

Corporate Social Responsibility









CSR STRATEGY

A COMMITMENT TO PERMANENT ACTION

Creator of a vital link that brings countries and peoples together, a major contributor to mobility, rooted in its regions, a leader in eco-friendly transport, Getlink integrates corporate social responsibility at the heart of its strategy.

E

ven before the emergence of the concept of CSR, the cross-Channel Fixed Link project was based on the creation of wealth for all while respecting humankind and nature.

SOCIAL RESPONSIBILITY

Getlink endeavours to create a working environment that promotes the development and personal fulfilment of its employees.

- Digital tools are used to help develop everyone's employability, and to uncover and promote talent.
- The remuneration and employee savings policy ensures equal opportunities, especially between men and women, and that all employees are linked to the Group's results according to collective and individual performance.
- Safety is the Group's number-one priority, as seen in the commitment of the Board of Directors' Safety and Security Committee, the operations directors and the managers present in each entity.
- Getlink promotes constructive social dialogue with employee representative organisations.

ENVIRONMENTAL RESPONSIBILITY

A major contributor to the energy transition, Getlink manages services and infrastructures that are among the most respectful of the environment:

- The Channel Tunnel is the quickest, simplest and most environmentally friendly way to cross the Channel.
 A truck crossing the Short Straits with Eurotunnel Shuttle Freight emits up to 20 times less greenhouse gas than on a Calais-Dover ferry.
- The Fixed Link reduced its carbon footprint by 55% between 2006 and 2014, and by 9% in 2015-2016, compared to 2012-2013. In 2017, it was awarded its fifth consecutive certification from the UK's Carbon Trust Standard.

Getlink's CSR actions are measured by a range of non-financial indicators audited and published each year, in the Group's Registration

Document."

- By far the world's leading rolling motorway, the Fixed Link has welcomed more than 410 million passengers and 80 million vehicles since opening in 1994.
- With Europorte, France's leading private rail freight operator, Getlink plays a key role in the transport shift between road and rail, with a carbon footprint that is much more environmentally friendly.
- Thanks to ElecLink and its 1GW direct current interconnector between France and the UK via the Tunnel, Getlink will be able to save 6.1 million tonnes of CO₂ emissions.
- By enabling high-speed trains to use the Tunnel, Getlink is making a first-rate contribution to the shift from short-haul air travel to high-speed rail, again with the prospect of significant reductions in CO₂ emissions.

CORPORATE RESPONSIBILITY

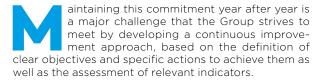
Committed to the local regions, Getlink contributes to local economic dynamism and and shares its know-how.

- The Tunnel transports 25% of the economic flows between the UK and continental Europe, which represents the activity of several hundreds of thousands of jobs.
- Since the opening of its commercial services in 1994, Getlink has created more than 8,500 direct and indirect jobs in both the Calais area and Kent.
- Operating one of the busiest railway systems in the world, Getlink shares its expertise with the scientific and educational community. The Group is a founding member of Railenium, known as the "investment programme of the future", and has partnerships with various institutions such as the prestigious French engineering school l'École Nationale des Ponts et Chaussées.
- Getlink and its employees develop many long-term actions of solidarity with associations such as the Alliances network, the French Secours populaire, the Association des paralysés de France and various schools and charities in Kent.



SAFETY: A PERMANENT IMPERATIVE

Inscribed at the very heart of railway culture, the safety of customers, employees, sub-contractors and all other stakeholders is an intangible principle which guides all of Getlink's actions.



WORKPLACE SAFETY

For the Fixed Link, 2017 saw a significant improvement in this area. In line with the target set, lost-time accidents fell by more than 40%, demonstrating the effectiveness of the actions undertaken. The continuous availability of the first-line management, the deep commitment of the Executive Committee, and the strengthening of Safety teams within the operational departments help to make safety a permanent concern.

The "Safety goes to the movies" campaign also helped to inspire safety culture at the forefront of people's minds. Ten 90-second video clips featuring the operational teams were produced in 2017. A playful take on Zorro, James Bond and Charlie Chaplin, this quirky campaign was widely appreciated in-house. Broadcast throughout the year on the intranet and the information screens across the various Eurotunnel buildings, these clips were seen by the majority of the staff.

Frequency rate* of lost-time work-related accidents in 2017 (compared to 8.6 in 2016)

* Frequency rate: number of work-related accidents requiring time off work x 1,000,000/number of hours worked. Severity rate**
of work-related
accidents
(stable compared
to 2016)

** Severity rate: number of days off work x 1,000/number of hours worked.



70 DEFIBRILLATORS

In order to ensure the safety of both customers and staff, 57 defibrillators were installed on board Passenger and Truck Shuttles, with four per Passenger Shuttle and one per Club Car. They add to the 13 defibrillators already available at the French and UK terminals.

EUROPORTE SAFETY WEEK

As is the custom each year, Europorte is organising its Safety Week, which looks back at actions undertaken and is centred on a specific topic. In the 2017 edition which focused on "human factors and behaviour", members of the Executive Committee made more than 60 site visits across France filled with edifying discussions on staff safety, incidents related to non-compliance with procedures and equipment incidents.





DIGITALISATION

Using big data to prevent accidents

Eurotunnel is working on a big data project to help prevent work related accidents. The experiment is based on the analysis of nearly one million basic data items over the past 6 years, from which algorithms are used to identify combinations of factors that may lead to work related accidents. By identifying those situations and circumstances in which risk is increased, effective preventive actions can be taken

A CONCERTED BINATIONAL APPROACH

RECRUITMENT, TRAINING, COMMITMENT

Integration of young people

Proof of employee commitment to the Group's objectives and the vitality of a corporate culture built up throughout a company's history filled with many different challenges, employee turnover has always been very low since Eurotunnel's launch. One natural consequence of this fundamental asset is that many of the employees who started work here 25 to 30 years ago will start to retire from 2019. Getlink has been preparing for this situation for many years by focusing its recruitment policy on rejuvenating its workforce whilst facilitating the transfer of skills. In France, apprenticeship schemes, professional contracts and international voluntary internships (VIE) are routinely used, meaning that Getlink's French workforce permanently includes some 200 apprenticeships of all types.

Training

CIFFCO, a subsidiary dedicated to training, develops a wide range of training courses designed specifically for Getlink's teams, delivered either face-to-face or via the MyLearning intranet platform. Among the topics covered in 2017 were:

- Fundamentals of employment law (contract and working time, civil and criminal liability), for managers
- Development of a digital culture for executives
- A "serious game" on how to conduct professional interviews
- · Driving with care
- Safety of mobile tools
- Remaining vigilant against corruption
- Getting to know and applying legal good practice
- What to do in the event of a terror attack...

PAY POLICY

Remuneration and savings

Getlink's remuneration policy offers a wide variety of individual increases, bonuses based on individual performance, incentives for collective performance, and savings plans that are supplemented by the company. Employees using the schemes reinvest these savings in Getlink shares, highlighting both their confidence in the Group's outlook and the extent to which their personal interests meet those of their professional community.

Employees under French legislation are also able to benefit from a Group Savings Plan (PEG), featuring a mutual fund into which payments are supplemented by the company. A Collective Retirement Savings Plan (PERCO), also launched in 2016, aims to increase employee savings based on capitalisation, and to make savers aware of the

expected fall in their pay-as-you-go pension scheme. Since 2015, employees subject to UK employment law have been able to use a system similar to the French *PEG*, known as a Share Incentive Plan (SIP), to which more than 63% of eligible employees have already subscribed. Both the SIP and the *PEG* can be boosted by shares received as part of the free share award programme.

Employee shareholding

Since 2011, all Getlink employees present since the launch of the programme, with the exception of senior executives, have received a total of 910 free shares. This proactive policy associating employees with the performance of the business, combined with other incentives, has led a 16-fold increase in the employee share ownership in the Group's capital.

WORKING CONDITIONS

Social dialogue

The Group regularly engages in dialogue with employee representative bodies and maintains direct relationships between directors and all employees regarding strategic policies and social issues.

In 2017, for instance, two agreements were signed between Eurotunnel and the French trade unions, including one on the right to disconnect, which restricts the times at which employees may be contacted by email or text message outside working hours, and rules of good conduct regarding the use of the internet and messaging systems. As regards to the agreement relating to the end of working life, it gives employees the option to gradually reduce their working time in the two years prior to the date on which they can retire on a full rate, without affecting their pension amount.

As for Europorte, an agreement on working time was signed in April 2017 by all trade unions as part of the railway reform act. Specifically, it allows better visibility of work schedules, the establishment of the Time Savings Account and the creation of a quarterly monitoring assessment.

Participatory library

An idea that is as inspired as it is easy to implement, a participatory self-service library was set up by the Eurotunnel Health and Well-being Committee. Some ad hoc shelving set up near the Coquelles staff canteen allows everyone to leave a book, magazine, or newspaper that they enjoyed reading, thus making them available to other employees, with whom they can then discuss their contents. Participants are then free to take another one, and so on. This scheme has been so successful that it will be extended to other buildings in the French and UK terminals

3,400 employees

in the Group at 31 December 2017, a 1.9% increase compared to 2016.

WORKFORCE **BREAKDOWN BY GENDER**

2,587 (76%) Women: **813** (24%)

WORKFORCE **BREAKDOWN** BY COUNTRY

France: **2,452** (72%) United Kingdom: 948 (28%)

Digital transformation



The cornerstone of the digital overhaul of human resource management processes is the Success Factor software package. This is already used to process the data collected during annual executive performance reviews, which was rolled out in 2017 to cover all Fixed Link employees in France and the UK. Everyone can now access the MyDev application on the intranet, where the contents of the performance review can be found, as well as the milestone review held with their manager. They can also develop their profile, adding any new skills acquired during the year.



296

contracts.

recruitments

for the Group in 2017, of which 86% on permanent

109,072

hours of training

dispensed to Group employees in 2017, an average of 32 hours per employee.

Each year, Getlink welcomes around 200 young people on apprenticeship schemes, professional contracts or international voluntary internships (VIE).



The "serious game" lets you explore a 3D professional situation that is close to reality.

ENVIRONMENT

LEADER IN ECO-RESPONSIBLE TRANSPORT

GREEN

Fifth Carbon Trust Standard certification

In 2007, Getlink became the first cross-Channel operator to have produced and published a carbon assessment, and remains the only one to have done so to date. Having pursued its proactive policy of reducing its greenhouse gas emissions since then, the Group obtained for the Concession, its fifth Carbon Trust Standard certification in 2017, for the 2015-2016 period. The audit, conducted every two years by this independent UK agency, assesses the company's policy, conducts a detailed analysis of its performance in terms of carbon footprint reduction, and awards a certificate if the objectives have been met.

Europorte goes green

Focusing on genuine initiatives for sustainable development, more than 250 employees took part in the 65 workshops and challenges laid on during the first edition of the Green Week, based around four themes: eco-driving of trains, waste management, environmentally friendly practices, and water management.

At Socorail, the Europorte subsidiary specialising in logistics management at industrial sites, the progress made in terms of environmental protection and safety were hailed by the renewal of certifications by ISO 9001 (Quality Management), MASE (French Corporate Safety Improvement Guide) and SQAS (Safety Quality Assessment for Sustainability). Socorail's Infrastructure Management branch will start the process to obtain MASE certification in 2018.

Keeping cool with savings of 50%

The eight refrigeration units in the plants at Sangatte and Shakespeare Cliff, responsible for cooling the pressurised water sent through the railway tunnels to keep the temperature below 30°C, have been replaced. The four new refrigeration units are much more powerful and halve the electrical power consumption. Another advantage is that they use an organic refrigerant gas, HFO, which has no effect on the environment.

MOBILITY

Restricting private car travel

Before the entry into force of the new French regulations on 1 January 2017 encouraging companies to restrict staff travel by private car, a survey carried out on Concession employees showed their keen interest in the topic, and led to the drafting of the Corporate Travel Plan required by the new legislation. Three actions were implemented in the third quarter of 2017. A shuttle bus between the TGV station in Fréthun and the terminal in Coquelles encourages employees living in Lille or Boulogne to commute to work by train. A Getlink community has been launched on the passpass.fr carpool platform. Lastly, employees were able to test-drive electric cars and bicycles at the Mobility Day held on 21 September.

In the UK, 70 employees are already taking part in the government's Cycle to Work programme, launched in 2016, and receive tax deductions equal to at least 25% of the price of the purchased bicycle. Many of them took part in the national Cycle Day, travelling a total of 650 km to come to work by bike in Folkestone on 13 September 2017

Electric vehicles

The electric solution lies at the heart of the Group's environmental policy. In 2017, Eurotunnel commissioned 12 new electric vehicles for use in its service tunnel and on terminals. Our customers are provided with 16 charging points, 8 of which are equipped with Tesla superchargers. In 2017, more than 5,800 electric cars of our customers travelled on board Le Shuttle, compared with just 40 in 2014.

c.€500,000

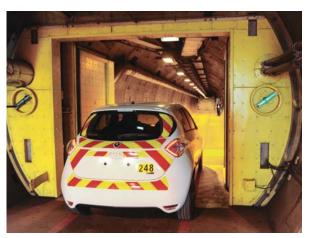
in energy savings made, thanks to the replacement of the refrigeration units. 71%
of our customers
travelling by electric

vehicle do so in a Tesla.

DIGITALISATION

Target: zero paper

The Group is pursuing its strategy of paper document digitalisation by acquiring tools that restrict printing, specifically the DocuSign application, a signature service that gives Freight customers the opportunity to sign contracts and account opening requests digitally. At Europorte, the ever increasing use of smartphones and tablets, together with the introduction of the SICOR tool, are further reducing the consumption of ink and paper, in favour of digital documentation.



Eurotunnel, an electric vehicle pioneer since the 1990s.

BIODIVERSITY

Eco-pasture

The polluting mechanical equipment used to maintain the green areas around the Coquelles terminal has been partially replaced by cattle. Some fifteen cows, both Salers and Highland cattle, chosen for their hardiness and ability to live outside all year, even on the Opal Coast, now graze 34 hectares considerably more peacefully than land-clearers did. An agreement was signed with a local farmer who looks after both herds.

Samphire Hoe turns 20

The nature reserve, created at the foot of the Cliffs of Dover from the chalk marl extracted from the Channel during the Tunnel's construction, celebrated its 20th birthday in 2017. Each year, this 40-hectare site reclaimed from the sea welcomes more than 100,000 visitors, who today can find some 130 species of birds and 200 species of plants there. In July 2017, and for the 13th consecutive year, Samphire Hoe received a Green Flag Award, which recognises the most beautiful parks and green spaces in the United Kingdom.



60 electric vehicles used by staff for operations on the terminals and in the service tunnel.



Cows help to maintain the environmental potential of the 34-hectare area.



833 companies including Eurotunnel took part in the UK Cycle Day in 2017.



1,400 children attended workshops in Samphire Hoe education shelter in 2017.







CORPORATE

LOCAL ROOTS AND A COMMUNITY PERSPECTIVE

SECURITY

Investments and seamless cooperation with the Governments

The security of such a strategic element of infrastructure as the Channel Tunnel, which provides a vital link between the United Kingdom and the continent, is a crucial priority for the public authorities in both France and the UK, as well as for Eurotunnel. The Group was entrusted by the Treaty of Canterbury, signed on 12 February 1986 to be the Concessionaire for the cross-Channel Fixed Link. This founding document set out the respective responsibilities of the States and the Concessionaire regarding security. Eurotunnel, which has no police powers or any authority for border control, is required to provide the governments with the means to exercise their sovereign responsibilities.

Security Plan

Security means ensuring the safety of goods and persons and the integrity of the facilities, and enabling effective border controls. It also means protecting those who face life-threatening risks by trying to get into a site where nearly 350 trains pass through on a daily basis, beneath a 25,000-volt catenary cable. During the 2015 migrant crisis, seamless cooperation with both governments was reflected in the implementation of a major security plan: the installation of 30 km of 4 metre high security fencing, protected by detection cables on the fences themselves or buried underground, 9 km of infrared barriers, the installation of 600 video cameras (operating day and night), the construction of a new Security Control Centre capable of managing up to 1,500 alarms, the purchase of a further two X-ray scanners (for vans and railway traffic). Since November 2015, the deployment of seven mobile squadrons of the gendarmerie is complemented and secured with both infrastructure and human means (with 300 security agents, including 135 dog handlers). Since then, there has been no further operational disruption linked to

The multi-year security plan continued in 2017 with the construction of a building fitted with a heartbeat detection system. The building is sited at the entrance to the Coquelles freight terminal and is fully insulated from vibrations and external sounds, meaning that our security officers can pick up the slightest indications of any human presence on board four trucks at a time.

