

Getlink SE
Modern Slavery Statement
for the financial year ending 31 December 2024

INTRODUCTION

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

OUR STRUCTURE AND BUSINESS

Getlink SE is a company registered in France and brings together a number of companies active in the fields of infrastructure management and transport operations. The Group has more than 3,600 employees and operates primarily in France and the UK. In 2024, the Group had a global annual turnover of over 1.6 billion euros, approximately 73% of which was generated by Eurotunnel. Eurotunnel is the trading name of a partnership between an English company 'The Channel Tunnel Group Ltd' and a French company 'France-Manche SA' which are, under a concession until 2086 granted by the governments of the UK and France, responsible for the operation of the Channel Tunnel Fixed Link.

Our business is organised into 5 key business segments:

1. **The Channel Tunnel Fixed Link:** Eurotunnel operates the Channel Tunnel Fixed Link between France and the United Kingdom. The Channel Tunnel is used by Eurotunnel's Freight and Passenger shuttle service ('LeShuttle'), high-speed passenger trains and international rail freight train services.
2. **Rail Freight Services:** International, national and local rail freight transport services are operated by Europorte SAS. Europorte SAS and other group companies provide a wide range of integrated services, training and other services to industry, as well as infrastructure management services for public authorities.
3. **Getlink Customs Services:** offers a range of customs services for carriers and shippers to facilitate cross-Channel trade.
4. **ElecLink:** which operates a 1GW electricity interconnector between the UK and France via the Channel Tunnel Fixed Link.
5. **CIFFCO:** Centre International de Formation Ferroviaire de la Côte d'Opale, a private training organisation providing train driver and safety training for rail companies operating on national and private rail networks.

OUR SUPPLY CHAINS

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

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

Our procurement policies and contracts require suppliers to comply with our Code of Ethics and Conduct and other policies including those relating to Modern Slavery and Illegal Working. In addition, our contracts contain detailed provisions relating to the laws on Illegal Working and Modern Slavery.

For contracts performed in France and in accordance with the French Employment Code, we require that suppliers and subcontractors must comply with the legal requirements relating to Illegal Working by providing certain documentation. That documentation includes a certificate of compliance with the “*obligation de vigilance*” issued by the appropriate French social security body certifying that the supplier is up to date with its filing obligations. Equivalent compliance is required from suppliers not domiciled in France. We also require, where applicable, that the supplier provides a list of the names of all foreign employees working on a contract who are required to have a work permit. The supplier must re-confirm its compliance every 6 months throughout the contract period.

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

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

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

Getlink has created and implemented an online resource dedicated to suppliers. The resources are hosted within a documentation corner on our website with links to the policies, documents and information suppliers must comply with in order to work with Getlink or its subsidiaries. The documentation corner contains links to Getlink’s policies relating to:

- Modern Slavery;
- Combatting Illegal Working (*Obligation de Vigilance*);
- Whistleblowing; and
- Ethics and Conduct.

The policies, documents and information provided by Getlink for its suppliers operate together to ensure suppliers are aware of and bound by the Group's commitment to preventing Modern Slavery and Illegal Working. We require our suppliers to sign a Declaration of Compliance with Getlink's policies which confirms their acceptance of, and continuing compliance with, Getlink's compliance policies and procedures.

Our Policies on Modern Slavery and Human Trafficking

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

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

Getlink monitors compliance with modern slavery and human trafficking issues and implements policies to combat them. Getlink ensures that the risks of modern slavery and human trafficking are communicated to our staff, suppliers and contractors. Compliance is closely monitored by the board of directors and our internal auditors.

Getlink's Chief Financial Officer/Deputy Chief Executive Officer is responsible for Corporate Social Responsibility. The Chief Financial Officer/Deputy Chief Executive Officer sits on the Group Executive Committee which ensures the coordination of activity and the implementation of Group policy with and between Getlink and Group companies.

The Group was in the first tranche of companies required to publish their 2024 CSR data in a CSRD framework. The Group's Universal Registration Document for 2024 is available on the Group website. All information regarding our social and human rights policies, actions and targets is presented in Chapter 6 for the benefit of direct collaborators (ESRS S1) and sub-contractors (ESRS S2).

Suppliers

The Group spends over €400 million each year with several hundred suppliers. While almost all of the company's direct suppliers are located in Europe (including the United Kingdom), Getlink's indirect supply chain spans all continents. In a largely globalised environment, the company's supply chain is complex. The Group employs a number of processes to identify the risks of modern slavery (along with other social and environmental risks) in order to minimise the risk to our business.

Risk mapping is the entry point to the supplier management and selection process. It includes a commitment by suppliers to comply with the Group's code of compliance which includes a charter of ethics and behaviour / code of conduct, the fight against illegal working and modern slavery, a business ethics questionnaire (including questions on health and safety policies, diversity and inclusion and working conditions) and, in the event of any indication of ethical issues, an in depth study of the supplier's business ethics.

The risks associated with the countries in which the Group operates or supplies, includes the robustness of regulations and the existence of monitoring institutions and is assessed using databases from recognised organisations, for example, the Global Slavery Index (from the Walk Free Foundation), the Global Right Index (from the International Trade Union Confederation), and the Corruption Perceptions Index (from Transparency International).

