

Getlink



Communication on progress

GC Advanced Level

November 2022

1, Declaration of continued support by the CEO

By signing the UN Global Compact in 2013, Getlink has openly undertook 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 (CSR) approach. To drive this approach even further, we have also selected the 10 Sustainable Development Goals which best chime with our business model, activities, and CSR material challenges. In 2021, aware of the climate emergency, Getlink had its 2025 carbon trajectory validated by the SBTi (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 Procurement for the same period compared to the reference year 2019. The choice was made to keep to the near future in order to be always in action, while setting a clear long-term vision. This strategy is based on regular, rigorous, and transparent monitoring of the results obtained. The Group regularly consolidates and updates its CSR commitments and has planned an update of its materiality analysis and the list of relevant SDGs in 2022.

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 2022 and following.

A handwritten signature in black ink, appearing to read 'Yann LERICHE', with a stylized flourish at the end.

Yann LERICHE, CEO of Getlink

PRELIMINARY QUESTIONS ABOUT YOUR ORGANISATION

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

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

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

Getlink makes every effort to provide reliable information and asks for an opinion each year from an independent third party on the quality of its procedures of reporting and feedback of social and environmental information. In 2021, the audit was carried out by the firm KPMG. The 2021 report made it possible to assess the compliance of the non-Financial Performance statement 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 2021 financial year, which is published in the Group's 2021 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, aware of the transformation taking place in our societies and the rapidly changing expectations of its internal and external stakeholders, the Group updated its materiality analysis. The group has planned to update it again in 2022, to consider future internal and societal changes.

The following indicators have been audited by an independent third party, with a reasonable level of assurance

| <u>Social indicators</u> | Opinion on honesty | Assurance Level |
|--|---------------------------|------------------------|
| End-of-period staff numbers, distribution by gender | X | Reasonable |
| Staff-manager ratio | X | Reasonable |
| Departure | X | Moderate |
| Temporary staff rate | X | Moderate |
| <i>Average hours of training by employee</i> | X | Moderate |
| <i>Frequency rate of work-related accidents resulting in time off</i> | X | Reasonable |
| <i>Severity rate of work-related accidents resulting in time off</i> | X | Reasonable |
| Absenteeism | X | Reasonable |
| Number of trainees and those on work study contracts | X | Moderate |
| Number of student-apprentice and work-experience contract converted on fixed-term and /or permanent contract | X | Moderate |
| Share of local recruitment | X | Moderate |
| Share of local purchasing | X | Moderate |
| Number of fatal accidents | X | Reasonable |
| Subcontractors' work-related accidents | X | Reasonable |

| <u>Environmental indicators</u> | Opinion on honesty | Assurance level |
|--|---------------------------|------------------------|
| Energy consumption: electricity, natural gas, fuel oil, NRD ¹ , petrol, diesel oil, biofuel, GTL ² | X | Reasonable |
| Greenhouse gas emissions- GHG (scope 1 & 2) | X | Reasonable |
| Wastes production (hazardous, non-hazardous) | X | Reasonable |
| Waste recovery rate (hazardous, non-hazardous) in France | X | Reasonable |
| Share of electric fleet | X | Moderate |
| SF6, Halon and refrigerant fluid leaks | X | Moderate |
| Scope 3 GHG emissions | X | Moderate |
| Breakdown of energy mix | X | Moderate |
| Avoided emissions (GHG) | X | Moderate |

| | Opinion on honesty | Assurance level |
|----------------------------|---------------------------|------------------------|
| Customer satisfaction rate | X | Moderate |

¹ NRD: non-road diesel, or “red” diesel

² GTL: gas-to-liquid

CSR social and environmental indicators for the 2021 financial year

*For the list of social and environmental indicators, please refer to our Universal Registration Document.2021
See p 313 to 317, chapter 6.12 (List of non-financial indicators)*

[Universal Registration Document](#)

SDG (Sustainable Development Goals) & 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

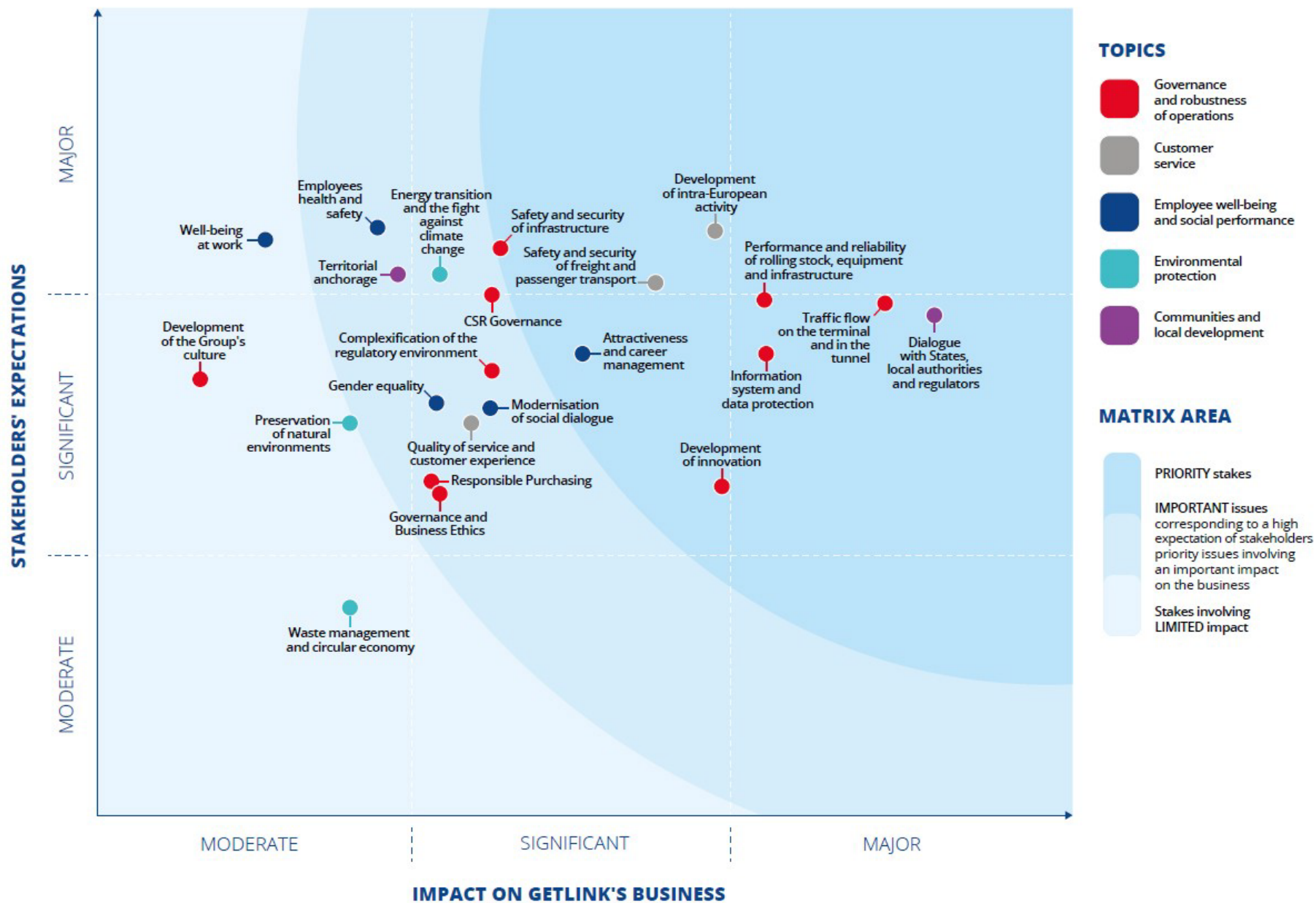
Since 2015, Getlink has carried out a materiality analysis to identify and rank the Group's material CSR challenges, based on its business activities and its stakeholders' expectations. In 2019, mindful of the transformation in society and rapid changes to internal and external stakeholders' expectations, the Group updated its materiality analysis. This analysis was conducted in three main stages by an independent third party:

Stage 1: Diagnosis and analysis: 57 challenges 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.

Stage 2: Identifying, adapting, and scoring challenges by stakeholders; through interviews conducted by an independent third party, 21 stakeholders, located in France and the United Kingdom, were questioned. The external stakeholders who were interviewed are representative of the Getlink ecosystem: its main business partners, shareholders, or suppliers. They are experts in strategic topics as well as operational workers from the industry. These interviews helped identify and list 23 material challenges for the Group.

Stage 3: Ranking challenges: to help understand and adopt the challenges, Getlink wanted to present its materiality analysis in the form of a materiality matrix. 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 conducted based on the methodology developed for the Group for its risk analysis (ranking scale from 1 to 6, from 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.

