

Getlink



Communication on progress

GC Advanced Level

JUNE 2020

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

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

These principles have been woven at the heart of the organisation, its strategy and its culture, notably through an exemplary ethical approach based on a new Code of Ethics and Behaviour and the "Get Compliant" programme, a human resources policy focused on the development and fulfilment of its employees and a strong commitment towards energy and environmental transition. In 2019, aware of the transformation taking place involving the Group's companies and the rapidly changing expectations of its stakeholders, the Group updated its materiality analysis, a key stage in its Corporate Social Responsibility approach. In order to drive this approach even further, we have also selected the 10 Sustainable Development Objectives which best chime with our business model, activities and material challenges.

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

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

I am delighted to reaffirm Getlink's continued support for the UN Global Compact and to renew its commitment to make its principles an integral part of its strategy, its daily operations and organizational culture for the year 2020.



Jacques Gounon, Chairman and Chief Executive Officer

8 June 2020

PRELIMINARY QUESTIONS ABOUT YOUR ORGANISATION

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

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

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

Getlink makes every effort to provide reliable information and asks for an opinion each year from an independent third party on the quality of its procedures for reporting and feedback of social and environmental information. In 2019, the audit was undertaken by the firm KPMG. The 2019 report made it possible to assess the compliance of the Extra Financial Performance Assessment with the regulatory provisions. It has also ensured that it presents the business model and the main risks related to the activity of all entities included in the scope of consolidation, including, where relevant and proportionate, risks created by its business relationships, products or services, and policies, actions and results, including key performance indicators. This COP covers the data and information relating to the 2019 financial year, which is published in the Group's 2019 Universal Registration Document. [Universal Registration Document](#)

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

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

In paragraph 6.9 of Chapter 6 of its Universal Registration Document, the Group details the existence of the various indicators using a cross-reference table to ensure that the information published can be clearly read and understood and that it is in line with the requirements of Grenelle 2 and GRI principle G4.

Since 2015, the Group has conducted a materiality analysis in accordance with the recommendations of the International Integrated Reporting Council (IIRC) and the Global Reporting Initiative (GRI). In 2019, aware of the transformation taking place in our societies and the rapidly changing expectations of its internal and external stakeholders, the Group updated its materiality analysis

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

<i>Social indicators</i>	Opinion on honesty	Reasonable assurance report
End-of-period staff numbers, distribution by gender	X	X
Mean age	X	X
Staff-manager ratio	X	X
Level of uncertain employment	X	X
Number of training hours	X	X
Average training hours per employee	x	x
Frequency of workplace accidents	X	X
Absenteeism rate	X	X
Number of trainees and those on work-study contracts	X	X
Number of work-study contracts and trainees transformed into permanent/ fixed-term contracts		X

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

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

[Social Data Synthesis 2019 \(French version\)](#)

[Environmental Data Synthesis 2019 \(French version\)](#)

SDG & MATERIALITY ANALYSIS

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

I. The materiality analysis of the Getlink Group

To adapt and respond to the challenges of the Group's transformation, in a rapidly changing context, Getlink endeavours to be attentive to its stakeholders (employees, customers, suppliers, shareholders, community, etc.) in order to better meet their expectations, to foster the creation of shared value and to strengthen the overall performance of the Group. As early as 2015, Getlink had carried out a first materiality analysis. In 2019, conscious of the ongoing transformation of our societies and the rapidly changing expectations of its stakeholders, the Group has updated its materiality analysis. It is an essential step. It enabled us to check the relevance of the priority issues and to secure the Group's future work in the review of its CSR strategy, its commitments, and the objectives to be defined. These elements will also contribute to prioritise the actions to carry out and select the issues and data to be taken into account into its communications and reporting.

Methodology:

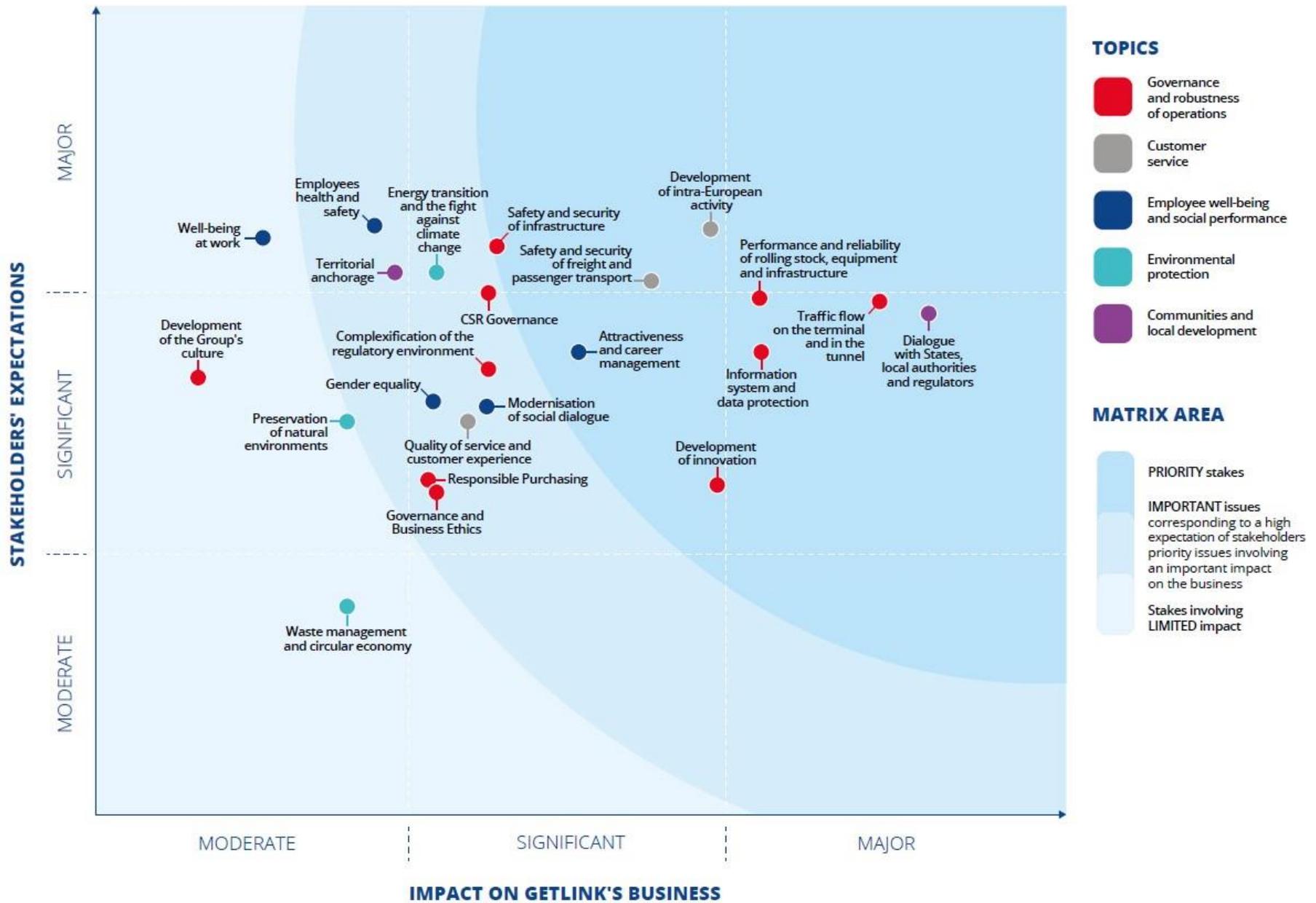
Conducted with the support of a benchmark consulting firm, the update was carried out in three steps:

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

- Identification, adaptation and rating of challenges by a representative sample of internal and external stakeholders located in France and in the United Kingdom. Based on 21 interviews, 23 material CSR challenges have been identified and assessed for the Group.
- Prioritisation of issues. In order to facilitate reading and the appropriation, these material challenges have been prioritised by taking into account both the importance for stakeholders and the impact on the Group's activity, which was assessed using the methodology developed for its risk analysis.

Results and materiality matrix:

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



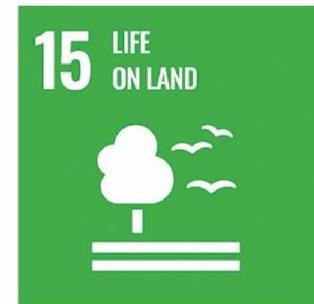
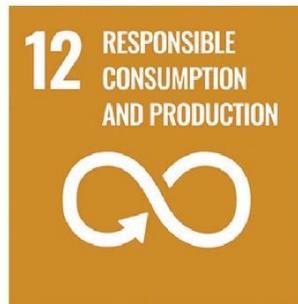
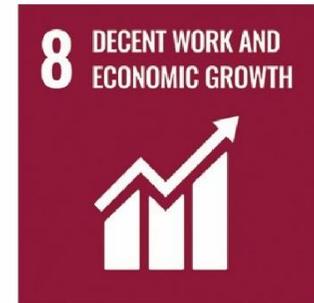
Some issues remain intangible and are the subject of a high expectation from some stakeholders such as the health and safety of employees or the safety and security of the infrastructure, transport, goods and customers. Many mechanisms have been implemented to cover risks associated with these challenges,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

