

THE GETLINK HUMAN RIGHTS POLICY



INTRODUCTION

As a vital link that brings people, businesses and cultures together, Getlink has fully integrated social, environmental and societal issues into its strategy since it was created.

As a responsible company, Getlink believes that ethical behaviour must be at the heart of all its activities.

Our Code of Ethics and Conduct is the foundation of our culture of ethics and integrity and through it we are committed to respecting the human rights of all those involved in our activities.

Getlink has been a signatory of the United Nations Global Compact since 2013. Through this policy, Getlink reaffirms its commitments in the area of human rights, sets out its expectations of its business partners and explains how these commitments form part of the business culture.

It is up to each of us to implement and ensure compliance with these fundamental principles in our day-to-day activities.

We thank each and every one of you for your commitment to promoting sustainable and responsible growth.



Jacques GOUNON
Chairman



Yann LERICHE
Chief Executive Officer

SUMMARY

INTRODUCTION.....2

1. Our Policy.....4

2. Commitments to stakeholders.....5

3. Operational implementation of the policy.....7

Getlink's Human Rights Policy (the «Policy») is part of the Group's commitment to respect human rights and to recognise their importance and universality.

The Policy stems from Getlink's Code of Ethics and Conduct. Its purpose is to set out the Group's commitments and identify the actions taken to protect human rights.

The Policy formalises Getlink's commitment and reaffirms its fundamental role in the Group's managerial and operational processes and in its relations with stakeholders.

Respect for human rights gives the Group legitimacy in the areas in which it operates and helps to strengthen its local roots. This commitment, which is fully in line with the Group's strategic vision, also provides it with external social legitimacy, fostering its long-term development.

In addition, placing ethics and respect for human rights at the heart of the Group's culture is a driver of internal cohesion and fosters a sense of belonging and pride among employees that is conducive to attracting new talent.

1. OUR POLICY

The Group's commitment

The standards, principles and rules of conduct set out in this Policy are based on the recommendations of the United Nations Guiding Principles on Business and Human Rights. Getlink complies with internationally recognised human rights standards in all its activities and the place where it operates. The Group believes that all people should be treated with respect and dignity in their business and working relationships, that inclusion and diversity are key to success and that all forms of discrimination, harassment and violence should be prohibited. The Group promotes human rights throughout its value chain.

Human rights

The implementation of Human Rights is carried out in accordance with international standards, in particular the United Nations' Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the Universal Declaration of Human Rights and the International Bill of Human Rights, the UN Declaration of the Rights of the Child, the ILO Declaration on Fundamental Principles and Rights at Work and the ILO Core Conventions, which deal in particular with child labour, forced labour, non-discrimination and the right to freedom of association and collective bargaining.

International human rights law deals with fundamental civil, political, economic, social and cultural rights. It also pays particular attention to so-called vulnerable groups such as women, children, indigenous peoples, people with disabilities and migrant workers.

Getlink recognises these different components of human rights and ensures that they are respected throughout the Group.

Activities and areas of operation

The Group was created in 1986 following the signing of the Concession Agreement granting the **Franco-British** consortium «France Manche SA / The Channel Tunnel Group Limited» the right to construct, finance and operate the Channel Tunnel («Tunnel»).

The Group operates a very long-term concession (until 2086) built around an integrated rail system beneath the sea.

Getlink provides the following services:

- The Eurotunnel segment's cross-Channel services:
 - Transport service between Calais (in France) and Folkestone (in the United Kingdom) on board Shuttles (Truck Shuttles and Passenger Shuttles).
 - Eurotunnel provides its infrastructure to enable rail operators to provide rail links between continental Europe and the United Kingdom. Eurostar operates end-to-end high-speed services with no transfers needed between London, Paris, Brussels and Amsterdam.
- Other categories of services:
 - Europorte, which operates throughout the rail freight logistics chain, particularly in France,
 - ElecLink, the 1 GW electricity interconnector between the United Kingdom and France.
 - Getlink Customs services offers a range of customs formality services for transporters and shippers to facilitate cross-Channel trade.

2. COMMITMENTS TO STAKEHOLDERS

The Group's priority commitment

Due to the nature of its activities, Getlink has made safety a core concern. The Group is committed to protecting the health, safety and welfare of all team members in all its subsidiaries and to providing a safe and healthy working environment for everyone involved. This priority applies to employees, partners and customers alike.