A siding track has also been built just before the entrance to the Tunnel. Should any human presence be detected on a Truck Shuttle after its departure and before it enters the Channel Tunnel, the train would be diverted onto this track, where it can be inspected without disrupting other rail traffic.

Lastly, the scanner in use at Fréthun from spring 2018 will enable automatic inspection of an entire rail freight train (see page 28).



Surrounded by 4m high security fencing and automated gates, the 850-metre long siding track constitutes a secure area if a Truck Shuttle needs to stop.

650

hectares

the size of the secure area of the Coquelles terminal.

PARTNERSHIPS AND COMMUNITY RELATIONS

Teachers visit to Eurotunnel

Under the agreement signed between Eurotunnel SGIE and the CGénial foundation, a group of teachers, careers advisers and head teachers came for a day to find out about job opportunities in rolling stock maintenance, under the auspices of the tenth edition of the "Teachers in company" initiative. This partnership is establishing solid links with the educational community, providing a better insight into the wealth of the Group's know-how, and may help to interest the young people of the region in careers in the rail industry.

CIFFCO wins a Hackathon

An approach to learning which aims to foster creativity, the Hackathon is a competition where teams are given a limited time to develop a solution to a specific problem. The challenge in this case was to come up with the best answer to the question, "How should we collate and manage training data?", in the space of 48 hours. Each project group then had 4 minutes to present their idea and make specific proposals to a panel of specialists. The team led by CIFFCO won the competition in style with its mobile application.

The Tunnel series

In the third and final season of the series "The Tunnel", broadcast in December 2017 on Sky Atlantic, the characters Commander Elise Wassermann from the Calais judicial police bureau and Detective Chief Inspector Karl Roebuck from Kent police faced two dangerous criminals. Fixed Link infrastructure features in various episodes, with Group employees appearing as extras.

Symbolising speed and performance

Eurotunnel was chosen by Audi as the main setting for the launch of the advertising for the new A8, the flagship of its range. Lambert Wilson takes the wheel and drives through the service tunnel, arriving in London in time for a movie shooting.

Job Squad

As every year, Eurotunnel in Coquelles provided support to a group of eight young jobseekers, under the Job Squad mentorship programme launched by the Alliances network in 2014. During seven sessions, a senior manager from the company gave them advice about drafting a good CV, succeeding at job interviews and developing their network of contacts. Within four months of the programme, seven of them had found employment.

Getlink, partner of the APF

Since 2013, Getlink has been committed to call on the French disabled people association (APF) for any services falling within the skill set of its partner companies which employ people with disabilities. As such, the Group regularly contracts work to the APF workshops in the Calais region, which specialise in mechanical welding, carpentry, packaging and tertiary services. The value of the services requested from the charity has continued to increase, from €14,742 in 2013 to ...









CGénial: teachers discover the abundance of different iob opportunities at Eurotunnel.



CIFFCO's performance in the Hackathon.



25 Group employees play extras in the third and final season of The Tunnel.



The Audi A8 makes a special appearance in the service tunnel.







Overcoming language barriers and learning to work together were two of the Sailing Voyage project objectives for 60 British and French pupils aged 13 or 14.

..

€112,892 in 2017, an increase of nearly 700%. In 2017, the partnership provided full-time work for more than four people at APF Calais.

SOLIDARITY

The Sailing Voyage project

60 pupils from Shepway and Boulogne-sur-Mer took part in the 3rd edition of the Sailing Voyage project, during which they learned to live and work together, thanks to logistical assistance from the Group which supports cross-border educational initiatives. All of them took part in physical challenges and 26 of the more adventurous pupils crossed the Channel from Folkestone to Boulogne-sur-Mer on sailing boats.

Charities

The French Works Council for the Concession regularly provides support to community initiatives actively supported by employees. This year, two local charities benefited from their display of generosity: the SPA animal welfare charity in Boulogne-sur-Mer and the *Cœur de Femme* association.

Wind turbines for solidarity

Getlink once again demonstrated its support for the French Secours populaire charity by giving it 10% of the revenue generated by the three wind turbines on the Coquelles site. For the last 7 years, this donation has helped the charity to distribute energy vouchers to vulnerable families in the Hauts-de-France region.

ETHICS AND BEST PRACTICE

The ambition to be exemplary

The Group, and in particular the Ethics and Governance Committee of the Board of Directors, is actively developing a climate of trust and fair relations with all its stakeholders via the implementation of a code of ethics, an anti-corruption policy and responsible purchasing:

- In accordance with the United Nations Global Compact, the Charter of Ethics and Behaviour defines common rules in terms of respect for the individual, fair competition, of internal control and environmental protection.
- The Charter for Responsible Supplier Relations describes ten commitments for responsible purchasing, to ensure proper two-way relationships with suppliers in compliance with the respective rights and obligations.
- The anti-corruption policy aims to bolster the dissemination of the rules of conduct supporting Group integrity and ethics.



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6.1 OVERVIEW OF GETLINK'S APPROACH TO CSR

6.1.1 ORIGIN OF GETLINK'S COMMITMENT AND APPROACH TO CSR

Group's history and commitments

From the very beginning, as an innovative rail company and responsible infrastructure manager Getlink has adopted a social responsibility policy that seeks to reconcile financial performance, social equity and environmental protection all within a framework of continuous improvement.

Social responsibility is at the heart of Getlink's operations and its interactions with its various internal and external stakeholders, thereby clearly demonstrating its commitment to its partners, such as its employees, customers, suppliers, shareholders and investors as well as regional government bodies, local authorities, associations and communities.

Overview of the CSR policy

The Group has set up a formal CSR policy, supported and sustained at the highest level of the organisation by the Chairman and Chief Executive Officer and the Board. This policy, which entered into force in 2015, dictates the Group's principles, challenges and commitments. The CSR objectives are defined each year and are included in the objectives assigned to the directors and the heads of the various entities of the Group.

True to its principles, for over twenty years the Group has implemented a policy that is both demanding and concrete in three main areas that represent the strategic priorities of its business:

- **People**, i.e. each of the 3,400 Group employees;
- Region, i.e. all communities the Group is connected to everywhere in France, in the UK and in Europe;
- Nature, i.e. the environment and ecosystems with which its growing operations interact.

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 Declaration on Fundamental Principles and Rights at Work of the International Labour Organization, OECD guidelines for multinational companies and the principles of the United Nations Global Compact.

As a signatory of the United Nations Global Compact, the Group communicates annually on its Corporate Social Responsibility (CSR) best practices within a "Communication on Progress" (COP) report. In 2017, this Group report was classified at the highest Global Compact level (GC Advanced), thereby placing Getlink amongst the 84 French companies that reached this classification in 2017 out of more than one thousand signatories in France. The Group supports, adheres to and actively participates in the World Forum for a Responsible Economy and the values it promotes.

Scope

As indicated in section 6.7 (methodological note) of this Registration Document, consolidation of the 2017 data covers all entities of the Group except ElecLink in respect of environmental data.

6.1.2 MATERIALITY AND DIALOGUE WITH STAKEHOLDERS

Group teams listen to their stakeholders in each of their respective areas and primarily to their clients in order to match their expectations and the Group's long-term goals. Constructive dialogue based on trust is clearly established with the various stakeholders. To go even further, the Group seeks to formalise the results of this dialogue at different levels of its organisation. After conducting a materiality analysis in 2015, aimed at identifying its most significant ethical, social or environmental challenges, both internal and external to the company, the Group intends to take stock of the state of its various public CSR communications in 2018 to assess to what extent they meet the recommendations in respect of "integrated reporting".

Methodology

The materiality analysis consisted of identifying and ranking the main CSR challenges, based on its operations and its stakeholders' expectations. This analysis was verified by KPMG in three main steps:

- Step 1 Identification: 57 challenges were identified through an internal and external documentary review of the Group (Group's publications and publications by companies in the same sector, analysis of media coverage, and benchmarks).
- Step 2 Assessment by the stakeholders: 25 internal and external stakeholders were polled by an independent third party based on a questionnaire. The top 25 CSR challenges were identified.
- Step 3 Prioritising challenges: This is represented as a materiality matrix that reflects the importance given by the respondent stakeholders and the impact that each challenge has on the Group's business.

Results

By establishing this ranking, the analysis identified a list of challenges arranged in their order of priority (top priority, very important, important):

CHALLENGES	1	Development of the business activity	Safety and security of sites
	2	Development of the business activity	Efficiency and reliability of equipment and infrastructures
	3	Investing in our employees	Employee safety
	4	Development of the business activity	Safety of travellers and goods
	5	Environmental performance	General policy governing environmental management

The Group assessed all the policies, procedures and means adopted for each of the challenges in order to determine the actions to be conducted to consolidate or step up its performance, as part of a continuous improvement process.

This procedure highlighted the primary values of the Group according to its stakeholders: safety and security, service, employees, environment, innovation.

6.1.3 MAIN DIMENSIONS OF THE CSR POLICY AND 2017 HIGHLIGHTS

The table below illustrates the most material challenges for the Group in each of its three areas of responsibility, as identified by the materiality analysis, and shows the key events for 2017:

,	Ambition	The most material challenges	Key events in 2017
People	As a responsible employer, Getlink is committed to providing a working environment that fosters personal development and fulfilment in order to attract and retain good and qualified staff.	Health and safety (including that of infrastructure and industrial sites) Working conditions Dialogue and labour relations Employment Training	Awareness campaign, "Safety takes to the screen", in the Fixed Link. 12 short video featuring operational safety teams were released in 2017, 6th Europorte Safety Week on the theme "behaviour and human factors". The Success Factors software, already implemented to process data collected during the managers' annual appraisals, was extended in 2017 to all employees of the Fixed Link, in France and the United Kingdom.
Region	As a committed partner in the economic and social environment in which it operates, Getlink is actively engaged in establishing its regional foothold and has created several thousand direct, indirect and related jobs in Kent and the Calais area since its establishment. The Group also demonstrates its corporate social responsibility in its concrete commitments and solidarity with the community, in partnership with the local authorities and associations.	Traveller safety Customer satisfaction and loyalty- building Promotion of rail transportation Regional development	A partnership agreement was signed with the CGénial Foundation in June 2017. This partnership establishes lasting links with the educational community, raises awareness of the wealth of the Group's know-how and can contribute to the creation of railway vocations among young people in the region.
Nature	As part of its commitment to low-carbon transport, the Group undertakes to reduce the impacts of its own operations on the environment, to raise awareness among its staff about civic environmentalism practices, to opt for innovative and environmentally-friendly products, and to strengthen actions that promote the protection of diversity.	Climate change and energy policy Circular economy Protection of biodiversity	13th successive Green Flag. In 2017, Getlink obtained the renewal of the Fixed Link's Carbon Trust Standard certification for its policy and results in reducing its carbon footprint over the 2015-2016 period.

6.1.4 POLICY STEERING AND ORGANISATION

Governance - Board

The Strategy and Sustainable Development Committee of the Board examines the environmental objectives of the company or the Group and reports its findings to the Board. The Committee is responsible for regularly examining the performance of GET SE and the Group in environmental matters and the strategic initiatives designed to promote environmental management, preserve natural resources and limit the impact of GET SE's and the Group's activities on the environment.

The work undertaken by the Committee is described in chapter 4 of this Registration Document. The Committee oversees the establishment of the Group's CSR policy and sets environmental priorities, structured around the themes included in the global CSR policy. In view of the ethical importance of CSR, the Strategy and Sustainable Development Committee has been merged with the Ethical and Governance Committee to form a single committee namely the Corporate Committee.

Remuneration

For 2017, the Remuneration Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is structured around four areas that are directly linked to the Group's activities: safety / security, labour relations, greenhouse gas emissions and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate an achievement rate with respect to the composite index, according to the objectives set for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the free shares plans subject to performance conditions. The composite index was audited in 2017, as part of the audit of social information by the statutory auditors.

6.1.5 REPORTING METHODS AND DATA CERTIFICATION

The Group's social and environmental reporting is based on the labour and environmental information stipulated in article 225 of French law 2010-788 of 12 July 2010, known as "Grenelle 2", and on the transparency principles of the Global Reporting Initiative (GRI). Following the materiality analysis that was carried out, the challenges deemed as the most material by the internal and external stakeholders were also identified as such by the Group.

6.1.6 INDICES AND AWARDS

Indices

In 2017, Getlink was included in the following sustainable development indices:

- The Deutsche Boerse STOXX Global ESG Leaders family of indices, in particular EURO STOXX Sustainability and Stoxx Europe Sustainability;
- The Gaia Index, the ISR index for midcaps developed by IDMidCaps and EthiFinance for the sixth year running;
- The Euronext Low Carbon 100 Europe[®] index: in December 2015, the Group entered the new version of the Low Carbon 100 Europe[®] index that measures the performance of the 100 largest European companies with the lowest CO₂ emission levels in their respective business sectors. The selection is based on an in-depth and accurate assessment of the carbon footprint of each company and is overseen by a scientific committee composed of experts, NGOs, public partners and financial sectors;
- The FTSE4Good index, included following the update in September 2014: the FTSE4Good index measures the
 performance of companies whose commitment to the environmental, social and corporate social responsibility (CSR)
 fields is significant.

In this respect, Groupe Eurotunnel SE is regularly monitored by several non-financial rating agencies.

Awards

In 2017, the Group won the following awards:

- Silver trophy in the Dynamic Governance category at the 14th Grand Prix du Gouvernance d'Entrerprise (annual corporate governance awards) organised by AGEFI, a French economic and financial trade journal.
- Green Flag Award: for the 13th year running, the Group received the green flag in recognition of its accomplishments in safeguarding the environment at Samphire Hoe, a natural reserve in England that is home to many rare species of fauna and flora. The Group in collaboration with White Cliffs Countryside Partnership jointly manages Samphire Hoe which welcomes over 80,000 visitors each year.
- Gold level award granted to the Europorte subsidiary Socorail by Eco Vadis. This is awarded to the top 5% of companies noted for their commitment to CSR.

6.2 PEOPLE

Overview of the Group policy

As a responsible employer, the Group seeks to promote the personal development and fulfilment of its employees, which it considers a key factor in its corporate strategy. Its human resources policies have been developed in order to foster equal opportunities and treatment for all Group employees throughout their career.

These human resources policies recognise each employee's contribution, taking account of the employee's qualifications, level of responsibility and individual performance.

The Group staff members who work for the Fixed Link in the United Kingdom are employees of ESL and in France, Germany, the Netherlands and Spain they are employees of ESGIE. Employees involved in rail freight transport and port infrastructure management activities are employed by the entities of the Europorte segment. ElecLink has recruited the necessary team for the interconnector project between France and the UK.

Staff may also be seconded to other Group companies. The company who acts as employer bills the other Group companies for their respective staff costs. The Group's senior managers are mostly employed by GET SE.

The most material challenges

The Group's commitment is focused on the challenges that have been deemed the most material in the materiality analysis:

 Safety of employees, travellers, goods and sites, as well as the efficiency and reliability of the equipment and infrastructures;

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- Well-being at work and work-life balance;
- Implementation of efficient forms of dialogue with employees;
- Working conditions;
- Employment and development of appeal.

6.2.1 HEALTH AND SAFETY

Group policy and challenges

Site safety and security, safety of employees, travellers and goods, as well as the efficiency and reliability of equipment and infrastructures were identified by the Group's stakeholders during the materiality analysis as being the priority challenges for the Group. Several mechanisms and procedures, which are reinforced on a regular basis, are used within the Group and its entities to ensure and reinforce work safety and security:

- The Group defines security as protection against external risks, resulting more specifically from deliberate, malicious acts;
- Safety involves the protection against risks arising from faults, damage, errors and hazards, of a physical, emotional or psychological nature, etc.

For the Group, health is a comprehensive state of physical, mental and social well-being that is promoted in the company by monitoring employees, listening to them and conducting preventive actions with the department of occupational health (monitoring of aptitudes, interviews with medical staff, psychological help, vaccination campaigns, improvement of working conditions, recognising hardship, etc.).

