

# CODE OF ETHICS AND CONDUCT





**From its beginnings,  
the company  
has demonstrated  
solid values geared  
towards Group  
cohesion, as  
a guarantee  
of its future and  
development.**

## CHAIRMAN'S MESSAGE

Getlink is a private company with a long-term public interest mission as a transport and infrastructure operator acting for the benefit of all its stakeholders: customers, employees, suppliers, shareholders, and the community in general.

From its beginnings, the company has demonstrated solid values geared towards Group cohesion, as a guarantee of its future and development. These values, which reflect our company spirit and act as our guide, are expressed by each one of us on a daily basis in all our professional business, in which we behave within a relationship of trust.

Building and preserving this trust relies on each one of us complying with the values that we are committed to and the responsibility that we bear in the decisions that we make or the projects that we undertake.

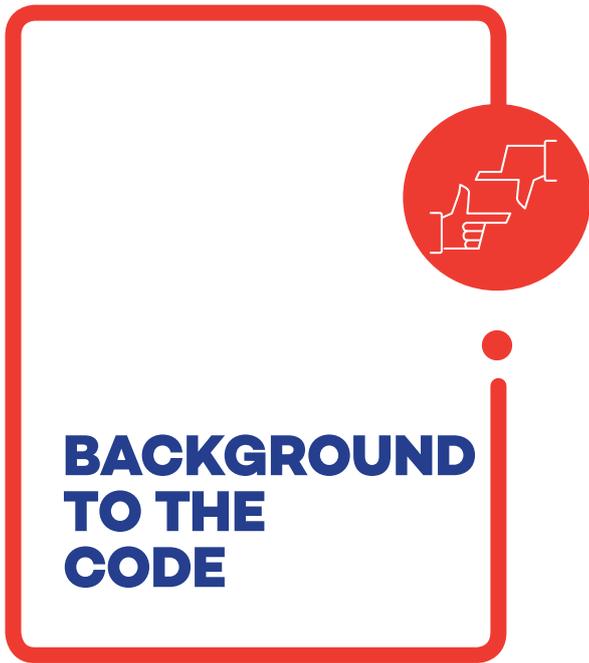
This Code of Ethics is our point of reference to inspire our choices, guide our everyday actions and enable us to build together every day the confidence of our stakeholders, which is the principal driving force behind the creation of value for the Group.

Let's ensure that each of us brings this Code to life in our everyday work to perpetuate the success of Getlink.

18 December, 2018



**JACQUES GOUNON**  
Chairman and Chief Executive Officer



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Getlink subscribes to the principles of the Universal Declaration of Human Rights, the International Labour Organisation (ILO) and the Organisation for Economic Cooperation and Development (OECD).

With reference to the United Nations Global Compact, this **Code of Ethics and Conduct** and particularly the “OECD Guidelines for Multinational Enterprises” describes the principles behind actions that must inspire the conduct of all employees in all circumstances and in all countries.

This Code has been approved by the Board of Directors of Getlink SE.

In addition to dissemination on the Group internet and intranet sites, this Code is provided as a matter of course when contracts are signed with employees, suppliers and subcontractors.

The companies within the Getlink Group (“Getlink”) comply with applicable laws, regulations and standards in particular in respect of labour law, in accordance with the principles of the United Nations Global Compact. Getlink recognises the right to freedom of association and the right to collective bargaining. It does not engage in any form of forced or compulsory labour, nor does it permit child labour, in any form whatsoever, and ensures that it does not practice any form of discrimination in respect of employment or occupation.

Integrity means that we respect high ethical standards. We understand and abide by the laws and regulations that apply to the business in which Getlink operates. We believe that ethical behaviour goes beyond compliance with legislation.

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**TO FIND OUT MORE:**

- [Universal Declaration of Human Rights](#)
- [The International Labour Organisation’s Fundamental Conventions \(ILO\)](#)
- [Guidelines of the Organisation for Economic Co-operation and Development \(OECD\)](#)
- [United Nations Global Compact \(Global Compact\)](#)

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AND STANDARDS  
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Getlink wishes to create a work environment that is based on trust, which drives performance with its employees, customers or stakeholders.

Effectiveness is boosted by a range of diverse talents. In particular, Getlink does not permit any discrimination on unlawful grounds such as gender, age, sexual orientation, ethnic group or nationality, disability, and religious, political or trade union views or affiliations.

All immoral, sexual or, in a more general sense, unlawful pressure, pursuit or persecution is prohibited. Each person must observe laws concerning respect for the private lives, especially laws governing computerised files. Pursuant to the principles of the United Nations Global Compact pertaining to human rights, Getlink does not permit any violations of human rights.

Any individual who works for or with Getlink has the right to a healthy, safe and secure working environment: we are all responsible for health and safety at work. Safety is a priority for Getlink.

Our health and safety depend upon a working environment that is free from any substance, which could prevent us from working properly or create hazardous working conditions. It is up to us to ensure that we give the best of ourselves every day.

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### **WE MUST:**

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- > 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.
- > Promote the fair treatment of candidates in the recruitment process.
- > Demonstrate respect and act courteously towards others.
- > Ensure that our actions incur no risk to ourselves or to other people.

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### **WE MUST NOT:**

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- > Disregard the company rules regarding hygiene, health and safety at work.
- > Engage in any form of discrimination whatsoever, or harass or pursue any behaviour which we have been told is unwanted.