The 23 material challenges were grouped into five themes presented in the materiality matrix and three levels of priority for the Group: priority (9 challenges), important (10 challenges) and moderate (4 challenges).



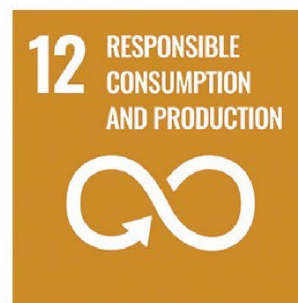
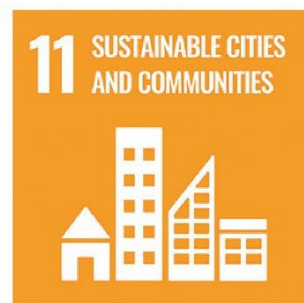
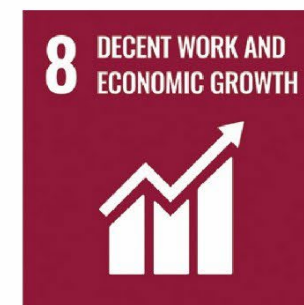
Some challenges remain intangible and are subject to high expectations by stakeholders such as employee health and safety and the safety and security of infrastructure, transport, freight, and passengers. Other challenges have come to the fore under the pressure of external stakeholders or major current affairs. The increasing complexity of the regulatory landscape reflects uncertainties linked to Brexit. Quality of service and customer experience are increasingly pressing. Energy transition and combating climate change are crucial challenges for stakeholders and cover several aspects: energy consumption and the use of renewable energy. The challenge of environmental protection also includes protecting natural areas, waste management and the circular economy. Faced with the challenges of renewing its workforce, recruiting experts in industries under pressure, and despite a dynamic policy in recent years, themes linked to human resources have thus been revised upwards by the Group. This is particularly the case for attractiveness and career management and the need to modernise social dialogue (labour relations). Gender equality is now also a major challenge that carries high expectations from both external and internal stakeholders. The Group's desire to be a regional leader in several areas (supporting local employment, community, and education, helping to develop local start-ups) underlines the importance of a local foothold (territorial anchorage). In relation with these different challenges, the need for constructive dialogue with States, local public authorities and regulators has also increased.

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 takes into account 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

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| 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 the Board of Directors. This policy came into force in 2015, and dictates the Group's principles, challenges, and commitments.</p> <p>The CSR objectives 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 2021, Getlink also identified 10 Sustainable Development Goals (SDG) that are particularly relevant to its material challenges. These elements feed the update of the Group's CSR strategy planned for 2022 and constitute performance levers.</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 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> | |

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| | | <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, of situations, strategies and people, based primarily on their experience, . to be able to anticipate identifying 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 in environmental matters and the strategic initiatives designed to promote environmental management, protect natural resources, and limit the impact of the Group's activities on the environment.</p> <p>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</p> | <p><i>See URD, p.199</i></p> <p><i>See URD, p.217</i></p> <p><i>See URD, p.256</i></p> |
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| | | <p>calculate an achievement rate with respect to the composite index, according to the objectives set for each area.</p> <p>The Board of Directors decided to include the 2021 performance action plan, which has the 2023 targets, in the CSR strategy review cycle. That approach was renewed by the Board of Directors on 23 February 2022. The long-term incentive plans will be subject to performance criteria to be met over a period of three years, in line with the 2024 CSR targets. The Board of Directors has decided to propose to the Annual General Meeting of 27 April 2022 that the CSR criteria be tied into Getlink's social, societal, and environmental ambitions for 2024 and the company's day-to-day operations:</p> <ul style="list-style-type: none"> • one of the internal performance conditions (the "Climate Weighting") would be based on the achievement of the objective of reducing greenhouse gas emissions by 20% in 2024 compared to 2019; in the event that the rate of achievement of the objective is strictly less than 100%, there will be no allocation; and in the event that the rate of achievement of the objective is equal to or greater than 100%, 15% of the allocable volume would be effectively allocated, with a ceiling of 15%. It would condition 15% of the cumulative weighting, • a further internal performance condition (the "CSR Weighting") of up to 10% of the cumulative weighting would be based on the achievement of four objectives including safety; gender equality with an objective of recruitment of more than 40% of each gender and at least 30% over the total workforce; social climate and quality of service assessed in relation to the NPS score. <p>By maintaining the weight of CSR criteria to 25% in this plan, this process helps ensure that there is alignment between corporate strategy and operational deployment.</p> | <p><i>See URD, p.256-257</i></p> |
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| | | <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 2021, the Nomination and Remuneration Committee maintained the composite CSR performance index as mentioned above.: The composite index was audited in 2021 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> | |

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| | | <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, since 2019, for the entire Group perimeter by the Group's CSR Department.</p> | |
| | <p>➤ Ensuring that the various departments within the company coordinate their activities to maximize performance and avoid negative impacts.</p> | <p>The Group's CSR Department, which reports to the Group Administrative and Financial Director, a member of the Executive Committee, oversees all CSR contributions and actions within the various subsidiaries.</p> | |
| <p><i>Criterion 2: The COP describes value chain implementation</i></p> | | | |
| <p><i>The good practices in place within the Group</i></p> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>The Group aims to formalise the results of dialogue at different levels of its organisation. In 2019, aware of the transformation taking place in our societies and the fast-changing expectations of its internal and external stakeholders, the Group has 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.</p> | |
| | <p>➤ Analysing each segment of the value chain.</p> | <p>The materiality analysis, which included consulting the main stakeholders within and outside the Group, made it possible to identify and establish the hierarchical order of the Group's primary CSR challenges, both internal and external.</p> | |

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| | <p>➤ Communication of policies and expectations to suppliers and other partners.</p> | <p>In representing the Group's CSR values and commitments, the Procurement Departments of the various Group entities 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 of the Group in terms of CSR.</p> <p>The consultation frameworks - to be signed by the supplier and the purchasing department - before each consultation refers to the policies to be considered. In addition, the Group is currently studying targeted reinforcement of environmental performance into the purchasing selection process.</p> | |
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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 (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. The Group is committed 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. The charter is based on the ISO 20400 standard on sustainable procurement.</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

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| 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, particularly 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, codes of conduct 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> | |

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| | | <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 underlines that: "Support and promote Getlink's commitments in this area, respect others, reject any form of discrimination, intimidation and harassment against other employees, customers or persons who have a relationship with Getlink and treat our colleagues and trading partners as we would like them to treat us". - Getlink complies with the laws relating to protecting the privacy of its employees, in particular those governing digital files. - The Code of Ethics and Conduct 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 Ethics Code is made available internally to all personnel on the Group intranet and the intranet of each subsidiary and externally on the Group's website. | |

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| | ➤ Other good practices | <p>In its quest to have a positive impact on its value chain, Getlink requires its suppliers to commit to all ethical issues (employment law, freedom of association and collective bargaining, compliance with occupational health and safety regulations, the fight against forced, illegal or compulsory labour, modern slavery, child labour, corruption and all forms of discrimination) and to pass on these commitments to their own suppliers or subcontractors. A whistle-blowing system in the event of a breach of these commitments is available to all Group stakeholders (the e-mail address is given in the Group's Code of Ethics and Conduct).</p> | <p><i>See URD, p. 261</i></p> |
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Criterion 4: The COP describes effective management systems to integrate Human Rights principles

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| <p>The good practices in place within the Group</p> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>The human resources policies of the various Group subsidiaries are developed based on criteria which support truly equal opportunities and treatment for all employees.</p> <p>A Group Human Resources Department supervises the application of policies within the subsidiaries and ensures compliance with the principles laid down in those policies.</p> <p>The Group's safety policies aim to improve the safety and working conditions and to protecting the physical and mental health of team members by evaluating and preventing professional risks and implementing all suitable personnel protection measures.</p> <p>Committees dedicated to improving working conditions and mental health units are some of the actions put in place by Group subsidiaries to tackle hardship at work.</p> <p>Respect for privacy and the protection of personal data is one of the pillars of the Group's ethics and compliance system. With the appointment of a Group data protection officer reporting to the Group legal director, the creation of a dedicated team, and the deployment of a global compliance programme with the General Data Protection Regulation ("GDPR"), the Group has equipped itself with the means to implement its commitment in this area</p> | <p><i>See URD, p. 271</i></p> |
| | <p>➤ Processes designed to ensure that international human rights are respected.</p> | <p>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).</p> <p>The Code of Ethics and Conduct and Human Resources Policies commit all subsidiaries to comply with the rules on respect for human rights</p> | |