II. Sustainable Development Goals of the United Nations

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



SUSTAINABLE DEVELOPMENT GOALS



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

I. Implementing the ten principles into strategies and operations

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

<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Getlink has set up a formal CSR policy, supported and sustained at the highest level of the organisation by the Chairman and Chief Executive and the Board of Directors. This policy came into force in 2015, and dictates the Group’s principles, challenges and commitments.</p> <p>The CSR objectives are defined each year and form part of the objectives assigned to the directors and managers of the various entities of the Group.</p> <p>In 2019, Getlink also identified 10 Sustainable Development Goals (SDG) that best reflect its most material challenges out of the 17 SDGs defined by the UN for the 2015-2030 period. These elements - combined with the materiality analysis - will supplement the updating of the Group’s CSR strategy in 2020 and will drive performance. These 10 SDGs, compared with the Group’s material challenges, are presented in this Universal Registration Document (page VI)</p> <p>Universal Registration Document</p>	<p><i>URD, Chapter 6.1.2. p.224</i></p>
	<p>➤ Giving executive responsibility for the CSR strategy to the relevant departments.</p>	<p>The Group’s strategic CSR commitments and their implementation are presented to the Corporate Committee and the Board of Directors.</p> <p>The composition of the Board of Directors reflects the commitment to diversity and complementary skills to benefit corporate strategy. Board members and members of specialised committees are selected based on a skills matrix (presented in chapter 4 of this Universal Registration Document) which can be used to identify recognition of skills relating to economic, environmental and social impacts through “CSR-governance”, “human</p>	

		<p>resources” and “risk management” criteria. Specifically, in terms of the CSR skills of the current board member.</p> <p>The Corporate Committee is responsible for regularly examining the performance of the Group in environmental matters and the strategic initiatives designed to promote environmental management, protect natural resources and limit the impact of the Group’s activities on the environment.</p> <p>In 2015, the Nomination Committee decided to create a stable, relevant and balanced CSR performance composite index: the Group asked an external consultancy firm to create a benchmark for the business practices of CAC 40 companies, and then conducted a qualitative study with its internal and external stakeholders. This initiative helped identify four themes directly linked to the Group’s activities: health/safety, labour relations, greenhouse gas emissions and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate an achievement rate with respect to the composite index, according to the objectives set for each area.</p> <p>Over the years, the Group’s CSR commitment has become a key part of its economic strategy: executives, through plans to convert preference shares into ordinary shares, and the Chairman and Chief Executive Officer through his annual bonus have direct responsibility over CSR challenges: the CSR composite index is used to calculate 10% of the Chairman and Chief Executive Officer’s annual variable remuneration.</p> <p>Operational action plans include CSR criteria. The CSR objectives are defined each year, and they are included in the objectives assigned to the directors and the heads of various Group entities. They are monitored and assessed during individual annual reviews.</p> <p>CSR operational management has adopted a network-style approach. The CSR reporting process has demonstrated the Group’s willingness to be transparent on these topics for over 10 years. Ethics underpin all management and operational actions. The Ethics Charter is a reference text to inspire employee decisions, guide their day-to-day actions and</p>	<p><i>See URD. p. 224</i></p>
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		<p>allow them to build stakeholder trust each day, something which is a major source of value creation for the Group.</p>	<p><i>See URD. p. 185</i></p>
	<p>➤ Aligning strategies, targets and forms of incentive with the CSR strategy.</p>	<p>In its environmental role, the Corporate Committee, which was founded as part of the Group’s longstanding policy on health, safety and the environment, is responsible for regularly considering the performance of Getlink SE and the Group in environmental matters and the strategic orientation designed to promote good environmental management, preserve natural resources and limit the impact of the company’s and the Group’s activities on the environment.</p> <p>For 2019, the Nomination and Remuneration Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is based on four topics which are directly linked to the Group’s activities: health & safety, social climate, GHG emissions, and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate a completion rate with respect to the composite index, according to the objectives fixed for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the performance-related plans to allocate free shares. The composite index was audited in 2019 as part of the audit of corporate information by the auditors.</p>	<p><i>See URD. p. 224</i></p> <p><i>See URD. p. 224</i></p>
	<p>➤ Allocating responsibility for CSR to an individual or group within each unit or subsidiary.</p>	<p>In 2019, the Group underlined its commitment to CSR by creating the role of Group CSR Director within the executive committee; this department will work to strengthen the overall approach, its clarity and impact by aiming to deal with all CSR areas in relation to ISO 26000. The Group will work to improve its actual and perceived CSR performance.</p>	

		<p>The Executive Management of each of the Group entities is responsible for the verification, collection and transmission of CSR information to Corporate Executive Management.</p> <p>The data are checked and validated by the Group entities and consolidated for the entire Group perimeter by the Group Human Resources Department. They have been since 2019, checked by the Group's CSR Department.</p> <p>Universal Registration Document</p>	
	<ul style="list-style-type: none"> ➤ Ensuring that the various departments within the company coordinate their activities to maximize performance and avoid negative impacts. 	<p>The Group Human Resources Department coordinated all CSR contributions and actions within the various subsidiaries.</p> <p>The CSR Department now coordinates all contributions of CSR actions and initiatives within the Group.</p>	
Criterion 2: The COP describes value chain implementation			
The good practices in place within the Group	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	<p>The Group aims to formalise the results of dialogue at different levels of its organisation. In 2019, aware of the transformation taking place in our societies and the fast changing expectations of its internal and external stakeholders, the Group has updated its materiality analysis.</p>	
	<ul style="list-style-type: none"> ➤ Analysing each segment of the value chain. 	<p>The materiality analysis, which included consulting the main stakeholders within and outside the Group, made it possible to identify and establish the hierarchical order of the Group's primary CSR challenges, both internal and external. It also allowed the Group to identify present and future opportunities and risks that could have a significant impact on its stakeholders, its environment or its economic performance.</p>	
	<ul style="list-style-type: none"> ➤ Communication of policies and expectations to suppliers and other partners. 	<p>In representing the Group's CSR values and commitments, the Procurement Departments of the various Group entities have taken actions that, beyond providing the Charter of Ethics and Conduct when new contracts are signed, require suppliers and subcontractors to comply with the Group's fundamental principles.</p>	

		<p>Health & safety, environment and quality questionnaires were sent by the Procurement Departments to candidate subcontractors and suppliers. Their responses were taken into consideration in the selection process. Now a system of consultation frameworks - to be signed by the supplier and the purchasing department - before each consultation refers to the policies to be considered. In addition, the Group is currently studying how to strengthen the integration of environmental performance into the selection process.</p>	<p>Quality questionnaire</p> <p>Safety questionnaire</p> <p>Sustainable Development Questionnaire</p>
	<p>➤ Implementing supervisory and assurance mechanisms (audits, checks) to ensure compliance of practices.</p>	<p>An Internal Audit Department is in place within the Group and has the role of ensuring compliance of practices.</p>	
	<p>➤ Awareness-raising, training and other methods for reinforcing skills with suppliers and other partners.</p>	<p>Getlink has been a signatory of the Charter for Responsible Supplier Relations since January 2012. This charter is broken down into ten commitments for responsible procurement, ensuring a genuine partnership between customers and their suppliers with due regard to their respective rights and obligations. The Group is committed, in particular, to ensuring financial equity towards suppliers, to respecting the principle of transparency, to incorporating environmental issues and even to ensuring the territorial responsibility of its company. It thereby represents a measure intended to prevent corruption.</p> <p>The Group is also a member of the steering committees for the 'Responsible Supplier Relations' charter and certification and has clearly demonstrated its wish to be part of this certification process, as an extension of the implementation of the charter's ten commitments.</p> <p>Charter for Responsible Supplier Relations</p>	

Reliable policies and procedures on Human Rights			
<i>Principle 1: Business should support and respect the protection of internationally proclaimed human rights</i>			
<i>Principle 2: Business should make sure that they are not complicit in human rights abuses</i>			
Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights			
The good practices in place within the Group	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	<p>Getlink has committed to implementing the principles of the UN Global Compact through its Charter of Ethics and Conduct. This charter ‘describes the principles behind actions that must inspire the behaviour of all employees in all circumstances and in all countries, particularly the OECD Guidelines for Multinational Enterprises’.</p> <p>The first version of the Charter was approved by the Group’s Board of Directors in January 2013. Since 2019, a new Ethics Charter, which has a more down-to-earth format containing a greater number of illustrations and offering a practical guide to ethics, forms the bedrock underpinning all internal policies, codes of conduct and specific procedures adopted by Getlink (anti-corruption policy, competition policy and protection of personal data etc.)</p> <p>Code of Ethics and Conduct</p>	
	<ul style="list-style-type: none"> ➤ Commitment to comply with all applicable laws. 	<ul style="list-style-type: none"> - Since 2013, Getlink has been adhering to the principles of the 1948 Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation (ILO). 	

		<ul style="list-style-type: none"> - The Group applies an equal-opportunities human resources policy in accordance with the law. In particular, it does not permit any discrimination for illicit reasons such as gender, age, way of life, ethnicity or nationality, disabilities, religious, political or trade union opinions or commitments. 	
	<ul style="list-style-type: none"> ➤ Declaration of commitment to respecting and supporting human rights approved at the highest level. 	In his declaration of support, the Chairman and CEO formally expressed the Group's commitment to complying with the ten key principles of the UN Global Compact, including those relating to human rights.	
	<ul style="list-style-type: none"> ➤ Declaration of commitment to personnel and stakeholders in respect of human rights. 	<ul style="list-style-type: none"> - In its Code of Ethics and Conduct, the Group underlines that: "Support and promote Getlink's commitments in this area, respect others, reject any form of discrimination, intimidation and harassment against other employees, customers or persons who have a relationship with Getlink and treat our colleagues and trading partners as we would like them to treat us". - Getlink complies with the laws relating to protecting the privacy of its employees, in particular those governing digital files. - The Ethics Code is presented when a contract is signed with a supplier, a subcontractor or an employee, and those entities and individuals are required to comply with the associated principles. - Getlink signed the Charter for Responsible Supplier Relations in 2012. 	
	<ul style="list-style-type: none"> ➤ Declaration of commitment communicated both internally and externally. 	The Group's Ethics Code is made available internally to all personnel on the Group intranet and the intranet of each subsidiary and externally on the Group's website.	
	<ul style="list-style-type: none"> ➤ Other good practices 	The Group requires that its partners (subcontractors and suppliers) make a clear commitment to respecting human rights.	