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**KEY DOCUMENTS FOR GETLINK EMPLOYEES AVAILABLE FROM THE INTRANET SITE:**

Human Resources Policy: 12 Harmonisation of terms and conditions of employment/non-discrimination



“  
**We all have a role to play in creating a work environment in which dignity is respected.**”



## ETHICS?

I often hear it said that diversity is important for the Group. Does this mean that I should only recruit or promote women or those from minority ethnic groups?

**No.** Getlink recruits on the basis of expertise and experience; you should therefore select the best candidate for the job, and don't forget that diversity also includes people with disabilities, older people, etc.

I am considering recruiting a person for a job in which he/she will be in direct contact with customers. I am worried that our customers will not be comfortable with his/her physical disability. Is this a legitimate reason not to recruit him/her?

**No.** To refuse employment to a candidate or an employee based on the reaction a third party may have towards their disability, ethnic group or another prohibited ground would constitute unlawful discrimination. If the candidate is the

most qualified person for the position, we must recruit him/her. At Getlink, we appreciate individual differences. Our customers expect nothing less.

I have heard a discussion during which one of my colleagues made inappropriate remarks of a sexual nature to another colleague. What should I do?

We all have a role to play in creating a work environment in which dignity is respected. You can speak to the person if you feel comfortable doing so, but in any case, you should raise the issue with your manager and seek advice from your Human Resources representative.

# 02



## Market integrity: respect for the rules of competition

All Getlink employees must refrain from any behaviour liable to be considered as anticompetitive on the markets in which they operate.

The companies, their directors, or their staff members who infringe legislation, the purpose of which is to prevent violations of free competition, shall be liable for sanctions which Getlink may decide to apply.

### WE MUST:

- > Promptly inform our senior management if we have received or accidentally used confidential and/or proprietary information about our competitors, which is legitimately owned by that competitor or a third party.
- > Be careful only to present public information and avoid any commercially sensitive points when attending an industry seminar or forum where our competitors are also present or to which they may have access.
- > Take legal advice before any form of joint action, joint venture or cooperation with a competitor.

### WE MUST NOT:

- > Talk to our competitors about any commercial matter.
- > Encourage our customers or suppliers to terminate contracts they may have with our competitors.
- > Allow any new employees hired by Getlink to provide us with confidential information about competitors for whom they have previously worked.

## ETHICS?

I met a representative from a ferry company at a recent trade fair. We had a drink at the bar and he told me that his company was soon going to be raising their fares for certain crossings. I think that information could be very valuable! Who should I talk to in order to derive the maximum possible benefit from this?

**We do not share or discuss non-public information with our competitors regarding prices or offers, such as pricing policies, promotions. If, on the spur of the moment, a competitor tells you information like this, you should immediately, but tactfully, end the conversation and notify your senior management and the Legal Department.**

Of course, you must not pass on this information to anyone. While the exchange was unintentional, it could give the appearance of price-fixing or bid-rigging which is unethical and prohibited.

**KEY DOCUMENTS FOR GETLINK EMPLOYEES AVAILABLE FROM THE INTRANET SITE:**  
[Group Competition Policy](#)



**All Getlink employees must refrain from any behaviour liable to be considered as anticompetitive on the markets in which they operate.**

03



## The prevention and combating of corruption: zero tolerance

Under the United Nations Global Compact principles, the negotiation and performance of contracts must not give rise to instances of conduct or facts that could qualify as active or passive corruption, connivance in influence peddling or favouritism.

No Getlink employee may directly or indirectly give undue advantages to third parties, of any type and by any means, in order to obtain or maintain a commercial transaction or favourable treatment.

All forms of corruption of public officials are forbidden.

Getlink companies make use of intermediaries such as commercial agents, consultants or business providers only when they can provide a useful service based on specific professional expertise. This obviously excludes the use of intermediaries to carry out unlawful operations.

All employees must avoid situations with third parties which may place them in a compromising situation or raise doubts as to their integrity. Likewise, employees must ensure that they do not put third parties whom they are trying to persuade or lead to do business with a Getlink company in such situations. All employees must report any such situation to their senior management, who shall take all measures to curtail the situation.

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## ETHICS?

In my professional capacity, I organise many business trips and meetings. The hotel where I most often book rooms wants to offer my parents an all-expenses-paid weekend for their wedding anniversary. This is really kind of them, may I accept?

**No. Even if you do not benefit directly from the gift, it will make it more difficult for you to demonstrate impartiality when you make further bookings on behalf of Getlink. You should politely decline the offer and tell them why you are doing so.**

One of my long-standing customers has just offered me tickets to a sold-out performance. May I accept?

**Such a gift might be of such value that you should politely decline the offer.**

In all cases you should refer to the Getlink Anti-Corruption Policy and training materials which make it clear where to draw the line. If you are unsure, talk to your line manager, the Legal Department or the Compliance Officer.

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**We must not accept gifts that do not comply with Getlink standards.**



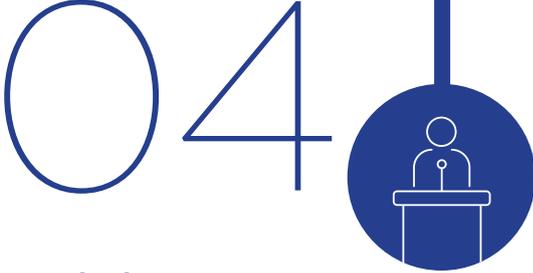
### **WE MUST:**

- > Ensure that the gifts and hospitality we offer or accept are appropriate and in line with the Getlink standard principles set out in the Getlink Anti-Corruption Policy.
- > Ensure that all those doing business with Getlink are informed of our standards.

