Getlink Group CSR Policy

GETLINK GROUP AND EUROTUNNEL SUBSIDIARIES

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LeShuttle   EUROTUNNEL   EUROPORTE   ELECLINK   GETLINK CUSTOMS SERVICES

GROUP CSR POLICY

Table of contents

GETLINK

1. WHY A CSR POLICY AT GETLINK?

As an innovative railway company and responsible infrastructure manager, including the cross-Channel fixed link, Getlink has been committed since its inception to a policy of environmental and social responsibility designed to reconcile financial and non-financial performance in a consistent and sustainable manner. Integrating sustainability into the company's strategy and all its activities enables it to foster dialogue with the Group's stakeholders, meet their expectations and thus strengthen its overall performance and create opportunities. Furthermore, by precisely identifying its impact on the planet and its stakeholders, whether positive or negative, the company assumes its share of responsibility in these areas, in line with public policy.

Faced with the challenges of the 21st century and growing instability, it is also a powerful lever for controlling the Group's risks and dependencies with the aim of making its activities more energy and resource efficient in the service of sustainable transport of people, goods and energy.

The purpose of this CSR policy is to reaffirm the fundamentals of CSR within the Group, to show how they are integrated into its strategy and governance, and how they are implemented in its operational processes.

This document is intended for all Getlink stakeholders, including local players, the financial community, government, supervisory and regulatory organisations, as well as societal, media and innovation relays (see section 7).

2. CSR VISION HORIZONS

Building on its environmental fundamentals since the creation of Eurotunnel's activities, Getlink has set itself a vision with a time horizon that reconciles ambition and accountability: in other words, allowing itself time to carry out often complex projects to modernise its infrastructure and rolling stock, while setting itself short deadlines to be able to report on its achievements and the fulfilment of its commitments:

- An initial window for 2019-2025 was thus defined in the 2025 Environmental Plan, reinforced by social commitments in 2022.
- A new window towards 2030 allows the Group to renew its ambitions in areas it considers to be priorities, in line with the materiality analysis (described in section 5).

3. SCOPE OF THE CSR POLICY

This policy applies to the activities and employees of each subsidiary of the Getlink Group (Eurotunnel, Europorte, Eleclink, Getlink Customs Services, CIFFCO). It must be

GETLINK

deployed as widely as possible throughout its value chain, both to its suppliers and subcontractors, as well as to its customers and other business partners, and is intended to be shared with all of its non-contractual stakeholders.

4. CSR GOVERNANCE

The CSR policy (in terms of its trajectory and the resources allocated to it) is approved by the Ethics and CSR Committee and the Board of Directors. Information is monitored and consolidated by the CSR Department, which reports to the Deputy Chief Executive Officer. The latter presents sustainability issues to the Ethics and CSR Committee, which reports to the Board of Directors.

Getlink's CSR commitments and their implementation are examined and reviewed by the Group's Board of Directors:

- The Audit Committee: monitors the information preparation process (including the effectiveness of internal control and risk management systems, particularly CSR); where necessary, it makes recommendations to ensure the integrity of these processes.

- The Ethics and CSR Committee:
    o Assists the Board of Directors in anticipating non-financial issues, opportunities and risks associated with its activities in order to promote long-term value creation.
    o Ensures that CSR issues are taken into account in defining Getlink's strategy, reviewing the sustainability impacts, opportunities and risks associated with Getlink's activities, reviewing policies in these areas, and reviewing the targets set and results achieved.

- The Environment and Climate Lead Director: ensures the promotion of a just transition and a long-term transformation approach to climate issues.

GETLINK

- The Appointments and Remuneration Committee: ensures that directors are competent in CSR matters and that sustainability performance is integrated into executive remuneration[1] .

The operational monitoring of CSR commitments is carried out by all management bodies, which are mobilised to promote shared and long-term value creation:

- Group Management: within the Group's Executive Committee, CSR is led by the Deputy Chief Executive Officer, to whom the CSR department reports

- CSR Department: works to strengthen the Group's CSR approach, its visibility and its impact

- Compliance Department: oversees the implementation of measures to ensure compliance with CSR regulations.

- The employee network: employees are involved in the approach and bring CSR issues to life within the organisation on a daily basis, while also participating in the reporting process.

In order to report on its CSR issues, actions and performance (in terms of environmental, social, societal and governance aspects), and in accordance with the EU Directive on sustainability-related financial reporting (CSRD), the Group publishes an annual sustainability report.

This sustainability report is described in a dedicated chapter of the integrated report (chapter 6 of the universal registration document: Annual financial reports . It is audited by sustainability auditors, whose findings are presented at the end of the same chapter.

5. METHODOLOGY FOR IDENTIFYING KEY CSR ISSUES

In order to adapt and respond to the challenges of the Group's transformation in a constantly changing environment, Getlink listens to its stakeholders (employees, customers, suppliers, shareholders, community, public authorities, etc.) in order to better meet their expectations, promote the creation of shared value and strengthen the Group's overall performance. In 2015, Getlink conducted its first materiality analysis. In 2019, and then in 2022, the Group updated its materiality analysis, taking into account

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[1] Indeed, part of the variable remuneration of executive directors and long-term incentive plans (LTIs) depends on the achievement of certain sustainability objectives, in particular the trajectory of greenhouse gas reduction or employee engagement.