Performance in matters of safety is monitored regularly as part of the continuous improvement process with appropriate corrective actions taken as needed. The Group has adopted policies and procedures to ensure the health, safety and well-being of its staff (SAFD – health and safety and OENV – operating environment).

Security was at the heart of the Fixed Link design. The transport system has a level of safety recognised as good, reinforced by feedback received since the beginning of operations. The health and safety measures put in place by the Group ensure that employees are guaranteed work conditions in accordance with the legislation in force in each of its locations and the human resources policies of each subsidiary.

In order to test response plans for the emergency services and good coordination in the event of an accident in the Tunnel, the Group and the public authorities organise an annual major full-scale safety exercise: the Binat (as in binational). Held in January 2018, the latest Binat was the 28th since the construction of the Tunnel and the 21st since the opening of commercial services in 1994. France was the pilot State this year for the purposes of the exercise.

The Group places great importance on reinforcing appropriate behaviour and so has established a set of procedures to ensure that the infrastructure and equipment are used efficiently. Effective management of these risk areas provides the foundation for overall safety performance.

Like safety, health has always been a major concern for the Group. Its policy in this area is based on transparency, discipline and discussion at all levels in the company. It is communicated to everyone and reviewed regularly.

In France, a charter on the handling of work-related psychosocial risks has been in force since April 2009 for ESGIE employees. This establishes the procedure adopted by the company to deal with cases of problems at work. In keeping with this charter, a commission was set up to anticipate and address work-related psychosocial risks and a psychological unit was created in July 2015 with the members of the CHSCT (the health, hygiene, security and working conditions committee). The commission meets quarterly with an associated plan of action. In July 2015, ESGIE also signed a company agreement on the gift of rest days to parents of seriously ill children, which agreement was extended to cover spouses and co-workers who are seriously ill, isolated and vulnerable.

Actions and means implemented

Organisation

Within the Board, the Safety and Security Committee ensures that mechanisms and procedures designed to ensure the safety of customers, employees, subcontractors and all stakeholders are implemented. The actions and responsibilities of this Committee are described in section 4.2.5 of this Registration Document. Additionally, each segment of the Group has its own safety and sustainable development department whose main task is to define the company's safety objectives and to guarantee the implementation and application of all the safety rules. It is also responsible for measuring performance within the various departments, with the objective of maintaining a safe and healthy work environment. Safety performance is regularly monitored by each of the entities as part of a programme for continuous improvement and any corrective actions are taken as necessary.

The main security expenditure (to ensure System security) in 2017 totalled a net amount of approximately €19 million (€19 million in 2016 and €29 million in 2015) for the Fixed Link.

Safety of facilities

The safety management system of Europorte's French entities licensed as rail companies is governed by the legislation of the different countries in which they operate.

The operating system for the Shuttle was designed under the supervision of the Intergovernmental Commission (IGC) and the Safety Authority. Each phase of the initial design was examined by the IGC and formally acknowledged by way of a no-objection statement.

The IGC and the Safety Authority, which were created under the Treaty of Canterbury and the Concession agreement, are charged with supervising the construction and operation of the System on behalf of the United Kingdom and France. In addition, audits and inspections are carried out by representatives of the French and British Safety Committee delegations.

Safety features and procedures are updated regularly and are part of the Safety Management System, which ensures the validity of the operating certificate issued by IGC, in accordance with laws and regulations resulting from the enactment of the European Union's Railway Safety Directive 2004/49/EC of 29 April 2004.

More generally, the System has detailed safety, security and policing features meeting the requirements of the United Kingdom and French authorities. These measures have been reinforced in the geopolitical context of the past two years, as indicated in chapter 3 of this Registration Document.

Safety and security measures for High-Speed Passenger Trains and for Train Operators Rail Freight Services have been developed by the operators after discussion with, and with the approval of, the United Kingdom and France. The Train Operators work with the Group as the infrastructure manager to implement and continuously improve these safety measures. Automated passport control incorporating facial recognition technology is operational for the Eurostar departing from the Gare du Nord in Paris¹⁴. Identical systems have been used at St Pancras station in London since June 2016. These systems check the traveller's identity using facial recognition. After London and Paris, Eurostar plans to install the same systems at the Brussels Midi station.

In the course of 2016, the IGC transferred its economic regulation authority to two regulators in France and the United Kingdom (ARAFER and ORR). Checks and terms of operation of the Railway Companies are now overseen by ARAFER and ORR.

Safety, the highest priority for the Fixed Link

The Channel Tunnel has a team of 48 rescue mission specialists who patrol the service tunnel round the clock. Since 2011, four SAFE stations are operational in the intervals in the centre of the Tunnel so that in the event of a fire on a Truck Shuttle, the 800 metre-long train can rapidly reach one of these stations. The Channel Tunnel is the only infrastructure of its type in the world equipped with a system of this kind.

Site safety

Intrusion attempts at the Coquelles site (Hauts-de-France) decreased in 2017 compared to 2016 and 2015, thanks in particular to the setting up by the Group of an important programme with the support of the French and British states, responsible for border control. This multi-year action plan is described in section 1.6.2 of this Registration Document.

Health and safety in the workplace

All safety events are recorded and analysed in order to issue recommendations and produce action plans. Additionally, various safety indicators are monitored continuously and systematically, notably by the Safety and Security Committee at Board level, in order to ensure improved overall performance. This is particularly true for the indicators concerning the safety of employees and subcontractors and the transportation system.

Prominence is also given to feedback that is implemented routinely in the Group's subsidiaries after an exercise or following a significant event. This feedback allows the integration of lessons learned and contributes to the effective development of organisational methods, with a view to making them more efficient.

The Group takes special care to ensure that its safety and security rules and procedures are enforced by its subcontractors who are required to sign a contractual agreement on compliance with labour laws and regulations. While on a Group subsidiary site, subcontractors are required to adhere to the same rules as the Group's employees. They also have to undergo safety training before they are authorised to enter a Group site or the site of one of the Group's customers. Moreover, subcontractors are submitted to audits and to on-site monitoring. Socorail sends accreditation questionnaires and annual evaluations to its subcontractors, as well as the policy and objectives of the organisation in relation to the health and safety of subcontractors. If there is a safety breach, corrective actions are put in place; these can be accompanied by warnings, penalties, suspensions of operations or by exclusion. Despite these efforts and vigilance, the risk of an accident cannot be totally avoided, as stated in section 3.1.2 of this Registration Document.

Each subsidiary deploys procedures and action programmes to limit and prevent the major risks inherent to the activities of its employees and to improve their quality of life in the workplace.

A committee dedicated to improving working conditions

In France, committees on hygiene, safety and working conditions (CHSCT) are set up and tasked with ensuring the protection of the health and safety of employees, and the improvement of their working conditions. This committee, that is comprised notably of staff representatives, analyses occupational risk and ensures – through means including surveys and inspections – compliance with the regulations in place. It is consulted prior to any major modification to working conditions.

In the United Kingdom, the occupational health service plays a key role in preventing occupational illnesses through the education and the promotion of health issues, and through the suitable control measures that are set up to improve working conditions. Composed of representatives of employees and company managers, the committee aims to promote safety at work and improve working conditions.

From a medical standpoint, employees have regular medical check-ups with occupational healthcare professionals and can request a medical examination independently of these check-ups. For ESGIE in France and ESL in the United Kingdom, the Group has an occupational healthcare service staffed by an occupational health doctor and two nurses to take care of employees' health.

¹⁴ Source: Eurostar press release, 15 February 2017.





In 2017, Getlink also continued its actions promoting health and safety by conducting awareness-raising and training sessions for its employees:

- Europorte organised its 6th Safety Week, on the theme of "Behaviour and human factors". In 2017, Europorte's CODIR carried out more than 60 site visits throughout France, during which fruitful discussions took place on staff safety, incidents linked to a lack of compliance with procedures and to significant incidents.
- An awareness-raising campaign, entitled "Safety takes to the screen", was launched by the general management of the Fixed Link in 2016 and continued in 2017. Based on short-format videos broadcast on the corporate intranet, this campaign aims to achieve greater awareness of safety issues and to promote and share best practices. The Fixed Link organised several other events in 2017:
 - the mobilisation of managers with a very strong presence on the ground (up 75%);
 - exchanges between suppliers and staff to share safety knowhow;
 - automated monthly safety reporting implemented;
 - a mobile app to collect safety incidents.

Results of the year

Lost time work-related accidents		2017		2016
Frequency rate ¹	✓	7.4	✓	8.6
Severity rate ²	✓	0.6	✓	0.6

The frequency rate for lost time work-related accidents corresponds to the number of lost time accidents which occurred during the year for the Group's workforce and temporary workers multiplied by 1,000,000 and divided by the number of hours actually worked and paid.

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In 2017, the Group recorded a decrease in the frequency of work-related accidents to 7.4 (compared with 8.6 in 2016 and 11.0 in 2015).

Also, in France, 17 applications requesting the recognition of occupational disease were recorded (16 files for ESGIE and one for Socorail), during 2017. Most of the requests concerned musculo-skeletal problems.

The Group had no fatal employee accidents in 2017.

6.2.2 WORKING CONDITIONS

Group policy and challenges

In accordance with its Global Compact commitments, Groupe Eurotunnel SE is committed to preventing any forms of modern slavery, human trafficking or child labour within its business and supply chain. Its policies and procedures reflect its aim to act ethically and with integrity in all its business relationships.

As regards work time organisation, the Group policy is based on the compromise sought between two major priorities: the determination to satisfy and best serve the company's customers, and the need to maintain a balance between its employees' work and family lives.

The Group's policy is driven by a flexible and responsive approach that enables the company – in particular the Fixed Link – to operate 24/7, 365 days of the year under the Concession agreement.

Actions and means implemented

Getlink ensures that all its subsidiaries comply with 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 trade union Unite and the staff representative bodies.

In France, employees' working hours (with the exception of certain senior managers and directors) 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.

Results for the year

Working hours

Breakdown of workforce	2017	2016
Staggered hours	67.1%	67.2%
Office hours	32.9%	32.8%
Part-time	6.2%	5.8%
Full-time	93.8%	94.2%

Overtime

No Group entity makes routine use of overtime. Overtime hours worked are usually in response to unplanned events affecting a transport business and the organisation of its operations.

The severity rate of work-related accidents resulting in time off is the number of calendar days taken off by the workforce concerned during the year resulting from work-related accidents, multiplied by 1,000 and divided by the number of hours actually worked and paid for the whole workforce.
All information identified by the symbol \(\sqrt{} \) was verified with a reasonable level of accuracy by an independent third party.

Indicator: number of overtime hours

	2	2017		2016
Number of overtime hours	117	,180		117,190
Absenteeism				
	2	2017		2016
Absenteeism rate	4	1.5%	√	4.5%

The absenteeism rate of 4.5% in 2017 is comparable to 2016. The main cause of absenteeism is sickness other than occupational disease.

However, efforts are being made by the Group's subsidiaries to reduce absenteeism. A follow-up of sick leave is carried out by the Human Resources Department, which has established processes including return to work interviews. Action plans are also developed to draw the attention of staff to the consequences of absenteeism in terms of the disruption to services.

6.2.3 DIALOGUE AND LABOUR RELATIONS

Group policy and challenges

The implementation of efficient forms of dialogue with employees was identified as a highly important challenge in the materiality analysis. Labour relations are very important for the Group, particularly negotiations with staff representative bodies. The Group has always strived to establish long-term and constructive relations with all its employees.

Actions and means implemented

Getlink has created the following bodies for dialogue with its employees:

	Tasks and working	Actions in 2017
Works Councils Health, hygiene and safety	In France, all subsidiaries have a Works Council and a Health and Safety Committee, which meet according to the specific terms of reference governing each committee. In the United Kingdom, the Company Council and the Safety, Health and Environment Committee are the 2 organisations for ESL employees with which permanent dialogue has been established. These 2 committees meet once every 2 months.	9 meetings were held during 2017 between ESGIE management and HSC and 11 with Works Council members. The Company Council met 6 times in 2017, and the Safety, Health and Environment Committee met 6 times during the same year. 6 meetings were held in 2017 between the ESL management and the trade union Unite.
European Works Council for the Fixed Link	The Fixed Link's European Works Council, a truly transnational body, is a venue for information, consultation, exchange of views and dialogue. The European Works Council supplements the existing national staff representative bodies, with its own prerogatives. The Fixed Link's European Works Council normally meets twice a year. It is informed about and, where appropriate, consulted on transnational issues having an impact on the Fixed Link's employees. The Group's European Works Council is composed of 16 incumbents. It is informed about the economic, financial and employee-related strategies of the Group.	No meetings in 2017.
Getlink Group Committee	The committee was set up on 31 January 2014 following a unanimous agreement between the Group's management and 4 unions. It is intended to operate as a forum for mutual information, to exchange views and to maintain dialogue between staff representatives and management on strategic guidelines and major employee-related issues. To this end, it is informed annually of the developments that have taken place and the future outlook. The Group Committee comprises 6 incumbent staff representatives and 6 alternate staff representatives appointed by the labour unions. It is supplemented by a union representative for each labour union. It meets twice a year in a plenary session, when convened by the Chairman or the Chairman's representative.	The Committee met twice in 2017 in the presence of the Group Chairman and CEO, the Deputy CEO (for the second meeting) and the Group Head of Human Resources.

Actions in 2017

	Tasks and working	Actions in 2017
European Company Committee	The staff representatives on the European Company Committee are employees of Group Eurotunnel SE's subsidiaries who are elected or appointed according to the rules applicable in the country that employs them, for a four-year period, as from 1 January 2015. The committee is composed of 12 incumbent staff representatives and 12 alternate staff representatives who are elected or appointed according to the rules applicable in the country that employs them, and is supplemented by a union representative for each participating labour union that appointed members to the European Company Committee. The committee is informed formally prior to any significant decision relating to the European company's scope, legal or financial structures, and the consequences, if any, on employment. The committee meets twice a year in an ordinary plenary session. Extraordinary meetings may be held in the event of exceptional circumstances that are likely to affect the employees' interests.	The Committee met twice in the presence of the Group Chairman and CEO (for the second meeting), the Deputy CEO, the Chief Operating Officer (for the first meeting) and the Group Head of Human Resources, who outlined the Group's operations, financial results and key events.
Committee for occupational health and well-being	The committee was set up in 2015 following the conclusions of a study performed by an outside firm to assess the workplace health and well-being of ESGIE employees. In addition to the CHSCT, this committee is in charge of considering actions aimed at improving working conditions and well-being at work, as an observer.	The Committee met 5 times in 2017.

Tacke and working

Dialogue and internal communication

The Group regularly holds meetings with staff representatives and directors which demonstrates the Group's determination to reinforce internal communication and social dialogue.

In addition, internal communications are mainly intended to nurture and strengthen the commitment and involvement of all employees. The Group uses different tools to communicate with and inform these employees (magazine, intranet, project-specific communications, etc.). The circulation of information relating to the Group strategy, objectives and results as well as the promotion of achievements and/or innovative initiatives are examples of actions taken to keep the employees of the Group informed in real time.

In February 2016, Europorte decided to carry out a survey called "Europorte And You", which it entrusted to an independent company. The approach enabled the identification of areas for improvement in modes of communication, relations within the company and life in the workplace. Three areas of progress were identified, in respect of which action was taken in 2017: supporting mobility, sharing company strategy and promoting communication between services.

Results of the year

No labour disputes or strikes disrupted operations in 2017.

Summary of collective bargaining agreements

During the 2017 financial year, 12 company-level agreements and/or amendments were signed by the Group's subsidiaries on topics such as the right to disconnect, end of career planning and wage negotiations. In France, employees of ESGIE are represented by four trade unions and covered by a collective bargaining agreement as part of a company-level agreement. The employees of Europorte subsidiaries are also represented by four unions and come under two collective bargaining agreements.

The employees of ESGIE come under the collective bargaining agreements mainly relating to the 35-hour work week, night work, strategic workforce planning, profit-sharing, and professional equality and efficiency gains. Specifically, in 2017, ESGIE signed four agreements and riders on the right to disconnect, end of career planning, a health scheme and fees, as well as the mandatory annual pay negotiations. The Europorte subsidiaries entered into eight agreements and/or amendments in 2017, covering procedures to organise working time, wage negotiations and the time savings account. ESL entered into no agreements in 2017.

