

Getlink SE
Modern Slavery Statement
for the financial year ending 31 December 2018

INTRODUCTION

Getlink is committed to preventing any forms of modern slavery, human trafficking or child labour within its business and supply chain. Our policies and procedures reflect our aim to act ethically and with integrity in all our business relationships.

OUR STRUCTURE AND BUSINESS

Getlink SE is a company registered in France and brings together a number of companies active in the fields of infrastructure management and transport operations. The Group has more than 3,300 employees and operates primarily in France and the UK. The Group has a global annual turnover of over 1 billion euros, approximately 85% of which is generated by Eurotunnel. Eurotunnel is the trading name of a partnership between an English company 'The Channel Tunnel Group Ltd' and a French company 'France-Manche SA' which is, under a concession until 2086 granted by the governments of the UK and France, responsible for the operation of the Channel Tunnel Fixed Link.

Our business is organised into 2 key business segments:

1. **The Channel Tunnel Fixed Link:** Eurotunnel operates the Channel Tunnel Fixed Link between France and the United Kingdom. The Channel Tunnel is used by Eurotunnel's Shuttles, high-speed passenger trains and international rail freight train services.
2. **Rail Freight Services:** International, national and local rail freight transport services are operated by Europorte SAS. Europorte SAS and other group companies provide a wide range of integrated services, training and other services to industry.

OUR SUPPLY CHAINS

We work with a wide range of suppliers who provide a variety of railway, construction and infrastructure related goods and services. We also procure goods and services designed to meet the day to day needs of our customers and staff.

We ensure that our suppliers adhere to our ethical standards. We do not tolerate slavery or human trafficking within our supply chains.

Our procurement policies and contracts require suppliers to comply with our Code of Ethics and Conduct. In addition, our contracts contain detailed provisions relating to the laws on illegal working and modern slavery.

For contracts performed in France and in accordance with French Vigilance Laws, we require that suppliers and subcontractors must comply with French Law requirements (decree 2015-

364 of 30 March 2015) relating to illegal working by, where appropriate, providing certain documentation. That documentation includes a certificate of compliance with the “obligation de vigilance” issued by the appropriate French social security body certifying that the supplier is up-to-date with its filing obligations. Equivalent compliance is required from suppliers not domiciled in France. We also require, where applicable, that the supplier provides a list of the names of all foreign employees working on a contract who are required to have a work permit. The supplier must re-confirm its compliance every 6 months throughout the contract period.

For contracts performed in the United Kingdom we require suppliers to comply with either the Modern Slavery Act 2015 or the laws applicable to illegal working in the country in which the supplier is domiciled and the country in which the contract is performed (if different). If equivalent law does not exist in the country where the contract is performed, we require the supplier to comply with the principles of the law in the country where the goods or services are to be delivered.

If a supplier subcontracts any of its obligations to entities based outside France or the UK and/or if the supplier engages foreign employees to work on a contract, we require the supplier to observe the following obligations:

- ensure that any seconded employees or subcontractors are housed in accommodation which respects human dignity;
- ensure that its subcontractors comply with all legal obligations, statutory provisions and collective agreements applicable to their employees;
- ensure that its seconded employees or those of its subcontractors are paid the statutory or collectively agreed minimum wage.

OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

Getlink’s Corporate Social Responsibility (CSR) policy is based on respect for fundamental human rights as defined by the Universal Declaration of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work. The Group is also a signatory to the United Nations Global Compact and fully adheres to its fundamental principles relating to Human Rights. The Getlink board of directors fully support the principles stated in these international codes and standards.

Getlink’s compliance activities implement that support by way of policies and procedures which address national and bi-national issues. In particular, Getlink’s CSR policy incorporates a Code of Ethics and Conduct comprising a set of operational procedures which define a common approach for all group companies. All personnel, suppliers and contractors are expected to comply with the principles set out in the Code.

The Group has tasked an internal committee to monitor our compliance with modern slavery and human trafficking issues and implement policies to combat them. The committee will ensure that the risks of modern slavery and human trafficking are communicated to our staff, suppliers and contractors. Getlink’s compliance will be closely monitored by the board of directors and our internal auditors.

TRAINING

Training within the Group is cascaded through the management structure to the relevant operational teams and is available to all personnel. Similarly, our suppliers and contractors are expected to ensure that their personnel and supply chains understand the risks of modern slavery and human trafficking. Mandatory training on modern slavery for all group personnel has been delivered via an online training module under Getlink's 'Get Compliant' programme.

MONITORING AND DUE DILIGENCE

Our contracts contain detailed provisions relating to the laws on illegal working and modern slavery. We require that suppliers and subcontractors comply with French and/or English Law requirements relating to illegal working as they apply in the country where the works or services are performed or delivered, or in which the supplier is domiciled. We require our suppliers to impose similar requirements on their subcontractors and suppliers. Our whistleblowing process can be used by our personnel, suppliers and contractors.

We are increasing our due diligence and monitoring capabilities by improving and updating our supplier assessment processes. This includes:

- updating our due diligence questionnaire;
- requiring supplier certification of compliance with modern slavery and illegal working laws;
- and
- regular and random checks on key supplier compliance.

The results of these improved processes will be assessed and monitored by our compliance committee.

FURTHER STEPS

We intend to take the following further steps to combat modern slavery and human trafficking:

- We will continue to provide training and guidance to our personnel, suppliers and contractors about the risks of modern slavery and human trafficking;
- We will continue to assess, monitor and work to reduce the potential risk of modern slavery and human trafficking in our business and supply chains by closely monitoring our due diligence processes;

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2018.

Jacques Gounon
Getlink SE
June 2019