Criterion 4: The COP describes effective management systems to integrate Human Rights principles

The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The human resources policies of the various Group subsidiaries are developed on the basis of criteria which support truly equal opportunities and treatment for all employees. A Group Human Resources Department supervises the application of policies within the subsidiaries and ensures compliance with the principles laid down in those policies.	
	➤ Processes designed to ensure that international human rights are respected.	Almost all of the Group's employees are stationed in France and in the United Kingdom. The few persons who are not employed in those two countries work in other European countries (Germany, Spain and the Netherlands). The Code of Ethics and Conduct and Human Resources Policies commit all subsidiaries to comply with the rules on respect for human rights	
	➤ Internal awareness-raising and training about human rights.	Internal distribution of the Charter of Ethics ans Conduct on the various intranet sites of subsidiaries (in French and English) and on the Group intranet, and the external distribution on the Group website contributes to this campaign of raising awareness undertaken by the Group.	
	➤ Operational complaint procedures for stakeholders potentially affected by the company's activities.	An Ethics Officer has been appointed by the Group to assist any stakeholder who is experiencing problems or has questions about the scope or application of the rules laid down in the Ethics Charter.	

Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration

The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The Charter of Ethics ans Conduct states clearly in its first paragraph that: 'Pursuant to the Global Compact principles in terms of Human Rights, Getlink does not permit any violations of Human Rights'. The Human Resources policy for each subsidiary clearly states that Human Rights principles must be integrated and adhered to.	
	➤ System for monitoring the effectiveness and implementation of human rights policies.	The various Human Resources Departments of the subsidiaries and the Group Human Resources Department guarantee and monitor the implementation of the policies relating to respect for human rights and application of the Group Ethics Code.	

	<ul style="list-style-type: none"> ➤ Monitoring of internal and external feedback. 	<p>Audits and controls are carried out by the Safety and Sustainable Development departments (renamed the Safety and Transversal Processes department as regards Fixed Link and QSE for Europorte subsidiaries) and by the subsidiaries' Purchasing departments on suppliers and service providers to ensure compliance with the Group's code.</p> <p>Internally, constructive social dialogue enables regular communication with personnel representatives both in the staff forums specific to each country and within the European Company Committee, which brings together representatives of French and British trade unions.</p>	
	<ul style="list-style-type: none"> ➤ Complaint procedures that are lawful, accessible, regular, fair, transparent, compatible with the law, sources of continuous learning, based on commitment and dialogue. 	<p>An Ethics Officer has been appointed by the Group to assist any stakeholder who is experiencing problems or has questions about the scope or application of the rules laid down in the Ethics Charter.</p>	

Reliable policies and procedures on labour

Principle 3: Business should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: Business should support the elimination of all forms of forced and compulsory labour

Principle 5: Business should support the effective abolition of child labour

Principle 6: Business should support the elimination of discrimination in respect of employment and occupation

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

<i>The good practices in place within the Group</i>	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	<p>As a responsible employer, Getlink seeks to promote the personal fulfilment and development of its employees, which it considers a key factor in its corporate strategy.</p>	
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		<p>Its human resources policies have been developed in order to foster equal opportunities and treatment for all Group employees throughout their careers.</p> <p>The main focus of Getlink’s training policy is to maintain a high level of operational performance within teams, enabling them to contribute to the development of the business.</p> <p>The Group has a training center, the Opal Coast International Railway Training Centre (CIFFCO), which provides professional training services essentially devoted to activities in the rail sector.</p> <ul style="list-style-type: none"> <i>In 2019, nearly 99,000 hours were devoted to employee vocational training, representing an average of 28 training hours per employee. The cost of training, which accounted for nearly 2.8% of the total wage bill, stood at €4,504,344 in 2019, compared to €4,973,086 in 2018.</i> <p>The human resources policies recognize each employee’s contribution, taking account of that employee’s qualifications, level of responsibility and individual performance.</p> <p>Getlink ensures that all its subsidiaries comply with their legal and contractual obligations regarding working hours.</p>	<p><i>See URD, Chapter 6.5.5, p.232</i></p>
	<p>➤ Reference to international conventions and standards.</p>	<p>Getlink’s CSR policy is in line with the observance of fundamental rights as defined in the major international principles – the 1948 Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, OECD guidelines for multi-national companies, and the principles of the United Nations Global Compact. Getlink supports, adheres to and actively participates in the World Forum for a Responsible Economy and the values it promotes.</p>	
	<p>➤ Company policy written in order to comply with national labour rights, comply with international standards in international activities, and engage in</p>	<p>All Group employees have staff representative bodies, with which the various Human Resources Departments, the Group Human Resources Department and the Group departments maintain constructive dialogue.</p>	

	<p>dialogue with employee representatives (international, national or sector-based).</p>	<p>Getlink ensures that all its subsidiaries comply with their legal and contractual obligations regarding working hours. In the United Kingdom, the average working week for ESL employees is 37 hours (i.e. 1,924 hours per year) based on individual contracts and agreements in place with the labour union Unite and the staff representative bodies.</p> <p>In France, employees' working hours (with the exception of certain senior managers and directors) are organised on a weekly basis and must not exceed an average of 35 hours a week over the year, and in any event, not more than 1,600 hours per year.</p> <p>Getlink's CSR policy, signed by the Chairman and CEO, states that the Group has made 'the issue of improving security and health at work a major concern with the renewed and expressed target of zero accidents.</p>	
	<p>➤ Integration of references to the principles of labour law into contracts with suppliers and other partners.</p>	<p>The general procurement conditions contain references to the legal obligations in relation to labour issues and note the obligation for suppliers to comply with the fundamental principles of the Charter of Ethics and Behaviour.</p>	
	<p>➤ Specific commitments and human resources policies in line with the Group's priorities for national development or priorities relating to decent employment in the countries where it operates.</p>	<p>Getlink is committed to promoting diversity as a key driver of performance to better reflect the society in which it operates:</p> <ul style="list-style-type: none"> • <i>In 2019, ESGIE entered into discussions to negotiate a collective agreement, which were concluded in February 2020 with the renewal of the professional equality collective agreement. This action affirms Getlink's desire to promote women and to put in measures to raise awareness as an extension of the proposed Charter on professional equality. In 2019, ESGIE published the results of its workplace equality index, which at 77/100 was above the 75 point threshold. In order to improve this result, the business has developed an action plan with progress targets regarding female promotion (women to account for at least 25% of total promotions over three years) and equal pay, ensuring that men and women with equivalent jobs, experience and education</i> 	

		<p><i>receive the same pay. This commitment was upheld as there was no pay gap reported in 2019¹.</i></p> <ul style="list-style-type: none"> • <i>Moreover, a Group workplace equality charter will be distributed in the first quarter of 2020. In developing this Charter, the Group sought to closely involve male and female employees during a workshop, where specific actions were shared and proposed to reduce gender inequality at work. The effective implementation of actions in favour of workplace gender equality within different Group subsidiaries will be regularly and carefully monitored</i> • <i>In the United Kingdom, the ‘Rate for the Job’ remuneration system and the HAY method ensure fair remuneration.</i> • <i>Eurotunnel welcomed some girls aged between 8 to 10 at a beginners’ programming workshop. This initiative was aimed at awakening an interest in computing careers from the earliest age.</i> 	<p><i>See URD, 6.5.3, p. 230</i></p>
	<p>➤ Participation and leadership in wider efforts by employer organisations (both international and national) to collectively meet the challenges in terms of work standards in the countries where it operates, where applicable as part of a tripartite approach (companies, labour unions, governments).</p>	<p>Together with its actions in promoting the continued employment of disabled people, Getlink works hand in hand with the sheltered and supported sectors by using employment agencies for disabled workers. An agreement was therefore signed in 2010, and is still in place, between the Group and the AFAPEI (Association Frontalière des Parents et Amis de l’Enfance Inadaptée). On 23 July 2013, a partnership framework agreement was signed with APF (the French association for people suffering from paralysis). Within this partnership, work was contracted to APF frequently in 2017 for various services. This collaboration provides full-time posts for four people on permanent contracts.</p> <p>As was the case in 2018, in 2019 the Group conducted several in-house awareness-raising actions on disability with the specialist company ‘Made in TH’, which included appointing a dedicated ambassador, setting up a monthly stand-by on site, conducting interviews and establishing support measures. In addition, a training initiative was established as part of a partnership between Getlink and a temporary employment agency which specializes in supporting disabled workers.</p>	<p><i>See URD, 6.7.2; p.238</i></p>