### **WE MUST NOT:**

- > Give or accept gifts that do not comply with Getlink standards.
- > Accept or solicit money or anything of value (gifts, hospitality, etc.) that may result in us failing to fulfil our professional obligations to Getlink or which may be perceived as influencing our business relationships.

**KEY DOCUMENTS FOR GETLINK EMPLOYEES  
AVAILABLE FROM THE INTRANET SITE:**  
Getlink Anti-corruption Policy



## Political activities



Getlink respects the commitments of its employees who, as citizens, take part in public service activities. If, however, such activities include involvement in decisions taken by a State, a public authority or a local authority, employees must refrain from taking part in any decision-making which may be perceived to be in the interests of the Group or one of its companies.

Getlink does not permit any direct or indirect financial contributions to political activity.

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## ETHICS?

I volunteer for a local candidate whose values I think are similar to those of Getlink. Can I use the photocopier to print their fliers?

**No. Do not use any of your working time or any other company resources to support any political activity.**

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### WE MUST:

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- > If we take part in political activities in a personal capacity, make it clear that we are not representing Getlink and notify senior management of our activities.

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### WE MUST NOT:

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- > Use company resources to carry out or support personal political activities.
- > Carry out political activities in the workplace.

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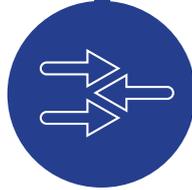
**KEY DOCUMENTS FOR GETLINK EMPLOYEES AVAILABLE FROM THE INTRANET SITE:**  
Getlink Anti-corruption Policy



**If such activities include involvement in decisions taken by a State, a public authority or a local authority, employees must refrain from taking part in any decision-making which may be perceived to be in the interests of the Group or one of its companies.**



05



## Prevention of conflicts of interest

All Getlink employees are bound to act in the best interests of the Group. Consequently, employees should ensure that they do not directly or indirectly carry out any activities or make any statements that would conflict with the interests of the Group.

Specifically, employees must not hold any significant financial or other interests in a company, be this a customer, supplier or a competitor of the Group, if this investment has the potential to influence their behaviour in the exercise of their functions at the Group.

All employees must have written authorisation from their senior management before carrying out, on behalf of a Getlink company, any transaction with a company in which they or any members of their families may be investors or executives.



**All Getlink employees are bound to act in the best interests of the Group.**

**HOW  
CAN  
I HELP?**

**EURO  
TUNNEL**

**WE MUST:**

- > All avoid situations in which our personal interests may conflict with those of Getlink: the mere perception of a conflict of interest could damage the reputation of Getlink and its employees.
- > If a conflict of interest does arise, report it immediately to our line manager, Human Resources manager or the Compliance Officer.
- > Disclose any personal or family relationship within the Group which could be perceived as a conflict of interest. For example, if a member of your family works for Getlink, every effort should be made to ensure that an independent person is responsible for his or her salary and performance reviews and that such situations are monitored on an ongoing basis to ensure objectivity and fairness to all.
- > Ask about any potential conflicts of interest when we recruit employees.

**WE MUST NOT:**

- > Conceal information regarding a conflict of interest (actual or potential).
- > Accept any assignment or work proposed by a supplier, customer or competitor which could affect our performance or judgement in the exercise of our duties within the Group.

**ETHICS?**

My wife works for a ferry company that is a competitor of Eurotunnel. At home, we don't talk about work and her professional activities have nothing to do with Getlink. However, some of my colleagues have suggested that I could be in an awkward situation. What should I do?

**This could create the perception of a conflict of interest. In order to protect the company and yourself, you should continue not to talk about work at home and discuss this with your senior management or Human Resources Manager. In addition, both you and your wife should take steps to ensure that any information that is confidential or which belongs to either company remains protected.**

I manage the contract of one of our customers who has offered to lend me some money because he knows that I am going through a difficult period in my private life. I am tempted to accept because there is a genuine relationship of trust between us and I will repay him, of course. May I accept our customer's offer?

**Absolutely not. This would create a conflict of interest.**

### **CONFLICT OF INTEREST: A RISK TO BE RECOGNISED, EVALUATED AND PREVENTED**

#### **Professional conflicts**



The exercise of an activity or the holding of interests in a third-party entity that is in a contractual or pre-contractual relationship with the Group.

**Example:** working in your spare time for a supplier who is undertaking an activity or a project for the Group.

#### **Personal conflicts**



Using your position or influence within the Group to benefit you, a close friend or relative who is in a contractual or pre-contractual relationship with the Group.

**Example:** taking steps to ensure the company procures the services provided by an entity in which a friend has a role, the responsibilities of which are associated with the contract in question.

06



## Communication and information stock market regulations

Getlink attaches major importance to information quality and ensures transparent and reliable communication with regard to all its stakeholders. Effective management of the Group requires that all employees do their utmost to guarantee the quality and accuracy of the information they transmit to customers, suppliers and other third parties.

Since Getlink is a listed company, relations with the media, investors, financial analysts and public bodies are handled by senior management, the Investors Relations Department, the Communications Department and any other parties duly authorised to do so. All requests of this nature received by employees must be transmitted to an approved Group spokesperson immediately.