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| | <ul style="list-style-type: none"> ➤ Internal awareness-raising and training about human rights. | Internal distribution of the <i>Code of Ethics and Conduct</i> on the various intranet sites of subsidiaries (in French and English) and on the Group intranet, and the external distribution on the Group website contributes to this campaign of raising awareness undertaken by the Group. | |
| | <ul style="list-style-type: none"> ➤ Operational complaint procedures for stakeholders potentially affected by the company's activities. | <p>An ethics officer has been appointed by the Group to assist any stakeholder who is experiencing problems or has questions about the scope or application of the rules laid down in the Code of Ethics.</p> <p>An alert 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.</p> | |
| Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration | | | |
| The good practices in place within the Group | <ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. | The <i>Code of Ethics and Conduct</i> states clearly in its background that: "The companies within the Getlink Group ("Getlink") 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. | |
| | <ul style="list-style-type: none"> ➤ System for monitoring the effectiveness and implementation of human rights policies. | The various Human Resources Departments of the subsidiaries and the Group Human Resources Department guarantee and monitor the implementation of the policies relating to respect for human rights and application of the Group Ethics Code. | |
| | <ul style="list-style-type: none"> ➤ Monitoring of internal and external feedback | Internally, constructive social dialogue enables regular communication with personnel representatives both in the staff forums specific to each country and within the European Company Committee, which brings together representatives of French and British trade unions. | |
| | <ul style="list-style-type: none"> ➤ 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). I | |

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

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| The good practices in place within the Group | <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>Its human resources policies have been developed to foster equal opportunities and treatment for all Group employees throughout their careers.</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. It also helps Eurotunnel's operational staff to implement the training plans internally. In 2021, CIFFCO invested in new state of the art mobile simulators and in the renovation of its cabin simulator to meet the needs of its customers and develop skills within the Group. Following an audit by AFNOR, CIFFCO also obtained QUALIOP certification (quality certification for training organisations) for a period of three years. The new QUALIOP National Quality Reference System (RNQ) aims to improve the quality of the services provided by training organisations and to standardise the assessment criteria. This new certification recognises the quality of the services offered by CIFFCO.</p> <p>In 2021, 70 732 hours were devoted to employee vocational training, representing an average of 21 training hours per employee. The cost of</p> | <p><i>See URD, p.266</i></p> |
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| | | <p>training, which accounted for nearly 2,03% of the total wage bill, stood at € 3 234 890 in 2021, compared to € 2 991 539 in 2020.</p> <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>Getlink ensures that all its subsidiaries comply with their legal and contractual obligations regarding working hours.</p> | <p><i>See URD, p.271</i></p> |
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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 the legal working conditions of its suppliers and subcontractors, 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>Industrial relations are very important for the Group, particularly negotiations with staff representative bodies. The Group has worked long-term to form sustainable and constructive labour relations so as to maintain a balance between the expectations of its employees and the organisational constraints of the business. 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>In France, ESGIE employees are represented by three union organisations and are covered by a company agreement. Europorte subsidiary employees are also represented by three or four union organisations (three in the case of Socorail and four in the case of Europorte France) and there are two national branch agreements. In the United Kingdom, in view of a voluntary single union organisation agreement signed since 2000 by ESL with the Unite union, all ESL employees (except management) are represented by Unite during collective negotiations while remaining free to join their preferred union.</p> | <p><i>See URD, p.266</i></p> |

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| | <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 (apart from certain senior managers and directors) are organised on a weekly basis and must not exceed an average of 35 hours a week over the year, and in any event, not more than 1,600 hours per year.</p> <p>Getlink's CSR policy states that the Group has made 'the issue of improving security and health at work a major concern with the renewed and expressed target of zero accidents.</p> | <p>See URD, p.267</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, to work with the Group. They also refer to the obligation for suppliers to comply with the fundamental principles of the Code of Ethics and Conduct of Getlink.</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 2019, 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. . ESL publishes an annual report on equal pay for women and men. At the start of 2022, ESGIE published, for the year 2021, the results of its workplace equality index, which at 86/100 was above the 75-point threshold. In accordance with one of the commitments made in the Professional Equality Charter, a professional equality index was also tested in 2021 for the Group's scope and it received a score of 84 points out of 100 in respect of</i> | |

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| | | <p>2020, i.e., also above the 75-point threshold. In order to consolidate this result, the organisation has developed an action plan with targets regarding female promotion (women to account for at least 25% of total promotions over two years) and equal pay, ensuring that men and women with equivalent jobs, experience and education receive the same pay.</p> | |
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| | | <p>The effective implementation of actions in favour of workplace gender equality within different Group subsidiaries will be regularly and carefully monitored. These actions include the identification of female talent, the creation of a network of women within the Group, the promotion of the Group's female team members in traditionally male jobs, the promotion of Getlink's jobs in schools and universities and the annual study on the remuneration gap between women and men. A dedicated working group meets every quarter to coordinate the practical implementation of these various actions. In 2021, the Group moved up from the 79th to the 61st place in the ranking of SBF120 companies regarding the feminization of the top management.</p> | <p><i>See URD, p.268</i></p> |
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| | <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, in which the integration, professional training and job retention of disabled workers are underpinned. In addition, several awareness-raising actions on disability have been carried out in recent years by ESGIE using the specialised company "Made in TH", including a dedicated ambassador, the organisation of a monthly on-site presence, the conduct of interviews and the implementation of support measures. However, the public health context of the last two years has forced the company to suspend these actions. A diagnosis on the issue of disability at Eurotunnel France (ESGIE) is planned for 2022.</p> <p>In addition to these initiatives, the Group collaborates with the disability sector by calling on companies that integrate disabled people through work and/or on institutions for assistance through work. Since 2013, a partnership framework agreement was signed with APF (the French association for people suffering from disability). Within this partnership, work was contracted to APF frequently in 2017 for various services. This collaboration has provided, in 2021, full-time posts for two people on permanent contracts. Socorail and Europorte France have also concluded contracts for the cleaning of uniforms with an "adapted company" (employing disabled people) in the Northwest region of France. This alternative will be examined when contracts are renewed in other regions.</p> | <p><i>See URD, p.267-268</i></p> |
| <p>Criterion 7: The COP describes effective management systems to integrate the labour principles</p> | | | |
| <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 set or to propose solutions if the company's position deteriorates.</p> | |

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| | <p>➤ Evaluations of risks and impacts concerning work standards.</p> | <p>As a responsible business, Getlink has made safety a core priority. Health and safety management schemes and compliance with procedures are based around this essential value. In this area, as a responsible employer Getlink seeks to protect the health, safety and well-being of its team members and to ensure a healthy and safe working environment for each of them by strengthening the safety culture.</p> <p>The Group's safety policies aim to improve the safety and working conditions and to protecting the physical and mental health of team members by evaluating and preventing professional risks and implementing all suitable personnel protection measures.</p> <p>A Safety and Security Committee has been set up at board level, whose 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 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"> ▪ <i>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;</i> ▪ <i>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;</i> ▪ <i>regularly review response procedures and the implementation of recommendations made to prevent the recurrence of similar events;</i> ▪ <i>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;</i> | <p><i>See URD, p.268</i></p> <p><i>See URD, p.216</i></p> |
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| | | <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>to report regularly to the Board.</i> <p>In 2021, the Committee met ten times on matters relating to the Concession, with an attendance rate of 100%.</p> <p>In respect of Eurotunnel, 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 continued to monitor the discussions with the IGC on the safety of the ElecLink project and its interface with the Concession, both during the works phase and during the operation of the cable. 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 corrective measures.</p> | <p><i>See URD, p.216</i></p> <p><i>See URD, p.216-217</i></p> |
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| | | <p>In this very unusual year, the Committee remained attentive to the measures taken in each of the Group's business sectors to deal with the Covid-19 pandemic by protecting staff and customers.</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 a number of independent expert reports.</p> | |
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| | | <p>The Group's subsidiaries also ensure that their procedures and safety and security rules are applied by their subcontractors and the subsidiaries require them to do the same with their own subcontractors when applicable.</p> | <p><i>See URD, p.269</i></p> |
| | <p>➤ Mechanisms for dialogue with labour unions.</p> | <p>The implementation of efficient forms of dialogue with employees was identified as a highly important challenge in the materiality analysis conducted by 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 2021 financial year, 16 majority agreements were signed by the Group's subsidiaries covering topics such as, professional equality, incentive schemes, the right to disconnect, furlough or wage negotiations.</p> | |
| | <p>➤ Allocation of responsibilities relating to work standards in the organisation.</p> | <p>The Human Resources Departments of the subsidiaries, backed by the Group Human Resources Department, are responsible for defining and implementing the employment policy.</p> <p>With regard to health, hygiene and safety, the Safety Department in each Group subsidiary, the 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. These entities</p> | |