		<p>In parallel, another initiative was carried out with the Hauts de France Regional Office for Business, Competition, Consumer Affairs, Work and Employment (DIRECCTE), which enabled a disabled worker to be taken on for a one-year service contract.</p>	
Criterion 7: The COP describes effective management systems to integrate the labour principles			
<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The Group Human Resources Department has introduced monthly monitoring reports on all company indicators (health, safety, security, absenteeism, turnover, training, etc.), which involves all Group subsidiaries. This allows the Group to measure the progress made in relation to the objectives set or to propose solutions if the company's position deteriorates.</p>	<p><i>See URD, 4.2.5; p.184</i></p>
	<p>➤ Evaluations of risks and impacts concerning work standards.</p>	<p>A Safety and Security Committee is responsible for monitoring safety and security issues in each of the Group's business sectors.</p> <p>The Safety and Security Committee reviews all matters concerning safety and security within the company or the Group and reports to the Board.</p> <p>The remit of the Safety and Security Committee is to:</p> <ul style="list-style-type: none"> ▪ <i>regularly examine all matters concerning the safety or security of (i) the operation of the transport System, including the services of the national railways during their crossing of the Tunnel, and, separately, (ii) the activities of the railway subsidiaries. This review includes issues that may have a significant impact on the environmental performance of the company and the Group;</i> ▪ <i>review reports on any incidents or accidents and ensure that appropriate action has been taken, or appropriate recommendations have been implemented by the national railways;</i> ▪ <i>regularly review response procedures and the implementation of recommendations made to prevent the recurrence of similar events;</i> ▪ <i>receive reports of any incidents or accidents occurring in other transportation systems or in other industries that are similar to the company's or the Group's system and to recommend appropriate action;</i> 	

		<ul style="list-style-type: none"> ▪ <i>receive reports on the safety consequences of any major changes in the transport System procedures or design, and to provide advice, if necessary, in the context of submissions to the Safety Authority of the IGC;</i> ▪ <i>more generally, take, within the scope of its powers, any initiative to be presented to the Board aimed at improving the current levels of performance of the company, in particular by updating the risk prevention and management strategies;</i> ▪ <i>ensure, with regard to occupational health and safety, that any person affected by the safety implications of an operating procedure or a change in such a procedure must be able to make his or her opinion known; and</i> ▪ <i>to report regularly to the Board.</i> <p>In 2019 the Committee met five times on matters relating to the Concession, with an attendance rate of 92%.</p> <p>The Committee monitors individual and collective safety and performance indicators for the corresponding action plans. The Committee also monitors workplace accident indicators for Fixed Link employees and sub-contractors present on the site; it supports measures launched to improve results in this area and, in particular, those aimed at developing a safety culture within the organisation.</p> <p>the Committee dedicated a significant amount of its activity discussing the safety of the ElecLink project and its interface with the Concession, both during the works phase and during the future operation of the cable; the topic has been the subject of a number of independent expert reports.</p> <p>The Committee also met twice to consider Europorte matters: it monitors the safety indicators and the employee training and awareness actions implemented. The Committee also analyses the key incidents affecting operations and considers remedies.</p> <p>It should also be noted that:</p>	<p><i>See URD, Chapter 6.3.2; pp.201-202</i></p>
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		<p>- Each Group subsidiary has its own safety department which works to promote a culture of prevention in terms of safety, with the aim of gradually achieving a safe and healthy working environment. Thus, each entity regularly monitors safety performance as part of a quest for continuous improvement and the deployment of any necessary corrective actions.</p> <p>- All safety events are recorded and analyzed in order to form the basis of recommendations and action plans.</p> <p>- A materiality analysis, which included consultation with the Group's main internal and external stakeholders, made it possible to identify and prioritize the Group's main internal and external CSR challenges. It also made it possible to identify present and future opportunities and risks likely to have a significant impact on the Group's stakeholders, environment and/or economic performance.</p>	
	<p>➤ Mechanisms for dialogue with labour unions.</p>	<p>The implementation of efficient forms of dialogue with employees was identified as a highly important challenge in the materiality analysis conducted by KPMG. Labour relations are very important for the Group, particularly negotiations with staff representative bodies. The Group has always strived to establish long-term and constructive relationships with all its employees.</p> <p>During the 2019 financial year, 16 majority agreements were signed by the Group's subsidiaries covering topics such as gender equality, end of working live agreement or wage negotiations. 8 agreements were signed at Group level.</p>	
	<p>➤ Allocation of responsibilities relating to work standards in the organisation.</p>	<p>The Human Resources Departments of the subsidiaries, backed by the Group Human Resources Department, are responsible for defining and implementing the employment policy.</p> <p>With regard to health, hygiene and safety, the Safety Department in each Group subsidiary, the Social and Economic committee, through the Health, Safety and Working Conditions Committee (CSSCT) or the Occupational Health Service in the United Kingdom and the occupational healthcare professionals cooperate in this process. All of these entities</p>	

		<p>work to ensure the protection of the health and safety of employees, and the improvements in their working conditions. They analyse occupational risk and ensure – through means including surveys and inspections – compliance with the regulations in place.</p> <p>Within the Board of directors, a Safety and Security Committee ensures that the appropriate systems and procedures to protect the safety of customers, employees, subcontractors and all stakeholders are in place.</p>	
	<p>➤ Internal awareness-raising and training about work standards within the organisation.</p>	<p>In 2019, Getlink continued its actions in favour of health and safety by conducting awareness-raising sessions and training for its employees:</p> <ul style="list-style-type: none"> ▪ <i>A safety week. Organised every year across all Europorte sites, the theme this year was “organisational and human factors” and more specifically, human limits and solutions that may be implemented.</i> ▪ <i>An awareness raising campaign, entitled “Safety takes to the screen”, was launched by Eurotunnel’s general management in 2016. 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. and more specifically, human limits and solutions which could be implemented. The campaign resumed in January 2020.</i> ▪ <i>Training. The Group has decided to place the emphasis on a shared safety culture by organising dedicated training for Group team members. Over 16,000 hours of training were dedicated to safety in 2019.</i> ▪ <i>Innovation and technical progress. Getlink is making greater use of connected devices (telephones, tablets) to enhance the means available to its team members to work safely.</i> 	<p><i>See URD, 6.5.4, p.231</i></p>
	<p>➤ Active engagement with suppliers concerning the challenges relating to work standards.</p>	<p>The general procurement conditions, along with tenders and specifications, contain references to the applicable legal obligations in terms of employment and to compliance with the fundamental principles of the Group’s Ethics Charter.</p> <p>Health/safety questionnaires were sent to suppliers and subcontractors during tenders.</p>	

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

The good practices in place within the Group	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	The Group’s control framework and procedures for reporting and information on corporate indicators are regularly reviewed and updated. These procedures define the roles and responsibilities of each player in the reporting process, the methods for collection of information, the necessary checks, and the consolidation and evaluation of the information sent by the various Human Resources Departments of the subsidiaries.	
	<ul style="list-style-type: none"> ➤ System for tracking and measuring performance. 	Each subsidiary has its own system for entering corporate indicators, which are consolidated by the Group Human Resources Department.	
	<ul style="list-style-type: none"> ➤ Dialogue with the representatives of employee organisations to verify the progress made and identify priorities for the future. 	In France, all subsidiaries have its Social and Economic Committee and its Safety, Health and Working Conditions Committee , which meet according to the specific operational rules governing each committee. In the United-Kingdom, the Company Council and the Safety, Health and Environment Committee are the two organisations for ESL employees with which permanent dialogue has been established.	
	<ul style="list-style-type: none"> ➤ Audits or other measures to monitor and improve work standards in companies in logistics chains in line with international work standards. 	Audits are undertaken regularly by the quality audit departments of the various subsidiaries.	

Reliable policies and procedures on protection of the environment

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

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

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

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

The good practices in place within the Group	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	<p>Getlink has set up a formal CSR policy, supported and sustained at the highest level of the organisation by the Chairman and Chief Executive and the Board of Directors. This policy came into force in 2015, and dictates the Group’s principles, challenges and commitments. The CSR objectives are defined each year and form part of the objectives assigned to the directors and managers of the various entities of the Group.</p>	<p><i>See URD, P.VI</i></p>
	<ul style="list-style-type: none"> ➤ Reference to international conventions and other international mechanisms. 	<p>Getlink’s CSR policy is in line with the observance of fundamental rights as defined in the major international principles – the 1948 Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, OECD guidelines for multi-national companies, and the principles of the United Nations Global Compact. Getlink supports, adheres to and actively participates in the World Forum for a Responsible Economy and the values it promotes.</p> <p>Getlink also identified in 2019 10 Sustainable Development Goals (SDG) that best reflect its most material challenges out of the 17 SDGs defined by the UN for the 2015-2030 period. These elements - combined with the materiality analysis - will supplement the updating of the Group’s CSR strategy in 2020 and will drive performance. These 10 SDGs, compared with the Group’s material challenges, are presented in this Universal Registration Document (page VI) and referred to in the text</p>	
	<ul style="list-style-type: none"> ➤ Discussion on the relevance of sustainable environmental management for the company. 	<p>The update of the materiality exercise carried out in 2019 by Mazars identified three issues relevant to the environment among 23 material CSR issues:</p>	

		<ul style="list-style-type: none"> ▪ the energy transition and the fight against climate change are a key issue for stakeholders; classified as important, this issue covers several dimensions. energy consumption and the use of renewable energies. ▪ The preservation of natural environments, which is considered to be moderate ▪ waste management and the circular economy, which is considered moderate. <p>The Group's environmental commitment focuses on these issues, which are considered to be the most material, as identified in the materiality analysis.</p>	<p><i>See URD, Chapter 6.5</i></p>
	<p>➤ Written company policy on sustainable environmental management.</p>	<p>In its CSR Charter, the Eurotunnel Group has identified five major challenges which correspond to core issues set out in the major founding texts and the various international frameworks and standards (Global Compact; GRI, ISO 26000). Among these major challenges, the environmental challenge has been identified as a priority.</p> <p>Committed to "low carbon" transport, the Group is pursuing an ambitious strategy that combines the development of its core business, cross-Channel transport, and external growth, beyond the Fixed Link, in its two main businesses and areas of expertise: infrastructure management and rail operations.</p> <p>Prior to the construction of the Tunnel, expense was incurred in order to prevent the harmful consequences of business activities for the environment. There are two separate sewer systems for storm water and waste water, retention ponds, treatment stations, etc. Furthermore, an environmental management system based on the requirements of standard ISO 14001 was put in place by the Concessionaires in 2002.</p> <p>The current policy has four main areas:</p>	<p>UK CSR Charter</p>