In the United Kingdom, due to the voluntary agreement on single union representation signed in 2000 by ESL with the union Unite, all employees of ESL (with the exception of supervisory staff) are represented by Unite during collective negotiations. Employees may nevertheless belong to the union of their choice for their individual representation.

Company welfare facilities

In 2017, in France ESGIE paid 0.8% of its gross total wage bill as restated to the Works Council, amounting to €621,048 for the development and management of its company welfare facilities (compared to €580,702 in 2016). ESGIE also contributed 0.2% of its total gross wage bill, i.e. €155,262, towards the operation of the Works Council (€145,175 in 2016).

In the 2017 financial year, Socorail contributed 0.50% of its gross total wage bill to its Works Council for developing and managing company welfare facilities, of which 0.20% was for its operation (compared to 0.56% and 0.20% in 2016). In respect of Europorte France, the figures were 0.42% and 0.20%.

In the United Kingdom, the Company Council, which receives contributions from ESL equal to 0.8% of its gross total wage bill as restated, received £255,962 in 2017 for developing and managing company welfare activities (compared to £243,916 in 2016). ESL also contributed 0.2% of its gross total wage bill, i.e. £63,990, towards the operation of the Company Council (compared to £60,979 in 2016).

6.2.4 EMPLOYMENT

Group policy and challenges

Getlink pays particular attention to the recruitment and employment of its employees and their remuneration in order to closely match workforce numbers and skills to its actual business needs.

Age pyramid

The Group is continuing its forward management of the age pyramid. For several years it has pursued a recruitment policy aimed at lowering the age of the workforce at the same time as facilitating the transfer of skills. It is also committed to promoting the maintenance of employees aged 55 and over in active employment, and to improve the working conditions of older employees.

Recruitment

The recruitment policy aims to equip the Group with the best skills in order to support its development. True to its values, the Group's recruitment process places great importance on applicants' cultural openness, their ability to work as part of a team, and their entrepreneurial spirit.

Remuneration

The Group remuneration policy is based on equitable and transparent remuneration, which ensures full cohesion between individual and company objectives. Getlink's strategy consists of sharing its success with its employees and making them a partner in its growth.

Recognition of individual performance is a major element in the Group's remuneration policy, and is intended to motivate all Group's employees, with a view to rewarding and retaining the most talented. The differences in remuneration between employees can be justified and reflect the responsibilities shouldered, the work experience and the potential of each person.

Career management

The Group is committed to the improvement of its employees' performance, and considers the individual annual performance review as an indispensable management tool for human resources management. It therefore fixes the target number of interviews at 100% for all the managers of the company.

Since 2015, the Group has used a new computer application called Success Factors that centralises the information gathered from annual performance reviews of the Group's managerial staff. This tool measures the needs of the different entities in the short, medium and long term and enables an assessment of the individual and collective potential of human capital and their deployment, as well, when necessary, the anticipation of the succession process for key jobs. Put in place to assimilate annual appraisal interview data for managerial staff, Success Factors was extended in 2017 so that it covers all Fixed Link staff both in France and the United Kingdom and not just managerial staff.

Employee share ownership and profit-sharing

The Group has put in place a number of mechanisms related to statutory and non-statutory profit-sharing, stock options and free shares, which are all systems intended to involve each of the employees in the Group's financial performance.

Temporary employment and subcontracting

The Group employs temporary staff, mainly to replace employees who are absent due to sickness or on leave, or to handle exceptional traffic peaks. It also relies on subcontractors to manage activities outside its core businesses or those requiring specific skills.

Actions and means implemented

The Group has taken various measures to cope with the risk of mismatch between the development of its activities and the human resources necessary to implement its strategy.

Recruitment

The Group tends to favour permanent work contracts, keen to demonstrate its commitment to its employees over the long term and guarantee them lasting employment.

Since 2014, Getlink has been working with Réseau Alliances to promote an employment support programme for new graduates.

Remuneration

Under a bonus system, half based on safety and service quality indicators and half on cash flow performance, all Concession employees are entitled to receive a bonus of up to 6% of annual basic salary.

For four years, the Group's employees have received a Total Benefits Statement detailing their overall remuneration and all the benefits they receive (and two years ago it began to be sent in dematerialised form).

Employee share ownership and profit-sharing

The Group pursues an active policy of encouraging employee shareholders so that they can share in the company's success. Thus, the Board has awarded shares to all employees of GET SE and its related companies or groups (excluding executives



and corporate officers of GET SE), as indicated in note E.5 to the consolidated financial statements included in section 2.2.1 of this Registration Document.

In addition, all employees of GET SE's French subsidiaries have the possibility to invest in ordinary shares in a Group savings plan via a "Eurotunnel shareholding" Plan Commun de Placement d'Entreprise – PCPE (corporate shareholding plan). The sums invested in this fund receive a matching contribution within the legal caps in force. At 31 December 2017, 1,755,375 ordinary shares were held under this plan, representing 0.32% of outstanding share capital.

The Group's employees also receive statutory and non-statutory profit-sharing bonuses. Thus, in France, amendments to the profit-sharing agreements were put in place within Socorail for the period from 2015 to 2017 and an agreement was put in place for the period from 2017 to 2019 for Europorte SAS. For 2017, ESGIE staff received a profit-sharing bonus of €2.010.

Although the French statutory profit-sharing scheme is not transposable to the United Kingdom, employees of ESL nevertheless benefit from a collective bonus scheme that resulted in the payment of £923 per ESL employee in 2017 (£1,035 in 2016). During the 2017 wage negotiations, a supplementary bonus of £600 per employee was agreed by way of adjustment to the 2016 bonus.

Work-study

Each year, the different entities of the Group offer training opportunities in the form of a work-study programme. Such agreements have been signed with various secondary schools and universities in the Hauts-de-France region and in the Paris region.

In this area, Europorte has initiated a collaboration with E2C Grand Lille (second chance school in Lille) to guide unskilled and unemployed young adults aged 18 to 25 into first-time employment and social inclusion, by providing them with professionalisation contracts, work-study training or internships.

In 2017, two recruitment sessions for professionalisation contracts were organised between CIFFCO, the French "Pôle Emploi" and the Group.

The various subsidiaries of the Group also take on trainees, apprentices and young people under professionalisation contracts. In France, 281 trainees, apprentices and young people under professionalisation contracts joined the Group in 2017. In addition, the Concession welcomed young graduates as part of the International Business Volunteering scheme that allows French companies to give a young person (up to 28 years old) a professional post abroad.

Number of employees	2017		2016
Student apprentices	82		87
Professional training contracts	105		85
Trainees	94		104
Total ✓	281	✓	276

As a part of its commitment and active involvement to promote the employability of young people, in 2017 the Group participated in several forums dedicated to recruitment to introduce its line of business and propose jobs or internships (the "Jeunes d'Avenirs" fair, the "Job d'Avenirs" forum, the seventh edition of Cross-border job fair at Fréthun, and the salon "Permis Sport Emplois" organised by FACE in the Calais area).

Diversity and equal opportunity

The Group has openly taken a stance in fighting discrimination, by its Charter of Ethics and Behaviour and through fair human resources policies for recruitment, remuneration and training. Moreover, the Group is a signatory of the United Nations Global Compact, and fully adheres to its ten fundamental principles, notably those relating to Human Rights and Rights at Work. The Group's human resources policies are also geared towards combating discrimination, and are designed to guarantee equal treatment and opportunities for all employees at every stage of their career. The Group never bases its decisions on criteria linked to gender, nationality, religion, ethnic origin, political opinions or union activities. The only valid decision-making criteria for the Group are each employee's professional qualities, qualifications and skills.

Professional equality between men and women is a particularly important lever in the Group's diversity policy. Its adherence to the principles of gender equality is reflected in the application of an equal opportunities policy in recruitment, access to training, remuneration and promotion. The human resources policies of every Group entity are based on the inviolable principle of gender equality, and the Charter of Ethics and Behaviour addressed to all Group employees describes the principles that must govern the behaviour of every employee in relation to respect for people, of which the principle of non-discrimination is one of the most important.

Disability is another important aspect of the Group's diversity policy, which supports the first-time employment, professional training and continued employment of disabled people.

Under its human resources policy, the Group conducts various actions and develops partnerships with economic stakeholders, the business sector and local players to foster employment. Since 2015, the Group has participated in a partnership with the "Capital Filles" association that organises mentoring of young girls in technical secondary schools by female professionals to promote accessibility by women to traditionally male dominated job sectors. In 2017, 6 sponsorships of this kind were established at the Calais secondary school, Lycée Léonard de Vinci.

An agreement on professional equality to do away with wage gaps between men and women was signed in June 2009 by ESGIE with the trade unions for an indefinite period.

In the United Kingdom, the Rate for the Job remuneration system and the HAY method (that notably measures the extent of the responsibilities entrusted and the difficulty inherent to them) ensures fair remuneration for ESL employees.

Together with its actions to promote the continued employment of disabled people, the Group works hand in hand with the sheltered and supported sectors by using employment agencies for disabled workers and/or supported job centres. An ongoing agreement was concluded in 2010 for the benefit of disabled workers with AFAPEI (a French association for parents and friends of children with developmental needs) and ESGIE. On 23 July 2013, a partnership framework agreement was signed between the Group and APF (the French association for people suffering from paralysis) in which the Group undertook to approach APF for any service falling within its areas of competence. ESGIE approached APF several times in connection with this partnership, for various services. Through this collaboration, four persons have been provided with permanent, full-time employment.

As in 2016, the Group conducted several awareness-raising actions in 2017 within the Group on disability with the specialised company "Made in TH", by appointing a dedicated ambassador, setting up a monthly consultation session on site, conducting interviews and setting up support measures. In addition, a training program was set up within the framework of a partnership between the Group and a temporary employment agency specialising in helping disabled people. At the same time, another action was carried out with the Direccte of the Hauts-de-France, which allowed the placement of a handicapped worker for a one-year service contract. Europorte signed a contract for the cleaning of work clothes with an ESAT organisation helping people back to work in the North-West region. This option will be considered when renewing contracts in other regions.

Results of the year

During the year, the Group experienced an increase of close to 2% in its workforce compared to 2016. This trend is mainly concentrated in the Fixed Link with an increase of close to 4%.

Workforce and geographical distribution

Number of employees	31 December 2017		31 December 2016
France	2,452		2,435
United Kingdom	948		901
Total	3,400	✓	3,336

At 31 December 2017, the Group employed 3,400 persons. 72.1% of the workforce is employed in France and 27.9% in the United Kingdom (2016: 73% and 27% respectively).

Breakdown of workforce by gender

Number of employees	31 December 2017		31 December 2016
Men	2,587	✓	2,556
Women	813	✓	780

At 31 December 2017, women made up 23.9% of the total workforce (23.4% in 2016 and 22.7% in 2015). This breakdown reflects the specific requirements of jobs within the Group, especially those related to railway maintenance.

Gender equality

At 31 December 2017, there were 813 women in the Group's workforce, including 185 women in the managerial population. This represents a female manager rate of 22.76% (22.37% in 2016).

Breakdown of workforce by age group

Number of employees	Dece	31 mber 2017	31 December 2016
Under 25 years		125	134
25 - 29 years		338	325
30 - 34 years		368	323
35 - 39 years		298	308
40 - 44 years		422	463
45 - 49 years		748	751
50 - 54 years		533	498
55 - 59 years		365	346
60 - 64 years		169	161
65 years and over		34	27

At the end of the 2017 financial year, more than 24% of the Group's workforce are under 35 years of age and around 46% are under 45 years of age. The number of employees aged 55 and over is slightly higher than in the previous year: they represent almost 17% of the workforce, compared to 16% in 2016. There are 203 employees over 59 years of age representing 6% of the workforce (compared with 188 in 2016, i.e. 5.6%).

The average age of the workforce in 2017 is √44 years (2016: 46 years, 2015: 45 years).

As indicated in section 6.2.4 of this Registration Document, the Group is continuing its work on the age pyramid.

Breakdown of workforce by category

At 31 December 2017, the proportion of managerial staff in the Group's workforce was \checkmark 23.9% of which 22.7% were women.

Recruitment

Number of employees	2017	2016
Permanent employment	256	223
Fixed-term employment	40	46
Total	296	269

At 31 December 2017, more than 86% of all persons recruited were hired under permanent work contracts. The rate of temporary employment (fixed-term contracts/temporary work contract) was 6.7% in 2017 compared to 6.4% in 2016.

Departures

Number of employees	2017	2016
Dismissal	44	38
Layoff	6	18
Contractual termination and termination by mutual consent	19	27
Resignation	53	66
Retirement	35	34
End of contract	36	64
Transfer within the Group	14	16
Transfer outside the Group	11	25
Unsuccessful trial period	12	14
Death	3	6
Total	233	308

In a context of low staff turnover (as shown below), the balance between hirings (296) and departures (233) is positive. Resignations (23% in 2017, 21% in 2016, 22% in 2015) constitute the main reason for employees leaving in 2016 and 2017.

Staff turnover

In 2017, the average turnover rate for the Group's workforce was 5.8%. After an increase in 2016 (7.1%) due to more departures, particularly in Europorte, this rate is in line with the historical trend (5.4% in 2015, 5.2% in 2014, 5.0% in 2013 and 5.4% in 2012).

Remuneration

In France, all employees received a collective increase in basic salary and of all allowance payments linked to working conditions from 1 January 2018, representing 1.3% for ESGIE staff, 1% for Socorail staff, 1% for EPP staff, 1.2% for EPF staff and 0.3% for Europorte SAS staff.

In the United Kingdom, a 2.4% collective increase to pay and allowance payments linked to working conditions was negotiated by the management and the trade union Unite for ESL from 1 April 2017.

For 2017, the results of the Fixed Link (ESGIE and ESL) translated into an operating bonus of 1.38% and a financial bonus of 0.72%, representing a general bonus of 2.10%. A management bonus is also paid to management staff, equal to a salary percentage that changes with the management level.

Indicator: gross total wage bill and employee contributions

€'000	2017	2016
Gross total wage bill	149,723	146,403
Social security contributions	36,518	33,648

Data is consolidated in euros at the exchange rate used for the income statement for the year. The gross total wage bill and the social security contributions cover 100% of the workforce as at 31 December 2017

Workforce external to the company

	2017	2016
Average monthly temporary workforce	230	215
Subcontracting costs (in €'000)	78,061	72,521

Employment and inclusion of disabled employees

In France, the employment rate for disabled workers in 2017 for ESGIE, EPF and Socorail, calculated on the basis of the data contained in the mandatory annual declaration of employment submitted to the AGEFIPH (French national association responsible for managing the fund for disabled employees), is 3.37%, 0.69%, and 0.79%, (2016: 4.06%, 0.75%, and 0.69%, respectively and 2015: 3.73%, 0.45%, and 0.92%).

While data cannot be gathered for this indicator in the United Kingdom as there is no specific "disabled worker" status, the British entities of the Group, like all the Group, are nevertheless bound by the same commitments and the fundamental principles of the Group's Charter of Ethics and Behaviour as concerns equality. Also, they implement an equal opportunities policy intended to ensure that all employees are treated identically, as in the French subsidiaries.

6.2.5 TRAINING

Group policy and challenges

The Group, which operates in highly technical business segments, has always placed training at the forefront of its concerns.

The main focus of the Group's training policy is to strengthen the key competencies of its employees and to maintain a high level of operational performance within teams, enabling them to contribute to the development of the business. Emphasising a common culture in the areas of safety, security and the environment and improving the adaptation of employees to their job position are key priorities.

Actions and means implemented

CIFFCO, with its training centre, manages both the training plan and the training for the Concession, as well as supporting the development of the rail freight industry and local train operators. It provides dedicated training programmes with a focus on rail-related activities in the national Railways and other networks, as described in section 6.3.2 of this Registration Document.

Results for the year

	2017		2016
Number of training hours	109,072	✓	84,508
Average number of training hours	32	\checkmark	25
Cost of training (in €000)	4,411		4,025
Proportion of the total wage bill represented by training	2.95%		2.75%

In 2017, 109,072 hours were devoted to employee vocational training, representing an average of 32 training hours per employee, up by more than 29%. Most of the increase lies in vocational training (up by 17,965 hours compared to 2016) and safety (up by 5,332 hours compared to 2016). The cost of training represents nearly 2.95% of the total wage bill and totalled €4,411,494 in 2017, compared to €4,024,579 in 2016.