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| | | <p>work to ensure the protection of the health and safety of employees, and the improvements in their working conditions. They analyse occupational risk and ensure – through means including surveys and inspections – compliance with the regulations in place.</p> <p>Specialised contact points for psycho-social risks, guaranteeing anonymity, have been maintained for Eurotunnel, Getlink and CFFCO employees (occupational psychologists available by appointment, health insurance psychological support service available 24/7). In 2021, ElecLink provided support and resources to help employees with health problems. Mental health support was also increased during the pandemic. Issues relating to the safety of employees and anyone working for Getlink remain and always have been the Group's top priority.</p> | <p><i>See URD, p.270</i></p> |
| | <p>➤ Internal awareness-raising and training about work standards within the organisation.</p> | <p>The Group is committed to a continuous improvement approach based on the definition of clear objectives and specific actions to attain them and measure them through relevant indicators. Getlink is strongly committed to continuing this progress through the following actions:</p> <ul style="list-style-type: none"> • <i>Safety campaigns: - a 12-week “road safety” campaign directed to all Europorte employees in 2021 covered various topics including: speed at the wheel, field of vision, braking distances, mobile use and driving under the influence of alcohol and/or drugs;</i> • <i>Safety Minute: based on short videos posted on the Eurotunnel intranet, this campaign aims to raise safety awareness and promote and share best practice. In 2021, six different videos amplified this safety campaign; and - messages on the return to work after a period of lockdown, on barrier gestures to be observed and on messages reminding the management of health rules.</i> • <i>Training: - the Group has decided to place the emphasis on a shared safety culture by organising dedicated training for Group team members. The number of hours of training increased by more than 4,000 compared to the previous year despite the public health crisis. The number of hours devoted to safety also increased in 2021. In fact, 20,322 hours of safety training were provided in 2021 (against 16,389</i> | <p><i>See URD, p.269</i></p> |

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| | | <p><i>in 2020), representing 29% of the total number of training hours (compared to 25% in 2020); and - training of subcontractors: 100% of subcontractors working on the terminals and in the Tunnel undergo mandatory safety training. This is a strict and necessary prerequisite for access to the sites with no exceptions allowed.</i></p> <ul style="list-style-type: none"> <i>• 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.</i> <p>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.</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 are sent to suppliers and subcontractors during tenders.</p> | |

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

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| 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>The Group's control framework and procedures for reporting and information on corporate indicators are regularly reviewed and updated. These procedures define the roles and responsibilities of each player in the reporting process, the methods for collection of information, the necessary checks, and the consolidation and evaluation of the information sent by the various Human Resources Departments of the subsidiaries.</p> | |
| | <ul style="list-style-type: none"> ➤ System for tracking and measuring performance. | <p>Each subsidiary has its own system for entering corporate indicators, which are consolidated by the Group CSR Department.</p> | |
| | <ul style="list-style-type: none"> ➤ Dialogue with the representatives of employee organisations to verify the progress made and identify priorities for the future. | <p>In France, all subsidiaries have their own <u>Social and Economic Committee and its Safety, Health and Working Conditions Committee</u>. The committee works according to its specific operational rules.</p> <p>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.</p> | |
| | <ul style="list-style-type: none"> ➤ Audits or other measures to monitor and improve work standards in companies in logistics chains in line with international work standards. | <p>Audits are undertaken regularly by the 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.</p> | |

Reliable policies and procedures on protection of the environment

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

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

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

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

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| <i>The good practices in place within the Group</i> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>In June 2021, Getlink announced a strengthening of its strategy, and it extended its environmental ambitions to ensure that the service provided to customers and the inclusion of new innovations make a tangible contribution to reducing its environmental impacts. Setting out this strategic vision via the 2025 Environment Plan allows the Group to sign up to international objectives and to contribute to national climate transition and environmental protection goals. This strategy aims to engage the teams in a demanding and meaningful momentum serving the Group's employees, customers and partners as well as the planet.</p> | <p><i>See URD, p.272</i></p> |
| | <p>➤ Reference to international conventions and other international mechanisms.</p> | <p>Getlink's environmental strategy is in line with the observance of fundamental rights as defined in the major international principles – the 1948 Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, OECD guidelines for multinational companies. 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.</p> <p>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" is one of the 10 SDGs selected by the Group.</p> | |

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| | <p>➤ Discussion on the relevance of sustainable environmental management for the company.</p> | <p>Mirroring the material environmental challenges faced by the Group, the Group's 2025 Environment Plan comprises three pillars that contribute to the Group's ambition to consolidate its position as a key player in sustainable mobility.</p> <p>For each of them, Getlink has set concrete targets for 2025. It is the choice of a short time horizon to be always in action, while setting a clear long-term vision. This strategy is based on the 2019 materiality study and a regular, rigorous and transparent monitoring system of the results obtained.</p> | |
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¹ See details of the Environment Plan at <https://www.getlinkgroup.com/content/uploads/2021/06/environmental-plan-2025-UK.pdf>

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| | <p>➤ Written company policy on sustainable environmental management.</p> | <p>The mission of the Environment 2025 plan is to respond to environmental challenges. 30% reduction in direct CO2 1 emissions by 2025, in order to achieve the 2° C and, if possible, 1. 5° C trajectory of the Paris climate agreement, commitment to the preservation of natural environments, waste management and the circular economy throughout the Group's ecosystem.</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>The trains are powered by low-carbon electricity throughout their journey</p> <p>Prior to the construction of the Tunnel, expense was incurred in order to prevent the harmful consequences of business activities for the environment. There are two separate sewer systems for storm water and wastewater, retention ponds, treatment stations, etc.</p> | |
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| | <p>➤ Integration of minimum environmental standards into contracts with suppliers and other partners.</p> | <p>In order to involve its entire value chain in its approach to protecting the natural environment, in 2021 the Group developed a responsible procurement procedure that will apply by 2025 to all purchases over €150,000. This procedure², which is currently being rolled out in successive thresholds between now and 2025, calls for specific criteria to be applied for all high stakes' purchases in respect all aspects of the Group's CSR strategy. In particular, commitments regarding water use, air quality and imported deforestation will be expected.</p> | <p><i>See URD, p.294</i></p> |
| | <p>➤ Specific commitments and objectives for given years.</p> | <p>In its Environmental Plan , the Group has set itself concrete targets for 2025:</p> <p>Objective 1 : Contribute to the 2°C trajectory of the Paris Agreement throughout the Group's value chain.</p> <p>The Getlink Group, which was the first cross-Channel operator to publish a carbon footprint in 2007, has worked on reducing its emissions since then and lowered them by 33% between 2012 and 2019. Currently, Europorte and Eurotunnel's businesses save more than 2 million tons of CO2 each year compared to alternative modes of transport.</p> <p>By committing to reduce its direct emissions by -15% by 2023 and -30% by 2025, the Group is announcing an ambitious trajectory, uncorrelated with its level of activity and compatible with the Paris Agreement's 2°C trajectory. The Group is primarily targeting its own emissions by committing to reducing emissions from non-electrified rail traction for Europorte freight and by substituting less emissive products for fluids used for cooling or fire-fighting purposes throughout the Channel Tunnel Fixed Link Concession.</p> <p>To be a driving force in the sustainable transformation of transport in Europe, Getlink also wants to accelerate the involvement of its entire value chain in this dynamic:</p> <ul style="list-style-type: none"> - 100% of the Group's purchases and supplies (greater than €200k/ year) include energy/climate performance; - Extending the Tunnel reception to all new forms of mobility by 2025 | |