		<ul style="list-style-type: none"> ▪ to reduce the environmental impacts of its own operations by focusing on reducing greenhouse gases, reducing its energy consumption, increasing its fleet of electric vehicles and optimizing 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 <p>The environmental policy is currently being revised for the coming period.</p>	
	<p>➤ Integration of minimum environmental standards into contracts with suppliers and other partners.</p>	<p>The general procurement conditions, along with tenders and specifications, contain references to the applicable legal obligations in terms of employment and to compliance with the fundamental principles of the Group's Ethics Charter.</p> <p>A 'Sustainable Development' questionnaire was sent to suppliers and subcontractors during tenders. The Group has established a consultation framework signed by the suppliers and launched a reflection to review this process.</p> <p>An article on 'Environmental Requirements' has also been inserted into subcontractor contracts.</p>	<p>Sustainable Development Questionnaire</p>
	<p>➤ Specific commitments and objectives for given years.</p>	<p>In its CSR Policy, Eurotunnel Group is committed, for 2019, to acting in line with the principles of sustainable development and in accordance with the three principles of the Global Compact relating to the environment. In order to achieve this, the Group has four commitments:</p> <ul style="list-style-type: none"> • <i>to reduce the environmental impact of its own operations by focusing on reducing greenhouse gases, reducing its energy consumption, increasing its fleet of electric vehicles and optimizing waste management;</i> • <i>to raise awareness amongst staff of their responsibilities as eco-citizens;</i> 	<p><i>See URD, 6.6.3.</i></p>

		<ul style="list-style-type: none"> • to choose innovative and environmentally friendly products; • to strengthen actions which support the protection of diversity. <p>In addition to these commitments, Getlink pays special attention to the environmental approach of its suppliers and asks them to implement actions which support the protection of the environment.</p> <p>The Group has set a recovery target of over 95% for 2020 like-for-like.</p> <p>The Group promotes a digitalisation plan to work towards a paperless workplace.</p> <p>Eurotunnel has set a target to implement a plastic cup recycling plan at the office buildings of the French part of the Concession.</p> <p>Aware of the climate emergency, the Group has set itself a voluntary consolidated target for 2020 of a 3.5% reduction per euro of revenue compared to 2019, corresponding to emissions of 57,692 tonnes of CO₂, taking into account business forecasts. Finally, as part of the environmental policy review launched in 2020, the Group is also working on defining a medium-term Climate ambition in line with the two-degree trajectory for limiting global warming and to refine if appropriate its target to reduce this ratio by a minimum of 5% in five years like-for-like and at constant exchange rates.</p>	<p><i>See URD, Chapter 6.5; pp.234-235</i></p>
Criterion 10: The COP describes effective management systems to integrate the environmental principles			
<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Getlink has developed a policy for monitoring and managing the greenhouse gas emissions of its subsidiaries in anticipation of the publication of the implementing regulations for Article 228-II of the Grenelle 2 Law regarding the disclosures required from any entity providing transport services or organising the provision of transport services, on the quantity of carbon dioxide emitted by the mode(s) of transport used to carry out that service.</p> <p>Getlink is The Carbon Trust Standard certified since 2009.</p>	

		<p>In 2019, the Group’s Carbon Trust Standard certification was renewed for Eurotunnel in recognition of its carbon footprint reduction policy for the 2017-2018 period. As part of this certification, Eurotunnel, which is the main contributor to the Group’s emissions, must reduce its emissions per euro of revenue by 2.5% per year.</p> <p>The renewal of this certificate for the 2019-2020 period will be audited during the second half of 2021.</p>	<p><i>See URD ; paragraph 6.6.1 p.234</i></p>
	<p>➤ Evaluations of environmental risks and impacts.</p>	<p>A risk review is conducted each year on all of the activities of the Group and its subsidiaries by the internal audit and risk management departments.</p> <p>These risks are described in Chapter 4 of the Universal Registration Document.</p> <p>Pursuant to French Law No 76-663 of 19 July 1976 relating to installations classified for the protection of the environment (ICPE), both terminals in Coquelles and Sangatte are designated ICPE sites due to the potential dangers and risks that their activities may pose to the surrounding area and to health, safety, nature and the environment, such as refrigeration, air-conditioning, storage and use of flammable liquids, workshops and paints. These activities are set out in a list which, on the basis of the severity of the dangers or risks that they may represent, requires Eurotunnel Group to either report to or request authorisation from the Prefecture of Pas-de-Calais in respect of the activities concerned. These activities are monitored by the regional authority for the environment, planning and housing (DREAL). Similarly, pursuant to French Law No 92-3 of 3 January 1992 on water, the Concessionaire France Manche must request authorisation from the relevant administrative authority for any proposed construction, works or activities to be carried out outside the ICPE area, which may pose a danger to public health and safety, endanger the free flow of water, reduce the availability of water, substantially increase the risk of floods or seriously damage the quality or diversity of the marine environment.</p>	

	<p>➤ Evaluations of the impact of product life cycle, providing green management policies.</p>	<p>As an innovative rail company and responsible infrastructure manager from the very beginning, Getlink has set itself apart by means of its sustainable development approach, which seeks to reconcile financial performance, social equity and environmental protection:</p> <ul style="list-style-type: none"> • <i>the Tunnel runs entirely underground and does not interfere in any way with the marine environment;</i> • <i>a transport that by its very nature limits impacts on the environment (it pollutes twenty times less than ferries: a lorry transported on-board a shuttle releases 8.8 kg of CO₂ compared to 158 kg on a ferry);</i> • <i>the electric traction system adopted is a major factor in reducing the Group's carbon footprint and greenhouse gas emissions;</i> • <i>a policy of daily electricity savings (with the use of electric power for which 90% is of nuclear or hydraulic origin, which therefore does not release CO₂);</i> • <i>The programme to replace the halon used as an extinguishing agent is now complete in the Tunnel's plant rooms and at the French and British terminals. The programme involving 57 locomotives ended in 2019. The removal of halon from carrying wagons represents 58.320 tonnes of halon. The project will take place as part of an overall Shuttle renovation programme. This mid-life Passenger Shuttle programme includes the replacement of our Passenger Shuttles' main systems: fire detection and extinguishing, air conditioning and ventilation, fire doors, networks and wiring. In 2019, halon emissions represented 5,197 T CO₂ for the Group. The programme for the renovation of the Shuttle fleet is described in section 1.6.1 of this Universal Registration Document.</i> • <i>Installation of GSM chips in built-in air conditioning systems on board Shuttles to limit leaks by detecting them more easily and quickly. It is also planned to replace some of these built-in air conditioning systems.</i> • <i>The replacement of refrigerants with less polluting solutions (refrigerants can have a very high global warming potential).</i> • <i>Implementation of some of the improvement actions identified during comprehensive energy audits of Fixed Link activities carried out periodically by a certified provider on the whole of those activities, such as the installation of LED lighting. Establishing a partnership between France</i> 	<p><i>See URD, 6.6.1, p.234</i></p>
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		<p><i>Manche and EDF to encourage energy saving. Signing a certified zero carbon Blue for Business contract on 1 January 2018 on the British side.</i></p> <ul style="list-style-type: none"> • <i>Raising awareness of rail freight and Shuttle drivers regarding eco-friendly driving styles.</i> • <i>The purchase of new Shuttles to transport road trailers on rail motorways is considered an energy-saving action eligible for the CEE programme (Certificat d'Économie d'Énergie - Energy Savings Certificate). The entry into service of a new Truck Shuttle at the end of December 2017, comprising 32 rail motorway wagons, allowed the granting of Certificats d'Économie d'Énergie (rail motorway wagon).</i> • <i>Modulating the power of fans in the Tunnel cooling plant, following the installation of cutting-edge electronic controllers in 2016 which consume less energy.</i> • <i>A fleet of 100% electric vehicles operating on the Fixed Link terminals: at the end of 2019, 43 vehicles were in operation (38 in 2018). The analysis continues as vehicles are replaced.</i> • <i>The Europorte employee awareness initiative which started in 2018 regarding eco-citizen initiatives (waste management, eco-friendly actions and water management) continued throughout 2019, via themed articles suggesting specific Sustainable Development initiatives, distributed through a monthly in-house newsletter. At Socorail, the Europorte subsidiary specialising in logistics management at industrial sites, progress in environmental protection and safety was rewarded with renewal of ISO 9001 (Quality management) and MASE (Company Safety Improvement Manual) certifications. The Socorail Infrastructure Management branch also obtained MASE certification in 2019 and Europorte France retained its SQAS (Safety & Quality Assessment for Sustainability) certification.</i> <p>Aware of the need to accelerate the environmental transition, in September 2018, Getlink launched the issue of Green Bonds for a principal amount of €550 million. The net profit of this issue has been allocated to finance investments linked to the Group's ElecLink project and the purchase of the G2 notes described in note G.7 to the consolidated financial statements in section 2.2.1 of this Universal Registration Document. The proceeds were also used to fund eligible environmental projects, such as the purchase of three cutting-edge and</p>	<p><i>See URD,6.6.1, p.234</i></p> <p><i>See URD, 6.6.1, p.233</i></p>
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	<p>more energy efficient Truck Shuttles, the replacement of air conditioning systems on board Passenger Shuttles, the replacement of Tunnel cooling systems and the removal of halon from plant rooms and locomotives, etc.</p> <p>According to the findings of the materiality analysis, the circular economy policy and waste management were included among the important challenges for Getlink. The Group has a waste collection and treatment strategy that prioritises recovery or reuse. Most waste products come from industrial activities and vary in type and quantity from year to year depending on the projects being undertaken.</p> <p>The French part of Eurotunnel sorts non-hazardous industrial waste, 97% of which is recycled into briquettes for industrial boilers. This process was made possible by the emergence of new solid fuel recovery channels.</p> <p>In keeping with the 1992 Montreal protocol, actions were implemented to reduce emissions of all gases leading to ozone layer depletion. Halon is in the process of being dismantled from Fixed Link infrastructures. The refrigerants used in the cooling ducts in Sangatte and Shakespeare Cliff have also been replaced in full on the French side, and 50% on the UK side, by new cooling units which are more energy-efficient and have no significant negative impact on the environment.</p> <p>Since 2015, the Group has provided a fast and free of charge recharging facility at the Eurotunnel sites in Coquelles (Pas-de-Calais) and Folkestone (Kent) for customers with electric cars. In thirty minutes, they can charge 80% of the battery capacity (universal battery chargers). The number of customers using the Passenger Shuttle in electric cars increased from 40 in 2014, to 800 in 2015, 5,696 in 2017 and close to 12,000 in 2019.</p> <p>The Concessionaires have large land reserves in France and the United Kingdom and have, since the Tunnel's construction, created several dozen hectares of nature reserves for the conservation and development of biodiversity.</p>	<p><i>See URD, 6.6.1, p.234</i></p>
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		<ul style="list-style-type: none"> • In France: The 'Jardins Ordonnés', with their seven-hectare lake, are a much-used haven for migrating species and an essential nest-building site for many birds. • In the United Kingdom, the nature reserve of Samphire Hoe attracts over 100,000 visitors each year. 	<p><i>See URD, 6.6.2, p.236</i></p>
	<p>➤ Allocation of responsibilities within the organisation.</p>	<p>The various Safety and Sustainable Development Departments (now renamed <i>Safety and Transverse Process and QSE Departments</i>) within the subsidiaries monitor energy consumption.</p> <p>The Corporate Committee within the Board of Directors examines the issues relating to the Group's environmental guidelines and reports on these to the Board of Directors. The Committee is responsible in particular for examining the Group subsidiaries' performance in relation to the environment and the strategic guidelines intended to promote good environmental management, conserve national resources and limit the impacts of the Group's activities on the environment.</p> <p>The Group Human Resources Department monitors and consolidates the environmental data from the various Group subsidiaries. This role is now performed by the Group's CSR Department, newly created in December 2019, in conjunction with the Group's subsidiaries.</p>	
	<p>➤ Internal awareness-raising and training about sustainable environmental management for executive management and employees.</p>	<p>As part of their induction to the company, all new employees learn about the company's environmental policy, its targets, and the organisation put in place to minimise the environmental impacts of its activity.</p>	
	<p>➤ Other good practices</p>	<p>An 'eco-comparer' is available on the Le Shuttle website so that passengers can calculate the average CO₂ emissions saved by using the Passenger Shuttles.</p> <p>Carbon Counter</p>	