The Group's commitment to ensuring the safety and health of its employees applies more broadly to all persons present on Group sites, whether it be customers, subcontractors, service providers or any other persons, including those whose presence may be irregular (such as migrants). With regard to migrants, the Group ensures their safety until they leave the Group's facilities and provides reception conditions that respect their dignity. These conditions are periodically verified by the government-appointed rights ombudsman.

This commitment to safety also applies to the goods transported and to the infrastructure.

Commitment to employees

Getlink and its subsidiaries ensure that the fundamental rights of employees are respected in accordance with international standards.

Consequently, the Group rejects all forms of:

- forced or compulsory labour;
- Child labour;
- discrimination or violence; and
- all forms of harassment.

The Group recognises the freedom of association and the right to collective bargaining, as well as respect for individual freedoms and privacy. The Group is also committed to working towards fair and open social dialogue.

The Group also pays particular attention to health and safety in the workplace, as mentioned above.

The Universal Declaration of Human Rights and the associated Agreements defend a number of individual freedoms, such as freedom of thought and conscience, freedom of opinion and expression, freedom of movement etc. The Group undertakes to respect the individual freedoms of its team members in a way that is compatible with the employment relationship. Any restrictions on these freedoms must be justified on legitimate grounds (such as the protection of individuals, health and safety, the commercial interest, the organisation and operation of the business, the employee's ability to perform his or her duties) and be proportionate to the aim pursued.

All Group team members have the opportunity to inform management, human resources, the ethics officer or the whistleblowing mechanism of any behaviour that contravenes these commitments.

Commitment to suppliers and subcontractors

Getlink and its subsidiaries require their suppliers and subcontractors to commit to respecting human rights. The Group promotes human rights in its value chain by asking its partners and their subcontractors to fully adhere to these fundamental rights and principles and to ask their own suppliers to respect them.

The Group endeavours to verify the integrity and reputation of its suppliers, subcontractors and partners.

Getlink applies due diligence mechanisms to its suppliers and their subcontractors to identify potential human rights violations. Where necessary, appropriate prevention and/or mitigation measures are defined and implemented.

In terms of fundamental rights, Getlink shares the aims of the British Modern Slavery Act and publishes an annual statement outlining the measures it has taken to ensure that there are no practices of modern slavery (including slavery, forced labour and human trafficking) in its operations nor in those of its supply chain.

The Group does not knowingly solicit or benefit from acts contrary to human rights committed by a third party with whom it has a business relationship.

Commitment to customers

The Group attaches priority to the experience and satisfaction of all its customers by implementing a high level of service quality. The Group's commitments in terms of safety, human rights, respect for people and dignity, and the strict rejection of any form of discrimination, harassment or violence are directly duplicated in all customer-facing activities.

Community involvement

Getlink is committed to contributing to the economic development of the areas in which it

operates. The Group maintains a constant and constructive dialogue with all its stakeholders at both national and local level. The Group is committed to respecting local communities living near its operating sites, to maintaining an open dialogue with them and to seeking to reduce the potential impacts that the Group's activities could generate. To this end, the Group assesses the potential impact of its activities on communities and ensures that their expectations are taken into account through dialogue and consultation.

It takes into account the situation of the most vulnerable communities¹ and recognises the rights of indigenous peoples when appropriate.

3. OPERATIONAL IMPLEMENTATION OF THE POLICY

This Policy is approved by the Chief Executive Officer, after being presented to the Ethics and CSR Committee and the Board of Directors. It is the responsibility of the Ethics Officer and is communicated to all staff. It forms part of the welcome pack for all new team members.

Each entity/company is responsible for its operational implementation. The functions most directly affected by this Policy are subject to regular training plans.

Any person or stakeholder who considers that the Group's activities violate their fundamental human rights may submit questions or complaints via the whistleblowing mechanism set up as part of the Group's Code of Conduct: contact.ethic@getlinkgroup.com

This Policy will be updated regularly to reflect changes in international standards and the Group's experience in this area.

¹ The United Nations considers that certain categories of people, such as women, children, people with disabilities, migrant workers and minorities, are more at risk of human rights violations and discrimination. They are therefore protected by specific conventions.