GETLINK

the significant changes that have taken place over the last three years, both internally and externally (the operational launch of ElecLink in May 2022, the end of lockdown periods and Covid-19 restrictions, the stabilised impact of Brexit after various stages of implementation, the war in Ukraine, etc.). In 2024, the Group sought to follow a **dual materiality** approach, adding to the materiality previously used (external effects on the Group) an "impact" materiality targeting the effects of the Group's activities on its surroundings: ecosystems, employees, suppliers, etc.

Carried out with the support of a leading consulting firm, the update was completed in four stages in accordance with the terms set out in the CSRD directive:

- **Identification of the 24 main issues:** this identification was based on several reference frameworks. The list of issues identified through the Group's successive materiality analyses (2015, 2019 and 2022) was expanded to include the list of topics proposed by the CSRD, as well as a comparison with the issues addressed by peers in the sector, so as not to omit any sensitive issues. In addition, stakeholders outside the Group (a dozen of representatives including directors, employee representatives, investors, local public authorities, local associations, local communities, suppliers and customers) confirmed the relevance of the list identified.

- **Breakdown into impacts, risks and opportunities (IROs)**

- **Assessment of these IROs:** Impacts were assessed based on their probability and severity, including the concepts of scale, scope and irremediability. The criticalities for risks and opportunities were taken from the Group's risk study. Finally, materiality thresholds were defined for each of the two axes (financial materiality and impact materiality). If several impacts or risks were identified for an issue, the highest value was taken into account for the assessment of that issue.

- **Graphical representation of the results** of the double materiality analysis in a matrix (2024 version). The CSR issues considered material, most of which were already included in previous materiality analyses, are represented according to three main themes (Environment, Social and Governance). This structure is also used in the sustainability report, which outlines the impacts, risks and opportunities associated with each material issue, as well as the policies, actions and metrics used to address them.

DOUBLE MATERIALITY MATRIX

■ Environment ■ Social ■ Governance
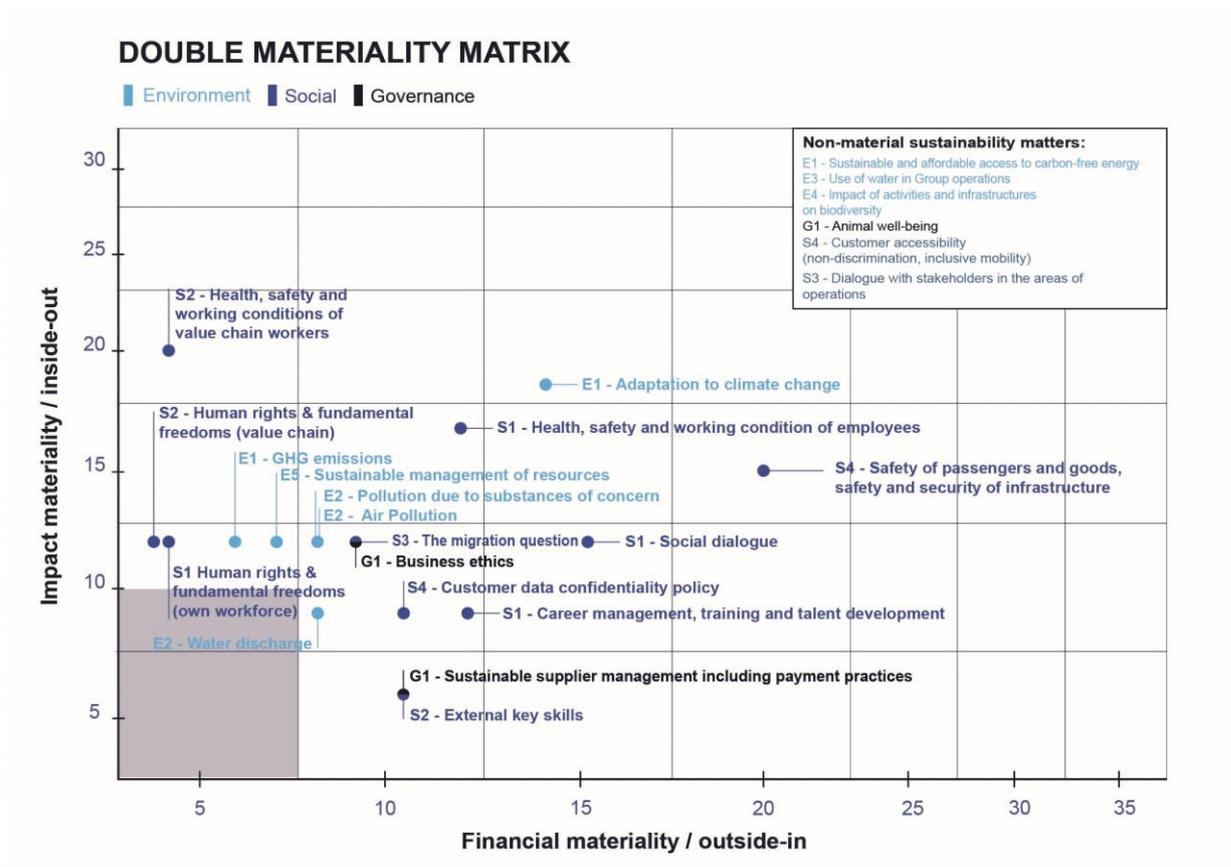
In order to remain open to the proper consideration of its challenges, Getlink maintains a constructive dialogue with all of its stakeholders. This dynamic is based on detailed knowledge of the stakeholders and their respective expectations.