6.3 REGION

Overview of the Group's policy

Corporate social commitment is deeply ingrained in the Group's history and culture. The Group seeks to establish close ties with all the communities that it interacts with – customers, local authorities, economic partners – in France, in Great Britain and in Europe.

Recap of the biggest challenges

The Group's commitment is focused on the most pressing challenges as indicated in the materiality analysis:

- Customer satisfaction and loyalty-building;
- Expansion of the railways and in particular, the links with national and European regulations;
- Development of local employment and the local economy.

6.3.1 CUSTOMER SATISFACTION AND LOYALTY-BUILDING

Group policy and challenges

The materiality analysis placed customer satisfaction and loyalty-building, as well as the management of traffic, capacity and railway path availability among the very important challenges for the Group. Free movement of goods and people are included in the important challenges.

The Group has placed customer care at the heart of its development strategy. For the staff in all of its subsidiaries, safety and quality of service are a priority as well as a daily and strategic requirement. Deeply rooted in a binational and customer-centric culture, the Group invests continuously in adapting its services, in quality care to customers, punctuality, smooth operation, comfort and safety, hinging on a central goal: to constantly expand the high-level quality of service which is the foundation for its economic growth.

Actions and means implemented

As described in section 1.6.2 of this Registration Document, the Group has deployed various actions to respond to the expectations of its customers (passenger buildings, Flexiplus) and to increase capacity (three new Truck Shuttles, programme to extend the terminals at Coquelles and Folkestone, etc.). The Group has adopted an ambitious digital plan, with a view to making its exchanges with customers, employees and partners even more fluid and personal in the interests of improving the customer experience. Built around the Group's customers, employees and partners, this strategic plan aims to integrate and rethink the place of digitalisation throughout the customer journey, improve the offer to customers and continue its development.

Europorte's sales policy seeks to transform the traditional approach of the rail transport sector based on short-term traffic into structured medium-term partnerships.

6.3.2 PROMOTION OF RAIL TRANSPORTATION

Group policy and challenges

The Group's dependence on national and European railway regulations was identified as a very important challenge by the materiality analysis. As world leader in rolling motorway and piggyback transport, Getlink campaigns for the use of railways to leverage the development of regions, as indicated in section 1.2.2.b) of this Registration Document, while keeping the environmental impact low.

Actions and means implemented

Vocational training in the rail industry

CIFFCO, the first private training centre dedicated to rail industry professions, was created in 2011 and is 100% owned by the Group. CIFFCO offers its services to all rail operators, infrastructure maintenance companies and industrial concerns for the training of their staff.

CIFFCO has:

- a Franco-British team with expertise in railway training;
- a building entirely devoted to training;
- 14 modern and efficient micro-simulators essential for the training of train drivers;
- a new platform for distance learning;
- the necessary approvals to operate as a railway training centre; CIFFCO is certified by Établissement Public de Sécurité Ferroviaire (EPSF, a public rail safety association) to provide train safety training on the French national rail network. The train driver training of CIFFCO is listed in the French national directory of professional certifications, as well as the training of ground staff. It can award a professional qualification recognised by the French State. CIFFCO is therefore today the first, and only, private training organisation authorised to offer these qualifications, in addition to the French public operator.

On 5 December 2017, EPSF invited the CEO of CIFFCO to present the training centre's actions and vision relating to the digital transformation applied to training.

CIFFCO has also invested in a partnership with the Association Activer des solutions pour le Fret Ferroviaire, 2A2F, which promotes rail freight, and so emphasises CIFFCO's attraction for logistics professionals.

In 2017, CIFFCO provided a total of 4,989 railways training days for 419 people from all over France but also from Belgium, Switzerland and Italy (Group employees and outside companies). In total, since the opening of the centre, 272 ground staff and nearly 550 trainee train drivers have been trained, with half of the training provided to companies outside the Group.

During the year, the training mainly concerned drivers of service and works trains on the French railway network, as well as ground and maintenance staff. CIFFCO contributes to creating skilled jobs and promoting employability. It also is a key driver in the development of railway transport and of its related jobs and, more generally, is involved in the economic development and the enhanced influence of the Hauts-de-France region. In 2017, CIFFCO and ESGIE along with other partners, arranged a seven week training course for disabled job seekers.

As part of its strong commitment to young people, the Group develops its relations with universities and schools in order to promote better knowledge of the jobs it offers and help young people enter the world of employment:

- Training diploma in railway engineering and maintenance professions set up and developed by Europorte in close collaboration with the Conservatoire National des Arts et Metiers;
- Agreement with the École Nationale des Ponts et Chaussées engineering school to establish an education and research "Railway transport sciences" chair dedicated to the study of railway activity, until the year 2018. The aim of this chair is training and research on the topics associated with infrastructure and transport services. This initiative attests to the Group's willingness to share its expertise in order to advance science and innovation, and to position the railway industry as a profession of the future:
- Partnerships with the Institut Catholique des Arts et Métiers (ICAM) and the Institut d'Administration des Entreprises (IAE), two Lille institutions, in order to develop a new approach to the maintenance trade;
- Participation in November 2017 in the "Professeurs en entreprises" operation initiated by Fondation C Génial, a foundation for scientific and technical culture. This operation is aimed at teachers (and other members of the national education system) at the secondary level and, in addition to the professional integration of young people, it makes it possible to promote the sectors and the scientific and technical professions of the companies visited. Several managers of the Fixed Link rolling stock were deployed in support of this activity.

Group partnerships for the development of the railways

The Group offers its expertise in managing transport infrastructures and rail activities to various public bodies at European, national and regional levels.

The Group also contributes to the work of the European Committee for Standardisation as part of the working group responsible for drafting a proposed standard for calculating the greenhouse gas emissions of transport services.

The Group is a founding member of the Fer de France association which was created in 2012 to bring together the leading players in the French railway industry. The work presided over by the Group led to proposals for the French State to recognise different professions in this developing sector.

The Group is also an active member of I-Trans, the global competitiveness cluster and the reference cluster for railways in France. The Group's Human Resources Director participates as the controller in the CAPFOR (training project management and coordination circle) operational group that aims to make existing training more consistent with the industry's expectations, creating a pool of expertise in the region and developing high-quality higher education with international influence.

6.3.3 REGIONAL DEVELOPMENT

Group policy and challenges

The development of local employment and the local economy are listed among the important challenges in the materiality analysis.

Getlink has carved a niche for itself in its environment and has shaped that environment in a positive manner. As an employer, it participates directly and actively in local economic development, and pursues its mission as developer in consultation with stakeholders. As a committed partner in its economic and social environment, the Group has always been a leading economic player and local employer. Its mission is fully in line with ensuring that it is rooted in the regions in which it operates.

The Group considers its commitment to regional matters to be crucial, especially as it contributes to improving the overall performance of the company, internal climate and social cohesion, and to enhancing employee loyalty.

To meet these challenges, the Group endeavours to establish links with all the local communities by providing active support to the associations, schools, universities and organisations with which it works closely on both sides of the Fixed Link. This commitment notably relies on its dialogue with all its stakeholders.

The decision by the United Kingdom to leave the European Union, which will take effect officially on 29 March 2019, represents a significant challenge for the Group. The economic consequences for the Group and the risks arising from Brexit (as set out in section 3.1.1 of this Registration Document) will depend on the outcome of negotiations between the parties.

Actions and means implemented

Development of local employment

For over 20 years now, the Tunnel has been a vital link between Great Britain and continental Europe. Since the Tunnel came into operation, it has created more than 8,000 direct and indirect jobs in the Kent and Hauts-de-France regions, and has led to the building of large-scale associated infrastructure, including new motorways, high-speed railway lines and international railway stations.

As indicated in section 1.1.4 of this Registration Document, EY has published a report evaluating the economic contribution of the Tunnel to trade and tourism and its role in the economic growth of the United Kingdom. Pursuant to the regeneration agreement signed in 2006 with the French State, Getlink continues to contribute financially and through its expertise to Calais Promotion, the development agency for the Calais area. This contribution is earmarked primarily for supporting job creation. Similarly, the Group provides financial support and actively participates in the cross-border job fair Jobs Frontaliers, a local initiative that facilitates the professional mobility of young people between France, the United Kingdom and Belgium.

Through its commitment to Fondation Agir Contre l'Exclusion (FACE), which provides assistance to those most in need, the Group encourages its employees to get involved in and initiate humanitarian and charity projects. Several part-time work contracts have been signed since 2013 between the subsidiary ESGIE and persons assisted by FACE Calais.

Other subcontracting and service partnerships were signed between ESGIE and local companies to develop employment and guarantee a community foothold for the Group's activities. These partnerships represented about 1,530 full time equivalent positions in 2017 for various work including services.

Development of the local economy

In connection with its role as a developer, the Group, through its subsidiary Euro-Immo GET, was chosen in January 2013 by the municipality of Sangatte Blériot Plage to develop the seaside eco-village and golf resort project at Porte des Deux Caps. This project will involve building an international-standard golf course, a luxury hotel, and an eco-friendly residential development of 500 housing units.

The Group's land reserves at Coquelles (Pas-de-Calais) were gradually transformed into a 700-hectare Zone d'Aménagement Concertée (ZAC or mixed development zone) that now includes a shopping centre drawing 6 million visitors per year on average.

In France, the Europorte companies as a whole are developing their rail freight haulage activities, which enable disused marshalling yards and railway lines, as well as lines with restricted traffic, to continue operating or to be brought back into service. However, without political will on the part of the bodies responsible for developing transport infrastructure, the progressive deterioration or eventual disappearance of the feeder networks could have, as described in chapter 3 of this Registration Document, a major impact on the income of EPF, which obtains an important part of its business from the transportation of grain.

Under an agreement similar to a public-private partnership, the Group, alongside the French State, the Hauts-de-France region, the CCI Cote d'Opale, and the urban community of Dunkirk and SNCF Réseau, is financing feasibility studies on the modernisation of the Fréthun-Calais-Dunkirk railway line, which would involve its electrification and an increase in rail freight path availability.

Solidarity actions

A key player in the natural, economic and human environment, the Group 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, the partnership agreement between the Group and Secours Populaire, was renewed for two more years (2017-2019).
- Active support to the French Second Chance Foundation, a recognised public interest group committed to the rehabilitation of people who have faced great difficulties in their lives.

The Concession Works Council regularly backs good causes actively supported by colleagues.

Sponsorship

The Group financially supports the World Forum for a Responsible Economy in Lille. Launched by the Réseau Alliances, this organisation aims to promote a responsible global economy, by sharing the best business practices of responsible companies.

6.3.4 BEST BUSINESS PRACTICES: BEING FAIR AND RESPONSIBLE

Group policy and challenges

The setting up of the Code of Ethics and the responsible purchasing policy were identified as important challenges in the materiality analysis. The Group is committed to building a climate of trust and fair relations with all of its stakeholders both inside and outside the Group.

Actions and means implemented

Ethics

In its Charter of Ethics and Behaviour, approved by the Board in 2013, the Group sets out the common rules regarding respect for people, fair competition, internal controls and environmental protection.

The Group operates as a collection of entities in various sectors of activity and geographical areas. These principles and guidelines for action apply to all the employees of the Group and its subsidiaries, as well as to their subcontractors and suppliers. Failure to abide by these ethical rules by employees of the Group can lead to disciplinary action.

The Group has strengthened its arrangements to fight corruption, as set out below and in section 3.4.2.

Relations with suppliers

The relations between Getlink and its suppliers go beyond the mere purchasing of goods and services. In compliance with the principles set down by the Charter of Ethics and Behaviour, the ACHA 0019 procedure (professional ethics code) set out the Group's ethics standards. These standards not only ensure compliance with applicable laws and regulations, but beyond legal criteria, they make for the building of a climate of trust in exchanges between Group representatives and third parties. Each Group buyer or other employee undertakes to abide by the professional ethics code and to seek suppliers who share these commitments. The tender process is designed to guarantee the fair treatment of suppliers during consultations.

In representing the Group's CSR values and engagements, the Procurement Departments of the various entities have taken actions that, beyond referring to the Group's Charter of Ethics and Behaviour in all new contracts, require their suppliers to comply with its fundamental principles and to sign the Compliance Policy (article 23). Article 23.2.1 requires that suppliers comply with the French regulations on corruption, as well as UK corruption laws, notably the Bribery Act 2010.

The sustainable development aspect is included by the Concessionaires as part of their tendering process for sub-contracted work on their Fixed Link sites. Subcontractors are required to commit contractually to respecting labour laws and regulations. Europorte operates mainly on its customers' sites, so as regards the management of port infrastructure it integrates the port authorities' requirements into its own subcontracting contracts.

In January 2012, the Group signed the "Charter for Responsible Supplier Relations". This charter includes ten commitments for responsible purchasing, ensuring a genuine partnership between customers and their suppliers with due regard to their respective rights and obligations. The Group is also a member of steering committees for the "Responsible Supplier Relations" charter and certification, and has clearly demonstrated its wish to be a part of this certification process, as an extension of the implementation of the charter's ten engagements. In addition, the ethics and compliance steering committee worked on the implementation of a Group anti-corruption policy, approved by the Board Ethics and Governance Committee and the Board of Directors, which aims to reinforce the dissemination of the rules of conduct which form the foundation of the Group's integrity and ethics. Digital anti-corruption training was put in place in 2017. It is available to all staff.

6.4 NATURE

Overview of the Group policy

In a world with limited natural resources, companies cannot ensure their continuity without making constant efforts to control their energy consumption and reduce the impact of their operations on the environment. For Getlink, it is clear: it is impossible to be successful in the long term without better control of its environmental impact.

Material challenges

The environmental commitment of the Group is focused on the challenges that have been deemed the most material, such as the ones highlighted in the materiality analysis:

- the general policy on the management of the environment and, in particular, the training of employees on environmental issues:
- the management of the consumption of energy and the increased use of renewable energy;
- the circular economy policy and waste management;
- the Tunnel and its rail transport system are intrinsic environmental assets;
- the Tunnel runs entirely underground and does not interfere in any way with the marine environment; and
- the use of electric power, 90% of which is of nuclear or hydraulic origin, for haulage produces little atmospheric pollution and much lower greenhouse gas emissions than fossil fuels.

Spurred on by the Group, Europorte has stepped up its environmental practices. As well as the implementation of transparent reporting on abstractions from and discharge into the environment, an environmental impact assessment of the activities of Europorte's French entities was completed in 2013, resulting in various measures being taken to mitigate those impacts namely:

- energy consumption optimised to reduce the impact on the greenhouse effect;
- environmental criteria taken into account when planning maintenance programmes for its shunting engines (oil leaks and engine particulate emissions). As at the end of 2017, 42% of the Socorail site is now equipped with new-generation engines;
- appropriate processes set up for sorting/collecting and treating the various types of waste produced;
- environmentally-friendly products chosen;
- green areas created to park and maintenance of machines;
- improved management of hazardous situations involving customers;
- awareness-raising among staff about the ways in which they can be green citizens.





In 2017, Europorte organised its first "Green Week", which acted as a reminder of Europorte's commitment to reduce its environmental impact. It also promoted good behaviour in team members in different topics such as saving energy and water and recycling both at work as well as in their everyday lives.

6.4.1 GENERAL ENVIRONMENTAL POLICY

In the materiality analysis, the general policy for the environment was classified amongst the priorities, and environmental training for employees was included amongst the important challenges for the Group.

Governance/steering

Above and beyond compliance with the legal and regulatory constraints for which a monitoring report is conducted and published each month, the Concessionaires created a safety and sustainable development department in 2006 to demonstrate their constant commitment to the environment.

The general policy of the Europorte subsidiaries sets out environmental considerations that require Europorte to control its environmental impacts, particularly as regards energy consumption. Progress on the resulting environmental action plans is monitored monthly by the Europorte safety committee and during management reviews. The deployment and the implementation of this plan are handled by Europorte's central safety, quality and environment department and more specifically, the environment quality department and taken up by the regional safety and quality officers.

Certifications and labels

As early as 2002, the Concessionaires installed an environmental management system based on the requirements of the ISO 14001 standard and put in place trained environment officers and internal auditors. An "Environmental Requirements" clause was also introduced into agreements with its subcontractors. Each year, the Safety and Sustainable Development Department carries out targeted audits in France and the United Kingdom; in 2017, six internal audits relating to service providers were carried out.