Any information that is not public must be protected, even in the absence of a formal non-disclosure duty, irrespective of whether the information relates to the company, its employees, or stakeholders. In particular, information concerning results, forecasts and other financial data, plans for business acquisitions and sales, commercial offers, new services or know-how, any decisions by regulators or oversight authorities, the loss or securing of a major contract, or information concerning ongoing legal proceedings or litigation and human resources is strictly confidential and must not be disclosed to any third party: it might be price sensitive information.

### WE MUST:

- > Comply with Getlink’s internal policy and the restrictions that apply to financial transactions.
- > Ensure that any non-public information remains confidential until it is published by those authorised to do so: it could affect the price of Getlink shares, or any of the Group’s other listed shares.

### WE MUST NOT:

- > Use inside information for the purposes of personal benefit.
- > Disclose confidential information to our family or friends. Employees must always strive to exercise caution in conversations in public places (trains, restaurants, etc.).

**KEY DOCUMENTS FOR GETLINK EMPLOYEES AVAILABLE FROM THE INTRANET SITE:**  
 Securities Ethics Charter  
 Human Resources Policy  
 254 Use of the Internet



“  
Any information that is not public must be protected, even in the absence of a formal non-disclosure duty, irrespective of whether the information relates to the company, its employees, or stakeholders.”

Communication and Intranet systems are the Group's property and are used for professional purposes. The utilisation of these systems for personal purposes is only authorised to the extent the usage is reasonable, may be justified by the need for a fair balance between private and professional life, and is deemed necessary.

Getlink is extremely concerned about protecting its reputation, particularly regarding its employees' use of certain online communication and discussion tools.

## ETHICS?

At times, the internet appears to be spreading a lot of false information about Getlink. Is it not my duty to correct this information?

**No. If there is false information being circulated, notify the Communications Department, so that it can take the necessary action.**

### WE MUST:

- Use these tools responsibly and refrain, in particular, from speaking on behalf of the Group, unless specifically authorised to do so.

### WE MUST NOT:

- Use these systems and networks for unlawful purposes, including, in particular, to convey messages of a racial, sexual or defamatory nature.

07



## Protection of assets and data

All Getlink employees have a duty to protect the Group’s property and assets. This includes equipment and property, ideas or know-how created by Group employees, and the Group’s reputation. Lists of customers, subcontractors and suppliers, information concerning markets, technical or commercial practices, technical bids or surveys and, in a more general sense, all data or information to which employees become party in the exercise of their functions, form part of the Group’s assets. This duty of protection remains in place even following the departure of an employee.

Employees must not misappropriate Group assets for their own personal use, or place them at the disposal of a third party for the benefit of parties other than the Group.

These days, we live in a world where it is easy to communicate without restrictions. Digital technology makes it increasingly difficult to maintain confidentiality but is becoming increasingly important. Everyone must familiarise themselves with the Group’s rules on this subject, and particularly on the appropriate use of social media and information and communication technology.

### WE MUST:

- > Keep secure all laptops, smartphones, tablets and other electronic devices provided by the company.
- > Keep secure our documents and electronic media containing confidential information.
- > Promptly report any loss, misuse or theft.
- > Demonstrate good judgement in our use of communication systems.

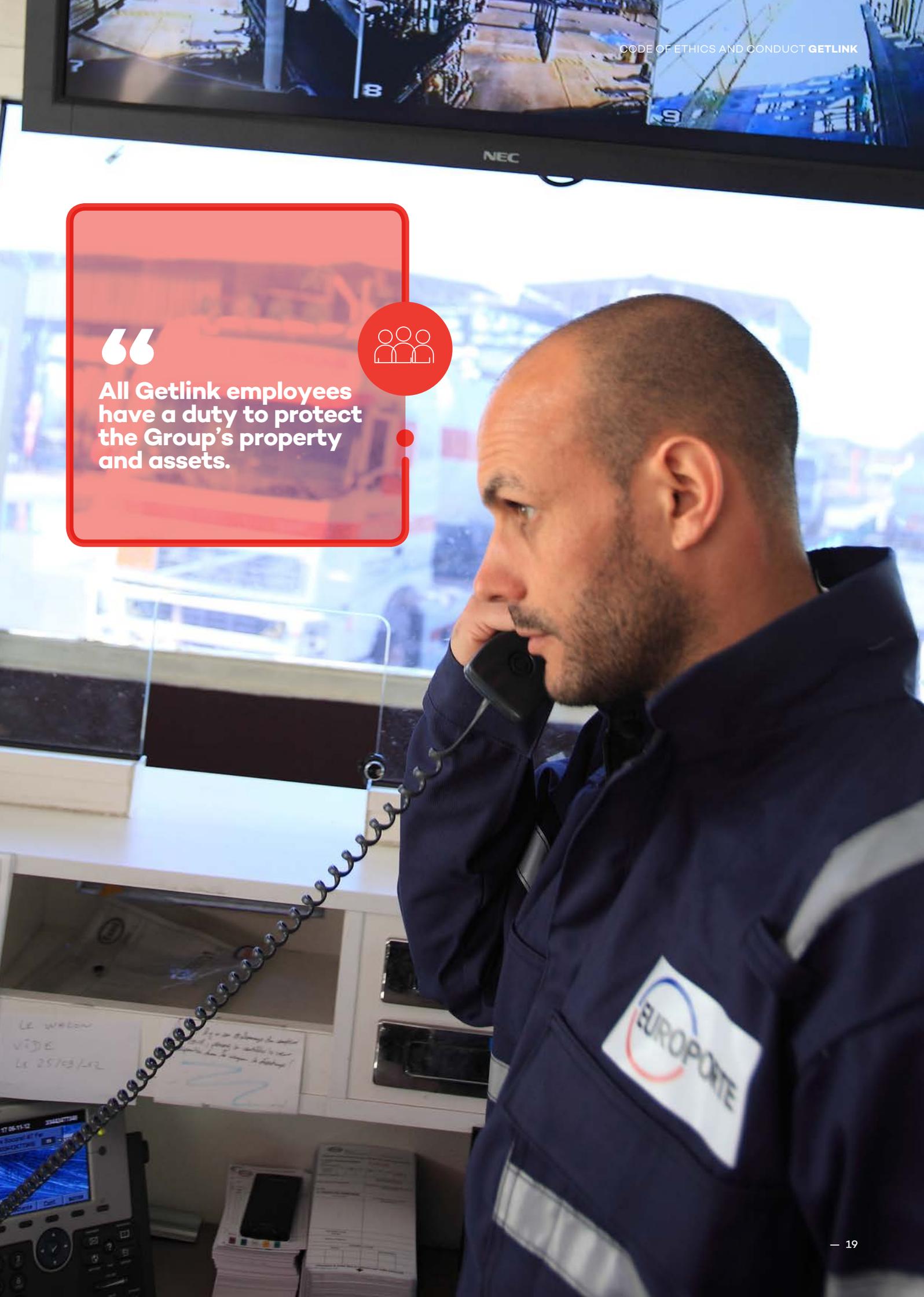
### WE MUST NOT:

- > Use Getlink’s computers or electronic communication systems for any unlawful activity, gambling, pornography or any other inappropriate activity.
- > Use or appropriate company assets for personal gain or advantage, or for the benefit of friends or family members.
- > Attempt to alter or bypass the security features of Getlink’s information systems.
- > Grant to social media access to one’s professional address book.

**KEY DOCUMENTS FOR GETLINK EMPLOYEES AVAILABLE FROM THE INTRANET SITE:**  
Group Data Protection Policy

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All Getlink employees have a duty to protect the Group's property and assets.





Information is valuable. The unauthorised disclosure of internal information may result in a loss of value and cause harm to Getlink. We all need to ensure that internal information is protected, by complying strictly with the information management rules laid down by the Group. Those of us with access to confidential information regarding our trading partners have the same obligation to protect that information against unauthorised disclosure.

We should only access information that we need to meet our professional commitments and only pass on that information which is absolutely necessary, even within the company.

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## **ETHICS?**

My friends often ask me questions about my work at Getlink: they are curious to know what Europorte transports or which local hauliers work with Eurotunnel. Of course, as a result of the work I do, I know the answers to many of their questions, but what information am I actually allowed to give them?

**Any information (written, electronic, verbal or in any other form) that is not in the public domain, and which has been made available to you in your capacity as a Getlink employee, should be considered as internal. Disclosing such information, even to trusted friends, is unacceptable. This could adversely affect the interests of the company.**

The other day, I was escorting a potential customer to a meeting. As we made our way to the meeting room, we passed the office of a colleague. His door was wide open and he was discussing our pricing policy with a customer on speaker-phone and my customer heard everything!

**We must all take the necessary measures to protect the confidentiality of information, even in the workplace, for example, by tidying our office in the evenings before we leave, locking documents away, changing our passwords regularly and being careful when using hands-free phones. You will never know beforehand who could be passing by. Even between Getlink employees, commercially sensitive information should only be exchanged when there is a legitimate need to do so.**

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**WE MUST:**

- Protect company and its customer information in all its forms.
- Restrict the disclosure of internal information exclusively to persons who have a legitimate need to know it in the interests of Getlink.
- Keep up to date with the Group's rules on information management.
- Keep secure any confidential, information relating to customers and suppliers, whether in electronic or hard copy format.
- Prior to sharing internal information with anyone external to Getlink (including, inter alia, members of our family or use of social media), check that we are entitled to pass it on.

**WE MUST NOT:**

- Discuss or work on internal information in public places where discussions may be overheard, and the security of data compromised.
- Disclose internal information regarding a former employer.
- Keep any internal information (including any copies) when we leave the employment of Getlink.
- Leave sensitive documents on printers or in meeting rooms.

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**We must all take the necessary measures to protect the confidentiality of information.**



09



**Getlink's  
reputation  
depends  
on how we  
all behave**

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**WE MUST:**

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- > Act with Getlink's best interests at heart.
- > Reflect the principles of this Code in our professional language and behaviour.
- > Lead by example: this is of particular importance for managers when faced with difficult issues about which staff seek their help or advice.
- > Ensure that there is no confusion between our personal opinions or interests and those of Getlink.
- > Always identify ourselves as Getlink employees when using social media for the purposes of our professional activities.
- > Always bear in mind that nothing on the internet is ever "secret" or "private".



## WE MUST NOT:

- > Discuss or write about issues that are outside our field of expertise.
- > Use Getlink headed paper or email addresses to express our personal views.
- > Give personal opinions on colleagues, customers or suppliers and their work on any professional development websites (e.g. LinkedIn).



**We must lead by example: this is of particular importance for managers about which staff seek their help or advice.**



## ETHICS?

I visited a colleague's blog and noticed that it contained some of his personal views regarding Getlink management. He didn't make it clear that he worked for Getlink but it seemed very obvious. Should I say anything to him about this?