The map below provides an overview of the Group's stakeholder ecosystem, as well as the diversity of dialogue methods and information tools deployed for each category.

Dialogue modes and information tools

Stakeholder dialogue is organised with specific mechanisms for each category.

6. CSR PRIORITIES IN RESPONSE TO THESE ISSUES

In response to these material challenges, the Group has defined its priorities for action. These priorities have already been affirmed in the past but remain relevant as a credible compass for enhanced sustainability in the future. These actions, associated with clear objectives, are based on four pillars:

- **Environmental contribution:**

    o Continue decarbonizing our own activities (scopes 1 & 2)

    o Continue decarbonizing the value chain (scope 3)

    o Limit impacts on natural environments and support their regeneration

    o Adapting the activity to climate change

    o Limit resource use and promote the circular economy

- **Social and societal contribution:**

- o Ensuring occupational health and safety for all

- o Promoting inclusion and diversity

- o Attracting and developing talent to ensure skills renewal

- o Creating a fulfilling work environment

- o Supporting local stakeholders and building impactful partnerships

- **Cooperation for a robust value chain:**
  - o Supporting the transition away from carbon dependence by increasing rail use
  - o Providing optimal service and a safe experience for customers
  - o Cooperating within the rail sector and with stakeholders to promote sustainability
  - o Integrating sustainability into procurement policy

- **Culture and governance of sustainability:**

  - o Fostering a culture of sustainability

  - o Maintaining and strengthening ethical business practices

These priorities are translated into policies, actions and indicators in accordance with the CSRD framework (ESRS requirements) and in the spirit of ISO 26000, particularly with regard to the coverage of the value chain and the main issues identified by the Group and its stakeholders. These elements are available in the sustainability report published annually by the Group.

7. LINK TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDGs)

Getlink, a signatory to the UN Global Compact since 2013, considers itself fully committed to the global challenge of sustainable development. The Group is committed to ensuring that its business model incorporates these principles and contributes to the UN Sustainable Development Goals (SDGs).

In parallel with its CSR materiality analysis, Getlink has defined a list of priority SDGs for its activities. In its quest for positive impact, Getlink's activities are particularly relevant to seven SDGs, to which Getlink is committed to bringing tangible benefits through its business lines and commitments

8. CSR RESOURCES

Various resources can be considered to be mobilised for CSR within the framework of the Group's current budgetary process:

- The CSR department's own budget for impact measurement, training and awareness-raising activities in particular;
- Expenditure decided by Operations that has a positive impact on sustainability (e.g. the replacement of emitting fluids in Eurotunnel's passenger shuttles);
- Expenditure associated with actions decided upon as part of the CSR trajectory but carried out by the Group's operational departments (e.g. the Eurotunnel solar project or the implementation of biofuels in Europorte's rail traffic);
- Sponsorship expenditure and expenditure on supporting local stakeholders are managed by the Public Affairs Department.

In addition, the operational departments (Quality, Safety and Environment; Human Resources; Compliance; Purchasing) also contribute to the successful implementation of the roadmap through their daily tasks and their own resources.

9. LIST OF POLICIES, CHARTERS AND OTHER DECLARATIONS RELATED TO CSR POLICY

- Trajectories:

    o 2025 Environment Plan: Plan-Environnement-2025-FR.pdf

    o CSR commitments: getlink_broch_rse_2023_vf.pdf

    o Sobriety Charter: Plan-sobriete-2022.pdf

    o [Coming soon] CSR commitments and trajectories for 2030

GETLINK

- Ethics Charter: charte-en-web_compressed.pdf

- Human rights policy: pol-droit-humains-get-en.pdf

- Local stakeholder engagement policypdf

- Statement on modern slavery: Modern Slavery Act 2015: sample slavery and human trafficking statement

- Responsible lobbying charter: charte-de-lobbying-en.pdf

- Responsible purchasing – letter to suppliers: note-engagement-achats-durables-en.pdf

- Tax strategy: getlink-se-tax-strategy-final-2023-version-en-final.pdf

For further information, including all objectives and performance indicators, please refer to:

- On the website https://www.getlinkgroup.com/strategie-et-durabilite/rse/

- In Chapter 6 of the Universal Reference Document https://www.getlinkgroup.com/actionnaires-et-investisseurs/informations-reglementees/rapports-financiers-annuels/