectives and commitments, to acting in line with the principles of the Global Compact.</p> <p>A Group CSR department, headed by a member of the Executive Committee, was created in 2019, illustrating the Group's commitment in this area.</p>	
	<p>➤ The CEO makes an explicit public commitment to CSR and the Global Compact.</p>	<p>The Group's CSR Charter is supported and sustained at the highest level of the organisation by the Chairman of the board and Chief Executive Officer.</p> <p>The Charter has been signed by the Chairman and Chief Executive Officer.</p>	
	<p>➤ 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>	<p>For 2020, 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 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.</p> <p>The composite index was audited in 2020 as part of the audit of corporate information by the auditors.</p>	

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 Ethics and CSR Committee considers all questions concerning governance and the strategic and environmental orientation of the company and the Group and reports on such questions to the Board.	
	➤ The Board of Directors sets up a Monitoring Committee or assigns CSR to a member of the Board.	The purpose of the Ethics and CSR Committee is to assist the Board of Directors in ensuring that the Group best anticipates the non-financial challenges, opportunities and risks associated with its business, to promote responsible and harmonious long-term value creation.	
	➤ The Board (or the Committee) approves the formal CSR reporting.	CSR reporting, coordinated by the Group CSR Department, is examined and approved by the Ethics and CSR Committee.	
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 to ensure a correlation between their expectations and the Group’s long-term goals. The updating of the Group’s stakeholder mapping in 2020, and its publication in the Unique Registration Document, demonstrates the Group’s commitment to transparency and commitment in this area.	
	➤ Defining sustainable development strategies, objectives and policies in consultation with key stakeholders.	The materiality analysis consists in identifying and prioritizing the Group's CSR challenges according to its activities and the expectations of its stakeholders. Updated in 2019 with the support of Mazars, the analysis	

		<p>was carried out following the three main steps:</p> <p>Stage 1: Diagnosis and analysis. 57 key issues were identified through an internal and external document analysis and an analysis of non-financial communications and trends in terms of reporting challenges and opportunities, within the transport and infrastructure management sector.</p> <p>Stage 2: Identifying, adapting, and scoring key issues by stakeholders; through interviews conducted by an independent third party. 21 stakeholders, located in France and the United Kingdom, were questioned. These were experts in strategic topics as well as operational workers from the industry. The external stakeholders who were interviewed are representative of the Getlink ecosystem: its main business partners, shareholders, or suppliers. These interviews helped identify and list 23 material challenges for the Group.</p> <p>Stage 3: Ranking the material challenges: to help understand and adopt the challenges, Getlink wanted to present its materiality analysis in the form of a materiality matrix (illustration page 8). This matrix reflects the importance of each material challenge for the respondent stakeholders and the impact on the Group's business. To ensure consistency, the impact analysis was carried out based on the methodology developed for the Group's risk analysis process (ranking scale from 1 to 6 very low to major) to classify the impact and probability. The impact of each challenge is determined based on the financial impact, the impact on reputation and the probability of risk associated with the challenge, based on the rating from the Group's risk analysis.</p> <p>The prioritization of challenges allowed to identify a list of prioritized issues (priority, very important, important). The CSR division is working on a medium-term strategy, which will be based on materiality analysis, stakeholder mapping, risk analysis, Sustainable Development Goals and internal priorities related to the timeliness of operations</p>	<p><i>URD; 6.2.2, pp. 263 -264</i></p>
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	<ul style="list-style-type: none"> ➤ Consulting stakeholders about dilemmas and challenges for implementation and inviting them to take part in the performance examination. 	<p>In 2015, Getlink conducted an initial materiality analysis, aimed at identifying the most significant internal and external ethical, social, or environmental issues for the company, with regard to the potentially significant impact on its stakeholders, its environment or its economic performance. This approach, which included consultation with the main internal and external stakeholders of the Group, made it possible to identify and prioritize the main internal and external CSR issues of the Group. It also made it possible to identify the present and future opportunities and risks likely to significantly impact its stakeholders, its environment, or its economic performance.</p> <p>In 2019, considering the changes in the activities of its subsidiaries and the expectations of its stakeholders, the Group updated its materiality analysis.</p>	
	<ul style="list-style-type: none"> ➤ Establishing communication channels to engage with employees and other stakeholders in order to hear their ideas. 	<p>The implementation of effective forms of social dialogue with employees has been identified, as an important issue, during the materiality analysis process in 2015, then during its update in 2019.</p> <p>The Group attaches great importance to social dialogue, particularly in the context of negotiations with employee representative bodies. Indeed, the Group has worked for many years to establish lasting and constructive labour relations with all its employees in France and the United Kingdom.</p>	