Since 2014, Europorte has implemented a continuous improvement procedure using the SQAS Rail (safety and quality assessment system) assessment procedure every three years for all its subsidiaries. This assessment supplements the MASE and ISO 9001 certifications mentioned in section 3.1.2 of this Registration Document.

Within the framework of the regulatory developments arising from France's Grenelle Environment Round Table programme, in September 2013, Socorail obtained EcoPhyto certification for weeding activities conducted on the rail networks of certain ports and industrial sites. The system implemented is intended to limit the use of phytosanitary products and to better control their impact.

Risk prevention

Pursuant to French law no. 76-663 of 19 July 1976 relating to installations classified for the protection of the environment (ICPE) the terminals in Coquelles and Sangatte are designated ICPE sites due to the potential dangers and risks that activities such as refrigeration, air-conditioning, storage and use of flammable liquids, maintenance workshops and paint may pose to the surrounding area and to health, safety, nature and the environment. These activities are set out in a list which, on the basis of the severity of the dangers or risks that they may represent, requires them either to be reported to or authorisation sought from the Prefecture of the Pas-de-Calais. These activities are monitored by the Direction Régionale de l'Environnement, de l'Aménagement et du Logement (DREAL, the French regional authority for the environment, planning and housing). Similarly, pursuant to French law 92-3 of 3 January 1992 on water, the Concessionaire France Manche must request authorisation from the relevant administrative authority for any proposed construction, work or activities to be carried out outside of the ICPE area, which may pose a danger to public health and safety, endanger the free flow of water, reduce the availability of water, substantially increase the risk of floods or seriously damage the quality or diversity of the marine environment.

From the construction of the Tunnel onwards, expenditure has been incurred to prevent the harmful consequences of business activities for the environment. The System includes separate rain water and waste water collection networks, retention basins and treatment plants.

The Group has not set aside any provisions for environmental risks, nor did it pay out any compensation for environmental damage as a result of any court orders during the course of the year. The obligation to establish a financial guarantee as defined in article L. 516-1 of the French Environmental Code against potential environmental damage does not apply to the Group's activities.

No fine of any nature has been imposed on the Group nor has it been reported for non-compliance of its operations.

Employee awareness/training

As part of their induction to the company, every new employee learns about the company's environmental policy, its targets, and the arrangements put in place to minimise the environmental impacts of its activity. Moreover, the Group is working on setting up digital CSR training, aimed at increasing employee awareness of the actions undertaken and the challenges faced by the Group in the areas of social responsibility.

6.4.2 CLIMATE CHANGE AND ENERGY POLICY

Group policy and challenges

The materiality review identified the management of energy consumption and the increased use of renewable energy as very important and important priorities respectively.

As part of its commitment to "low-carbon" transport, the Group is pursuing an ambitious strategy combining the development of its core activity, cross-Channel transport, with external growth in its two main businesses and areas of expertise other than the Fixed Link, namely infrastructure management and railway operations. In line with this strategy, Getlink and the Europorte subsidiaries are developing a broad-based offering of rail freight transport and associated logistics services throughout France and the United Kingdom.

Actions and means implemented

Emission level measurement

The Group has developed a policy for monitoring and managing the greenhouse gas emissions of its subsidiaries in anticipation of the publication of the implementing regulations of article 228 – II of the "Grenelle 2" law. The regulations relate to mandatory disclosures by entities providing transport services or organising the provision of transport services on the quantity of carbon dioxide emitted by the mode(s) of transport used to carry out that service. In order to better satisfy the transparency requirements imposed by article 173 of law 2015-992 of 17 August 2015 on energy transition for green growth, the Group has initiated a study aimed at identifying the primary sources of greenhouse gas emissions which should make it possible to provide a detailed qualitative analysis for the next financial period in the Fixed Link and elsewhere.

Since 2009, the Group has been certified by The Carbon Trust Standard, an independent organisation that audited the Group's management of greenhouse gas emissions in 2011 and set the baseline level for greenhouse gas emissions for the whole of the Group's activities at 2010 levels. In 2017 the Group's Carbon Trust Standard certification was renewed in respect of the Fixed Link in recognition of its carbon footprint reduction policy for the period 2015-2016.

The Group is moreover the only cross-Channel operator to have conducted and published a carbon footprint assessment. An exhaustive carbon footprint assessment of the Fixed Link was performed in 2007 in both France and the United Kingdom, using the method developed by ADEME. This carbon footprint assessment identified the Fixed Link's primary sources of greenhouse gas emissions. This was followed by an action plan focused on two factors that accounted for 80% of the emissions, namely refrigeration fluid leakages and the use of energy provided by electricity and fossil fuels.

In the United Kingdom the Concessionaires, as the manager of an infrastructure of major importance to the British economy, carried out a study of the infrastructure's ability to withstand the foreseeable effects of climate change in line with the Climate Change Act 2008 and at the request of the British Department for Environment, Food and Rural Affairs (DEFRA).

In keeping with the 1992 Montreal Protocol, actions were implemented to reduce emissions of all gases leading to the depletion of the ozone layer. Halon is being removed from the Fixed Link infrastructure. Also, refrigerants used in the cooling ducts in Sangatte and at Shakespeare Cliff were also replaced. All were replaced on the French side and half on the British side, with new cooling units that are more energy-efficient and have no significant negative impact on the environment.

Customer offer

The Group is committed to leading the way in environmentally responsible transport and makes its expertise and leadership available to its subsidiaries and customers to help them reduce the carbon footprint of their activities.

An eco-comparison tool is available on the Fixed Link website and can be used by customers to calculate the average savings on CO_2 emission levels when using the Truck Shuttles.

Since 2015, the Group has provided a fast and free of charge recharge facility at the Fixed Link sites in Coquelles (Pas-de-Calais) and Folkestone (Kent) for customers with electric cars. In thirty minutes, they can charge 80% of the battery capacity (universal battery chargers), providing a range of over 250 km. There are 16 dedicated spots that can be used simultaneously at the two terminals of the Channel Tunnel. These are the only sites in Europe to provide such a comprehensive offering. The number of customers using the Passenger Shuttle in electric cars increased from 40 in 2014 and 800 in 2015 to more than 3,500 in 2016 and 5,805 in 2017. This number is expected to reach 6,000 in 2018.

The Group is continuing to improve its social responsibility programme by encouraging its employees to commute to Coquelles by other means. It has launched three initiatives from its Business Travel Plan namely a shuttle bus between the high-speed train station at Calais Fréthun and the Coquelles terminal, a web-based Eurotunnel car-sharing community, electric cars and bicycles and information on public transport. The arrangements already in place include bicycle racks, fleet of electric vehicles and recharging points and a remote-working trial. In Folkestone, 70 employees have already signed up for the government "Cycle to Work" scheme set up in 2016 and some of them joined in the national "Cycle to Work" day on 13 September. These initiatives contribute to minimise the business's carbon footprint and to promote employees' well-being.

Since 2014, Europorte's subsidiaries have been awarded TK' Blue status by the European TK' Blue Agency. This measures the ecoresponsible engagement level and the technical, economic, environmental and social performance of their transport services.

Energy policy

Since 2016, the Group has worked to put in place actions to improve energy performance, as identified in the comprehensive energy audits of the Concession's operations.

Given their mutual interest in the matter, France Manche and EDF have entered into partnership to promote energy saving.



The purchase of new wagons to transport road trailers on rail motorways is considered an energy-saving action within this context.

The entry into service of the first new Truck Shuttle, made of 32 rail motorway wagons at the end of December 2017, contributed to the granting of Certificats d'Économies d'Énergie (CEEs, energy savings certificates) as part of the "Rail Motorway Wagon" CEE project.

In 2016, after the installation of new generation electronic variable speed drives which use less energy, the business can modulate the speed of the cooling fans. As at the end of 2017, the fleet of 100% electric vehicles operating on the Concession terminals had grown to 39 vehicles.

Europorte France has set up an eco-driving initiative to increase awareness among main line train drivers of the impact of their driving style on fuel consumption. This initiative also involves the installation of technical equipment designed to reduce the fuel consumption of locomotives as well as driver assistance systems, depending on the nature of the network and the train, to help drivers to adopt a more environmentally-friendly driving style. Since 2015, Europorte France has used seven medium horsepower locomotives of a new model (Vossloh DE18), which provide a 15% to 20% reduction in fuel consumption for an equivalent level of use.

The energy audits carried out for Europorte in December 2015 and conducted by an approved organisation made it possible to identify opportunities for reducing energy consumption. As such, an initial experiment in pool-sharing of company cars was set up in the Lyons area. In January 2016, Arval awarded the eco-responsible mobility award to Europorte for this initiative.

Results of the year

Greenhouse gases (GHG) emission indicator (scope 1 and scope 2 of the Kyoto protocol¹⁵)

Tonnes of CO₂ equivalent	2017		2016
France	69,854		62,740
United Kingdom	29,335		22,106
Total ✓	99,189	✓	84,846

The Group constantly strives to limit the impact of its activities on the environment.

In 2017, the Group's greenhouse gas emissions rose by 16.9% compared to the previous year. This increase is:

- on the one hand, to be put in perspective compared to the reductions recorded in previous years; and
- on the other hand, should be viewed:
 - in respect of the Fixed Link in the context of the gradual elimination of halon gases, of an accidental discharge for reasons of fire safety and of an increase in the use of electricity from the UK for traction efficiency reasons (rather than the extended power supply available in France, the electron being seven times more carbonised in the UK than its French equivalent); and
 - for Europorte the increased use of non-electric engines using non road diesel (NRD) on lines not wholly electrified.

Such an increase may occur from time to time and is linked to exceptional events (discharge of halon, increase in the use of electricity from the UK) or to situations over which the Group has no control. This is the case in respect of the non-electrification of certain lines of the French rail network which requires the Europorte subsidiaries to use, as part of their commercial operations, diesel locomotives for journeys not equipped with electrified lines.

It should also be noted that whilst emissions increased in 2017 compared to 2016, they recorded a decrease of 4.3% between 2013 and 2017, which demonstrates the constant and long-term commitment of the Group to limit the impact of its activities on the environment.

Efforts are continually being made to reduce the energy consumption of the Group and consequently CO₂ emissions. For that reason, the Shuttle on-board air conditioning systems have been equipped with GSM datacards that will take readings of the pressure and temperature of the generators every two hours. This will make the detection of leaks quicker and easier and thereby minimise them. The replacement of some of these on-board air-conditioning systems is being considered.

In 2016 and 2017, an investment was made with the purchase of new HVAC (heating, ventilation and air conditioning) units for the Passenger Shuttles (150 out of a fleet of 450) in order to address the ageing of this equipment. A contract has been entered into for the complete prototyping of the HVAC system, as part of a project to renew the Passenger Shuttles.

Since the Truck Shuttles began operations, the Group has enabled savings of nearly 3.9 million tonnes of CO₂ compared to the ferries and the Group's carbon footprint (scope 1 and 2) and greenhouse gas emissions have fallen by 55% since 2006.

Emissions linked to the use of fossil fuels in combustion facilities or in transport vehicles (scope 1), as well as fugitive emission of refrigerant fluids, SF6 and halon 1301 (scope 1) and indirect emissions linked to electrical power purchase (scope 2).

Energy source indicator

Energy source	Total consumption in 2017	Total consumption in 2016	Unit
Electricity	570,049,202	561,376,759	kWh
Natural gas	8,079,345	7,691,510	kWh
Non-road diesel (NRD)	8,822,595	7,094,666	Litres
Liquid petroleum gas (LPG)	7,074	7,290	Litres
Diesel	799,615	808,242	Litres
Petrol	39,844	43,970	Litres

The 1.5% increase in electricity consumption compared to the previous year is linked to the increase in Shuttle traffic. It should however be noted that the current lighting has been replaced by more economical LED lighting when maintenance or renewal work has been undertaken in the Concession workshops. This is in addition to the installation of movement detectors in the administration buildings and the sub-stations. A study is moreover under way to replace the lighting in the maintenance workshops. Efforts are also being undertaken to replace electrical resistance heating systems with more economical thermodynamic heating systems.

NRD consumption has risen sharply (24.4% increase) compared to last year because of more sustained Europorte activity, using non-electric engines on fully non-electrified lines.

Natural gas consumption rose by 5%, due primarily to an increase of almost 25% at Europorte because maintenance work on engines required a constant background workshop temperature to be maintained.

Efforts are continually being made to reduce consumption. For that reason, all the old boilers have on the UK terminal been replaced by condensing boilers.

LPG and petrol consumption also dropped by 3% and 9.4% respectively, compared to the previous year.

Water consumption indicator

Cubic metres		2017		2016
Water from public network				
France		129,723		125,811
United Kingdom		144,978		122,777
Total	✓	274,701	✓	248,588
Groundwater				
France		30,457		34,908
United Kingdom		0		0
Total	✓	30,457	✓	34,908

The consumption of water from the public network rose by 10% compared to the previous year, primarily due to a change in the Tunnel cooling system valves on the British side and to an accidental water leak in a Europorte maintenance workshop. Notwithstanding this and with a view to putting in place in 2020 a plan to reduce water consumption across the Concession, a network of connected meters has been installed in order better to identify the consumption sources.

Consumption taken from the underground water table dropped 12.8% across the Group, which can be attributed to the malfunctioning of a meter in a fire reservoir portal.

In addition, water offtakes respect the relevant legal constraints.

6.4.3 CIRCULAR ECONOMY AND WASTE MANAGEMENT

Group policy and challenges

According to the findings of the materiality analysis, the circular economy policy and waste management are among the important challenges for the Group, which 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.

It should moreover be noted that, given the nature of its activities, food wastage is not a material issue for the Group. This subject concerns on-site food services only and data on this subject will not be published for the 2017 financial period.

Actions and means implemented

In France, the Fixed Link sorts hazardous and non-hazardous industrial waste, 95% of which is recycled. This process was made possible by the emergence of new solid fuel recovery channels. There are three ways of recovering waste: improved sorting, waste buyback and outlets and recycling or free recovery.

For Europorte, almost all the waste produced comes from the maintenance of rolling stock and rail infrastructure. At industrial sites, waste management procedures are generally the responsibility of the customer. Europorte applies its own waste management procedures to its port rail infrastructure services at Dunkirk, Nantes-Saint Nazaire and Le Havre-Rouen, and



Europorte Proximité's locomotive maintenance workshop at Arc-les-Gray. In both these activities, waste is sorted internally and passed on to a waste service provider for treatment.

Results of the year

Waste indicator

Tonnes	2017		2016
Hazardous industrial waste			
France	183		186
United Kingdom	221		168
Total ✓	404	✓	354
Non-hazardous industrial waste			
France	2,860		5,499
United Kingdom	2,824		1,688
Total ✓	5,684	✓	7,187

The production of hazardous industrial waste rose by 14% compared to last year. In respect of ESL, this increase is due to the change in interceptors (a hydrocarbon filtration arrangement) and a treatment of disposable and rechargeable lamp batteries as well as in respect of Europorte the increase in activity of a mechanical maintenance workshop. By contrast, the quantities of non-hazardous industrial waste decreased (almost 21%) since in 2017 the business did not embark on a tree felling and vegetation clearance programme, as it had done for security reasons in 2016.

The noise of commercial activities and maintenance around installations is also closely monitored. A past study shows that the activities of the Fixed Link breach no noise standards, whether at the edge of the property or in regulated surrounding areas, during the day or at night. Measurements were taken in compliance with (i) the technical annex to the Ministerial Order dated 23 January 1997 on limiting environmental noise by installations classified for environmental protection (ICPE) without derogating from any of its provisions, and (ii) Standard NF S 31-010 of December 1996 on the characterisation and measurement of environmental noise-specific measurement methods.

By the nature of its activities, neither the consumption of raw materials nor improving the efficiency of use are relevant issues for the Group.

6.4.4 PROTECTION OF BIODIVERSITY

Group policy and challenges

In the area of biodiversity, Getlink complies with the letter and the spirit of the Convention on Biological Diversity whose main goals include the conservation of biodiversity and the sustainable use of its elements.

Actions and means implemented

The Concessionaires have large land reserves in France and the United Kingdom and since the construction of the Tunnel have created several dozen hectares of nature reserves for the conservation and development of biodiversity. In France, the nature reserves are located within the Concession perimeter and therefore not open to the public. In France, the Jardins Ordonnés with its seven-hectare lake situated next to the Coquelles terminal are a much-used haven for migrating species and an essential nest-building site for many birds.