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

<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>As early as 2002, Eurotunnel Concessionaires installed an environmental management system based on the requirements of the ISO 14001 standard.</p> <p>With the SQAS Rail (Safety and Quality Assessment System) assessment procedure every three years since 2014 for the entire scope of its French subsidiaries, Europorte implements a continuous improvement procedure. This assessment supplements the MASE and ISO 9001 certifications.</p> <p>At Socorail, the Europorte subsidiary specialising in logistics management at industrial sites, the progress made in terms of environmental protection and safety have been rewarded with renewal of ISO 9001 (Quality management), MASE (Company Safety Improvement Manual) and SQAS (Safety & Quality Assessment for Sustainability) certifications. The Socorail Infrastructure Management branch obtained a MASE certification in 2019 and Europorte France maintained its SQAS (Safety & Quality Assessment for Sustainability) certification.</p>	<p><i>See URD; Chapter 6,6.1 p.234</i></p>
	<p>➤ System for tracking and measuring performance.</p>	<p>All of the environmental indicators are monitored by the various Safety and Sustainable Development Departments within the subsidiaries and by the Group Human Resources Department, and are published once a year in the Registration Document, the Annual Report and the CSR Report for the Group, in particular in the Extra financial Performance Statement</p>	
	<p>➤ Examination of executive management for monitoring and improvement of results.</p>	<p>The Corporate Committee is responsible for examining the Group subsidiaries' performance in relation to the environment and the strategic guidelines intended to promote good environmental management, conserve national resources and limit the impacts of the Group's activities on the environment.</p>	

	<ul style="list-style-type: none"> ➤ Audits or other measures to monitor and improve work standards in line with international work standards. 	<p>Since 2016 the Group has worked to put in place actions to improve energy performance identified during full energy audits of Concession activities.</p>	
	<ul style="list-style-type: none"> ➤ Results of integration of principles relating to the environment. 	<p>The Group has made no provisions against environmental risks, nor did it pay out any court-ordered compensation for environmental damage during the course of the year. The obligation to establish a financial guarantee against any environmental damage, as defined in Article L. 516-1 of the French Environmental Code, does not apply to the Group's activities.</p> <p>No fine of any nature has been imposed on the Group and nor has it been reported for non-compliance of its operations.</p>	

Reliable policies and procedures on preventing corruption

Principle 10: Business should work against corruption in all its forms, including extortion and bribery

Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

<p><i>The good practices in place within the Group</i></p>	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	<p>The Group has established a Group Ethics Charter which, in application of the United Nations Global Compact, describes the principles of action that must inspire the behaviour of each employee in all circumstances, with reference to the OECD Guidelines for Multinational Enterprises.</p> <p>This charter was reviewed in its form on the advice of the Corporate Committee and the Audit Committee and was approved by the Board of Directors on December 18, 2018, in a more illustrative and concrete form, to be a practical guide to ethics, the foundation on which all internal policies, codes of conduct, specific procedures, adopted by Getlink (anti-corruption policy, competition policy, stock market ethics charter, etc.) are based.</p> <p>The Group's Ethics Charter, deployed to all employees and reviewed for the last time in December 2018, formalizes all Getlink's rules of conduct,</p>	<p><i>See Code of Ethics and Conduct above</i></p>
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		<p>giving each employee a framework to guide him or her in their choices and attitudes by exercising discernment.</p> <p>The Ethics Charter presents in a pedagogical manner the rules and behaviors to be adopted by all, illustrated with concrete examples. It also specifies the roles of managers and employees in implementing the Charter on a daily basis. It is supplemented by an alert system (Whistle-blower Policy) set up for employees to enable them to report directly to the Group Compliance Officer any suspicion of violation of the applicable rules or to obtain help and advice regarding its content and application.</p> <p>In the area of purchasing, the Purchasing Department's Code of Ethics, updated in 2011, is the practical and ethical guide enabling each employee to comply with applicable laws and regulations and also to develop a climate of trust in exchanges between the Group's representatives and players in the outside world. Purchasing procedures are formalized and delegations of authority are in place for the management and approval of purchases. In addition, a Responsible Supplier Relations Charter has been in place since 2010, to build a lasting and balanced relationship between customers and suppliers, with possible recourse to the Group's mediator. Finally, the tender procedures specify the conditions for competitive bidding and referencing of the main suppliers.</p> <p>Getlink has set up a specific program to combat corruption and raise awareness of ethical practices (the Compliance Program). This program has been supplemented with risk prevention tools. Led by a multi-disciplinary functional team, this program is based on a system including awareness tools and an alert system in a prevention and continuous improvement approach</p>	
	<p>➤ Support from executive management in preventing corruption.</p>	<p>The first version of the Ethics Charter was validated by the Board of Directors in January 2013. Since 2019, a new, more illustrative and concrete Ethics Charter has been in place.</p>	

		<p>The Procurement and Legal Departments and the Group’s Executive Management actively support measures and policies to prevent corruption and pay very close attention to the application of the policies and procedures in place.</p>	
	<p>➤ Formal, public zero-tolerance policy in respect of corruption.</p>	<p>In particular, the Code of Ethics states that: "No Getlink employee shall directly or indirectly grant undue advantages of any kind whatsoever to a third party by any means whatsoever in order to obtain or maintain a business transaction or preferential treatment. Bribery of public officials, in any form, is prohibited.</p> <p>Each year, the Group develops and strengthens its compliance culture, based on its new ethics charter, which forms the foundation for all internal policies, codes of conduct and specific procedures adopted by Getlink. A strong message, notably of "zero tolerance", particularly with regard to the fight against corruption, is conveyed by the Chairman and Chief Executive Officer.</p> <p>In accordance with the “zero tolerance” message promoted by the Chairman and Chief Executive Officer with respect to all types of corruption, the Group, which is subject to the Sapin II law, has defined a rigorous corruption risk prevention programme which is applicable to all Group entities and is founded on team member training and information campaigns to raise awareness of major fraud and corruption risks. A map of corruption and influence peddling has been created in conjunction with internal stakeholders in order to identify the types of risks to which the Group could be exposed in the course of its operations. A third-party evaluation procedure has also been developed with several levels of controls. An anti-corruption policy and a whistleblowing system have been implemented. All team members can contact the Group’s ethics officer if they consider that communicating information to a line manager could present difficulties or not result in the proper follow-up.</p>	