**Blogs are becoming a means of self-expression. Employees who use them should state clearly that they are expressing their personal opinions and take the necessary precautions to ensure that their views cannot be confused with those of Getlink.**

You should raise this issue with your colleague first, as he may not have realised how his actions could adversely affect Getlink's interests. If necessary, you might decide to discuss the matter with your senior management.

I took part in an international conference and at the welcome reception, I spoke to another delegate about my work at Getlink. Later that evening, I realised that the young woman next to us was a journalist who was there to cover the conference. Although I did not mention anything particularly confidential, I would prefer not to see my comments on the front page.

**When you are at external events, you should always bear in mind that your comments could be used if you find yourself in the presence of a journalist in a professional or personal situation. Contact the Communications Department for advice.**

10



## Transparency and internal control

All employees contribute towards continuous improvement of the risk management system, helping to identify and treat malfunctions, and must therefore contribute with all due care and diligence to the enquiries, reviews and audits performed as part of internal control.

Operations and transactions carried out by the Group are recorded in a true and fair manner in the accounts of each company pursuant to prevailing regulations and internal procedures.

Any hindrance to the proper performance of inspections and audits, whether carried out by internal services or by statutory auditors, including the concealment of information, is forbidden.

### KEY DOCUMENTS FOR GETLINK EMPLOYEES AVAILABLE FROM THE INTRANET SITE:

- Securities Ethics Charter
- Internal Audit Charter



Any hindrance to the proper performance of inspections and audits, whether carried out by internal services or by statutory auditors, including the concealment of information, is forbidden.



11



## Environmental protection



In accordance with the Global Compact environment principles, Getlink has a precautionary approach to environmental problems. Getlink undertakes to promote greater environmental responsibility awareness amongst its staff and to give priority to the development and dissemination of environment-friendly technologies.

Getlink strives to limit the environmental impact of its activities and the users of its services by implementing an active policy in this regard.

Respect for the environment is at the heart of Eurotunnel's founding principles. The Channel Tunnel and its rail transport system enables Eurotunnel to respond to the increasing requirement for cross-channel transportation services without compromising the environmental outlook for future generations. We are committed to the process of limiting greenhouse gaz emissions in order to mitigate the causes of climate change.

### WE MUST:

- Assist with implementing the measures taken by Getlink to protect the environment and encourage sustainable development, striving to make our own individual contribution to best practice, especially in terms of saving energy, reducing the amount of waste we produce and sorting waste for recycling.

### WE MUST NOT:

- Disregard the Group rules on environmental protection.

**KEY DOCUMENTS FOR GETLINK EMPLOYEES  
AVAILABLE FROM THE INTRANET SITE:**  
Sustainable Development Strategy

# 12



## Selection and equitable treatment of suppliers



### WE MUST:

- > Comply with our procurement procedures and demonstrate transparency.
- > Ensure that our expectations in terms of ethics are clearly understood.
- > Check that invoices are received correctly and ensure we pay our suppliers promptly.

### WE MUST NOT:

- > Impose unfair terms on our suppliers.
- > Continue to work with a supplier who repeatedly fails to live up to our expectations.

Getlink's supplier relationships are built over time. Our relationships are based on the principles of impartiality, equity and loyalty. Getlink has drawn up a procurement code of ethics and various procurement procedures:

- contracts/orders must be awarded based on fair and open competition;
- suppliers awarded with contracts must be selected based on their compliance with quality, technical and performance criteria (including safety and sustainable development), and the overall cost;
- under public tenders, bids submitted by suppliers are subject to an evaluation procedure: an appropriately qualified and experienced team will evaluate the proposals using evaluation criteria that have been derived from the specification of requirements and approved before the bids are opened;
- the company has set out rules that apply according to the type of tender process, and these rules must be adhered to in all cases.

**KEY DOCUMENTS FOR GETLINK EMPLOYEES  
AVAILABLE FROM THE INTRANET SITE:**  
Procurement Code of Ethics  
Procurement Procedures