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| | | <p>(gas, electricity, hydrogen);</p> <ul style="list-style-type: none"> - Development of two new service offers to encourage low-carbon mobility (passenger and freight) and modal shift. <p>In addition to its greenhouse gas emission reduction targets, Getlink has decided to strengthen its consideration of climate change risks and opportunities, in accordance with the guidelines of the Taskforce on Climate-related Financial Disclosure (TCFD), created at COP 21.</p> <p>Objective 2: Sustainable management of resources and control of impacts on natural environments</p> <p>Getlink is responsible for the management of 37 hectares of reserves created and protected in England and France. These nature reserves, largely created by reusing chalk and marl extracted from the Channel when excavating the Tunnel are dedicated to the preservation and development of biodiversity. For example, Samphire Hoe site contains 220 species of birds, 200 species of plants (including more than 1,300 rare Ophrys spider orchids) and 30 species of butterfly.</p> <p>In order to continue to improve the control of its impact on the natural environments of its sites, Getlink is committed to:</p> <ul style="list-style-type: none"> - Obtain ISO 14 001 or equivalent certification for all its sites and activities; - Adopt 100% natural and/or organic solutions for weeding and maintenance of green spaces; - Reduce drinking water consumption by 10 per cent; - Improve air quality in the Tunnel. <p>Objective 3: Controlling waste and promoting the circular economy throughout the Group's ecosystem</p> <p>Today, 85% of the Group's waste is non-hazardous industrial waste. More than 90% of the Group's waste handled at the French terminal is recovered and 30% of non-hazardous waste is transformed into SRF briquettes for use in boilers.</p> <p>In order to continue this effort, The Group's ambition is:</p> <ul style="list-style-type: none"> • not to increase the volume of waste that it produces per euro | |
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| | | <p>invested (Reference value 2019);</p> <ul style="list-style-type: none">• Deploy full selective sorting with customers and staff;• By 2025, create 3 partnerships or service offers that are part of the circular economy <p><u>Communiqué: Environmental Plan 2025</u></p> | |
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Criterion 10: The COP describes effective management systems to integrate the environmental principles

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| <p>The good practices in place within the Group</p> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>Getlink has put in place several mechanisms to contribute to the achievement of its environmental and especially its climate ambitions:</p> <ul style="list-style-type: none"> • the remuneration of the board members and executive officers on the one hand, and of the senior managers selected within the framework of the Long-Term Incentives (approximately 30 people as set out in section 5.3) receive variable remuneration based on CSR performance. This performance significantly integrates environmental performance and in particular compliance with the Group's carbon trajectory; • In September 2020, the Group introduced an internal carbon price for certain investment projects in order to integrate the carbon impact of the projects and the various solutions proposed into its decisions. With the slowdown in activity and projects in 2020, this tool will have its full effect from 2022/2023 onwards. The tool covers the scope of the Group's direct and indirect emissions. The price, currently set at €100, will be adjusted in 2022 to evolve over time. • The Group has developed a responsible purchasing (procurement) procedure to assess the significant contributions of its purchases to priority environmental issues. This procedure will allow the inclusion and training of the Group's value chain, which is the only way to ensure success in achieving these ecosystem objectives. • The current policy and future objectives are in line with the approach undertaken by all the Group's subsidiaries over many years to structure the initiatives and the environmental management system. These approaches have often been recognised by various awards and certifications as presented in section 6.1 of this Universal Registration Document. For example, in terms of climate change, Eurotunnel has been awarded Carbon Trust Standard certification since 2009. Getlink has also been ranked in first place in the Transport & Logistics | <p><i>See URD, p.273</i></p> |
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| | | <p>category in the Challenges/Statista “Les champions du climat” 2020 rankings³⁷, which acknowledges the Group’s efforts to reduce GHG emissions in recent years from among hundreds of companies across all business sectors. Getlink is also graded A in Axylia's Vérité 40 Index, which illustrates the low absolute carbon impact of the Group's activities. Since 2019, in order 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 bridging 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. Energy audits have been carried out every four years. In addition, as part of the objectives of the 2025 Environment Plan, the Group wishes to achieve ISO 14001 certification on the Eurotunnel Concession by 2025. In this respect, the implementation of a procedure drafted in 2021 for responsible purchasing is a key element of preparation in that it will particularly favour energy-efficient products and services.</p> <ul style="list-style-type: none"> • Europorte's activities are subject to integrated management by a Quality, Environment and Safety department in accordance with the best standards. Since 2014, Europorte’s subsidiaries have been awarded TK’Blue status by the European TK’Blue Agency; this label, which was again awarded in 2021, 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 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 | <p><i>See URD, p.273-274</i></p> |
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| | | <p>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, just as the workshop at Arc-lès-Gray has been, it 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 the regions.</p> <ul style="list-style-type: none"> • Following Ecovadis assessments conducted at the request of certain customers, Europorte France has kept its “gold” rating in 2021 for its rail activities. This rating reflects the quality of the business's CSR management system at the time of the assessment. The following table summarises the qualification status of each of the Group’s rail freight entities. • Lastly, a regulatory energy audit was conducted in 2020 in Europorte France, and Socorail under the French Energy Code (article L. 233-1) and the conclusions of this audit reinforce the Group’s policy. • In addition to these initiatives to structure and certify environmental management (all Europorte's activities (on average 15% of Group revenue) have environmental certification), the Group has been keen to get its teams involved. The Europorte employee awareness initiative launched in 2018 covering eco-citizen initiatives (waste management, ecofriendly actions and water management) continued throughout 2020 and 2021, via themed articles suggesting specific sustainable development initiatives and distributed through a monthly in-house newsletter. This awareness initiative has been enhanced since 2021 by compulsory talks on the environmental impacts of local activities and on the management of accidental spills. | <p><i>See URD, p.274</i></p> |
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| | <p>➤ Evaluations of environmental risks and impacts.</p> | <p>Following the recommendations from the Task force on Climate-related Financial Disclosures (TCFD), Getlink is placing the analysis of climate-related risks and opportunities at the core of its activity enriching its asset management as well as Group strategy and planning. Getlink regularly features among the organisations best prepared for the +2°C target for limiting global warming. At the request of the British Department for Environment, Food and Rural Affairs (DEFRA) and in line with the Climate Change Act 2008, in 2011 Eurotunnel carried out a study of its infrastructure's ability to withstand the foreseeable effects of climate change. In 2021, the Group strengthened its assessment of long-term resilience with a Group-wide analysis of risks and opportunities related to Climate. Supported by an external consultant, the study followed the best-in-class methodology and recently available information to set up a robust assessment of physical risks as well as transition risks at the horizon of 2030 and beyond. It should be noted that the climate issues do not involve the same timescale as the Group risk register. Nevertheless, despite the strong underlying uncertainties when assessing the risk likelihood and impacts the Group has already initiated action plans to mitigate potential long-term impacts. In this study, in accordance with the best methodologies in force a distinction is made between "physical" risks, which materialise the impact of the expected climate upheavals, and "transition" risks, which concern the technological, political and market changes resulting from the profound transformation of the world that will make it possible to achieve the objectives of limiting temperature increases.</p> <p>A deep dive analysis has been performed for Eurotunnel activities. Firstly, this study allows the Group to consolidate a full inventory of the constructive arrangements and organisational measures that strengthen the assurance on the resilience of the Eurotunnel infrastructure against all climate hazards, especially flooding and heat stress (large water basins and drainage system, positioning of substations at the highest points, speed reduction when there are extreme climatic conditions, expansion devices on rail tracks and so on). Moreover, in order to complete the vision, a full climate hazard review was carried out. Based on two climate scenarios (RCP2.6 and RCP8.554) and climate model projections for the</p> | <p><i>See URD, p.285</i></p> |
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| | | <p>Calais region from Météo France's DRIAS web platform, the climate hazards have been characterised to give predictions about future frequency changes and intensity changes relating to heat stress, catchment basin flooding, droughts, windstorms, cold stresses, snowstorms and thunderstorms. The overall climate risk mapping below (impact and occurrence) supported by a system vulnerability analysis⁵⁵ lead to the consideration of two risks as major risks: flooding of the Coquelles terminal (due to the catchment basin flooding after heavy rainfall rather than submersion by the sea) and the impact of heat stress. To deliver an in-depth assessment of the flooding risk, a detailed study has been performed based on high-resolution LiDAR⁵⁶ data and a hydraulic modelling derived from a projection of increased rainfall flooding by Météo France's DRIAS web platform. This evaluation has made it possible to identify the most vulnerable buildings. Only two buildings have been considered as being partially flooded for less than two days during a 50-year return event period.</p> <p>Based on all these data, Eurotunnel has designed an action plan with three-time frames. The immediate priority is to improve the flooding adaptation plan by consolidating a building-by-building analysis focusing on the most vulnerable buildings identified. A detailed simulation of Tunnel cooling needs will also be performed to refine projection in energy consumption over coming decades. A medium-term investigation will address solutions to mitigate the effects of the high temperature on Tunnel cooling. In the longer term, dedicated climate-related specifications based on this climate study will be included in the new project designs (e.g., ERTMS).</p> <p>Moreover, a review based on interviews identified the main applicable physical risks for ElecLink and Europorte. For ElecLink the analysis of design and mitigation systems confirmed the resilience to main applicable risks for the cables located in the Tunnel and the substations (heatwaves, salt storms, flooding). A broader spectrum of physical risks such as flooding, heat waves, snowstorms or forest fire could affect Europorte activities. A map has been built to highlight the exposure of the current Europorte rail segments to climate disruption based on Météo France's calculation by 2030 for a RCP8.5 scenario and sensitivity</p> | <p><i>See URD, p.285-286</i></p> |
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| | | <p>extended to 2100. Some specific segments have been identified to be more vulnerable than others to the risk of flooding or heat stresses. Nevertheless, risks are not considered material at Europorte level thanks to its business characteristics (flexibility in case of network breaches, penalty applicable to the network operator, line redundancy, margin little correlated to the nature of freight transported and so on) and especially since it relies on the preventive work as well as the mitigations put in place by the rail network operators where it operates.</p> <p>Getlink, because of its geographical position and its type of activity, will have to face many challenges and changes related to climate transition in the years to come. The European Union and the United Kingdom are implementing climate policies aimed at carbon neutrality by 2050. This includes new legislation and high carbon prices in new sectors, such as transport and shipping, which have a direct relationship to Getlink's activity. Therefore, by conducting a market analysis, looking at new legislation that might be introduced, technological developments in transport, and reputational risks and opportunities in the face of an increasingly demanding climate challenge, the Group has identified 19 transition risks and opportunities. Without underestimating long-term uncertainties and sometimes contradictory effects (as an example, Europe and UK sustainable mobility strategies favour rail but localism and reduction of exchanges for people and goods cannot be excluded), the likelihood and impact of each has been assessed as at a horizon of 2030.</p> <p>Some of these risks and opportunities, even major ones, have been already raised regardless of climate issues and are currently thoroughly monitored in the frame of the Group risk register (e.g., MT5, MT10, MT5/O5). For risks and opportunities driven by climate issues, the Group has developed scenarios and appropriate indicators across four pillars (economy, energy, industry and transport) based on international publications⁵⁷ to describe a “business as usual” 2°C world and 4°C world. This scenario analysis has deepened the understanding of major risks and opportunities and their impacts. Most of the transition risks already captured within the Group risk register are backed up by a detailed action plan. In particular, the PT7 and MT11 occurrences mainly refer to the</p> | <p><i>See URD, p.285-286</i></p> <p><i>See URD, p.286-287</i></p> |
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| | | <p>modification of customer vehicles being one of the strong trends in the transition to a low-carbon economy. This change has the most immediate impact for Eurotunnel activities. Therefore, a programme was launched starting in 2020 to structure the approach to speed up the acceptance of new engine types in the Tunnel (electric, CNG, LNG, hydrogen). In 2021, the safety files have made significant progress and acceptance dates for most-likely vehicles are expected for 2022, the final timeline depending on the authorisation process led by the regulatory bodies. At present, the impact of control or risk mitigating actions has not been considered material. For electrical vehicles, a new partner was chosen in 2021 to extend significantly the number and the quality of service of the charging points for the customers at both Coquelles and Folkestone terminals.</p> <p>In summary, for the main risks and opportunities the Group has shown not only good resilience but also a capacity to adapt itself. In terms of other opportunities arising from climate transition scenarios (O11), the Group is also working to adapt by creating new rail routes to contribute to the European-wide modal shift promoted by the Green Deal in particular; the Amsterdam-London route became fully direct on 26 October 2020. Finally, the launch of new unaccompanied freight management services trialed at Eurotunnel in 2021 as well as the launch of the Flex Express service at Europorte, particularly for isolated wagons, are two other examples of the Group's ability to adapt to technical and economic changes derived from climate transition.</p> | <p><i>See URD, p.287</i></p> |
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| | <p>➤ Evaluations of the impact of product life cycle, providing green management policies.</p> | <p>From the outset, Getlink has been committed to low-carbon transport. The rail sector accounts for less than 1% of national emissions (both in France and the United Kingdom) and is a major lever for achieving national and European climate targets. The assessment of the alignment of the Group's activities with the sustainability criteria established by the European taxonomy confirms this positioning (as indicated in section 6.7.1 of this Universal Registration Document). In addition, the Group has joined several business coalitions that are committed to climate change. In 2021, Getlink joined the French Business Climate Pledge initiated by Medef, the Ambition4Climate initiative led by Medef and the European Business Climate Pact as a participant in the CDP39. These initiatives bring together the ambitions and concrete actions of businesses in favour of climate transition (reduction of intrinsic emissions, actions in favour of customers' and suppliers' value chain etc.).</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). On the Eurostar side, a passenger's journey between Paris and London emits 70 times less emission than a plane ;</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 now completed in the Tunnel's plant rooms and at the French and British terminals removed about 16 tons of halon. The reduction and then total elimination of this highly emissive fluid will materialise at the time of the start of the Passenger Shuttle mid-life renewal programme45 (i.e., from the carbon reporting for the 2023 and 2024 financial years). This programme will allow the dismantling of the remaining 58.3 tons of halon</i> • <i>As for halon, the Group has been committed for nearly 10 years to reducing and replacing these highly emissive fluids46. In 2021, emissions were reduced by 30% compared to 2020 thanks to the control of R407C fluid leaks. Indeed, there was less maintenance of the Heating Ventilation and Air</i> | <p><i>See URD, p.290</i></p> |
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| | | <p><i>Conditioning (HVAC) units on the Passenger Shuttles compared to 2020 and the condenser failure identified in 2019 was corrected in January 2020. In the medium term, the Passenger Shuttle mid-life renewal programme⁴⁷ has been designed to eliminate the remaining 13 tons of this fluid and therefore the potential for emission leaks. Finally, after the substitution of R22 in the Tunnel cooling system in 2018, the last quantities of R22 in the locomotives were eliminated in 2021.</i></p> | <p><i>See URD, p. 281</i></p> |
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| | | <p>Conscious of the need to contribute to accelerating the ecological transition, Getlink issued Green Bonds in September 2018, for a principal amount of €550 million. This amount was increased to €700 million in October 2020, with an additional issue of €150 million in October 2021. The issue proceeds, after deduction of fees and other expenses, are mainly allocated to the ElecLink project financing.</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>In 2021, the Group waste recovery rate for the whole of France was 90%. 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>See URD, p.35 (Adjusted values as at 31/10/2022)</i></p> <p><i>See URD, p.296</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 welcomes an increasing number of visitors each year. In 2021, more than 140,000 people were able to take advantage of the site. 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 in addition to the financial support offered by Eurotunnel. The partnership between the Concessionaires and the WCCP received its 16th Green Flag Award in 2021, recognising the excellent environmental quality of this nature reserve. | <p><i>See URD, p.291</i></p> |
| | <p>➤ Allocation of responsibilities within the organisation.</p> | <p>The various <u>Safety and Sustainable Development Departments</u> (<i>renamed from 2020 Safety and Transverse Process and QSE Departments</i>) 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 set and results achieved, 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. | |