The Group is fully aware of the requirements of national and European regulations (Sapin II law, CSRD, the Corporate Sustainability Due Diligence Directive ((EU) 2024/1760) (CSDDD)) and our purchasing processes integrate CSR and ethical risk management into Getlink's supply chain. The process comprises a planning phase - analysis of needs and risks, listing and analysis of supplier markets, consultation strategy and preparation of business consultation documents, a selection phase - engagement of suppliers, evaluation of offers, clarification and negotiation, award and contracting, and a management phase - contract initiation, performance and supplier relationship management and management of the end of the contract.

In July 2024, Getlink produced a map of CSR and ethical risks applying to 40 purchasing categories within the scope of Eurotunnel and Europorte. This tool measures exposure to CSR risks and monitors purchasing categories based on the use of a common reference framework of ten issues covering the entire scope of the duty of care and the ESRS reference framework defined in the CSRD. The mapping of CSR and ethical risks by purchasing category makes it possible to identify, evaluate and control risks by implementing appropriate controls and drawing up effective action plans. This process is explained in chapter 6, section 6.1.3 of our Universal Registration Document 2024.

The Getlink Group is committed to protecting the health, safety, and welfare of all employees in all its subsidiaries and personnel working for suppliers and subcontractors by providing a safe and healthy working environment.

Commitment to employees: Getlink and its subsidiaries ensure that the fundamental rights of employees are respected in accordance with international standards, including the prohibition of child labour, forced or compulsory labour, all forms of harassment, discrimination or violence, respect for freedom of association and the right to collective bargaining, and respect for individual freedoms and privacy. The Group and its companies are also committed to working towards fair and open social dialogue.

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 requiring its suppliers and their subcontractors to adhere fully to these fundamental rights and principles and to demand compliance from their own suppliers.

Commitment to customers: Group companies make the experience and satisfaction of all their customers a priority by implementing a high level of quality of service. The Group's commitments in terms of human rights, respect for people and dignity, and the strict rejection of any form of discrimination, harassment or violence are embedded in all its activities in relation to customers.

Training

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

Contracts and Whistleblowing

Our contracts contain detailed provisions relating to the laws on Illegal Working and Modern Slavery. These contractual provisions require that suppliers and subcontractors comply with French and/or English Law requirements relating to Modern Slavery/Illegal Working as they apply in the country where the works or services are performed or delivered, or in which the supplier is domiciled, and that suppliers impose similar requirements on their subcontractors and suppliers. Our whistleblowing process can be used by our personnel, suppliers, and contractors. We report further on Whistleblowing in the Getlink Registration Document.

Developments in UK

The previous UK government proposed significant changes to the slavery and human trafficking statement regime. Changes to the regime were proposed in September 2020 which led to a new Modern Slavery Bill being proposed in the Queen's Speech May 2022. The Queen's Speech outlined the government's intention to mandate areas to be covered in

modern slavery statements, require them to be published on a government-run registry, and introduce civil penalties for non-compliance. The changes proposed by the UK government were supplemented by guidance published by other organisations, for example by HM Revenue & Customs (Advice on applying supply chain due diligence principles to assure labour supply chains) and the Ethical Trading Initiative (Modern Slavery Reporting Framework). However, no progress was made in this regard during the 2022-23 Parliamentary session, and the Bill was not mentioned in the King's Speech 2023.

In February 2024, the House of Lords Committee on the Modern Slavery Act 2015 published a call for written evidence for its inquiry into the impact and effectiveness of the Modern Slavery Act 2015. In October 2024, the Committee published its report "The Modern Slavery Act 2015: Becoming World-Leading Again". The Committee Report made several recommendations for improvement, including to strengthen company accountability for modern slavery in their supply chains and for the new government to revisit and strengthen the former government's draft Modern Slavery Bill mentioned in the 2022 Queen's Speech.

On 16 December 2024, the government published its response to the Committee Report, focussing on certain key areas, including supply chains, the impact of immigration legislation, enforcement of the Modern Slavery Act 2015 and the independent Anti-Slavery Commissioner. The government's response does not give any information on specific timings or any no real indication of when the Committee's recommendations may or may not be actioned.

While progress on updating the principles underpinning the Modern Slavery Act is slower than in Europe, it is the case that any large UK companies operating in the EU will be required to undertake mandatory human rights and environmental due diligence under the Corporate Sustainability Due Diligence Directive ((EU) 2024/1760) (CSDDD) published in July 2024. In this respect, the Group's UK operations will comply with EU legal requirements.

The Corporate Sustainability Due Diligence Directive ((EU) 2024/1760) entered into force on 25 July 2024. Member states must transpose the Directive into national law by 26 July 2026. Following implementation by member states, the Directive will start to apply on a phased basis to in-scope companies.

The Directive introduces a sustainability due diligence duty on large EU companies and non-EU companies with significant EU activity (including the Channel Tunnel Group Ltd) to address potential adverse human rights and environmental impacts in their own operations, their subsidiaries and their value chains. The Directive includes a new due diligence duty to be integrated into corporate policies and risk management systems which requires companies to identify, prevent, mitigate, minimise and end adverse impacts in their own operations, in their subsidiaries, and in their business partners' operations where impacts relate to their chain of activities.

Getlink will address the impact of the Directive, any action taken by the UK government and any other relevant new legislation in future Modern Slavery Statements.

Getlink will continue to make training and guidance available to our personnel, suppliers and contractors about the risks of modern slavery and human trafficking. We will also continue to monitor the potential risk of modern slavery and human trafficking in our business and supply chains through our due diligence processes.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2024.

Yann Leriche
CEO
Getlink SE
June 2025

A handwritten signature in black ink, appearing to be 'Yann Leriche', written over a faint, light blue grid background.