In the United Kingdom, the Samphire Hoe site is a real example of the Group's determination to take measures to develop biodiversity and protect the environment. Samphire Hoe, a nature reserve spanning about thirty hectares at the foot of the Dover cliffs, was created using five million cubic metres of blue chalk and marl extracted from the Channel subsoil when the Tunnel was bored. This strip of land reclaimed from the sea was gradually transformed into a nature reserve. The White Cliffs Countryside Partnership (WCCP), in charge of the day-to-day management of this protected space, is supported by many volunteers living in and around Kent. The partnership between the Concessionaires and WCCP was awarded its 13th successive Green Flag Award® in 2017, recognising the high ecological quality of this nature reserve.

Samphire Hoe attracts over 80,000 visitors each year. Since 2014, a new reception centre, financed jointly by Getlink and the Heritage Lottery Fund, provides a fully-equipped educational centre for school groups all year round.

In another partnership with WCCP, the Concessionaires are also involved in the upkeep and conservation of the Doll's House Hill site, the steep slope overlooking the Folkestone terminal facilities, whose plant and wildlife belong to a Site of Special Scientific Interest (SSSI).

The soil and plant life in Biggins Wood were removed when the Folkestone terminal was built and replanted close by in order to safeguard this testimony of Britain's primary forest.



6.5 GRI 4 CROSS-REFERENCE TABLE

G	iR	! I		
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Grenelle 2 – article R.225-105-1	GRI equivalent G4	Title	Equivalent in chapter 6 of the Registration Document
WORKFORCE INFORMATION			
Employment			
Total workforce	LA1	Total number and percentage of new employees hired and staff turnover by age, gender, and geographical distribution	6.2.4 Employment: Workforce and geographical distribution
Breakdown of employees by gender	LA1	Total number and percentage of new employees hired and staff turnover by age, gender, and geographical distribution	6.2.4 Employment: Breakdown of workforce by gender
Breakdown of employees by age	LA1	Total number and percentage of new employees hired and staff turnover by age, gender, and geographical distribution	6.2.4 Employment: Breakdown of workforce by age group
Breakdown of employees by geographical region	LA1	Total number and percentage of new employees hired and staff turnover by age, gender, and geographical distribution	6.2.4 Employment: Workforce and geographical distribution
Hirings	LA1	Total number and percentage of new employees hired and staff turnover by age, gender, and geographical distribution	6.2.4 Employment: Recruitment
Dismissals	LA1	Total number and percentage of new employees hired and staff turnover by age, gender, and geographical distribution	6.2.4 Employment: Departures
Remuneration	LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	6.2.4 Employment: Remuneration
Changes in remuneration	LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	6.2.4 Employment: Remuneration
Work Organisation			
Organisation of work time	LA	Labour practices and decent work	6.2.2. Working conditions: Working hours
Absenteeism	LA6	Rate and type of work-related accidents, occupational disease, absenteeism, proportion of lost workdays and total number of work-related fatalities by region and gender	6.2.2. Working conditions: Absenteeism
Labour Relations			
Organisation of social dialogue	HR4	Identified sites and suppliers in which the right to freedom of association and to collective bargaining may be not respected or seriously under threat and measure taken to ensure respect for this right Equivalence Charter of Ethics and Behaviour: pages 2 and 3	6.2.3 Dialogue and labour relations
Organisation of social dialogue	LA4	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements Equivalence Charter of Ethics and Behaviour: pages 2 and 3	6.2.3 Dialogue and labour relations: Summary of collective bargaining agreements
Health and Safety			
Occupational Health and Safety	LA5	Percentage of total workforce represented in joint occupational health and safety committees that help monitor and advise	6.2.1 Health and safety: Health and safety in the workplace
Agreements signed with trade unions on workplace health and safety	LA8	Health and safety topics covered in formal agreements with trade unions	6.2.1 Health and safety: Health and safety in the workplace
Frequency rate of workplace accidents	LA6	Rate and type of work-related accidents, occupational disease, absenteeism, proportion of lost workdays and total number of work-related fatalities by region and gender	6.2.1 Health and safety: Work-related accidents



Grenelle 2 – article R.225-105-1	GRI equivalent G4	Title	Equivalent in chapter 6 of the Registration Document
Severity rate of workplace accidents	LA6	Rate and type of work-related accidents, occupational disease, absenteeism, proportion of lost workdays and total number of work-related fatalities by region and gender	6.2.1 Health and safety: Work-related accidents
Occupational diseases	LA7	Employees exposed directly and frequently to diseases related to their activity	6.2.1 Health and safety: Work-related accidents
Training policy			
Total number of training hours	LA9 / LA10	Average hours of training per year per employee, by gender and employee category.	6.2.5 Training
		Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	
Diversity and equal opportunities	es		
Diversity and equal opportunities policy and actions	LA12 / EC5 / EC7	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity Equivalence Ethics and Behaviours Charter: page 2	6 .2.4 Employment: Diversity and equal opportunity
Gender equality	LA13	Ratio of basic salary and remuneration of women to men by employee category and by significant locations of operation	6.2.4 Employment: Diversity and equal opportunity, Gender equality
		Equivalence Charter of Ethics and Behaviour: page 2	
Employment and integration of disabled people	LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	6.2.4 Employment: Employment and inclusion of disabled employees
Policies to prevent discrimination and promote diversity	LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	6.2.4 Employment: Diversity and equal opportunity
		Equivalence Charter of Ethics and Behaviour: page 2	
Promotion and respect of ILO va	alues (Humar		
	LA and HR	Labour Practices and Decent Work / Human Rights Equivalence Charter of Ethics and Behaviour: page 2	6.1.1 Origin of commitment and approach to CSR
ENVIRONMENTAL INFORMATIO	N		
General Environmental Policy			
Company organisation to take into account environmental issues. Environmental assessment or certification where required	Manageme nt approach	Disclosures that cover how an organisation addresses a given set of topics in order to provide context for understanding performance in a specific area Equivalence Charter of Ethics and Behaviour: page 6	6.4.1 General Environmental Policy
Employee training and communication on environmental protection	Manageme nt approach	Disclosures that cover how an organisation addresses a given set of topics in order to provide context for understanding performance in a specific area Equivalence Charter of Ethics and Behaviour: page 6	6.4.1 General Environmental Policy
Allocation of resources to prevent environmental risks and pollution	EN31	Total environmental protection expenditures and investments by type	6.4.1 General Environmental Policy: Risk prevention
Amount of provisions and guarantees for environmental risks (unless there is risk of	EN29 / EN34	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	6.4.1 General Environmental Policy: Risk prevention
serious harm)		Number of environmental impact grievances filed, reviewed and resolved through formal grievance mechanisms	

	GRI equivalent		Equivalent in chapter 6 of the
Grenelle 2 – article R.225-105-1	G4	Title	Registration Document
Pollution			
Prevention, reduction or compensation measures for air emissions or water and soil discharges that seriously affect the environment	EN23 / EN24 / EN25	Total weight of waste by type and disposal method Total number and volume of significant spills Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally	6.4.3 Circular economy and waste management: waste indicator
Taking account of noise and other forms of pollution specific to an activity	EN24	Number and total volume of substantial discharges	6.4.3 Circular economy and waste management
Circular economy Waste prevention and waste ma	ınagement		
Measures for the prevention, recycling, reuse, other forms of recovery and elimination of waste	EN23 / EN25	Total weight of waste by type and disposal method Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally	n/a
Fight against food waste		n/a	n/a
Circular economy Sustainable use of resources			
Water consumption and water supply according to local constraints	EN8 / EN9 / EN10	Total water withdrawal by source Water sources significantly affected by withdrawal of water Percentage and total volume of recycled and reused water	6.4.2 Climate change and energy policy: water consumption indicator
Consumption of raw materials and measures taken to improve efficiency in their use	EN1 / EN2	Consumption of materials by weight or volume Percentage of materials from recycled materials	
Energy consumption and measures taken to improve energy efficiency and renewable energy use	EN3 / EN6 / EN7	Energy consumption within the organisation Reduction of energy consumption Reduction of energy requirements for products and services	6.4.2 Climate change and energy policy: energy source indicator
Soil use	EN5 / EN6 / EN7		6.4.2 Climate change and energy policy: energy policy
Climate change			
The significant sources of greenhouse gas emissions	EN15 to EN21	Direct greenhouse gas emissions (scope 1) Indirect greenhouse gas emissions (scope 2) related to energy Other indirect greenhouse gas emissions (scope 3) Intensity of greenhouse gas emissions Reduction of greenhouse gas emissions Emissions of ozone-depleting substances NOx, SOx and other significant air emissions Total water discharges by type and destination Total weight of waste by type and method of treatment	6.4.2 Climate change and energy policy: greenhouse gases (GHG) emission indicator (scope 1 and scope 2 of Kyoto protocol)
Adaptation to the impact of climate change	EC2	Number and total volume of substantial discharges Financial implications and other risks and opportunities for the organisation's activities due to climate change	6.4.2 Climate change and energy policy



	GRI equivalent		Equivalent in chapter 6 of the
Grenelle 2 – article R.225-105-1	G4	Title	Registration Document
Protection of biodiversity			
Measures taken to protect and improve biodiversity	EN11 to EN14	Operational sites held, leased or managed in or adjacent to protected areas, as well as areas rich in biodiversity outside these protected areas	6.4.4 Protection of biodiversity
		Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	
		Habitats protected or restored Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	
SOCIETAL INFORMATION			
Territorial, economic and social	impact of ac	tivity	
On employment and regional development	EC7/EC8	Development and impact of infrastructure investments and services supported Substantial indirect economic impacts, including the extent of impacts.	6.3.3 Regional development: Development of local employment, Development of the local economy
On residents or local populations	SO1 / SO2	Percentage of sites having implemented local community engagement, impacts assessments and development programs.	6.3.3 Regional development: Development of local employment
		Operations with significant actual and potential negative impacts on local communities.	6.3.4 Best business practices: being fair and responsible
Relations with stakeholders			
Conditions of dialogue with people and organisation	G4-24 to G4-27		
Sponsorship and partnership actions	EC1	Direct economic value generated and distributed	6.3.3 Regional development: Solidarity actions, Sponsorship
Subcontracting and suppliers			
Consideration of social and environmental issues in procurement policies	EC6 / HR10	Percentage of new suppliers that were screened using human rights criteria	6.3.4 Best business practices: Being fair and responsible
Importance of subcontracting and consideration of CSR in relations with suppliers and subcontractors	SO9	Percentage of new suppliers that were screened using criteria for impacts on society	6.3.4 Best business practices: Being fair and responsible
Fair practices			
Actions taken to prevent all forms of corruption	SO3 / SO4 / S05	Percentage and total number of business units assessed for risks related to corruption and significant risks identified.	6.3.4 Best business practices: Being fair and responsible
		Communication and training on anti-corruption policies and procedures.	
		Confirmed incidents of corruption and actions taken	
Magazza tales for a comme	DD4 / DD0	Equivalence Charter of Ethics and Behaviour: page 3	COAllocate and refers Office
Measures taken for consumer health and safety	PR1 / PR2	Percentage of significant categories of products and services for which health and safety impacts are assessed for improvement.	6.2.1 Health and safety: Safety of facilities, Site safety
		Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes	

6.6 CSR POLICY: PRINCIPLES, CHALLENGES AND COMMITMENTS

CSR at the heart of the Group's strategy

Corporate social responsibility (CSR) requires companies to integrate environmental and social issues into their business model and strategy. A self-regulation initiative which in its early days was adopted on a voluntary basis, CSR has been enshrined in a regulatory framework initiated in France since 2001-2002 by the French law Nouvelles Régulations Economiques (new economic regulations). The verification of sociological, social and environmental data by an independent third party has gone on to become mandatory for French businesses following the publication in 2012 of the decree

implementing article 225 of the Grenelle 2 law and subsequently the ruling of 13 May 2013. The Group has exceeded this obligation and its initiative goes beyond simple verification.

The Group places social responsibility at the heart of its activities and its interactions with its various internal and external stakeholders and provides clear information about its commitments to its partners: employees, customers, suppliers, shareholders, investors, regional government bodies, local authorities, associations and communities. True to its principles, for over 20 years it has operated a policy that is both demanding and concrete in respect of corporate social responsibility, in three main areas that represent the strategic priorities of its business:

- People, i.e. each of the 3,400 Group employees;
- Nature, i.e. the environment and the eco-systems with which its growing operations interact;
- Region, i.e. all communities the Group is connected to everywhere in France, in the UK and in Europe.

The Group has developed a CSR policy which is based on the respect of fundamental rights as defined by the major founding international texts: the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

The Group's Board and its Chairman and Chief Executive Officer fully support the principles stated in these international codes and standards. The purpose of this policy is to translate this support into a set of operational procedures defining a common approach for all Group entities.

Compliance with this policy will be continuously monitored under the close scrutiny of the Group's Board supported by the Strategy and Sustainable Development Committee. Stakeholders shall also be informed of the policy via the Group's various annual reports.

The CSR targets will be defined each year and will form part of the targets set for the directors and managers of the various Group entities. They shall be monitored and assessed during individual annual reviews.

Each manager shall be charged with ensuring that the stated principles are communicated to all employees and are further understood and observed by them.

Challenges

The Group has identified five major challenges which correspond to core issues set out in the major founding texts and the various international frameworks and standards (Global Compact; GRL, ISO 26000). These challenges can be split into several categories: social, regional, environmental, economic and ethical.

- Social challenges: respecting the rights of employees;
- Regional challenges: developing close links with the region;
- Environmental challenges: reducing the impact of the business activity on the environment;
- Economic challenges: managing relationships with customers;
- Ethical challenges: continuing with policy development and value sharing within the Group in connection with stakeholders.

Answering these challenges has been and remains a priority for the Group which, since its inception, has been committed to a social responsibility policy reconciling economic performance, social equity and environmental protection as part of a programme of continuous improvement.

Social challenges

For the Group, responding to the social challenges involves a commitment to fully support a work environment which fosters the personal development and growth of its workers. The human resources policies are developed on the basis of criteria which support truly equal opportunities and treatment for all employees. In its Charter of Ethics and Behaviour, the Group has effectively committed itself to combating all forms of discrimination. In the same Charter, it strongly reasserts its adherence to the principles and values of the 1948 Universal Declaration of Human Rights and to the fundamental conventions of the International Labour Organization as well as to the principles of the United Nations Global Compact.

In order to reinforce the development of its workers and to guarantee a stable and safe working environment for them, 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. Mindful of the progression of its employees' performance, the Group considers the individual annual review to be an essential management tool for human resources and has therefore set a target for all managers in the company of 100% reviews.

The Group invests heavily in young people and is developing its relationships with universities and schools with the aim of fostering a better understanding of its business and of better integrating young people into the world of work. This is why an agreement was signed in January 2013 with the Ecole Nationale des Ponts et Chaussées creating for a period of five years an education and research chair for the science of railway transport dedicated to the study of railway activity. The aim of this chair is training and research on the topics associated with infrastructure and transport service. This initiative attests to the Group's willingness to share its expertise in order to advance science and innovation and to position the railway sector as a profession of the future.

The Group is also strongly focused on training for careers in the railway sector. Created by the Group in 2011, the CIFFCO international railway training centre contributes to the creation of skilled jobs and professional integration. It plays a leading role in the development of railway transport and its associated businesses and, more generally, plays a part in the economic development and influence of the Hauts-de-France region.



Regional challenges

As a committed partner in its economic and social environment, the Group has always been a leading economic player and local employer. As part of its mission, it fully subscribes to a logic of "community involvement", understood as defined by ISO 26000 "proactive outreach work undertaken by an organisation within the community with the aim of preventing and solving problems, fostering partnerships with local organisations and stakeholders and being a good citizen of the community".

The Group has contributed to the creation of several thousand direct, indirect and induced jobs in Kent and the Calais region and has, as part of its role as a developer, strongly contributed to the growth of the local economy at either end of the Tunnel and to the positive transformation of the environment in which it operates.

The Group is conscious of the fact that community involvement is not limited to responsibility for the impact of its activities on the environment but involves responsible behaviour and good citizenship. It is also constantly seeking ways to strengthen its integration into its immediate environment by means of firm commitments and actions of solidarity geared towards the community. The Group also supports education and culture and is conscious that sharing knowledge is a factor which promotes more equal opportunities.

