

Getlink SE
Modern Slavery Statement
for the financial year ending 31 December 2019

INTRODUCTION

Getlink is committed to preventing any forms of modern slavery, human trafficking or 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.

The publication of this statement has been delayed to allow Getlink to assess the impact of the Covid 19 pandemic on our commitment to prevent any form of modern slavery. The conclusions we have reached and the steps we have taken to counter that impact are set out below.

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 3,300 employees and operates primarily in France and the UK. The Group has a global annual turnover of over 1 billion euros, approximately 85% of which is 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 is, 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 2 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 Shuttles, 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.

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 a number of 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 subcontracts 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.

Since our last statement 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 resources also contains a link to a Protocol for suppliers resuming and/or continuing business activities on Eurotunnel's UK and French sites during the Covid-19 pandemic.

Similar protocols apply to activities on sites operated by Europorte and Eleclink. These Protocols are designed to ensure the health and safety of our staff and contractors.

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 are working to complete a Group wide initiative that will require all suppliers, on commencement of a contract and throughout its duration, 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 Corporate Social Responsibility (CSR) 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. In particular, Getlink's CSR policy 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.

The Group has tasked an internal committee to monitor our compliance with modern slavery and human trafficking issues and implement policies to combat them. The committee will ensure that the risks of modern slavery and human trafficking are communicated to our staff, suppliers and contractors. Getlink's compliance will be closely monitored by the board of directors and our internal auditors.

Since our last statement, in December 2019, Getlink appointed a Director for Corporate Social Responsibility ('CSR'). The CSR Director reports to the Chief Financial Officer. The Chief Financial Officer sits on the Group Executive Committee which assists the Board with general management and ensures the coordination of activity and the implementation of Group policy with and between Getlink S.E. and Group companies.

In 2019, conscious of the ongoing transformation of society and the rapidly changing expectations of its stakeholders, the Getlink Group instigated a review of our materiality analysis. The steps taken included the diagnosis, identification and prioritisation of CSR challenges faced by the group. This process enabled the Group to check the relevance of the challenges it faces and provided a sound basis for the Group's review of its future CSR strategy and its commitments. In 2020, the Group's CSR Director launched a project for the renewal of the Group's CSR strategy for the period 2021- 2025.

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 has been 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.

MONITORING AND DUE DILIGENCE

We are working to complete a Group wide initiative that will ensure all Getlink Group company 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. No Whistleblowing reports on Modern Slavery or Illegal Working were made during the year. We will report further on Whistleblowing in our next Modern Slavery Statement and Getlink Registration Document.

Since our last statement we have been working to complete a Group wide initiative that will ensure all Getlink Group companies implement increased due diligence and monitoring of suppliers by improving and updating our supplier assessment processes. When complete, all Group companies will benefit from:

- an updated supplier due diligence questionnaire;
- access to a documentation corner on our website with links to the policies, documents and information suppliers must comply with in order to work with Getlink;
- a process requiring supplier certification of compliance with modern slavery and illegal working laws;
- a process to check supplier compliance with the requirements under '*obligation de vigilance*' compliance; and
- an update of our approach to CSR.

The results of these improved processes will be assessed and monitored by our compliance committee.

FURTHER STEPS

During the ongoing Covid 19 pandemic, we have taken further steps to combat Modern Slavery and Illegal Working by focussing on the health and safety of our employees and contractor personnel. As with many businesses operating in the transport sector, we are experiencing fluctuations in demand for our services and we are conscious of the impact of the current situation on our personnel. In particular, we understand that changes to working practices - *activite partielle* in France, furlough and the Job Support Scheme in the UK, and the increase in the numbers of personnel working from home - have the potential to

affect the mental and physical wellbeing of those who work for us. That in turn may operate to increase the risks of labour exploitation. To address this risk we have put in place measures designed to ensure the welfare of our workers. Managers have been instructed to pay close attention to the welfare of personnel working remotely and keep in regular contact with team members. Telephone help and advice lines are available to offer assistance to workers with personal and work related issues. In addition, our Human Resources and Occupational Health Departments are available to workers as required.

From the outset of the pandemic we have sought to engage proactively with our suppliers to minimise the impact on their businesses and ours. While some of our project and goods and services activities have been paused or reduced in scope, we have sought to maintain good relationships with our suppliers in order that we are prepared for a recovery of activity in the future.

In addition to the above:

- We 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 continue to assess, monitor and work to reduce the potential risk of modern slavery and human trafficking in our business and supply chains by closely monitoring our due diligence processes.

We have worked to meet the objectives set out in our previous Modern Slavery statement and as this statement demonstrates, go further. In our next statement we intend to report on our efforts to address the risks we have encountered during this period and how we have adapted our activities and priorities in response. We also intend to strengthen our reporting on Whistleblowing, Modern Slavery and Illegal Working.

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 2019.



Yann Leriche
Getlink SE
December 2020