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| | | <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. 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> | <i>See URD, p.255</i> |
| | ➤ 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 the Le Shuttle website so that customers (passengers) can calculate the average CO₂ emissions saved by using the Passenger Shuttles.</p> <p>Carbon Counter</p> | |

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

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| <p>The good practices in place within the Group</p> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>At Board level, the Ethics and CSR Committee ensures, as stated above, that CSR issues are taken into account in the formation of the Group's strategy and in its implementation.</p> <p>To support the organisation to move towards a lower carbon economy, the Board of Directors of Getlink SE has appointed an Environment and Climate Lead Director. The role of the Environment and Climate Lead Director is to ensure that the Board of Directors is able to make informed decisions on a just transition.</p> <p>On the Group's Executive Committee, all aspects of the environmental strategy are led by the administrative and financial director, to whom the CSR department reports, in coordination - on workforce issues - with the Group's human resources director.</p> <p>As early as 2002, Eurotunnel Concessionaires installed an environmental management system based on the requirements of the <u>ISO 14001 standard</u>. As part of the objectives of the 2025 Environment Plan, the Group wishes to achieve ISO 14001 certification on the Eurotunnel Concession by 2025. In this respect, the implementation of a procedure drafted in 2021 for responsible purchasing is a key element of preparation in that it will particularly favour energy-efficient products and services.</p> <p>In terms of governance, the progress of the <u>projects</u> is monitored within the framework of the Eurotunnel and Europorte environmental committees, which were initiated as early as 2020. In 2021, these committees met three times.</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</p> | <p>See URD, p. 273</p> <p>See URD, p.282</p> |
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| | | <p>protection and safety have been rewarded with renewal of ISO 9001 (Quality management), MASE (Company Safety Improvement Manual) and SQAS (Safety & Quality Assessment for Sustainability) 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, just like the Atelier <u>Arc-lès-Gray</u>, in the ISO 9001 certification scope in early 2021. Europorte France renewed its Safety & Quality Assessment for Sustainability (SQAS) certification for its headquarters.</p> <p>Following Ecovadis assessments conducted at the request of certain customers, Europorte France has kept its “gold” rating in 2021 for its rail activities. This rating reflects the quality of the business's CSR management system at the time of the assessment. The following table summarises the qualification status of each of the Group’s rail freight entities</p> | See URD, p.274 |
| | ➤ System for tracking and measuring performance. | 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. | |
| | ➤ Examination of executive management for monitoring and improvement of results. | At the Board level, 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. | |