The Group considers its regional commitment to be essential as it contributes to the company's overall performance, to the internal climate and social cohesion and to the loyalty of its employees.

In order to meet these challenges, the Group is committed to strengthening links with local communities by actively supporting associations, schools, universities and organisations with which it works closely on both sides of the Fixed Link.

Environmental challenges

In a world with limited natural resources, companies cannot ensure their continuity without making constant efforts to control their energy consumption and reduce the impact of their operations on the environment. For Getlink, it is clear: it is impossible to be successful in the long term without better control of its environmental impact.

As part of its commitment to "low-carbon" transport, the Group is pursuing an ambitious strategy combining the development of its core activity, cross-Channel transport, with external growth in its two main business and areas of expertise other than the Fixed Link, namely infrastructure management and railway operations.

Since the construction of the Tunnel, expenditure has been incurred to prevent the harmful consequences of business activities for the environment. There are two separate sewer systems for rain water and waste water, retention ponds, treatment stations, etc. Furthermore, an environmental management system based on the requirements of ISO 14001 was put in place by the Concessionaires in 2002.

For 2018, the Group is committed to acting in line with the principles of sustainable development and in accordance with the principles of the Global Compact relating to the environment. In order to achieve this, the Group has four commitments:

- to reduce the environmental impacts of its own operations by focusing on reducing greenhouse gas emissions, reducing its energy consumption, increasing its fleet of electric vehicles and optimising waste management;
- to raise awareness amongst staff of their responsibilities as eco-citizens;
- to choose innovative and environmentally friendly products;
- to strengthen actions which support the protection of diversity.

In addition to these commitments, the Group will pay special attention to the environmental approach of its suppliers and will ask them to implement actions which would support the protection of the environment.

Economic challenges

The Group places a focus on each individual customer at the heart of its development plan. Quality of service is both an everyday and a strategic priority and expectation for its teams within all of its subsidiaries.

Rooted in a binational culture where the concept of "customer" prevails, the Group is continually investing in adapting its offer, the quality of customer services, punctuality, smoothness, comfort and security around a central objective: to constantly increase the high level of quality of service which forms the basis of its economic growth. A golden rule is applied: every innovation and every investment project must demonstrate that it benefits customers before being adopted. This continuous improvement initiative is of particular importance today when, more than 20 years after the start of operations, a new generation of customers is emerging.

This commitment was consolidated in 2013 by the launch of important projects in the various Group subsidiaries, such as the creation of a Customer Experience Department, the renovation of the terminals and Truck Shuttle wagons, a mobile telephone service throughout the Tunnel, etc.

The leading private railway operator in France and the UK, Europorte, a Group subsidiary, stands out by the quality of its service.

Committed to a continuous improvement initiative, the Group is carrying out a transformation project in its terminals where the reception capacity will be increased in order to offer, as of 2015, more departures, toll lanes and secure parking to respond smoothly to the expected growth in truck traffic.

The Group and its subsidiary service companies aim to achieve a higher level of quality of service for 2018. Customer satisfaction is an absolute priority for the Group. For 2018, it has set a central goal for the sector of a customer satisfaction rate of 90% for the passenger activity and 85% for commercial truck activity.

In order to meet the challenges of responsible supply, the Group has undertaken work to identify and evaluate its main suppliers in the field of sustainable development.

Ethical challenges

In order to define its priorities, the Group is involved in and is continuing an ongoing dialogue with its internal and external stakeholders including employees, customers, suppliers, shareholders, local communities, competitors, public authorities and trade unions. This dialogue helps the Group to better understand societal developments and the associated challenges, to develop new topics and to start reflecting on the pilot projects.

The Group's aim is to be viewed as a benchmark and a model within the transport industry in the area of corporate social responsibility and intends to maintain its role as a major player in cross-Channel transport and its position as global leader in piggyback transport.

This ambition requires clearly stated commitments. The Group achieves this by committing through this policy to developing a climate of trust and loyal relationships with all of its internal and external stakeholders. It is particularly committed to:

- staying loyal to its customers and partners;
- instigating, maintaining and encouraging an open dialogue with the various stakeholders;
- strengthening its community involvement;
- strictly observing the fundamental rights as defined in the major international principles: the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work;
- reporting its economic, social and environmental results with the greatest transparency.

6.7 METHODOLOGICAL NOTE RELATING TO CORPORATE SOCIAL RESPONSIBILITY

The Group's social and environmental reporting is based on information stipulated in article 225 of French law 2010-788 of 12 July 2010, known as the "Grenelle 2" law, and the transparency principles of the Global Reporting Initiative (GRI).

The Group's CSR data is consolidated under the responsibility of the Group Human Resources Department.

Consolidation period for CSR reporting

The period used for annual reporting of workforce and societal data is the calendar year (1 January 2017 to 31 December 2017).

Environmental data, however, is reported on a rolling year basis (from 1 October 2016 to 30 September 2017) as data and supporting evidence for the full year is not available within a timescale compatible with the publication date of the Registration Document.

Scope of consolidation

Data is consolidated for all Group entities, with the exception of ElecLink and GET SE in respect of environmental data.

Choice of indicators

The purpose of the indicators is to monitor the commitments made by the Group and its progress in terms of environmental and workforce performance. The indicators were chosen by the Group because they are appropriate to its activities and serve the needs of stakeholders as well as its regulatory obligations.

Workforce indicators have been chosen to:

- measure the results of the human resources policy and the Group's social commitments,
- take account of cultural differences and local disparities (different national law, varying legal obligations, etc.).

Environmental indicators have been chosen to:

- serve environmental policy and reflect progress in the Group's different activities; the indicators chosen are appropriate
 to the Group's activities,
- allow monitoring of the Group's performance on key environmental issues.

Internal consolidation and control

Workforce information is collected from each entity through a computerised data feedback system, which includes consistency checks. The data is checked and validated by the Group's entities and consolidated across the entire scope by the Group Human Resources Department.

Each entity's environmental information is collected through the computerised data feedback system. The data is checked and validated by each Group entity and is then consolidated by the Group Human Resources Department.

During consolidation of workforce and environmental data, consistency checks are carried out at Group level. Comparisons are made with the results from previous years and discrepancies deemed significant are analysed and examined in greater detail.

Societal information is collected, checked and validated at the level of each entity. It is then centralised by the Group Human Resources Department.

Further information and methodological limits of the indicators collected

The methodologies used for some workforce and environmental indicators may in practice be limited by:

- a lack of harmonisation in national/international definitions and legislation,
- the representativeness of the measurements taken or limited availability of external data needed to calculate the indicator,



- the qualitative and therefore subjective nature of some data,
- the practical methods used to collect and input this data.

Consumption of natural gas

Consumption at Europorte's subsidiary sites has been extrapolated on the basis of a ratio of natural gas consumption / m² / day. This ratio was calculated based on data from sites equipped with meters.

Europorte consumption of electricity

For premises, the consumption of electricity has been estimated on the basis of average consumption per site relative to the surface area of the site.

For motor engines, the consumption of electricity has been estimated using kilometres travelled by engines, according to a methodology agreed by all the parties involved (Europorte, the French Rail Network/Network Rail and the energy supplier).

Greenhouse gas emissions

The calculation of emissions of greenhouse gases is based on the methodology developed by the Carbon Trust. For some incoming refrigerant data, the emission factors are based on the product safety data sheets. The emission factors used to convert the consumption of energy are those of ADEME in France and DEFRA for all other consumption.

Waste products

Data relating to waste generated by operations at customers' sites, collected for the monitoring of the activities of contractors, is excluded from the scope of reporting.

Consumption of water

The consumption of water for the Europorte subsidiary sites not equipped with meters has been extrapolated by applying a ratio of consumption of water in cubic metres per employee present on site per day from sites equipped with meters.

Rate of absenteeism

In the calculation of the rate of absenteeism for the four French Europorte entities, the number of scheduled hours is obtained by multiplying the number of full time equivalent staff by the number of theoretical hours.

Training

The training budget is the sum of logistics costs (when available), external costs and the related staff costs.

Salary and employers' costs are extracted from the payroll systems by the human resources departments.

Rate of non-permanent employment

Trainees and student-apprentices on professionalisation contracts are excluded.

External audit

In order to ensure that it provides reliable information, each year the Group requests the opinion of an independent third party regarding the quality of its workforce and environmental information collection and reporting procedures. In 2017, the audit was carried out by KPMG. The 2017 assurance report expresses reasonable assurance for three environmental indicators, ten social indicators (information marked \checkmark) and one societal indicator, and limited assurance for all other information presented in chapter 6 of this Registration Document.

6.8 REPORT BY ONE OF THE STATUTORY AUDITORS, APPOINTED AS INDEPENDENT THIRD PARTY, ON THE CONSOLIDATED HUMAN RESOURCES, ENVIRONMENTAL AND SOCIAL INFORMATION INCLUDED IN THE MANAGEMENT REPORT

This is a free English translation of the statutory auditors' report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

For the year ended 31 December 2017

To the Shareholders,

In our capacity as statutory auditor of Group Eurotunnel SE, (hereinafter named the "Company"), appointed as independent third party and certified by COFRAC under number 3-1049¹⁶, we hereby report to you on the consolidated human resources, environmental and social information for the year ended 31 December 2017, included in the management report (hereinafter named "CSR Information"), pursuant to article L. 225-102-1 of the French Commercial Code (*Code de commerce*).

Company's responsibility

The Board of Directors is responsible for preparing a company's management report including the CSR Information required by article R. 225-105-1 of the French Commercial Code in accordance with the guidelines used by the Company (hereinafter the "Guidelines"), summarised in the management report and available on request from the Company's head office.

Independence and quality control

Our independence is defined by regulatory texts, the French Code of ethics (Code de déontologie) of our profession and the requirements of article L. 822-11-3 of the French Commercial Code. In addition, we have implemented a system of

Whose scope is available at www.cofrac.fr.

quality control including documented policies and procedures regarding compliance with the ethical requirements and applicable legal and regulatory requirements.

Statutory auditor's responsibility

On the basis of our work, our responsibility is to:

- attest that the required CSR Information is included in the management report or, in the event of non-disclosure of a part
 or all of the CSR Information, that an explanation is provided in accordance with the third paragraph of article R. 225105 of the French Commercial Code (Attestation regarding the completeness of CSR Information);
- express a limited assurance conclusion that the CSR Information taken as a whole is, in all material respects, fairly
 presented in accordance with the Guidelines (Conclusion on the fairness of CSR Information);
- at the request of the Company and out of the scope of certification, express reasonable assurance, that information selected¹⁷ by the Group and identified by the symbol (√) in the chapter 6 of the management report is fairly presented, in all material respects, in accordance with the Guidelines (Reasonable assurance on a selection of CSR information).

However, it is not our responsibility to pronounce on the compliance with the relevant legal provisions applicable if necessary, in particular those envisaged by article L. 225-102-4 of the French Commercial Code (Duty of care) and by the law n° 2016-1691 of 9 December 2016 known as Sapin II (fight against corruption).

Our work involved six persons and was conducted between September 2017 and February 2018 during a thirteen-week period. We were assisted in our work by our CSR experts.

We performed our work in accordance with the order dated 13 May 2013 defining the conditions under which the independent third party performs its engagement and with the professional guidance issued by the French Institute of statutory auditors (Compagnie nationale des commissaires aux comptes) relating to this engagement and with ISAE 3000¹⁸ concerning our conclusion on the fairness of CSR Information.

1. Attestation regarding the completeness of CSR Information

Nature and scope of our work

On the basis of interviews with the individuals in charge of the relevant departments, we obtained an understanding of the Company's sustainability strategy regarding human resources and environmental impacts of its activities and its social commitments and, where applicable, any actions or programmes arising from them.

We compared the CSR Information presented in the management report with the list provided in article R. 225-105-1 of the French Commercial Code.

For any consolidated information that is not disclosed, we verified that explanations were provided in accordance with article R. 225-105, paragraph 3 of the French Commercial Code.

We verified that the CSR Information covers the scope of consolidation, i.e., the Company, its subsidiaries as defined by article L. 233-1 and the controlled entities as defined by article L. 233-3 of the French Commercial Code, within the limitations set out in section 6.8 of the management report.

Conclusion

Based on the work performed and given the limitations mentioned above, we attest that the required CSR Information has been disclosed in the management report.

2. Conclusion on the fairness of CSR Information

Nature and scope of our work

We conducted fifteen interviews with the persons responsible for preparing the CSR Information and, where appropriate, responsible for internal control and risk management procedures, in order to:

- assess the suitability of the Guidelines in terms of their relevance, completeness, reliability, neutrality and understandability, and taking into account industry best practices where appropriate;
- verify the implementation of data-collection, compilation, processing and control process to reach completeness and consistency of the CSR Information and obtain an understanding of the internal control and risk management procedures used to prepare the CSR Information.

We determined the nature and scope of our tests and procedures based on the nature and importance of the CSR Information with respect to the characteristics of the Company, the human resources and environmental challenges of its activities, its sustainability strategy and industry best practices.

Regarding the CSR Information that we considered to be the most important and presented in Appendix:

- at parent entity level, we referred to documentary sources and conducted interviews to corroborate the qualitative information (organisation, policies, actions), performed analytical procedures on the quantitative information and verified, using sampling techniques, the calculations and the consolidation of the data. We also verified that the information was consistent and in agreement with the other information in the management report;
- at the level of a representative sample of entities selected by us¹⁹ on the basis of their activity, their contribution to the consolidated indicators, their location and a risk analysis, we conducted interviews to verify that procedures are properly applied and we performed tests of details, using sampling techniques, in order to verify the calculations and reconcile

¹⁹ Europorte, Eurotunnel Services GIE, Eurotunnel Services Ltd.



¹⁷ See appendix.

¹⁸ ISAE 3000 – Assurance engagements other than audits or reviews of historical financial information.



the data with the supporting documents. The selected sample represents 99% of headcount considered as material data of social issues and 100% of environmental data considered as material data²⁰ of environmental issues.

For the remaining consolidated CSR Information, we assessed its consistency based on our understanding of the Company.

We also assessed the relevance of explanations provided for any information that was not disclosed, either in whole or in part.

We believe that the sampling methods and sample sizes we have used, based on our professional judgement, are sufficient to provide a basis for our limited assurance conclusion; a higher level of assurance would have required us to carry out more extensive procedures. Due to the use of sampling techniques and other limitations inherent to information and internal control systems, the risk of not detecting a material misstatement in the CSR information cannot be totally eliminated.

Conclusion

Based on the work performed, no material misstatement has come to our attention that causes us to believe that the CSR Information, taken as a whole, is not presented fairly in accordance with the Guidelines.

3. Reasonable assurance on a selection of CSR Information

Nature and scope of our work

For the information selected by the Group and identified by the symbol \checkmark , our audit consisted of work of the same nature as described in paragraph 2 above for CSR information considered the most important, but in more depth, particularly regarding the number of tests.

The selected sample represents 99% of headcount considered as material data of social issues and 100% of quantitative environmental information identified by the symbol \(\sqrt{} \) published.

We consider that this work enables us to express a conclusion of reasonable assurance for the information selected by the Group and identified by the symbol \checkmark .

Conclusion

In our opinion, the information selected by the Group and identified by the symbol \checkmark is fairly presented, in all material respects, in compliance with the Guidelines.

Paris – La Défense, 20 February 2018 KPMG S.A. Philippe Arnaud

Partner Sustainability Services Fabrice Odent Partner

Appendix

Human resources indicators	Level of assurance
Total workforce and workforce broken down by gender	
Average age of workforce	
Management to workforce ratio	
Temporary employment rate Number of student apprentices and employees on work experience	Reasonable
Number of training hours Average number of training hours per employee	
Frequency rate for lost time work related accidents	
Severity rate of work related accidents	
Absenteeism rate	
Environmental indicators	Level of assurance
Water consumption	
Greenhouse gas emissions (scope 1 and 2)	Reasonable
Waste produced (hazardous and non-hazardous)	

See environmental indicators listed in Appendix.



Social indicators	Level of assurance
Composite index	Reasonable
Qualitative information	
	Occupational health and safety conditions
Human resources information	Organisation of social dialogue
	Policies implemented regarding training
	The organisation of the company to integrate environmental issues
Environmental information	Energy consumption and measures implemented to improve energy efficiency
	Greenhouse gas emissions
Social information	Territorial, economic and social impact of the company activity regarding regional employment and development
	Partnership and sponsorship actions