		<p>With regard to procurement, the Code of Conduct for Purchasing, brought up to date in 2011, is the guide to practices and ethics that enables each team member to comply with the applicable laws and regulations. It also helps develop a climate of trust between Group representatives and persons outside the business. Formal purchasing procedures and delegations of authority are in place for the management and approval of purchases. In addition, a Responsible Supplier Charter has been in place since 2010, to build lasting and balanced relationships between customers and suppliers with recourse to the Group mediator. Finally, the call for tender procedures specify the conditions of competition and referencing for the main suppliers.</p>	
	<p>➤ Other good practices</p>	<p>Getlink has been a signatory of the <i>Charter for Responsible Supplier Relations</i> since January 2012. This charter is broken down into ten commitments for responsible procurement, ensuring a genuine partnership between customers and their suppliers with due regard to their respective rights and obligations. The Group is committed, in particular, to ensuring financial equity towards suppliers, to respecting the principle of transparency, to incorporating environmental issues and even to ensuring the territorial responsibility of its company. It thereby represents a measure intended to prevent corruption.</p> <p>Getlink is also a member of the steering committees for the <i>'Responsible Suppliers Relations' charter and certification</i> and has clearly demonstrated its wish to be part of this certification process, as an extension of the implementation of the charter's ten commitments.</p>	<p><i>See URD ;3.4.2 p.141</i></p> <p><i>See URD; 6.3.8 p.227</i></p>
<p>Criterion 13: The COP describes effective management systems to integrate the anti-corruption principles</p>			
<p><i>The good practices in place within the Group</i></p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>In addition to its publication on the internet and intranet sites of Getlink entities, the <i>Code of Ethics and Conduct</i> given to all new employees, suppliers and subcontractors when their contracts are signed.</p>	

	<ul style="list-style-type: none"> ➤ Human Resources procedures supporting the anti-corruption commitment or policy. 	<p>The HR policies of Group entities contain an ethics code that describes the moral principles and ethical values governing the Group’s activities. It defines the behavioral rules that are acceptable in the professional environment and helps to understand and observe those rules. It states the policies and laws that all members of staff are required to know so that they can perform their professional activities correctly and it describes the company policy in relation to fraud.</p> <p>As part of their induction to the company, all new employees are provided with information about the HR policies and procedures relating to the ethics code and the Charter of Ethics and Behaviour, which is also provided.</p> <p>The Group is also working to set up digital CSR training, the purpose of which will be to raise awareness among all employees about the actions undertaken in the fields of social responsibility and the challenges the Group faces.</p>	
	<ul style="list-style-type: none"> ➤ Communication channels and tracking mechanisms for reporting concerns or requesting advice. 	<p>The Code of Ethics specifies the whistleblowing methods available to employees.</p>	
Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.			
The good practices in place within the Group	<ul style="list-style-type: none"> ➤ Pertinent policies, procedures and activities planned to meet this criterion. 	<p>This annual risk review also covers this issue.</p>	<p><i>See Code of Ethics and Conduct, p.31</i></p> <p><i>See URD 3.4.2; p.141</i></p>
	<ul style="list-style-type: none"> ➤ Process for management of incidents. 	<p>An internal whistleblowing mechanism and an ethics officer are in place to address any risk of corruption.</p> <p>An e-mail address (mailto:contact.ethic@getlinkgroup.com) is available for any stakeholders encountering any difficulties or with queries as to the boundaries or application of the rules laid down in the Code of Ethics.</p>	
	<ul style="list-style-type: none"> ➤ Other good practices 	<p>Getlink has a specific anti-corruption and ethical awareness programme (the Compliance Programme). This program has been supplemented with risk prevention tools. Led by a multi-disciplinary functional team, this program is based on a system including awareness tools and an alert system in a prevention and continuous improvement approach. With a view to continuous improvement, Getlink deployed a</p>	

		compliance awareness initiative in 2019 in a program called Get Compliant 2019.	
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II. Acting to support the broader objectives of the United Nations

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

<i>The good practices in place within the Group</i>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>The strategic vision of Getlink, as this is reflected in part in its CSR Charter, is in phase with the objectives and challenges laid down in the UN’s Global Compact. In its Charter, the Group has identified five major challenges, which correspond to core issues set out in the major founding texts and the various international frameworks and standards (Global Compact; GRL, ISO 26000). These challenges can be split into several categories: social, regional, environmental, economic and ethical.</p> <ul style="list-style-type: none"> • Social challenges: respect the rights of employees. • Regional challenges: develop close links with the region. • Environmental challenges: reduce the impact of the business activity on the environment. • Economic challenges: manage relationships with customers • Ethical challenges: continue with policy development and value sharing within the Group in connection with stakeholders. <p>Answering these challenges has been and remains a priority for Getlink which, since its inception, has been committed to a social responsibility policy reconciling economic performance, social equity and environmental protection as part of a programme of continuous improvement.</p>	<i>See CSR Charter</i>
	<p>➤ Adopting or amending operational procedures to maximize the contribution to United Nations objectives and themes.</p>	<p>In keeping with the 1992 Montreal protocol, actions were implemented to reduce emissions of all gases leading to ozone layer depletion. By the same token, halon will be phased out in 2016 from the Fixed Link infrastructures and rolling stock. Also, the refrigerants used in the cooling</p>	

		<p>ducts in Sangatte and Shakespeare Cliff will be replaced by new cooling units that are more energy-efficient and have no negative impact on the environment.</p> <p>Since 2015, the Group has provided a fast and free of charge recharging facility at the Eurotunnel sites in Coquelles (Pas-de-Calais) and Folkestone (Kent) for customers with electric cars. In thirty minutes, they can charge 80% of the battery capacity (universal battery chargers). The number of customers using the Passenger Shuttle in electric cars increased from 40 in 2014, to 800 in 2015, 5,696 in 2017 and close to 12,000 in 2019.</p> <p>The Group is continuing to improve its social responsibility programme by encouraging its employees to commute to Coquelles by other means. It has launched three initiatives from its Business Travel Plan: namely, a shuttle bus between the high-speed train station at Calais Fréthun and the Coquelles terminal, a web-based Eurotunnel car-sharing community, incentives for the use of electric vehicles and information on public transport. The arrangements already in place include bicycle racks, fleet of electric vehicles and recharging points and a remote-working trial. In Folkestone, 130 employees have already signed up for the government “Cycle to Work” scheme set up in 2016 and some of them joined in the national day organised each summer. These initiatives contribute to minimise the business’s carbon footprint and to promote employees’ well-being.</p> <p>To support specific sustainable development initiatives, various Europorte team members took part in workshops and challenges during the second Green Week, around the theme of eco-citizen action (waste management, eco-actions and water management). At Socorail, the Europorte subsidiary specialising in logistics management at industrial sites, the progress made in terms of environmental protection and safety have been rewarded with renewal of ISO 9001 (Quality management), MASE (Company Safety Improvement Manual) and SQAS (Safety & Quality Assessment for Sustainability) certifications. The Socorail</p>	<p><i>See URD;6.6.1, pp.233-234</i></p>
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		<p>Infrastructure Management branch launched a MASE certification project in 2018 for planned certification in 2019.</p> <p>Since 2016, the company has been able to modulate the variation of cooling fans, with the installation of new generation, more energy efficient electronic variators. Lastly, at the end of 2019, the fleet of 100% electric vehicles operating on the Concession terminals reached 43 units.</p>	
Criterion 16: The COP describes strategic social investments and philanthropy			
<p>The good practices in place within the Group</p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>A key player in the natural, economic and human environment, Eurotunnel fulfils its social responsibility through concrete commitments and actions to support the community:</p> <ul style="list-style-type: none"> ▪ <i>Payment since 2010 of 10% of the land rental income from the wind farm on its Coquelles site to Secours Populaire, which distributes the payments in the form of “energy vouchers” to families in Pas-de-Calais. Following its expiry in 2019, the partnership agreement between Eurotunnel and Secours Populaire was renewed for two more years (2021).</i> ▪ <i>Active support for the French Second Chance Foundation, a recognised public interest group committed to the rehabilitation of people who have faced great difficulties in their lives.</i> ▪ <i>Support for project leaders and start-ups in the Calais area through the Maison du Numérique et de l’Innovation (Digital and Innovation Centre), which is chaired by Getlink’s Chairman and CEO, Jacques Gounon. Opened in October 2019, this new structure is entirely dedicated to new technologies and aims to help a broader audience discover digital technology and recent developments. Comprising various rooms for training and an open space for co-working, it also has several 3D printers.</i> ▪ <i>Commitment to high-priority disadvantaged areas by signing a partnership agreement in July 2019 between Eurotunnel, the Grand Calais Terres et Mers urban area and the State, represented by the Prefect of Pas-de-Calais.</i> <p>Getlink financially supports the World Forum for a Responsible Economy in Lille. Launched by the Réseau Alliances, this organisation aims to</p>	<p><i>See URD; 6.7.2, p.239</i></p>