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| | <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 course of the year. The obligation to establish a financial guarantee against any environmental damage, as defined in Article L. 516-1 of the French Environmental Code, does not apply to the Group's activities.</p> <p>No fine of any nature has been imposed on the Group and nor has it been reported for non-compliance of its operations.</p> | |

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

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| <i>The good practices in place within the Group</i> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>As stated above, the Group has established a Group 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, with reference to the OECD Guidelines for Multinational Enterprises.</p> <p>This Code of Ethics was reviewed in its form on the advice of the Corporate Committee and the Audit Committee and was approved by the Board of Directors on December 18, 2018.</p> <p>The Ethics Charter is a reference text to inspire team members' decisions, guide their day-to-day actions and allow them to build stakeholder trust each day, something which is a major source of value creation for the Group.</p> <p>In order to support the management of the ethics programme, a specific structure has been set up. The Board of Directors' Ethics and CSR Committee ensures the communication through the whole organisation of the ethics, culture and principles applicable to executives and officers, as well as all team members, and which serve as the basis for the work of the other Board committees and executives and officers.</p> | <p><i>See Code of Ethics and Conduct above</i> <i>See URD, p.201</i></p> <p><i>See URD, p.257</i></p> <p><i>See URD, p.161</i></p> |
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| | <p>➤ Support from executive management in preventing corruption</p> | <p>Each year the Group develops and strengthens its compliance culture, basing it on an Ethics Charter that is the bedrock on which the set of internal policies, code of conduct and procedures adopted by Getlink are based. A strong “zero tolerance” message, in particular in the fight against corruption, is promoted by the Chairman and general management.</p> <p>An internal working group (the Compliance Steering Group), which brings together the compliance officer, internal control, internal audit and the legal and human resources departments as needed, oversees compliance with the rules set out in the Ethics Charter and the procedures contained in it, with the responsibilities being allocated to the relevant departments. The compliance convergences and links are set out in a matrix of compliance topics with owners allocated to each topic. The legal department is thus the owner of the topics relating to personal data. The Board secretariat monitors financial market laws and regulations, as well as best practice with regard to corporate governance, and ensures they are transposed into internal procedures. Deployment In the subsidiaries is carried out by a network of compliance representatives.</p> <p>The Group’s ethics system, which is based on the Group's values and Ethics Charter, is supplemented by various policies. The aim of this system is to develop an ethical culture among all new team members that promotes integrity of behaviour, to raise individual awareness of compliance with international and national laws and regulations and to highlight initiatives aimed at strengthening the prevention system and avoiding infringements, breaches or negligence in these areas. A user-friendly Ethics Charter offers a practical guide to ethics and forms the bedrock underpinning all internal policies, codes of conduct and specific procedures adopted by Getlink (anti-corruption policy, competition policy, protection of personal data).</p> <p>A Securities Ethics Charter sets out the measures to prevent insider trading and establishes “trading closed periods”. In accordance with the “zero tolerance” message promoted at the highest levels in the organisation with regard to all types of corruption, the Group has defined</p> | <p><i>See URD, p.160</i></p> <p><i>See URD, p.161</i></p> |
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| | | <p>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.</p> | |
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| | <p>➤ Formal, public zero-tolerance policy in respect of corruption.</p> | <p>An anti-corruption policy and a whistleblowing system are in place. 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> | <p><i>See URD, p.161</i></p> |
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| | ➤ Other good practices | <p>As part of a voluntary responsible procurement initiative, Getlink signed a “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 2021, the Group renewed its commitment by signing the new version of the Charter (2021 version) and continued its action in favour of an effective responsible purchasing policy</p> | See URD, p.261 |
| Criterion 13: The COP describes effective management systems to integrate the anti-corruption principles | | | |
| The good practices in place within the Group | ➤ Pertinent policies, procedures and activities planned to meet this criterion. | <p>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)</p> | |

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| | <p>➤ Human Resources procedures supporting the anti-corruption commitment or policy.</p> | <p>The HR policies of Group entities contain an ethics code that describes the moral principles and ethical values governing the Group’s activities. It defines the 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 Code of Ethics and Conduct, which is also provided.</p> | <p>See URD, p.262</p> |
| | <p>➤ Communication channels and tracking mechanisms for reporting concerns or requesting advice.</p> | <p>To ensure that any possible breach of its commitments could be reported quickly, when it drew up its first Ethics Charter the Group set up an alert system open to all its stakeholders (access is specified in the Charter).</p> | |
| <p>Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.</p> | | | |
| <p>The good practices in place within the Group</p> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>A map of corruption and influence peddling 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. The assessment of ethical risks is integrated into the risk analysis process. A third-party evaluation procedure has also been developed with several levels of controls.</p> | <p>See URD, p.161</p> |

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| | ➤ Process for management of incidents. | <p>An internal whistleblowing mechanism and an ethics officer are in place to address any risk of corruption. 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> <p>An e-mail address is available for any stakeholders encountering any difficulties or would like to make an alert.</p> | See URD, p.161 |
| | ➤ 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.</p> <p>With a view to continuous improvement, Getlink deployed a compliance awareness initiative in 2019 in a program called 'Get Compliant'.</p> | |

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

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

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| <p>The good practices in place within the Group</p> | <p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p> | <p>The strategic vision of Getlink, as this is reflected in part in its CSR policy, is in phase with the objectives and challenges laid down in the UN's Global Compact. In its policy, 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> <p>Since 2013, the Group has also been a signatory to the United Nations Global Compact and has fully embraced its ten key principles, notably those relating to human rights and employment law. The Group is particularly vigilant in the fight against undeclared work, by implementing the regulatory obligations in both France and the United Kingdom, in France with the obligation of vigilance and in the United Kingdom with the Modern Slavery Law. In addition to these regulatory aspects, the Group is consolidating its positive impact in terms of responsibility on its procurement by implementing a responsible purchasing policy</p> | <p><i>See URD, p.162</i></p> |
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| | <p>➤ Adopting or amending operational procedures to maximize the contribution to United Nations objectives and themes.</p> | <p>Getlink has an organisation and structured governance, which was strengthened in 2019 by the creation of a team dedicated to CSR. In June 2021, Getlink published, as detailed above, its 2025 Environment Plan to address its environmental challenges.</p> | |
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| | | <p>In terms of tools, the Group has put in place several mechanisms to contribute to the achievement of its environmental and especially its climate ambitions:</p> <ul style="list-style-type: none"> • In September 2020, the Group introduced an internal carbon price for certain investment projects in order to integrate the carbon impact of the projects and the various solutions proposed into its decisions. With the slowdown in activity and projects in 2020, this tool will have its full effect from 2022/2023 onwards. The tool covers the scope of the Group's direct and indirect emissions. The price, currently set at €100, will be adjusted in 2022 to evolve over time. • The Group has developed a responsible purchasing (procurement) procedure to assess the significant contributions of its purchases to priority environmental issues. This procedure will allow the inclusion and training of the Group's value chain, which is the only way to ensure success in achieving these ecosystem objectives. • The current policy and future objectives are in line with the approach undertaken by all the Group's subsidiaries over many years to structure the initiatives and the environmental management system. | <p><i>See URD, p.273</i></p> |
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| | | <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 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 the regions.</p> <p>Following Ecovadis assessments conducted at the request of certain customers, Europorte France has kept its “gold” rating in 2021 for its rail activities. This rating reflects the quality of the business's CSR management system at the time of the assessment. The following table summarises the qualification status of each of the Group’s rail freight entities.</p> <p>In addition to these initiatives to structure and certify environmental management (all Europorte's activities (16,8% of Group revenue) have environmental certification), the Group works to engage its teams involved. The Europorte employee awareness initiative launched in 2018 covering eco-gesture initiatives (waste, energy, water travel, IT equipment and consumption management) continued throughout 2020 and 2021, via themed articles suggesting specific sustainable development initiatives and distributed through a monthly in-house</p> | <p><i>See URD, p.274</i></p> <p><i>See URD, p.274</i></p> |
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| | | <p>newsletter. This awareness initiative has been enhanced since 2020 by compulsory talks on the environmental impacts of local activities and on the management of accidental spills.</p> <p>Since 2016, the company has been able to modulate the variation of cooling fans, with the installation of new generation, more energy efficient electronic variators. Lastly, at the end of 2020, the fleet of hybrid and electric vehicles represent 9% of the Eurotunnel/Europorte light vehicle fleet (64 vehicles in total).</p> | |
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Criterion 16: The COP describes strategic social investments and philanthropy

The good practices in place within the Group

- Pertinent policies, procedures and activities planned to meet this criterion.

