

# **GETLINK POLICY ON RESPONSIBLE LOBBYING**



## INTRODUCTION

**Getlink** is a private company that carries out a long-term, public interest mission in the field of transport and infrastructure management. This mission is carried out in particular in the context of the Cross-Channel Fixed Link Concession in cooperation with the public concession-granting authorities (Principals).

With values that ensure its cohesion and development, Getlink has adopted an ethical approach and principles that guide the daily actions of its employees; these ethical principles are described in the Ethics and Conduct Code and are set out in several policies.

Getlink's Responsible Lobbying Policy (the «Policy») aims to establish clear guidelines for interest representation activities to ensure that they are conducted ethically, transparently and in compliance with applicable laws and regulations in France and the United Kingdom.

In the interests of information and transparency, this Policy is posted on the Group's website.

## SUMMARY

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## 1. SCOPE

This Policy applies to all subsidiaries within the scope of the consolidated Getlink Group at the time in question.

## 2. OBJET

The purpose of this Policy is to define the responsible principles that govern interest representation activities ("lobbying"), which are based on commitments to transparency, integrity and loyalty. As defined by "Transparency International France" in its 2019 report "For a better framework for lobbying", lobbying can play a positive role that is totally compatible with democracy when it is conducted with integrity and its use is made clear and transparent. "In this case, it contributes to public decision-makers making their decisions with full awareness of the analyses and opinions of all components of society. Those who make the law need to exchange with those who live it on a daily basis."

**Lobbying activity is understood as any action of influence or information on the initiative of an interest representative of the Group with a public official aimed at guiding a public decision.** This type of action is intended to defend the Group's interests and to provide public decision-makers with technical expertise on the consequences and practical scope of current or proposed legislation and regulations.

An interest representative is a person or entity whose main or regular mission is to influence public decision-making, in particular a law or a regulation.

## 3. LEGISLATIVE AND REGULATORY FRAMEWORK

Getlink complies with the legislative and regulatory provisions relating to the transparency of public life and the reporting obligations incumbent on interest representatives, in particular:

- Law No. 2013-907 of 11 October 2013 on the transparency of public affairs;
- Law No. 2016-1691 of 9 December 2016 on transparency, fight against corruption and modernisation of economic activity
- The Decree of 9 May 2017 on the digital directory of interest representatives amending Article 18 of Law No. 2013-907 of 11 October 2013 on the transparency of public affairs;
- The laws and regulations applicable in the countries where the Group operates.

## 4. COMMITMENTS : TRANSPARENCY, INTEGRITY AND LOYALTY

Interest representatives acting on behalf of the Group must carry out their activities in accordance with the Group's ethical principles: acting in accordance with laws and regulations, behaving honestly and promoting a culture of integrity, demonstrate loyalty. These principles imply, among other things, respect for:

- the policy of preventing corruption,
- the policy governing gifts and hospitality and,

- the policy on the prevention of conflicts of interest. In this respect, any interest representative acting for the Group must verify, in case of doubt, with his or her superiors or the Compliance Officer (for any employee of the Group) or his or her organisation to which he or she belongs for any third party, that he or she is not in a conflict of interest. Getlink ensures that lobbying activities are entrusted to people who do not have interests that may conflict with those of the Group.

Interest representatives must make it clear to their interlocutors and third parties that they are acting on behalf of the Group and avoid any confusion with other activities that may be carried out in a private or professional capacity or within the framework of any mandate (associative, political or trade union).

Within the Getlink Group, lobbying activities are placed under the responsibility of the Chief Corporate and Public Affairs Officer, under the authority of the Chief Executive Officer. The Public Affairs Department coordinates the Group's lobbying activities and calls on the Group's managers and experts to develop its positions. Any contact with a public official to try to influence a public decision is made in close coordination with the Department of Public Affairs, which is the sole guarantor of the reporting obligations as described below. They must also transmit, at Getlink's request, reliable information concerning their activities, in order to comply with the obligation to declare to the "Haute autorité pour la transparence de la vie publique" (HATVP).

Getlink annually declares the required information to the "Haute autorité pour la transparence de la vie publique", including the identity of the persons concerned, the scope of lobbying activity, the actions carried out as part of the representation of interests, the number of people employed for this mission, the trade unions or professional associations to which the persons concerned belong, as well as the budgets allocated.

Getlink updates the European Union's Transparency Register annually by indicating the identity of its interest representatives, the topics defended, and the budgets allocated. Interest representatives must also ensure that the organisations with which they lobby are included in the transparency registers, where they exist, and comply with the codes of conduct and regulations of these same organisations.

Getlink generally refrains from contributing directly or indirectly to the financing of political activity.

## **5. COMPLIANCE APPROACH**

The Public Affairs Department ensures that:

- the Group's positions are known to the interest representatives working for the Group.
- the persons permanently responsible for the activity of interest representation shall have the necessary skills to carry out their duties;
- any breach of the principles and commitments of this Policy is dealt with the utmost diligence in order to put an end to it.

Any breach of this Policy may be reported by any internal or external person to the email address of the ethics whistleblowing system: [contact.ethic@getlinkgroup.com](mailto:contact.ethic@getlinkgroup.com)

Information on ethical breaches falling within the scope of this Policy will be communicated to the Ethics and CSR Committee of the Board of Directors.