13

**Respect  
for ethics**

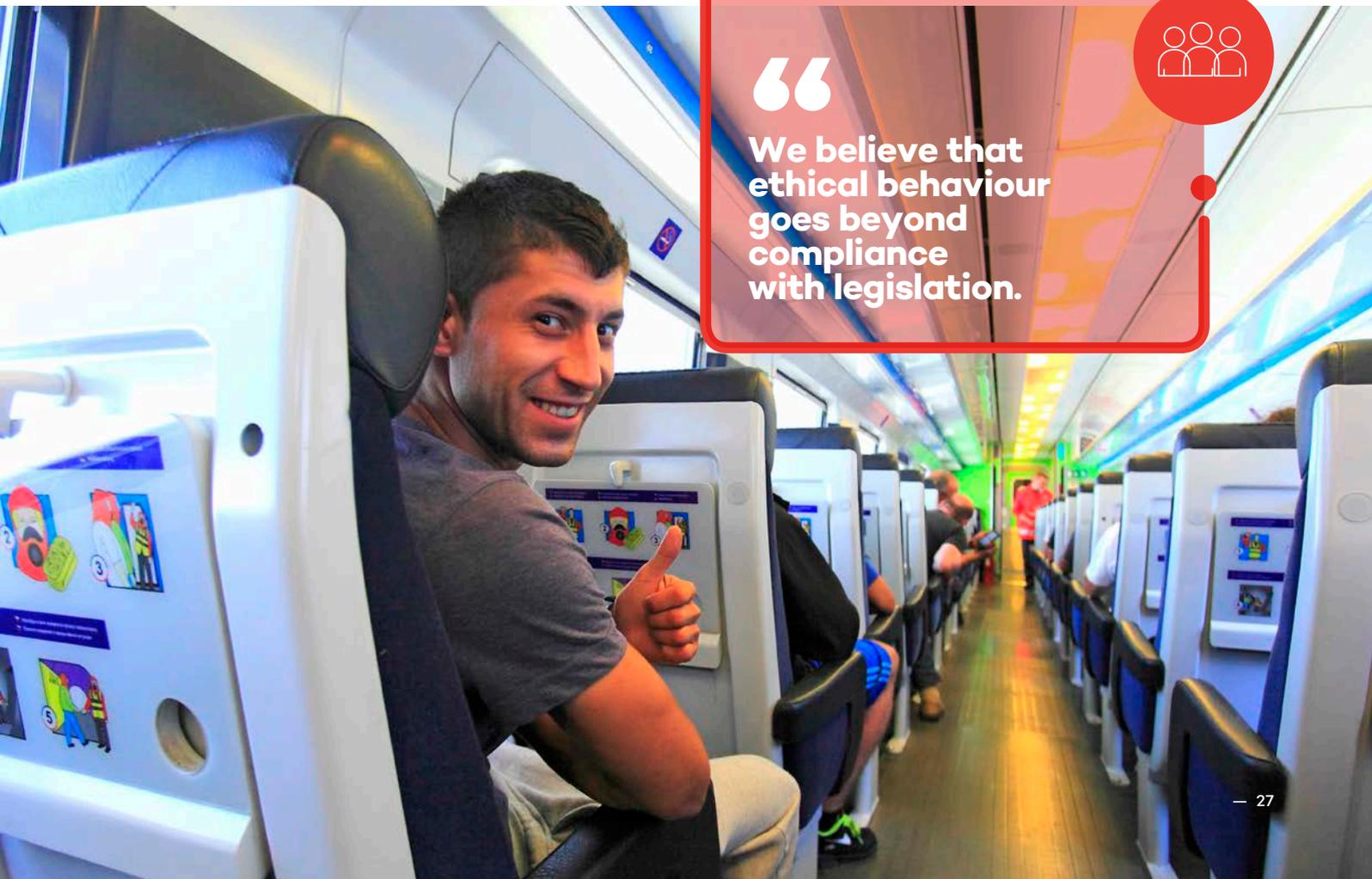
Integrity means that we respect high ethical standards. We understand and abide by the laws and regulations that apply to the business in which Getlink operates. We believe that ethical behaviour goes beyond compliance with legislation.

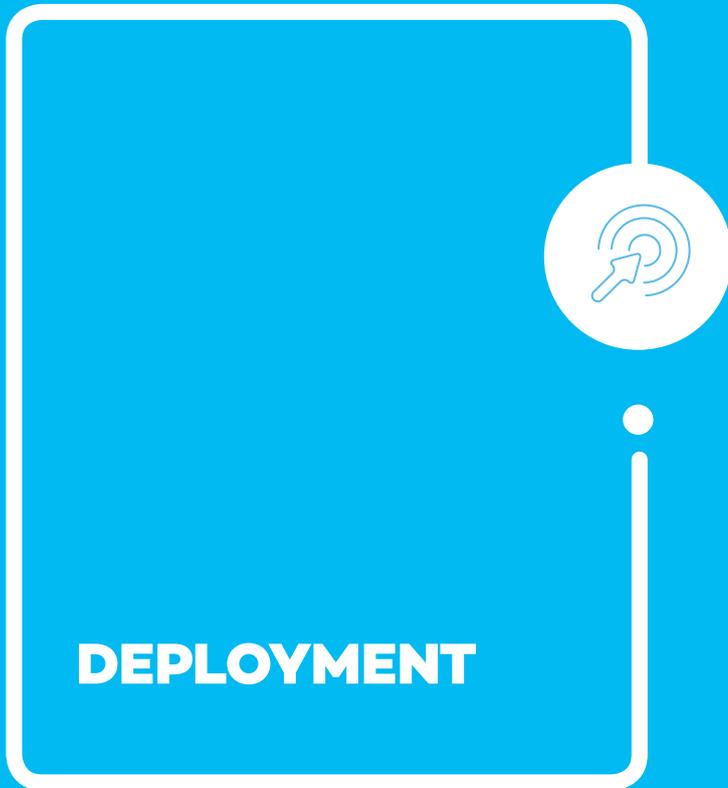
Getlink complies with applicable legislation, regulations and standards and specifically, in accordance with the principles of the United Nations Global Compact on employment, Getlink recognises the right to freedom of association and the right to collective bargaining. It does not engage in any form of forced or compulsory labour, nor does it permit child labour, in any form whatsoever, and ensures that it does not practice any form of discrimination in respect of employment or occupation.

All employees must refrain from any behaviour that could lead them or other employees, their company or Getlink to carry out unlawful acts or engage in actions against the interests of the Group. In this regard, at Getlink no performance target may be defined, imposed, accepted or remunerated in any way whatsoever if that entails derogation from these rules.

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**We believe that ethical behaviour goes beyond compliance with legislation.**





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## WHO DOES THIS CODE APPLY TO?

All Group employees and entities, customers and stakeholders. All Getlink employees, customers and suppliers irrespective of their position and level in the Company, must adhere to the principles of behaviour and rules of conduct set out in this Code.

In addition to necessary compliance with compulsory rules, the purpose of these principles is to outline behaviours and provide guidelines which reflect exemplary behaviour on both a personal and professional level, in the interests of Getlink.

