

**Getlink SE**  
**Modern Slavery Statement**  
**for the financial year ending 31 December 2023**

**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.

**OUR STRUCTURE AND BUSINESS**

Getlink SE is a company registered in France and brings together several 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. In 2023, the Group had a global annual turnover of over 1.8 billion euros, approximately 60% 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 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 4 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. **ElecLink:** which operates a 1GW electricity interconnector between the UK and France via the Channel Tunnel Fixed Link.
4. **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 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.

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 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. 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.

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.

In 2022, Getlink updated its materiality analysis to take account of significant internal and external developments: the operational start-up of Eleclink in May 2022, the exit from the Covid-19 lockdowns and related restrictions, the stabilisation of the impacts of Brexit following the different stages of its implementation, and the war in Ukraine. 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. As part of the Group CSR strategy project, Getlink has undertaken a detailed stakeholder mapping process with its executives and managers and has selected 7 of the 17 Sustainable Development Goals (SDG's) proposed by the United Nations. The list of priority SDGs for the Group focuses on those that best correspond to the Group's strategic material challenges. These together form the cornerstones of the Group's CSR strategy and compliment Getlink's commitment to combat Modern Slavery.

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 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.

## **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.

## **Remote Working**

Our remote working policy, introduced during the Covid-19 pandemic means Getlink Group personnel continue to benefit from a combination of work in the office, Getlink Group company locations and home. Remote working technologies are provided to support these working arrangements. This policy is supported by strong line management across the Group which includes the flexibility to determine ways of working for teams to ensure the wellbeing of personnel and that business needs are met.

Getlink recognises the potential effect on the mental and physical wellbeing of those who work from home and has put in place measures designed to ensure the welfare of our personnel. 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 promoted by email and posters in the workplace, offering assistance to workers with personal and work-related issues. Getlink's Human Resources and Occupational Health Departments are available to workers as required.

Getlink recognises that its suppliers may have similar remote working initiatives in place. From the outset of the pandemic in 2020, Getlink has sought to engage proactively with its suppliers to minimise the impact on their businesses and ours. Getlink continues to maintain good relationships with its suppliers, an approach which has assisted with the recovery of our activities post-pandemic.

## **Other Developments**

The previous UK government intended to make 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. The new UK government has yet to clarify its approach. As a result, the future of the proposed changes is unclear.

On 5 July 2024, the European Commission published the Corporate Sustainability Due Diligence Directive ((EU) 2024/1760) in the Official Journal of the European Union. The Directive enters 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 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 new UK government and any other 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 2023.



Yann Leriche

CEO

Getlink SE

June 2024