		<p>promote a responsible global economy, by sharing the best business practices of responsible companies.</p>	
	<p>➤ Seeking social investments and philanthropic contributions linked to core business.</p>	<p>The Group invests heavily in young people and is developing its relationships with universities and schools with the aim of fostering a better understanding of its business and encouraging young people into the world of work:</p> <ul style="list-style-type: none"> ▪ <i>Training diploma in railway engineering and maintenance professions set up and developed by Europorte in close collaboration with the Conservatoire National des Arts et Métiers (CNAM);</i> ▪ <i>Partnerships with the Institut Catholique des Arts et Métiers (ICAM) and the Institut d'Administration des Entreprises (IAE), two Lille institutions, to develop a new approach to the maintenance trade;</i> ▪ <i>Participation since 2016 in the "Professeurs en entreprises" operation initiated by the Fondation C Génial, a foundation for scientific and technical culture. This operation is aimed at secondary school teachers (and other members of the national education system). In addition to encouraging the professional integration of young people, it promotes the sectors and the scientific and technical professions of the companies visited. Several Eurotunnel rolling stock managers took part in this activity.</i> 	<p><i>See URD; 6.7.2, p.239</i></p>
	<p>➤ Other good practices.</p>	<p>Getlink also offers its expertise in managing transport infrastructures and rail activities to various public bodies at European, national and regional levels. The Group is:</p> <ul style="list-style-type: none"> ▪ <i>A founding member of the Fer de France association which was created in 2012 to bring together the leading players in the French railway industry. The work presided over by the Group led to proposals for the French state to recognize different professions in this developing sector.</i> ▪ <i>An active member of I-Trans, the global competitiveness cluster and the reference cluster for railways in France. The Group's Human Resources Director participates as the controller in the CAPFOR (training project management and coordination circle) operational group that aims to make existing training more consistent with the industry's expectations, creating a</i> 	<p><i>See URD; 6.7.2, p.239</i></p>

		<p><i>pool of expertise in the region and developing high quality higher education with international influence.</i></p> <ul style="list-style-type: none"> ▪ <i>As a partner of the École des Ponts et Chaussées, in July 2018 Getlink renewed the “Rail transport sciences” fellowship for five years. This partnership aims to make progress in rail science by studying the whole scope of the activity, as well as the sustainability of facilities and technologies in place.</i> <p>Participation in coding: Eurotunnel welcomed young girls aged between 8 and 10 at a beginners’ programming workshop. This initiative was aimed at awakening an interest in computing careers from the earliest age.</p>	
Criterion 17: The COP describes advocacy and public policy engagement			
The good practices in place within the Group	➤ Pertinent policies, procedures and activities planned to meet this criterion.	The Group’s Charter of Ethics and Conduct and CSR Charter takes a clear position in support of the principles of the United Nations.	
	➤ Public commitment to the importance of acting on one or more United Nations themes.	Getlink regularly reasserts its adherence to the Global Compact and its fundamental principles through its Communication on Progress (COP) and the declaration of continued support provided by its Chairman and CEO.	
	➤ Encouraging company executives to participate in summits, conferences and other interactions about public policies in relation to one or more United Nations objectives.	Getlink is a partner of the World Forum in Lille.	
Criterion 18: The COP describes partnerships and collective action			
	➤ Developing and establishing partnerships with public and private organisations.	Getlink is a partner of the World Forum in Lille, which supports and promotes a responsible global economy.	
	➤ Joining industry peers, UN organisations and/or stakeholders in initiatives that contribute to resolving shared challenges.	<p>Getlink also offers its expertise in managing transport infrastructures and rail activities to various public bodies at European, national and regional levels. The Group is:</p> <ul style="list-style-type: none"> ▪ <i>A founding member of the Fer de France association which was created in 2012 to bring together the leading players in the French railway industry. The</i> 	

		<p><i>work presided over by the Group led to proposals for the French state to recognize different professions in this developing sector.</i></p> <ul style="list-style-type: none"> ▪ <i>An active member of I-Trans, the global competitiveness cluster and the reference cluster for railways in France. The Group's Human Resources Director participates as the controller in the CAPFOR (training project management and coordination circle) operational group that aims to make existing training more consistent with the industry's expectations, creating a pool of expertise in the region and developing high quality higher education with international influence.</i> ▪ <i>The group is an active member of the 4F alliance, the players in the sector are actively working on a development plan for rail freight with a view to contributing to the development of France's strategy in this area and to doubling the modal share of rail freight in France by 2030, in order to develop low-carbon transport.</i> 	<p><i>See URD; 6.7.2, p.239</i></p>
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III. Governance and leadership of Corporate Social Responsibility (CSR)

Criterion 19: The COP describes CEO commitment and leadership

<p><i>The good practices in place within the Group</i></p>	<p>➤ Pertinent policies, procedures and activities planned to meet this criterion.</p>	<p>Getlink's CSR Charter lays down the challenges, but also the Group's objectives and commitments. For 2019, the Group has committed to acting in line with the principles of the Global Compact.</p> <p>A Group CSR department, a member of the Executive Committee, was created in 2019, illustrating the Group's commitment in this area.</p>	
	<p>➤ The CEO makes an explicit public commitment to CSR and the Global Compact.</p>	<p>The CSR Charter is supported and sustained at the highest level of the organisation by the Chairman and Chief Executive and the Board of Directors.</p> <p>The charter has been signed by the Chairman and Chief Executive Officer.</p>	
	<p>➤ Integrating sustainable development criteria and the principles of the Global Compact into the objectives and incentive programmes for the Chairman and CEO and the executive management team.</p>	<p>For 2019, the Nomination Committee maintained the composite CSR performance index: stringent, stable, pertinent and balanced, this index is based on four topics which are directly linked to the Group's activities: health & safety, social climate, GHG emissions, and customer satisfaction. For each of these areas, indicators and targets were established so as to calculate a completion rate with respect to the</p>	

		composite index, according to the objectives fixed for each area. This index is used to calculate 10% of the annual variable remuneration of the Chairman and CEO and 10% of the performance-related plans to allocate free shares. The composite index was audited in 2017 as part of the audit of corporate information by the auditors.	
Criterion 20: The COP describes board adoption and oversight			
	➤ The Board of Directors is responsible for and supervises the strategy and long-term performance of CSR.	The Corporate Committee within the Board of Directors examines the issues relating to the company's or Group's environmental guidelines and reports on these to the Board of Directors.	
	➤ The Board of Directors sets up a Monitoring Committee or assigns CSR to a member of the Board.	The corporate committee's mission is to review the Group's environmental performance and the strategic orientations designed to promote environmental management, preserve natural resources and limit the impact of the Group's activities on the environment.	
	➤ The Board (or the Committee) approves the formal CSR reporting.	Reporting on CSR, coordinated by the Group CSR Department, is examined and approved by the Strategy and Sustainable Development Committee.	
Criterion 21: The COP describes stakeholder engagement			
	➤ The company's responsibility publicly acknowledged in terms of its impacts on internal and external stakeholders.	Group teams, each in its respective area, are listening to their stakeholders and primarily to their clients in order to ensure a correlation between their expectations and the Group's long-term goals.	
	➤ Defining sustainable development strategies, objectives and policies in consultation with key stakeholders.	The materiality analysis consisted in identifying and prioritizing the Group's CSR challenges according to its activities and the expectations of its stakeholders. Updated in 2019 with the	

		<p>support of Mazars, the analysis was carried out in the following three stages</p> <p>Stage 1: Diagnosis and analysis: 57 challenges were identified through an internal and external document analysis and an analysis of non-financial communications and trends in terms of reporting challenges and opportunities within the transport and infrastructure management sector.</p> <p>Stage 2: Identifying, adapting and scoring challenges by stakeholders; through interviews conducted by an independent third party. 21 stakeholders, located in France and the United Kingdom, were questioned. These were experts in strategic topics as well as operational workers from the industry. The external stakeholders who were interviewed are representative of the Getlink ecosystem: its main business partners, shareholders or suppliers. These interviews helped identify and list 23 material challenges for the Group.</p> <p>Stage 3: Ranking challenges: to help understand and adopt the challenges, Getlink wanted to present its materiality analysis in the form of a materiality matrix (illustration page V). This matrix reflects the importance of each material challenge for the respondent stakeholders and the impact on the Group's business. To ensure consistency, the impact analysis was conducted based on the methodology developed for the Group for its risk analysis (ranking scale from 1 to 6 very low to major) to classify the impact and probability. The impact of each challenge is determined based on the financial impact, the impact on reputation and the probability of risk associated with the challenge, based on the rating from the Group's risk analysis.</p> <p>The prioritization allowed to identify a list of prioritized issues (priority, very important, important)</p>	<p><i>See URD; 6.1.1, pp. 221-222</i></p>
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	<p>➤ Consulting stakeholders about dilemmas and challenges for implementation and inviting them to take part in the performance examination.</p>	<p>In 2015, Getlink conducted a materiality analysis to determine its most significant ethical, social and environmental challenges, both internal and external to the company, in the light of the potentially major impact on its stakeholders, its environment or its economic performance. This analysis was conducted in a context that was not yet affected by the migration crisis and its impacts in terms of security, brand image and customer service. This approach included consulting with the main stakeholders within and outside the Group to identify and establish the hierarchical order of the Group’s primary CSR challenges, both internal and external. It also allowed the Group to identify present and future opportunities and risks that could have a significant impact on its stakeholders, its environment or its economic performance.</p> <p>In 2019, mindful of ongoing transformation in society and rapid changes to internal and external stakeholder expectations, the Group updated its materiality analysis.</p>	<p><i>See URD ; Chapter 6, paragraph 6.1.1, p. 197</i></p>
	<p>➤ Establishing communication channels to engage with employees and other stakeholders in order to hear their ideas.</p>	<p>The implementation of effective forms of social dialogue with employees has been identified, during the materiality exercise in 2015, then during its update in 2019, as an important issue. The Group attaches great importance to social dialogue, particularly in the context of negotiations with employee representative bodies. Indeed, the Group has worked for many years to establish lasting and constructive labour relations with all its employees in France and the United Kingdom.</p>	