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## HOW SHOULD WE USE THIS CODE?

This Code is a practical guide to ethics, the bedrock of all the internal policies, codes of conduct and specific procedures adopted by Getlink to which we should refer.

The Code of Ethics is not a substitute for these policies, codes and procedures but is the framework on which they are built.

Any failure to adhere to these rules by employees shall constitute misconduct and may be dealt with by appropriate sanctions and disciplinary proceedings. In particular, pursuant to the laws applicable, such sanctions may include dismissal for misconduct and a claim for damages by Getlink, even if non-compliance with the rules has been identified by the Group itself as part of its internal controls.

All Getlink suppliers or subcontractors must adhere to this Code, which has been made available to them.

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## ADDITIONAL RESPONSIBILITY FOR MANAGERS

Managers have an additional obligation to lead by example in complying with this Code.

Getlink managers shall:

- > Behave appropriately in all situations;
- > Create an environment that promotes ethical behaviour and open communication;
- > Communicate with employees and give them the ability to act, by ensuring that they have the appropriate knowledge, training and resources to comply with the legislation and this Code;
- > Ensure that their teams have undertaken and understood anti-corruption training;
- > Anticipate issues and flag them up promptly.



**All Getlink suppliers or subcontractors must adhere to this Code, which has been made available to them.**

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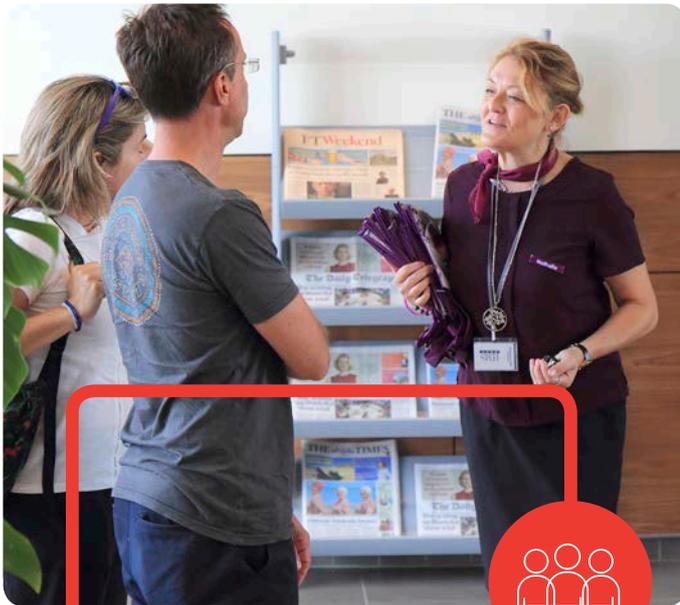
## ETHICAL DECISION-MAKING

Making the right choice is not always easy. When faced with a difficult decision, we should ask ourselves:



If the answer to any of these questions is no, stop and speak up!

If you have any concerns or any doubts, please discuss it with your line manager, a Human Resources representative, the legal Director or the Compliance Officer.



**With direct and honest communication, we can resolve problems before they become serious.**

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## ASK QUESTIONS AND SHARE YOUR CONCERNS

With direct and honest communication, we can resolve problems before they become serious. This is why we should ask for advice when we are not sure of the right decision and immediately flag up anything that contravenes, or could contravene, the law, the Code or our ethical principles.

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## REPORT OUR OWN MISTAKES

Although we do our best to comply with the rules, we can sometimes make mistakes. Having the courage to report our own mistakes voluntarily and quickly reflects Getlink's principles and values. An unintentional mistake made in good faith and reported promptly will be perceived more favourably than a problem that is covered up and resurfaces at a later stage. Prompt reporting can prevent more serious problems.



## WHEN SHOULD I MAKE A REPORT AND TO WHOM?

Any person who has a working relationship with Getlink may use this procedure, as soon as they are aware of information likely to involve the following acts, irrespective of whether they have already been or are about to be committed:

- ⊗ A criminal offence has been, is being or is about to be committed;
- ⊗ A company within Getlink or Getlink itself is failing to comply with its legal obligations;
- ⊗ A miscarriage of justice has happened or is likely to happen;
- ⊗ An individual's health and safety is being jeopardised;
- ⊗ The environment is being, or is likely to be damaged;
- ⊗ Information falling into any of the above categories has been, is being, or is likely to be deliberately concealed;
- ⊗ And that such disclosure is "in the public interest".

**KEY DOCUMENTS FOR GETLINK EMPLOYEES AVAILABLE FROM THE INTRANET SITE:**  
Whistleblower Policy

## HOW TO SUBMIT A REPORT?

Any Getlink or external employee who has a working relationship with Getlink who wishes to submit a report should make verbal or written contact with:

- ⊗ Their direct or indirect line manager or a manager of another department, if this would be more appropriate; or
- ⊗ Their Human Resources manager; or
- ⊗ The Getlink Compliance Officer.

Temporary external workers who wish to submit a report are encouraged to send any information to the Getlink Compliance Officer [contact.ethic@getlinkgroup.com](mailto:contact.ethic@getlinkgroup.com).

● All Getlink's ethics and compliance documents are available on the Group intranet.

Any stakeholders encountering any problems with or who have questions about the scope or application of these rules may contact the Getlink Compliance Officer at the following address: [contact.ethic@getlinkgroup.com](mailto:contact.ethic@getlinkgroup.com)