A key player in the natural, economic and human environment, Eurotunnel fulfils its social responsibility through concrete commitments and actions to support the community:

- *Payment since 2010 of 10% of the land rental income from the wind farm on its Coquelles site to Secours Populaire, which distributes the payments in the form of “energy vouchers” to families in Pas-de-Calais. Following its expiry in 2021, the partnership agreement between Eurotunnel and Secours Populaire was renewed for two more years (2023).*
- *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 recent developments. Comprising various rooms for training and an open space for co-working, it also has several 3D printers.*
- *Commitment to the inhabitants of priority urban policy areas through the signature in July 2019 of a three-year partnership agreement between Eurotunnel, the French Grand Calais Terres et Mers conurbation and the State represented by the Prefect of Pas-de-Calais.*
- *In partnership with Simplon, a training centre for digital professions for people who are isolated from employment, ESGIE’s IT department welcomed three trainees for a period of three months in 2021.*
- *Donations of laptops or desktop computers to schools and/or associations in the Hauts-de-France region. In 2021, about 30 computers were donated by ESGIE’s IT department.*

See URD, p.299

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| | | <p>Since 2013, Eurotunnel has turned to the Association des Paralysés de France (APF) for any service within the areas of expertise of its partner companies, which employ people with disabilities. Thus, subcontracting projects have been entrusted to APF workshops near Calais, notably specialised in mechanical welding, carpentry and packaging. In 2021, despite the reduction in subcontracted activity, Eurotunnel continued its collaboration with APF.</p> | |
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| | <p>➤ Seeking social investments and philanthropic contributions linked to core business.</p> | <p>Despite the current circumstances of the health crisis, 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:</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>a partnership with the École des Ponts et Chaussées since 2013, 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. Several projects have been carried out within the framework of this partnership, including the project relating to the ageing track in the Tunnel which has led to the development of a machine for detecting cracks and block breakages called COBRA for which Eurotunnel shares a patent with ENPC;</i> ▪ <i>a partnership with the Toulouse School of Economics. Getlink offers financial support to the school’s research activities, particularly through a programme aimed at clarifying the links between ESG issues, companies' ESG policies and economic and financial performance;</i> ▪ <i>a partnership with ULCO – the Littoral Côte d’Opale University (Hauts-de-France region). For the past ten years, Eurotunnel has been developing exchanges with this local university, in the form of presentations to law students, presentations on the legal profession, case studies and simulated job interviews. In 2020, students from ULCO's Environment Master's programme worked for Eurotunnel on updating the analysis of physical risks, starting with the risk of flooding.</i> <p>ESL also supports several local partnerships, in the fields of culture, tourism or the environment, such as:</p> <ul style="list-style-type: none"> • <i>the Samphire Hoe Nature Reserve, owned by the Group, which covers 30 hectares at the foot of the White Cliffs of Dover in England;</i> • <i>a partnership with the Elham Valley Railway Museum in Newington for the maintenance and renovation of the only model of the Tunnel;</i> • <i>membership of 'Visit Kent', a leading tourist information website for Kent; and</i> • <i>sponsorship of the Kent Press and Broadcast award, a regional award for talent of the year.</i> | <p><i>See URD, p.299-300</i></p> |
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Criterion 17: The COP describes advocacy and public policy engagement

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| 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 CSR Charter take a clear position in support of the principles of the United Nations. | |
| | ➤ Public commitment to the importance of acting on one or more United Nations themes. | Getlink regularly reasserts its adherence to the Global Compact and its fundamental principles through its Communication on Progress (COP) and the declaration of continued support provided by its chairman and CEO. | |
| | ➤ Encouraging company executives to participate in summits, conferences and other interactions about public policies in relation to one or more United Nations objectives. | | |

Criterion 18: The COP describes partnerships and collective action

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| | ➤ Developing and establishing partnerships with public and private organisations. | <u>Getlink</u> has developed many partnerships with public agencies as indicated below. | See URD, p.296 |
| | ➤ 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"> ▪ 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 | |

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| | | <i>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> | |
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| | | <ul style="list-style-type: none"> • <i>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.</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 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. The coalition also seeks to ensure that the government keeps up its efforts in relation to the rail freight recovery plan and to support SNCF Réseau in making the necessary investments for the development of low-carbon rail freight. The 4F Coalition has appointed Europorte's rail operations officer as its spokesperson in 2021. 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.</i> • <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>Since 2021, Europorte has been a member of the "Union Maritime et Groupement Industriel de Fos et de sa région" (UMGIF) and the « Union Maritime et Fluviale de Marseille-Fos » (UMF), which are part of the Union des Entreprises des Bouches-du-Rhône (UPE 13). Its role, among other things, is to actively participate in the economic and social development of the region and to promote enterprise and entrepreneurship among young people, academics, politicians, and opinion leaders.</i> | <p><i>See URD, p.200</i></p> |
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III. Governance and leadership of Corporate Social Responsibility (CSR)

Criterion 19: The COP describes CEO commitment and leadership

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| The good practices in place within the Group | ➤ Pertinent policies, procedures and activities planned to meet this criterion. | <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> | |
| | ➤ The CEO makes an explicit public commitment to CSR and the Global Compact. | <p>The CSR Charter is supported and sustained at the highest level of the organisation by the Chairman of the board and Chief Executive Officer. The Charter has been signed by the Chairman and Chief Executive Officer.</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>For 2021, the Nomination Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is based on four topics which are directly linked to the Group's activities: health & safety, social climate, GHG emissions, and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate a completion rate with respect to the composite index, according to the objectives fixed for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the performance-related plans to allocate free shares. The composite index was audited in 2021 as part of the audit of corporate information by the auditors.</p> <p>The Board of Directors decided to include the 2021 performance action plan, which has the 2023 targets, in the CSR strategy review cycle. That approach was renewed by the Board of Directors on 23 February 2022. The long-term incentive plans will be subject to performance criteria to be met over a period of three years, in line with the 2024 CSR targets.</p> <p>The Board of Directors has decided to propose to the Annual General Meeting of 27 April 2022 that the CSR criteria be tied into Getlink's social, societal and environmental ambitions for 2024 and the company's day-to-day operations:</p> | |

See URD, p.256-257

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| | | <ul style="list-style-type: none">• one of the internal performance conditions (the "Climate Weighting") would be based on the achievement of the objective of reducing greenhouse gas emissions by 20% in 2024 compared to 2019; in the event that the rate of achievement of the objective is strictly less than 100%, there will be no allocation; and in the event that the rate of achievement of the objective is equal to or greater than 100%, 15% of the allocable volume would be effectively allocated, with a ceiling of 15%. It would condition 15% of the cumulative weighting.• a further internal performance condition (the "CSR Weighting") of up to 10% of the cumulative weighting would be based on the achievement of four objectives including safety; gender equality with an objective of recruitment of more than 40% of each gender and at least 30% over the total workforce; social climate and quality of service assessed in relation to the NPS score. <p>By maintaining the weight of CSR criteria to 25% in this plan, this process helps ensure that there is alignment between corporate strategy and operational deployment.</p> | |
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Criterion 20: The COP describes board adoption and oversight

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| | ➤ 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, in order 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

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| | ➤ The company's responsibility publicly acknowledged in terms of its impacts on internal and external stakeholders. | Group teams, each in its respective area, are listening to their stakeholders and primarily to their clients in order to ensure a correlation between their expectations and the Group's long-term goals. 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 consisted 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 | |

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| | | <p>was carried out in the following three stages</p> <p>Stage 1: Diagnosis and analysis. 57 challenges 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 challenges 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 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 conducted based on the methodology developed for the Group for its risk analysis (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>See URD, p.251-252</i></p> |
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| | <p>➤ Consulting stakeholders about dilemmas and challenges for implementation and inviting them to take part in the performance examination.</p> | <p>In 2015, Getlink conducted 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 analysis was conducted in a context not yet marked by the migration crisis and its impacts in terms of security, image and customer service. 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, aware of the transformation underway in our companies and the rapidly changing expectations of its internal and external stakeholders, the Group updated its materiality analysis.</p> <p>The Group ha planned to update its materiality analysis in 2022.</p> | |
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| | <p>➤ Establishing communication channels to engage with employees and other stakeholders in order to hear their ideas.</p> | <p>The implementation of effective forms of social dialogue with employees has been identified, during the materiality exercise in 2015, then during its update in 2019, as an important issue. 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> | |
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